



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

November 9, 2020

Mr. John Dinelli, Site Vice President  
Arkansas Nuclear One  
Entergy Operations, Inc.  
N-TSB-58  
1448 S.R. 333  
Russellville, AR 72802-0967

SUBJECT: ARKANSAS NUCLEAR ONE, UNITS 1 AND 2 – INTEGRATED INSPECTION  
REPORT 05000313/2020003 AND 05000368/2020003 AND INDEPENDENT  
SPENT FUEL STORAGE INSTALLATION AGING MANAGEMENT  
INSPECTION REPORT 07200013/2020001

Dear Mr. Dinelli:

On September 30, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Arkansas Nuclear One, Units 1 and 2. On October 15, 2020, the NRC inspectors discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

One finding of very low safety significance (Green) is documented in this report. This finding involved a violation of NRC requirements. We are treating this violation as a non-cited violation (NCV) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violation or the significance of the violation documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the NRC Resident Inspector at Arkansas Nuclear One.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document

Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

John L. Dixon, Jr., Chief  
Reactor Projects Branch D  
Division of Reactor Projects

Docket Nos. 05000313, 05000368, and  
07200013  
License Nos. DPR-51 and NPF-6

Enclosure:  
As stated

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ARKANSAS NUCLEAR ONE, UNITS 1 AND 2 – INTEGRATED INSPECTION  
 REPORT 05000313/2020003 AND 05000368/2020003 AND INDEPENDENT  
 SPENT FUEL STORAGE INSTALLATION AGING MANAGEMENT INSPECTION  
 REPORT 07200013/2020001 - November 9, 2020

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DATE	11/9/2020				

**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Numbers: 05000313, 05000368, and 07200013

License Numbers: DPR-51 and NPF-6

Report Numbers: 05000313/2020003, 05000368/2020003, and 07200013/2020001

Enterprise Identifier: I-2020-003-0003 and I-2020-001-0094

Licensee: Entergy Operations, Inc.

Facility: Arkansas Nuclear One

Location: Russellville, AR

Inspection Dates: July 1, 2020 to September 30, 2020

Inspectors: R. Alexander, Senior Emergency Preparedness Inspector  
L. Brookhart, Senior Spent Fuel Storage Inspector  
M. Davis, Transportation and Storage Safety Inspector  
T. DeBey, Resident Inspector  
M. Doyle, Operations Engineer  
C. Henderson, Senior Resident Inspector  
J. Kirkland, Senior Operations Engineer  
J. Melfi, Senior Resident Inspector  
T. Sullivan, Resident Inspector

Approved By: John L. Dixon, Jr., Chief  
Reactor Projects Branch D  
Division of Reactor Projects

Enclosure

## SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Arkansas Nuclear One, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

### List of Findings and Violations

Failure to Properly Evaluate Design Change to Emergency Diesel Generator Day Tank Level Control and Indication			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000368/2020003-01 Open/Closed	None	71111.15
The inspectors identified a Green finding and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the failure to appropriately verify the adequacy of a design change made in 1997 for safety-related emergency diesel generator fuel oil day tank transfer components. Specifically, the licensee failed to properly evaluate the electrical and thermal loads within the enclosures, resulting in a reasonable doubt with respect to the qualification of the day tank level control electronics to be able to operate in the environment of the enclosures.			

### Additional Tracking Items

None.

## PLANT STATUS

Unit 1 began the inspection period at full power where it remained for the rest of the reporting period except for minor reductions in power to support scheduled surveillances.

Unit 2 began the inspection period at full power and remained at full power until September 9, 2020, when the unit reduced power to 94 percent to investigate a suspected leak in high pressure feedwater heater 2E1B. After determination there was no leak, Unit 2 returned to full power on September 10, 2020, where it remained for the rest of the reporting period except for minor reductions in power to support scheduled surveillances.

## INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), resident and regional inspectors were directed to begin telework and to remotely access licensee information using available technology. During this time the resident inspectors performed periodic site visits each week, increasing the amount of time on site as local COVID-19 conditions permitted. As part of their onsite activities, resident inspectors conducted plant status activities as described in IMC 2515, Appendix D; observed risk-significant activities; and completed on site portions of IPs. In addition, resident and regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

## REACTOR SAFETY

### 71111.01 - Adverse Weather Protection

#### Seasonal Extreme Weather Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of seasonal summer heat and storms for the following systems:
  - Unit 1 and Unit 2 switchyard
  - Cooling water intake structure

#### 71111.04 - Equipment Alignment

##### Partial Walkdown Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

- (1) Unit 1 emergency feedwater while performing surveillance on emergency feedwater initiation and control on September 9, 2020
- (2) Unit 2 service water system on October 1, 2020

#### 71111.05 - Fire Protection

##### Fire Area Walkdown and Inspection Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

- (1) Unit 1 lube oil reservoir room, Fire Area B-1, Fire Zone 175-CC, on July 1, 2020
- (2) Unit 2 lower north electrical penetration room, Fire Area B-3, Fire Zone 2112-BB, on July 1, 2020
- (3) Unit 2 motor-driven emergency feedwater pump room, Fire Area FF, Fire Zone 2025-JJ, on July 6, 2020
- (4) Unit 1 upper north piping penetration room, Fire Area B-1, Fire Zone 79-U, on July 6, 2020
- (5) Unit 2 motor control center and access corridor, Fire Area JJ, Fire Zone 2109-U, on September 22, 2020

#### 71111.07A - Heat Sink Performance

##### Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

- (1) Unit 2 emergency diesel generator 1 jacket water heat exchanger on September 10, 2020

#### 71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

##### Requalification Examination Results (IP Section 03.03) (2 Samples)

- (1) The inspectors reviewed and evaluated the Unit 1 licensed operator examination failure rates for the requalification annual operating examination administered June 2020 through July 2020.
- (2) The inspectors reviewed and evaluated the Unit 2 licensed operator examination failure rates for the requalification annual operating examination administered June 2020 through July 2020.

## 71111.11B - Licensed Operator Requalification Program and Licensed Operator Performance

### Licensed Operator Requalification Program (IP Section 03.04) (1 Sample)

#### (1) Biennial Requalification Written Examinations

The inspectors evaluated the quality of the licensed operator biennial requalification written examination administered on June 12 and June 19, 2020.

#### Annual Requalification Operating Tests

The inspectors evaluated the adequacy of the licensee's annual requalification operating test.

#### Administration of an Annual Requalification Operating Test

The inspectors evaluated the effectiveness of the licensee in administering requalification operating tests required by 10 CFR 55.59(a)(2) and that the licensee is effectively evaluating their licensed operators for mastery of training objectives.

#### Requalification Examination Security

The inspectors evaluated the ability of the licensee to safeguard examination material, such that the examination is not compromised.

#### Remedial Training and Re-examinations

The inspectors evaluated the effectiveness of remedial training conducted by the licensee and reviewed the adequacy of re-examinations for licensed operators who did not pass a required requalification examination.

#### Operator License Conditions

The inspectors evaluated the licensee's program for ensuring that licensed operators meet the conditions of their licenses.

#### Control Room Simulator

The inspectors evaluated the adequacy of the licensee's control room simulator in modeling the actual plant and for meeting the requirements contained in 10 CFR 55.46.

#### Problem Identification and Resolution

The inspectors evaluated the licensee's ability to identify and resolve problems associated with licensed operator performance.



## 71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

### Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

- (1) The inspectors observed and evaluated licensed operator performance in the Unit 2 control room during an unplanned down power to investigate a possible feedwater heater tube leak on September 9, 2020.

### Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

- (1) The inspectors observed and evaluated operator requalification training for a steam generator tube rupture on September 24, 2020.

## 71111.12 - Maintenance Effectiveness

### Maintenance Effectiveness (IP Section 03.01) (1 Sample)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components (SSCs) remain capable of performing their intended function:

- (1) Unit 2 in core instrument flange number 2, 4, and 6 leakage during Refueling Outage 2R27 on August 19, 2020

## 71111.13 - Maintenance Risk Assessments and Emergent Work Control

### Risk Assessment and Management Sample (IP Section 03.01) (2 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

- (1) Unit 2 emergency diesel generator 1 maintenance outage window on September 16, 2020
- (2) Unit 1 intermediate cooling water heat exchanger E-28A/B tube plugging margin on September 18, 2020

## 71111.15 - Operability Determinations and Functionality Assessments

### Operability Determination or Functionality Assessment (IP Section 03.01) (6 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

- (1) Unit 1 safety-related 4160 volt switchgear overcurrent relay Part 21 operability on September 8, 2020
- (2) 2VEF-24C emergency diesel generator exhaust fan thermal overload failure on September 9, 2020
- (3) Unit 1 containment cooler VCC-2A/D operability on September 9, 2020
- (4) Unit 2 service water pump A failure to start due to anti-pump breaker failure operability on September 10, 2020

- (5) Unit 2 emergency diesel generator B wall thinning of silencer operability on September 23, 2020
- (6) Unit 2 emergency diesel generator A and B day tank level controller operability on September 29, 2020

#### 71111.19 - Post-Maintenance Testing

##### Post-Maintenance Test Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated the following post maintenance test activities to verify system operability and functionality:

- (1) Containment sump isolation valve 2CV-5650-2 to emergency core cooling system B suction on August 26, 2020
- (2) Unit 2 charging pump A on September 11, 2020
- (3) Unit 2 emergency diesel generator A train on September 15, 2020

#### 71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

##### Surveillance Tests (other) (IP Section 03.01) (1 Sample)

- (1) Unit 2 service water systems A and B as-left flow test on September 23, 2020

#### 71114.02 - Alert and Notification System Testing

##### Inspection Review (IP Section 02.01-02.04) (1 Sample)

- (1) The inspectors evaluated the maintenance and testing of the alert and notification system between September 1, 2019, and August 30, 2020.

#### 71114.03 - Emergency Response Organization Staffing and Augmentation System

##### Inspection Review (IP Section 02.01-02.02) (1 Sample)

- (1) The inspectors evaluated the readiness of the licensee's Emergency Response Organization between September 1, 2019, and August 30, 2020.

#### 71114.04 - Emergency Action Level and Emergency Plan Changes

##### Inspection Review (IP Section 02.01-02.03) (1 Sample)

- (1) The inspectors evaluated the following Emergency Plan Implementing Procedure changes and the licensee's Emergency Plan change review process per 10 CFR 50.54(q):
  - EN-EP-310, Emergency Response Organization Notification System, Revision 9
  - EN-EP-801, Emergency Response Organization, Revision 17
  - OP-1904.002, Offsite Dose Projections, Revisions 48 and 49

This evaluation does not constitute NRC approval.

#### 71114.05 - Maintenance of Emergency Preparedness

##### Inspection Review (IP Section 02.01 - 02.11) (1 Sample)

- (1) The inspectors evaluated the maintenance of the emergency preparedness program between September 1, 2019, and August 30, 2020.

#### 71114.06 - Drill Evaluation

##### Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)

The inspectors evaluated:

- (1) Unit 2 dynamic simulator examination performance indicator opportunity on July 22, 2020

### **OTHER ACTIVITIES – BASELINE**

#### 71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

##### EP01: Drill/Exercise Performance (IP Section 02.12) (1 Sample)

- (1) (July 1, 2019 – June 30, 2020)

##### EP02: ERO Drill Participation (IP Section 02.13) (1 Sample)

- (1) (July 1, 2019 – June 30, 2020)

##### EP03: Alert & Notification System Reliability (IP Section 02.14) (1 Sample)

- (1) (July 1, 2019 – June 30, 2020)

##### MS06: Emergency AC Power Systems (IP Section 02.05) (2 Samples)

- (1) Unit 1 (July 1, 2019 – June 30, 2020)

- (2) Unit 2 (July 1, 2019 – June 30, 2020)

MS07: High Pressure Injection Systems (IP Section 02.06) (2 Samples)

- (1) Unit 1 (July 1, 2019 – June 30, 2020)
- (2) Unit 2 (July 1, 2019 – June 30, 2020)

MS08: Heat Removal Systems (IP Section 02.07) (2 Samples)

- (1) Unit 1 (July 1, 2019 – June 30, 2020)
- (2) Unit 2 (July 1, 2019 – June 30, 2020)

71152 - Problem Identification and Resolution

Annual Follow-up of Selected Issues (IP Section 02.03) (3 Samples)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issues:

- (1) Unit 2 shutdown cooling control valve 2CV-1456-2 failure to operate on August 14, 2020
- (2) Unit 2 emergency feedwater isolation valve 2CV-1039-1 failure to close on September 8, 2020
- (3) Unit 2 emergency diesel generator day tank level enclosure temperature on September 29, 2020

71153 – Follow-up of Events and Notices of Enforcement Discretion

Event Follow-up (IP Section 03.01) (2 Samples)

- (1) The inspectors evaluated the stuck control element assemblies in Unit 2 and the licensee's response on August 6, 2020.
- (2) The inspectors evaluated a 5 percent down power for a suspected feedwater heater leak in Unit 2 and the licensee's response on September 9, 2020.

**OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL**

2690/011 - Review of Aging Management Programs at Independent Spent Fuel Storage Installations

The inspectors evaluated whether the licensee had adequate procedures in place to implement an Aging Management Program (AMP) for their independent spent fuel storage installation (ISFSI) from September 17–20, 2019, and conducted an in-office review of additional information including the inspection results from July 14–16, 2020, and September 28–30, 2020.

Review of Aging Management Programs at Independent Spent Fuel Storage Installations (1 Sample)

- (1) The overall program and implementing procedures that the licensee had in place to implement the AMP were inspected in accordance with paragraphs 03.01–03.10 of the temporary instruction and the inspectors found the licensee's program and procedures

consistent with the AMP provided in the renewed Certificate of Compliance (CoC) for the Westinghouse Electric Company’s ventilated storage casks (VSCs) system (Docket No. 72-1007), formerly EnergySolutions’. However, the licensee did not perform all the required AMP inspections within the period specified in the renewed CoC license Condition 5.iii and VSC’s Final Safety Analysis Report (FSAR) as updated. The licensee had up to 2 years to complete the inspections after the effective date of the CoC renewal, which was September 20, 2017, or within 1 year of the 20th anniversary of the first cask loaded at the site, whichever was later. The licensee loaded the first VSC-24 cask on December 12, 1996. Therefore, the last day to implement the AMP inspections was September 20, 2019.

Following the missed AMP inspections, the licensee submitted an exemption from the regulations delineated in 10 CFR 72.212(b)(3), 10 CFR 72.212(b)(5)(i), and 10 CFR 212(b)(11) to provide additional time to perform the required AMP inspections including the lead cask inspection. The licensee proposed to conduct the missed AMP inspections within the next 6 months and concluded that nothing significant would be expected since aging is a long-term degradation issue. The NRC technical staff reviewed and assessed the information presented within the exemption request and found the information acceptable to conduct the AMP inspection within the next 6 months. The technical reviewers and inspectors determined that the risk would be extremely low because of the continuous monitoring of the storage casks and the results of previous aging management inspections conducted at two other sites, which identified no major issues on the VSC-24 storage system. Based on the NRC’s technical review of the exemption request, the inspectors decided to treat this issue like a missed technical specification surveillance, which generally allows up to 25 percent additional time to perform and complete a missed surveillance. This issue was determined to constitute a violation of minor significance that is not subject to enforcement action in accordance with Section 2.2.2.e. of the Enforcement Policy. The licensee completed the remaining AMP inspections during the final week in March 2020 and presented the results of the inspection to the inspection staff in April 2020. The results of the AMP inspections did not show any major degradation of the selected VSC-24 storage systems located on the site.

## INSPECTION RESULTS

Failure to Properly Evaluate Design Change to Emergency Diesel Generator Day Tank Level Control and Indication			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000368/2020003-01 Open/Closed	None	71111.15
The inspectors identified a Green finding and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” for the failure to appropriately verify the adequacy of a design change made in 1997 for safety-related emergency diesel generator fuel oil day tank transfer components. Specifically, the licensee failed to properly evaluate the electrical and thermal loads within the enclosures, resulting in a reasonable doubt with respect to the qualification of the day tank level control electronics to be able to operate in the environment of the enclosures.			

Description: On January 15, 2020, the inspectors noted that there appeared to be no cooling air flow through the electrical enclosures containing the day tank level control and indication systems for both Unit 2 emergency diesel generators. These enclosures contain the power supplies and electronic equipment needed to detect the diesel fuel oil level in the day tanks, to actuate the fuel transfer components to add fuel to the day tanks, and to provide alarms to the control room if an abnormal condition was detected. Based on the inspectors questioning, the licensee wrote Condition Report (CR) CR-ANO-2-2020-00100 to document that an air filter on the emergency diesel generator A equipment box was dirty. Subsequently, the licensee wrote Condition Report CR-ANO-2-2020-00117 to document that the cooling fan on the emergency diesel generator B enclosure was not running. Maintenance performed every 2 years (Work Order (WO) 52743222 and WO 52751639 in 2018) required that the enclosure ventilation filter be cleaned; however, it implied that one filter exists on each enclosure when there are actually two. The site engineering department evaluated the heat load and electrical power load for the control enclosures and identified that the original (1997) engineering evaluation had errors. The actual electrical and thermal loads were significantly higher than the original analysis. Measurements and analyses performed in July 2020 had significant uncertainty and did not support the original engineering evaluation that no cooling air flow was needed. The inspectors questioned the data and the site responded with additional measurements and analyses (with minimal uncertainty) in September 2020 that demonstrated a maximum estimated enclosure temperature that would be below the 140 °F design limit of the limiting internal components. The estimated enclosure electrical heat load started with the original analysis of ~5.5 Watts (W), increased to the July estimate of ~72 W and ended with the September value of ~43 W. The final information does support that forced cooling is not needed to maintain the electronic components within their design specifications.

Corrective Actions: The licensee replaced all enclosure filters in both emergency diesel generator's fuel oil transfer electronic enclosures and replaced the cooling fan in the train B emergency diesel generator enclosure to resolve the immediate air flow issues. The bottom (inlet) filters on the enclosures were cleaned in January 2020 and then documented in July 2020 as being dirty again. A corrective action was proposed to increase the preventive maintenance frequency to semiannual for these filters. A procedure improvement form was also submitted to improve the preventive maintenance and to clearly indicate that two filters are present on each enclosure.

Corrective Action References: Condition Reports CR-ANO-2-2020-00100, CR-ANO-2-2020-00101, CR-ANO-2-2020-00117, CR-ANO-2-2020-00560, CR-ANO-2-2020-02904, CR-ANO-2-2020-02921, CR-ANO-2-2020-02924, CR-ANO-2-2020-02971, and CR-ANO-2-2020-03036

Performance Assessment:

Performance Deficiency: The licensee failed to appropriately verify the adequacy of a design change made in 1997 for safety-related emergency diesel generator fuel oil day tank transfer components.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the equipment performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the errors were such that there was a reasonable doubt as to the qualification of the day tank level control electronics to be able to operate in the environment of the enclosures. The licensee performed new types of evaluations to reach the final conclusion that the enclosure components would remain within their design criteria.

Significance: The inspectors assessed the significance of the finding using Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors determined that the finding had very low safety significance (Green) because the finding did not involve the design or qualification of a mitigating structure, system, or component, did not represent a loss of system or function, did not represent an actual loss of function of at least a single train or two separate safety systems, and did not represent an actual loss of function of one or more nontechnical specification trains of equipment designated as high safety significance in accordance with the licensee's maintenance rule program.

Cross-Cutting Aspect: None. No cross-cutting aspect was assigned because this deficiency occurred in 1997 and is not indicative of current licensee performance.

Enforcement:

Violation: Title 10 CFR Part 50, Appendix B, Criterion III, "Design Control," requires, in part, that design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. Contrary to the above, the licensee did not appropriately verify the adequacy of the design change made in 1997 for safety-related fuel oil transfer components located in the emergency diesel generator day tank level control enclosures by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program.

Specifically, the licensee failed to provide adequate design evaluations for the electrical and thermal loads within the day tank level control enclosures. Documentation that supported qualification of the day tank level control and indication components was not adequately developed to assure that the components would be capable of performing their functions correctly during a design basis event.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

## **EXIT MEETINGS AND DEBRIEFS**

The inspectors verified no proprietary information was retained or documented in this report.

- On August 17, 2020, the inspectors presented the annual and biennial requalification inspection results to Mr. J. Sullivan, General Manager, Plant Operations, and other members of the licensee staff.
- On September 18, 2020, the inspectors presented the emergency preparedness program inspection results to Mr. J. Dinelli, Site Vice President, and other members of the licensee staff.
- On October 1, 2020, the inspectors presented the ISFSI aging management inspection results to Mr. R. Clark, Licensing Specialist, and other members of the licensee staff.
- On October 15, 2020, the inspectors presented the integrated inspection results to Mr. J. Dinelli, Site Vice President, and other members of the licensee staff.



**DOCUMENTS REVIEWED**

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
2690/011	Corrective Action Documents	CR-ANO-	C-2019-03560, C-2019-03563(1), C-2019-04471, C-2020-01137, C-2020-01138, C-2020-01139	
	Procedures	EN-FAP-OU-111	Examination of VSC Top End Steel Components AMP	0
		EN-FAP-OU-112	Examination of MTC Assembly AMP	0
		EN-FAP-OU-113	Dry Fuel Tollgate Assessment	0
		EN-FAP-OU-114	VSC-24 Lead Cask Inspection	0
		EN-FAP-OU-115	Examination of VCC Assembly Ventilation Ducts & Annulus AMP	0
		EN-FAP-OU-116	Examination of VCC Assembly Exterior AMP	0
		EN-LI-102	Corrective Action Program	38
		EN-LI-113	Licensing Basis Document Change Process	18
		EN-OE-100	Operating Experience Program	32
		OP-3401.001	Conduct of Dry Fuel Storage (DFS)	3
		OP-3401.002	VSC-24 Aging Management Annual Examination of VCC Exterior	0
		OP-3401.003	VSC-24 Aging Management 5 Year Examination of VSC Assembly Ventilation Ducts and Annulus	0
		OP-3401.004	VSC-24 Aging Management 10 Year Examination of VSC Top End Steel Components	0
		OP-3401.005	VSC-24 Aging Management 20 Year Examination of VSC Lead Cask	0
	OP-3401.006	VSC-24 Aging Management 10 Year Examination of MTC Assembly	1	
	Work Orders	WO 50239086	5YR Inspection of VCC Interior Surface and Exterior of MSB	0
WO 52883726		20YR Examination VCC Lead Cask	1	
WO 52883728		10YR Examination VCC Top End Steel	1	
71111.01	Corrective Action Documents	CR-ANO-	C-2019-03814, C-2020-02001, C-2020-02080, C-2020-02131	
71111.01	Procedures	OP-3305.004	ANO Transformer Yard Controls	0
71111.04	Corrective Action Documents	CR-ANO-	1-2020-00290, 1-2020-00952, 1-2020-01168, 1-2020-01211, 1-2020-01215, 2-2020-01466, 2-2020-01931, 2-2020-02388, 2-2020-02389, 2-2020-02446, 2-2020-02458, 2-2020-02646,	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			2-2020-02733, 2-2020-02852	
71111.04	Drawings	M-2210	P&ID Service Water System	
71111.04	Miscellaneous	STM-2-42	Service Water and Auxiliary Cooling Water Systems	
71111.04	Procedures	OP-1106.006	Emergency Feedwater Pump Operation	114
71111.04	Procedures	OP-2104.029	Service Water System Operations	117
71111.04	Procedures	OP-3305.001	Ops System Alignment Tests	1
71111.04	Work Orders	WO	52863446	
71111.05	Calculations	CALC-83-E-0063-13	Flooding Depth due to Fire Protection Discharges and Known Elevations of Safety Related Electrical Equipment	4
71111.05	Calculations	CALC-90-R-1014-56	Penetration 0175-1A-0088	0
71111.05	Corrective Action Documents	CR-ANO	1-2018-00221, 1-2018-00911	
71111.05	Drawings	FP-2103, Sheet 1	Fire Zoned Intermediate Floor Plan El. 368'-0" and 372'-0"	38
71111.05	Fire Plans	PFP-U1	ANO Prefire Plan (Unit 1)	21
71111.05	Fire Plans	PFP-U2	ANO Prefire Plan (Unit 2)	17
71111.05	Miscellaneous		Arkansas Nuclear One - Unit 1 and Unit 2 Fire Hazard Analysis	19
71111.05	Miscellaneous	Fire Impairment	6904, 7437	
71111.05	Procedures	OP-1203.049	Fires In Areas Affecting Safe Shutdown	15
71111.05	Procedures	OP-1203.055	Actions for Turbine Generator Fires	0
71111.05	Procedures	OP-2203.034	Fire or Explosion	26
71111.05	Procedures	OP-2203.049	Fires in Areas Affecting Safe Shutdown	20
71111.07A	Calculations	CALC 91-D-2003-01		
71111.07A	Corrective Action Documents	CR-ANO-	2-2018-00735, 2-2020-00960, 2-2020-02617, 2-2020-02804, 2-2020-03093	
71111.07A	Procedures	OP-2104.029	Service Water System Operations	117
71111.07A	Procedures	OP-2305.062	Service Water System Flow Testing	4
71111.07A	Work Orders	WO	354436, 499061, 517346, 52865292, 52877528, 52891262	
71111.11B	Corrective Action Documents	CR-ANO-	2-2019-01432, 2-2020-00206, 2-2020-02164, 2-2020-02611, C-2018-02463, C-2018-02830, C-2018-03594, C-2019-00110, C-2019-00443, C-2019-00776, C-2019-00828, C-	

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			2019-01696, C-2019-01697, C-2019-01698, C-2019-01736, C-2019-02123, C-2019-02285, C-2019-02290, C-2019-02300, C-2019-02435, C-2019-02605, C-2019-02759, C-2019-02760, C-2019-02761, C-2019-04220, C-2019-04684, C-2019-04702, C-2019-04875, C-2020-00867, C-2020-01323	
71111.11B	Miscellaneous		Cycle 2005 - LOR Biennial Written Exam Details - Exam - 2 - RO	06/19/2020
71111.11B	Miscellaneous		Cycle 2005 - LOR Biennial Written Exam Details - Exam - 1 - SRO	06/12/2020
71111.11B	Miscellaneous	JPM-A2JPM-RO-2D36	2D-36 Battery Eliminator Startup	0
71111.11B	Miscellaneous	JPM-A2JPM-RO-CCW02	Shift Running CCW pumps	10
71111.11B	Miscellaneous	JPM-A2JPM-RO-CVCS2	Perform Emergency Boration (Alternate Success Path)	5
71111.11B	Miscellaneous	JPM-A2JPM-RO-FPEM1	Perform service water emergency makeup to the SFP (with Loop 1 service water)	0
71111.11B	Miscellaneous	JPM-A2JPM-RO-SIT10	SIT Isolation	0
71111.11B	Miscellaneous	JPM-A2JPM-SRO-EAL30	Classify an Emergency Event	0
71111.11B	Miscellaneous	SES-2-009	Dynamic Exam Scenario, Week of 7/6/20	8
71111.11B	Miscellaneous	SES-2-034	Dynamic Exam Scenario, Week of 7/6/20	6
71111.11B	Procedures	DG-TRNA-015-EXAMSEC	Simulator Exam Security Guidelines	18
71111.11B	Procedures	EN-TQ-114	Licensed Operator Requalification Training Program Description	13
71111.11B	Procedures	EN-TQ-210	Conduct of Simulator Training	15
71111.11B	Procedures	EN-TQ-217	Examination Security	9
71111.11B	Procedures	TQF-114-AOESIM	Annual Operating Exam JPM Quality Checklist	5
71111.11B	Procedures	TQF-114-AOESIM	Annual Operating Exam Simulator Scenario Set Quality Checklist	8

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71111.12	Calculations	CALC-18-E-0007-01		
71111.12	Corrective Action Documents	CR-ANO-	2-2017-03388, 2-2018-00852, 2-2018-00883, 2-2019-03313, 2-2020-00513, 2-2020-00968, 2-2020-01078, 2-2020-01234, 2-2020-01395, 2-2020-01424, 2-2020-01447, 2-2020-01486, 2-2020-01611, 2-2020-01615, 2-2020-01642, 2-2020-01658, 2-2020-01665, 2-2020-01709, 2-2020-01731, 2-2020-01802, 2-2020-01928, 2-2020-01987, 2-2020-01996, 2-2020-01928, 2-2020-02035, 2-2020-02048, 2-2020-02455, 2-2020-02807, 2-2020-02850, 2-2020-03044, 2-2020-03057, C-2018-03338	
71111.12	Drawings	M-2210, Sheet 1-4, 6	P&ID	
71111.12	Drawings	M-2242-AA-26		
71111.12	Miscellaneous	GL-89-10	Safety Related MOV Testing and Surveillance	
71111.12	Miscellaneous	PEAR-95-0290		
71111.12	Procedures	OP-2507.004	ICI Flange Disassembly	17
71111.12	Procedures	OP-2507.005	ICI Flange Reassembly and Cable Connections	24
71111.12	Work Orders	WO	501163, 507265, 519374, 547841	
71111.13	Corrective Action Documents	CR-ANO-	1-2017-04444, 1-2017-05061, 1-2020-00295, 1-2020-00481, 1-2020-00932, 1-2020-01002, 2-2020-03044, 2-2020-03057	
71111.13	Engineering Changes	EC-63596		
71111.13	Engineering Changes	EC-70622		
71111.13	Engineering Changes	EC-72994		
71111.13	Procedures	EN-WM-104	On-Line Risk Assessment	22
71111.13	Procedures	OP-2104.036	Emergency Diesel Generator Operations	98
71111.13	Work Orders	WO	304158, 436716	
71111.15	Calculations	974603P201-03	EDG Fuel Oil Day Tank Level Switches	1
71111.15	Calculations	CALC-20-E-0010-01		
71111.15	Calculations	CALC-90-D-6028-		

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		01		
71111.15	Calculations	CALC-90-E-0013-32		
71111.15	Calculations	CALC-91-R-2013-01	SW Performance Testing Method	28
71111.15	Corrective Action Documents	CR-ANO-	1-2005-00816, 1-2005-02753, 1-2006-00167, 1-2020-00363, 1-2020-00585, 1-2020-01025, 2-2014-02605, 2-2014-02827, 2-2018-01147, 2-2018-01686, 2-2020-00100, 2-2020-02446, 2-2020-02458, 2-2020-02584, 2-2020-02606, 2-2020-02733, 2-2020-03095, C-2020-01563, C-2020-01706	
71111.15	Corrective Action Documents Resulting from Inspection	CR-ANO-	2-2020-00560	
71111.15	Engineering Changes	EC-77690		
71111.15	Engineering Changes	EC-77691		
71111.15	Engineering Changes	EC-87790		
71111.15	Miscellaneous	2-BOP-UT-16-012		
71111.15	Miscellaneous	2-BOP-UT-18-006		
71111.15	Miscellaneous	2-BOP-UT-18-008		
71111.15	Miscellaneous	2-BOP-UT-20-046		
71111.15	Miscellaneous	2-BOP-UT-20-049		
71111.15	Miscellaneous	ER-2000-2646-003		
71111.15	Miscellaneous	ER974603P201	Replace EDG Day Tank Level Control Switches	09/1998
71111.15	Procedures	OP-1104.033	Supplement 5	

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71111.15	Procedures	OP-2104.029	Service Water Operations Change	117
71111.15	Procedures	OP-2104.036	Emergency Diesel Generator Operations	98
71111.15	Procedures	OP-2204.012H	Annunciator 2K08 Corrective Action	39
71111.15	Work Orders	WO	393099, 394916, 503684, 545948, 50274573, 52746504, 52858463, 52868957	
71111.19	Corrective Action Documents	CR-ANO-	2-2020-03061, 2-2020-03062, 2-2020-03170	
71111.19	Work Orders	WO	502990, 542752, 545039, 549683, 52618649, 52858463, 52858572, 52859347, 52861717, 52868160, 52873681, 52877528	
71111.22	Calculations	CALC-90-E-0116-01		
71111.22	Corrective Action Documents	CR-ANO-	2-2018-03994, 2-2020-00960, 2-2020-01794, 2-2020-01795, 2-2020-01796, 2-2020-01797, C-2020-01460	
71111.22	Corrective Action Documents	CR-RBS-	2020-01723 (CA-14)	
71111.22	Engineering Changes	EC-61132		
71111.22	Engineering Changes	EC-79644		
71111.22	Engineering Changes	EC-86561		
71111.22	Procedures	OP-2104.033		
71111.22	Procedures	OP-2305.062		
71111.22	Work Orders	WO	517346	
71114.02	Corrective Action Documents	CR-ANO-	C-2019-03166, C-2019-03621, C-2020-01425	
71114.02	Miscellaneous		Design Report Update: Upgraded Public Alert and Notification System (ANS) - Arkansas Nuclear One	May 2009, as Revised May 2016
71114.02	Miscellaneous		Design Report Update: Upgraded Public Alert and Notification System (ANS) - Arkansas Nuclear One	Supplement 1 (February 2017)
71114.02	Miscellaneous		FEMA Letter - Arkansas Nuclear One (ANO) Nuclear Power	06/28/2016

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			Plant Alert and Notification System (ANS) Design Report Update	
71114.02	Miscellaneous		FEMA Letter - Arkansas Nuclear One (ANO) Nuclear Power Plant Alert and Notification System (ANS) Design Report Update Supplement (1) dated February 2017	02/28/2017
71114.02	Procedures		Arkansas Dept. of Health - Guidelines for Siren Warning System	10/2012
71114.02	Procedures	Form 1903.004-K	Alert and Notification System Oversight Activity	12/18/2019
71114.02	Procedures	Form 1903.004-L	Offsite Training Program Oversight	09/16/2019, 09/23/2019
71114.03	Corrective Action Documents	CR-ANO-	C-2019-03276, C-2019-04446, C-2019-04623, C-2019-04759, C-2020-00132, C-2020-00136, C-2020-00380	
71114.03	Miscellaneous		Entergy - Arkansas Nuclear One On-Shift Staffing Analysis Final Report	2
71114.03	Procedures	EN-EP-310	Emergency Response Organization Notification System	9
71114.03	Procedures	Form 1903.062C	2019 3rd Quarter Staffing Drill Report - Yellow Team September 22, 2019 (Sunday) @ 0800	09/25/2019
71114.03	Procedures	Form 1903.062C	2019 4th Quarter Staffing Drill Report - Green Team November 26, 2019 (Tuesday) @ 0445	12/03/2019
71114.03	Procedures	Form 1903.062C	2020 1st Quarter Staffing Drill Report - Green Team January 15, 2020 (Wednesday) @ 0530	01/15/2020
71114.03	Procedures	Form 1903.062C	2020 1st Quarter Staffing Drill Report - Red Team January 27, 2019 (Monday) @ 1830	01/30/2020
71114.03	Procedures	Form 1903.062C	2020 2nd Quarter Staffing Drill Report - Yellow Team May 30, 2020 (Saturday) @ 0800	06/09/2020
71114.03	Procedures	OP-1203.048	Security Event	39
71114.03	Procedures	OP-1903.011	Emergency Response/Notifications	58
71114.04	Miscellaneous		10 CFR 50.54(q)(2) Review: OP-1904.002, Offsite Dose Projections, Rev. 48	01/08/2020
71114.04	Miscellaneous		10 CFR 50.54(q)(2) Review: OP-1904.002, Offsite Dose Projections, Rev. 49	04/08/2020
71114.04	Miscellaneous		10 CFR 50.54(q)(2) Review: EN-EP-310, Emergency Response Organization Notification System, Rev. 9	03/11/2020
71114.04	Miscellaneous		10 CFR 50.54(q)(2) Review: EN-EP-801, Emergency	11/04/2019

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			Response Organization, Revision 17	
71114.04	Procedures	EN-EP-305	Emergency Planning 10CFR50.54(q) Review Program	8
71114.05	Corrective Action Documents	CR-ANO-	1-2018-04530, 1-2019-02362, 1-2019-03789, 1-2019-03821, 1-2019-04609, 1-2020-01010, 2-2020-00305, 2-2020-00344, 2-2020-00663, 2-2020-02801, C-2019-01494, C-2019-03094, C-2019-03102, C-2019-03203, C-2019-03223, C-2019-03229, C-2019-03766, C-2019-04061, C-2019-04476, C-2019-04788, C-2020-00319, C-2020-00382, C-2020-00385, C-2020-00506, C-2020-00864, C-2020-00979, C-2020-00988, C-2020-01166, C-2020-01211, C-2020-01389, C-2020-01390, C-2020-01435	
71114.05	Corrective Action Documents Resulting from Inspection	CR-ANO-	C-2020-02577	
71114.05	Engineering Evaluations	KLD TR – 1097	Arkansas Nuclear One - 2019 Population Update Analysis	09/21/2019
71114.05	Engineering Evaluations	KLD TR – 1167	Arkansas Nuclear One - 2020 Population Update Analysis	09/08/2020
71114.05	Miscellaneous		Arkansas Nuclear One (ANO) Medical Emergency Report - October 5, 2019 (corrected)	07/21/2020
71114.05	Miscellaneous		Letter of Agreement Between Entergy Operations, Inc. and Saint Mary's Regional Medical Center	05/01/2019
71114.05	Miscellaneous		10 CFR 50.54(q)(2) Review: CR-ANO-C-2020-979 and OP-1903.060	07/07/2020
71114.05	Miscellaneous		Arkansas Nuclear One Yellow Team Site Drill Report - August 21, 2019	09/19/2020
71114.05	Miscellaneous		Arkansas Nuclear One ERO Team Yellow Site Drill Report - February 5, 2020	03/05/2020
71114.05	Miscellaneous		Arkansas Nuclear One HP/Post Accident Drill Report - August 4, 2020	09/08/2020
71114.05	Miscellaneous		Scenario EOF-PI-2019-04, Blue Team Drill Report	09/26/2019
71114.05	Miscellaneous		Scenario EOF-PI-2019-04, Red Team Drill Report	09/12/2019
71114.05	Miscellaneous		Scenario EOF-PI-2020-01, Green Team Drill Report	02/12/2020



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71114.05	Miscellaneous		Arkansas Nuclear One (ANO) HP/RP ENVIRONMENTAL Drill Report - August 6, 2020	09/08/2020
71114.05	Miscellaneous		Arkansas Nuclear One (ANO) Strength Development – Emergency Planning Virtual Tabletop - August 2020	08/2020
71114.05	Miscellaneous		Scenario EOF-PI-2020-02, Yellow Team Drill - June 25, 2020	06/25/2020
71114.05	Miscellaneous		Arkansas Nuclear One Emergency Plan	45
71114.05	Miscellaneous	ANO-2019-016	Letter of Agreement Between Entergy Operations, Inc. and the Board of Trustees of the University of Arkansas by and on behalf of the University of Arkansas for Medical Sciences Hospital	12/26/2019
71114.05	Miscellaneous	EP-2019-015 MS-1	2019 Medical Drill with Pope County EMS and University of Arkansas Medical Services	10/07/2019
71114.05	Miscellaneous	QA-07-2019-ANO-1	Quality Assurance Audit Report - Emergency Preparedness (50.54(t)(1) & (2))	05/20/2019
71114.05	Miscellaneous	QA-7-2020-ANO-1	Quality Assurance Audit Report - Emergency Preparedness (50.54(t)(1) & (2))	05/11/2020
71114.05	Procedures	EN-EP-306	Drills and Exercises	10
71114.05	Procedures	EN-EP-308	Emergency Planning Critiques	6
71114.05	Procedures	EN-LI-102	Corrective Action Program	41
71114.05	Procedures	Form 1903.004-N	Annual LOA/Contracts Review	12/17/2019
71114.05	Procedures	Form 1903.060A	Control Room Kits Inventory	09/02/2020
71114.05	Procedures	Form 1903.060B	Onsite Radiological Monitoring Kit Inventory	08/18/2020
71114.05	Procedures	Form 1903.060C	Technical Support Center Kit Inventory	08/18/2020
71114.05	Procedures	Form 1903.060E	Emergency Operations Facility Kit Inventory	08/18/2020
71114.05	Procedures	Form 1903.060F	Field Monitoring Kit Inventory Form (Kits A-D)	08/18/2020
71114.05	Procedures	Form 1903.060J	St. Mary's Hospital Kit Inventory	08/18/2020
71114.05	Procedures	Form 1903.060Q	Monthly Emergency Kit Surveillance	08/18/2020
71114.05	Procedures	Form 1903.060U	UAMS Hospital Kit Inventory	08/18/2020
71114.05	Procedures	OP-1903.004	Admin. & Maintenance of the Emergency Plan & Implementing Procedures	36
71114.05	Procedures	OP-1903.011Y	Emergency Class Initial Notification Message	50
71114.05	Procedures	OP-1903.060	Emergency Supplies & Equipment	46

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71114.05	Procedures	OP-1903.069	Equipment Important to Emergency Response	10
71114.05	Self-Assessments	LO-ALO-2019-0087	2020 Pre-NRC Evaluated Exercise Assessment	05/27/2020
71114.05	Work Orders	WO	509704, 5276021, 531729, 536314-01, 547435	
71114.06	Miscellaneous	SES-2-059	Dynamic Exam Scenario	2
71114.06	Miscellaneous	SES-2-072	Dynamic Exam Scenario	0
71151	Corrective Action Documents	CR-ANO-	C-2020-01424	
71151	Corrective Action Documents Resulting from Inspection	CR-ANO-	C-2020-02559, C-2020-02575	
71151	Miscellaneous		Siren Testing Verification Checklists from ADH (September 2019 - June 2020)	
71151	Miscellaneous		Monthly DEP PI Opportunity Listing (September 2019 - June 2020)	
71151	Miscellaneous		ANO Key ERO Participation Rosters (3Q/2019 - 2Q/2020)	
71151	Miscellaneous		3Q19 MSPI T-Sheets EDG-HPI	
71151	Miscellaneous		1Q20 MSPI T-Sheets EDG-HPI	
71151	Miscellaneous		2Q20 MSPI T-Sheets EDG-HPI	
71151	Miscellaneous		4Q19 MSPI T-Sheets EDG-HPI	
71151	Miscellaneous	20QTR-1	Limited Focus PI Drill - Green Team	02/25/2020
71151	Miscellaneous	DEP PI 20190717	DEP Opportunity Package: SMPI July	07/02/2019
71151	Miscellaneous	DEP PI 20190903	DEP Opportunity Package: Red Team	09/12/2019
71151	Miscellaneous	DEP PI 20191101	DEP Opportunity Package: SMPI November	11/01/2019
71151	Miscellaneous	DEP PI 20200610	DEP Opportunity Package: Red Team	06/18/2020
71151	Miscellaneous	EOF-PI-2019-04	DEP Opportunity Package: Blue Team	09/26/2019
71151	Procedures	EN-FAP-EP-005	Emergency Preparedness Performance Indicators	13
71152	Corrective Action Documents	CR-ANO-	2-2018-00852, 2-2018-00883, 2-2019-03313, 2-2020-00560, 2-2020-01987, 2-2020-01996, 2-2020-02451, 2-2020-02455, 2-2020-02467, 2-2020-02850, 2-2020-02904, 2-2020-02921, 2-2020-02924, 2-2020-02971, 2-2020-03036, C-2018-03338	
71152	Drawings	E-2299, Sheet 1A		

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71152	Drawings	E-2638, Sheet 1		
71152	Drawings	M-2242-AA-26		
71152	Drawings	P&ID M-2210 SHEET 1-4	6PEAR-95-0290	
71152	Engineering Changes	EC-86561		
71152	Miscellaneous	GL-89-10	Safety Related MOV Testing and Surveillance	
71152	Procedures	EN-LI-100	10 CFR 50.59 Evals	20
71152	Procedures	EN-LI-100	Process Applicability Determination	29
71152	Procedures	OP-2104.029	Service Water Operations	39
71152	Procedures	OP-2305.005	Valve Stroke and Position Verification	16
71152	Work Orders	WO	501163, 517346, 545045, 547841	
71153	Corrective Action Documents	CR-ANO-	2-2020-02964, 2-2020-03214, 2-2020-03218, C-2020-02529	
71153	Drawings	M-2205, Sheet 1	Piping and Instrument Diagram - Extraction Steam Heater Vents and Drains	45
71153	Drawings	M-2205, Sheet 4	Piping and Instrument Diagram - Extraction Steam Heater Vents and Drains	13
71153	Drawings	M-2206, Sheet 1	Steam Generator Secondary System	154