

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II

245 PEACHTREE CENTER AVENUE N.E., SUITE 1200 ATLANTA, GEORGIA 30303-1200

July 26, 2022

Mr. Edward Pigott Site Vice President Duke Energy Carolinas, LLC 12700 Hagers Ferry Road Huntersville, NC 28078

SUBJECT: MCGUIRE NUCLEAR STATION – INTEGRATED INSPECTION REPORT 05000369/2022002 AND 05000370/2022002

Dear Mr. Pigott:

On June 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at McGuire Nuclear Station. On July 19, 2022, 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 or severity 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 II; the Director, Office of Enforcement; and the NRC Resident Inspector at McGuire Nuclear Station.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region II; and the NRC Resident Inspector at McGuire Nuclear Station.

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

E Signed by Stamm, Eric on 07/26/22

Eric J. Stamm, Chief Reactor Projects Branch 1 Division of Reactor Projects

Docket Nos. 05000369 and 05000370 License Nos. NPF-9 and NPF-17

Enclosure: As stated

cc w/ encl: Distribution via LISTSERV

SUBJECT: MCGUIRE NUCLEAR STATION – INTEGRATED INSPECTION REPORT 05000369/2022002 AND 05000370/2022002 – dated July 26, 2022

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ADAMS ACCESSION NUMBER: ML22207B630

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		Sensitive			Non-Publicly Av	vailable
OFFICE	RII/DRP	RII/DRP	RII/DRP			
NAME	A. Hutto	D. Jackson	E. Stamm			
DATE	7/24/2022	7/25/2022	7/26/2022			

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U.S. NUCLEAR REGULATORY COMMISSION Inspection Report

Docket Numbers:	05000369 and 05000370
License Numbers:	NPF-9 and NPF-17
Report Numbers:	05000369/2022002 and 05000370/2022002
Enterprise Identifier:	I-2022-002-0017
Licensee:	Duke Energy Carolinas, LLC
Facility:	McGuire Nuclear Station
Location:	Huntersville, North Carolina
Inspection Dates:	April 1, 2022, to June 30, 2022
Inspectors:	 A. Hutto, Senior Resident Inspector C. Scott, Resident Inspector J. Diaz-Velez, Senior Health Physicist S. Downey, Senior Reactor Inspector B. Kellner, Senior Health Physicist N. Lacy, Operations Engineer M. Meeks, Senior Operations Engineer M. Schwieg, Senior Reactor Inspector
Approved By:	Eric J. Stamm, Chief Reactor Projects Branch 1 Division of Reactor Projects

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at McGuire Nuclear Station, in accordance with the Reactor Oversight Process. The Reactor Oversight Process (ROP) 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 Adequately Implement Clearance and Tagout Procedures					
Cornerstone	Significance	Cross-Cutting	Report		
		Aspect	Section		
Initiating Events	Green	[H.8] -	71111.20		
	NCV 05000369/2022002-01	Procedure			
	Open/Closed	Adherence			
A self-revealed Green finding and associated non-cited violation (NCV) of Technical					
Specification (TS) 5.4.1 was identified for the licensee's failure to adequately implement their					
administrative tagout procedure, resulting in the unintended transfer of inventory from the					
refueling water stor	rage tank (FWST) to the recycle holdup tan	k (RHT) while in lo	wered		

inventory. Specifically, the licensee did not implement the requirements of tagout procedure, AD-OP-ALL-0200, "Clearance and Tagging," and failed to place a component in the required clearance position prior to beginning work on the safety injection (NI) system.

Additional Tracking Items

Туре	Issue Number	Title	Report Section	Status
URI	05000369,05000370/ 2022002-02	Technical basis for changes to calibration frequency of radiation monitors EMF-36, EMF-44, and EMF-49 LOW and HIGH channels and SLC respective update/clarification.	71124.05	Open

PLANT STATUS

Unit 1 began the inspection period shut down for a scheduled refueling outage. The unit was returned to full power operation on May 12, 2022. On May 25, 2022, power was reduced to 84 percent rated thermal power (RTP) to allow for isolation and repair of a steam leak on the 1B1 moisture separator reheater (MSR) drain tank condenser drain line. Power was returned to 100 percent RTP on May 26, 2022. On June 19, 2022, power was reduced to 78 percent RTP to repair an emergent steam leak on a 1/2-inch flow element sensing line associated with the 1B1 MSR. Power was returned to 100 percent RTP on June 23, 2022, and remained at or near 100 percent RTP for the remainder of the inspection period.

Unit 2 operated at or near 100 percent RTP for the entire inspection period.

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 performed activities described in IMC 2515, Appendix D, "Plant Status," observed risk significant activities, and completed on-site portions of IPs. 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.

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 hot weather for the following systems:
 - "B" train of control room ventilation and cooling on May 13, 2022
 - Unit 2 emergency diesel generators (EDGs) on May 13, 2022

71111.04 - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (3 Samples)

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

- (1) Unit 1 "B" train of spent fuel pool cooling on April 13, 2022
- (2) Unit 1 "B" EDG on April 20, 2022
- (3) "B" control area chiller on June 24, 2022

Complete Walkdown Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated system configurations during a complete walkdown of the Unit 1 auxiliary feedwater system on May 5, 2022.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (6 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 auxiliary feedwater pump area on April 13, 2022
- (2) Unit 2 auxiliary feedwater pump area on April 13, 2022
- (3) Unit 2 "A" emergency switchgear room on April 21, 2022
- (4) Unit 1 "A" EDG on May 10, 2022
- (5) Unit 1 "B" EDG on May 10, 2022
- (6) Standby shutdown facility (SSF) on May 31, 2022

71111.08P - Inservice Inspection Activities (PWR)

PWR Inservice Inspection (ISI) Activities Sample (IP Section 03.01) (1 Sample)

- (1) The inspectors reviewed the following ISI activities from April 4 to April 18, 2022:
 - The inspectors reviewed the following non-destructive examinations (NDEs) activities to verify that the licensee is conducting selected NDEs appropriately and addressing any identified defects appropriately:
 - o Ultrasonic examination of the 6" Loop 1B hot leg line
 - Visual examination of loop 1B reactor vessel outlet nozzle-to-safe-end weld
 - Visual examination of reactor pressure vessel upper head penetrations
 - The inspectors reviewed the boric acid control program to verify that the licensee is managing boric acid appropriately to guard against corrosion mechanisms that could lead to the degradation of safety-significant components
 - The inspectors reviewed the upper head penetration inspection activities to verify that the licensee is conducting inspections appropriately in accordance with the plant procedures, industry guidelines, and applicable regulatory requirements
 - The inspectors reviewed steam generator tube inspection activities to verify that they were performed in accordance with the plant's technical specifications, industry guidelines, and applicable regulatory requirements
 - Steam Generator 1A eddy testing (ET) for tubes R85C82, R117C72
 - Steam Generator 1B ET for tubes R57C76, R62C43
 - Steam Generator 2C ET for tubes R75C60, R82C69, R90C59

71111.11B - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Regualification Program (IP Section 03.04) (1 Sample)

The inspectors completed an inspection to verify the licensee's ability to evaluate the performance of their licensed operators during the conduct of examinations, to assess their ability to properly develop and administer requalification annual operating tests and biennial written examinations, to evaluate the performance of the control room simulator and their testing and maintenance of the simulator, to ensure that licensed individuals satisfy the conditions of their licenses, and to assess their effectiveness in ensuring that operator license conditions are satisfied.

(1) <u>Biennial Requalification Written Examinations</u>

The inspectors evaluated the quality of the licensed operator biennial requalification written examination administered on June 17, 2022.

Annual Regualification Operating Tests

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

Administration of an Annual Regualification Operating Test

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

Requalification Examination Security

The inspectors evaluated the ability of the facility 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 facility 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 Regualification 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 control room during reactor shutdown and plant cooldown for the Unit 1 refueling outage on April 2, 2022.

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

(1) The inspectors observed and evaluated annual simulator exam ASE-03 on May 25, 2022. The scenario involved a nuclear instrument failure followed by a reactor coolant system leak and loss of heat sink.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (2 Samples)

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

- (1) Nuclear condition report (NCR) 2408566, investigate and repair snubber 1VNHGH021/1-MCA-VN-H021, 1B diesel ventilation exhaust duct
- (2) NCR 2428398, previously identified SSF ventilation issues remain

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (4 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) Action request (AR) 2415989, M1R28 outage independent review risk assessment, on April 11, 2022
- (2) Equipment protection plan for Unit 1 core reload, on April 19, 2022
- (3) Unit 1 yellow risk condition during reduced inventory, on April 21, 2022
- (4) Equipment protection plan for the 1A EDG maintenance outage, on June 22, 2022

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (5 Samples)

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

- (1) NCR 2422415, Unit 1 ice basket weights below the safety analysis mean limit
- (2) NCR 2423306, failed setpoint test on 1NV-6
- (3) NCR 2424356, investigate and repair 1N-32 source range nuclear instrument channel 2
- (4) NCR 2427222, 0RNLP6380, location found non-conservative to TS 3.7.9
- (5) NCR 2430759, 1B EDG failed to develop voltage and frequency during slow start

71111.18 - Plant Modifications

Severe Accident Management Guidelines (SAMG) Update (IP Section 03.03) (1 Sample)

(1) The inspectors verified the site SAMGs were updated in accordance with the pressurized water reactor generic severe accident technical guidelines and validated in accordance with NEI 14-01, "Emergency Response Procedures and Guidelines for Beyond Design Basis Events and Severe Accidents," Revision 1.

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the following post-maintenance testing activities to verify system operability and/or functionality:

- (1) PT/1/A/4350/002 A, "Diesel Generator 1A Operability Test," following an outage maintenance, on April 18, 2022
- (2) PT/1/A/4209/001 B, "1B NV [chemical and volume control]; Pump Performance Test," following inboard and outboard pump seal replacements, on April 23, 2022
- (3) PT/1/A/4600/105, "RCCA [rod cluster control assembly] Drop Timing Using DRPI [digital rod position indicator] System," following Unit 1 refueling, on May 1, 2022
- (4) PT/1/A/4252/002 B, "CA [auxiliary feedwater] Valve Stroke Timing Quarterly 1B Motor Driven Pump Flowpath," following flow balance adjustments on 1CA-40B and 1CA-44B, on May 10, 2022
- (5) PT/1/A/4350/002 A, "Diesel Generator 1A Operability Test," following maintenance, on June 26, 2022

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage Sample (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated refueling outage M1R28 activities from April 2, 2022, to May 9, 2022.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance testing activities to verify system operability and/or functionality:

Surveillance Tests (other) (IP Section 03.01) (3 Samples)

- (1) PT/1/A/4350/026 B, "Auxiliary Shutdown Panel Control Verification During Modes 5, 6 or No Mode," on April 22, 2022
- (2) PT/1/A/4150/005, "NC [reactor coolant] Valve Stroke Timing Test Using Air," on April 25, 2022
- (3) PT/2/A/4600/003 D, "Monthly Surveillance Items," on May 9, 2022

Inservice Testing (IP Section 03.01) (1 Sample)

(1) PT/1/A/4200/022, "ND [residual heat removal] Suction Swapover Timing Test," on April 14, 2022

Containment Isolation Valve Testing (IP Section 03.01) (1 Sample)

(1) PT/1/A/400/001 C, "Isolation Valve Leak Rate Test," on April 7, 2022

Ice Condenser Testing (IP Section 03.01) (1 Sample)

(1) PT/0/A/4200/018, "Ice Bed Analysis (Unit 1)," on April 28, 2022

71114.06 - Drill Evaluation

<u>Select Emergency Preparedness Drills and/or Training for Observation (IP Section 03.01)</u> (<u>1 Sample</u>)

(1) The inspectors observed the emergency preparedness drill on May 18, 2022. The drill involved a loss of offsite power followed by the sequential loss of both diesel generators for greater than 15 minutes.

RADIATION SAFETY

71124.01 - Radiological Hazard Assessment and Exposure Controls

Radiological Hazard Assessment (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated how the licensee identifies the magnitude and extent of radiation levels and the concentrations and quantities of radioactive materials and how the licensee assesses radiological hazards.

Instructions to Workers (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated how the licensee instructs workers on plant-related radiological hazards and the radiation protection requirements intended to protect workers from those hazards.

Contamination and Radioactive Material Control (IP Section 03.03) (3 Samples)

The inspectors observed/evaluated the following licensee processes for monitoring and controlling contamination and radioactive material:

- (1) Licensee surveys of potentially contaminated material leaving the radiologically controlled area (RCA)
- (2) Workers exiting the RCA Unit 1 during a refueling outage
- (3) Hot particle surveys of workers exiting the area under the reactor head

Radiological Hazards Control and Work Coverage (IP Section 03.04) (5 Samples)

The inspectors evaluated the licensee's control of radiological hazards for the following radiological work:

- (1) McGuire Nuclear Station M2R27 Refueling Outage Report, 01/18/2022 [Fall 2021 outage]
- (2) ALARA [as low as reasonably achievable] Plan 22-04 Revision 0, M1R28 Fleet Reactor Services Routine Outage Work [Reactor head and upper internals removal/install, and fuel movement in the reactor cavity & spent fuel pool]
- (3) ALARA Plan 22-03 Revision 0, Steam Generator (Primary and Secondary) [Eddy current, sludge lance, and foreign object search and retrieval]
- (4) ALARA Plan 22-05 Revision 0, Under head Mod., including 50 percent in-progress review [Cutting funnels and prep work for future modification under the reactor head]
- (5) ALARA Plan 22-07 Revision 0, U1 NV gasket replacement

High Radiation Area and Very High Radiation Area Controls (IP Section 03.05) (5 Samples)

The inspectors evaluated licensee controls of the following High Radiation Areas and Very High Radiation Areas:

- (1) Unit 1 fuel transfer canal locked high radiation area (LHRA) temporary boundary
- (2) Unit 1 access under the reactor head LHRA
- (3) Unit 1 incore tip room door Very High Radiation Area
- (4) Unit 1 reactor cavity upper internals lift
- (5) Unit 1 reactor cavity reactor head lift

Radiation Worker Performance and Radiation Protection Technician Proficiency (IP Section 03.06) (1 Sample)

(1) The inspectors evaluated radiation worker and radiation protection technician performance as it pertains to radiation protection requirements.

71124.03 - In-Plant Airborne Radioactivity Control and Mitigation

Permanent Ventilation Systems (IP Section 03.01) (2 Samples)

The inspectors evaluated the configuration of the following permanently installed ventilation systems:

(1) Unit 1/Unit 2 auxiliary building ventilation system

(2) Unit 1/Unit 2 containment purge ventilation system

Temporary Ventilation Systems (IP Section 03.02) (1 Sample)

The inspectors evaluated the configuration of the following temporary ventilation system:

(1) HEPA #U010997, room 809 letdown heat exchanger

Use of Respiratory Protection Devices (IP Section 03.03) (1 Sample)

(1) The inspectors evaluated the licensee's use of respiratory protection devices.

Self-Contained Breathing Apparatus for Emergency Use (IP Section 03.04) (1 Sample)

(1) The inspectors evaluated the licensee's use and maintenance of self-contained breathing apparatuses.

71124.04 - Occupational Dose Assessment

Source Term Characterization (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated licensee performance as it pertains to radioactive source term characterization.

External Dosimetry (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated how the licensee processes, stores, and uses external dosimetry.

Internal Dosimetry (IP Section 03.03) (1 Sample)

The inspectors evaluated the following internal dose assessment:

(1) AD-RP-All-4010, Attachment 1, Internal Dose Assessment. Radiation protection (RP) Badge Number 501077. 10/29/2020

Special Dosimetric Situations (IP Section 03.04) (2 Samples)

The inspectors evaluated the following special dosimetric situations:

- (1) Reviewed documentation of monitoring of three declared pregnant workers during the period 7/1/2020 through 4/1/2022
- (2) Reviewed multi-badging documentation for 23 individuals performing work under the Unit 1 reactor head from 4/7/2022 to 4/18/2022

<u>71124.05 - Radiation Monitoring Instrumentation</u> Walkdowns and Observations (IP Section 03.01) (10 Samples)

The inspectors evaluated the following radiation detection instrumentation during plant walkdowns:

- (1) Canberra iCAM, Sn:5735 (EnRad 13202), Unit 1 spent fuel pool
- (2) Ludlum 3030P Smear Counter, Sn: 317124 (EnRad 12780) Unit 1 spent fuel pool
- (3) Ludlum LUD-177 Rate Meter w/frisker, Sn: 309471 (EnRad 07531), Unit 1 spent fuel pool
- (4) Ludlum LUD-177 Rate Meter w/frisker, Sn: 279135 (EnRad 10161), auxiliary building, room 1009A
- (5) Rotem Telepole, Sn:6613-109 (EnRad 12232), Unit 2 upper containment RP desk
- (6) Canberra Cronos -1, Sn: 1411-241-CR0100G (EnRad 12749), admin building, room 157 (Dosimetry)
- (7) Canberra GEM-5, Sn: 0511-024 (EnRad 12354), admin building, room 157 (Dosimetry)
- (8) Radeco "Goose Neck" Air Sampler, Sn: 5956 (EnRad 02929), equipment hatch area
- (9) Rotem Telepole, Sn:0914-113 (EnRad 07595), RP count room
- (10) Thermo RadEye G, Sn:30760 (EnRad 16013), auxiliary building, room 1009A

Calibration and Testing Program (IP Section 03.02) (13 Samples)

The inspectors evaluated the calibration and testing of the following radiation detection instruments:

- (1) 1-EMF-51A, Unit 1 Containment High Range Radiation Monitor, calibrated 04/05/2019
- (2) 1-EMF-51A, Unit 1 Containment High Range Radiation Monitor, calibrated 10/03/2020
- (3) 2-EMF-51A, Unit 2 Containment High Range Radiation Monitor, calibrated 03/23/2020
- (4) 2-EMF-51A, Unit 2 Containment High Range Radiation Monitor, calibrated 09/26/2021
- (5) 2-EMF-51B, Unit 2 Containment High Range Radiation Monitor, calibrated 04/14/2020
- (6) 2-EMF-51B, Unit 2 Containment High Range Radiation Monitor, calibrated 03/23/2020
- (7) 1-EMF-12, Unit 1 Control Room Area Radiation Monitor, calibrated 09/03/2019
- (8) 1-EMF-17, Unit 1 Bridge Spent Fuel Pool Area Radiation Monitor, calibrated 12/23/2021
- (9) 1-EMF-17, Unit 1 Bridge Spent Fuel Pool Area Radiation Monitor, calibrated 04/14/2020
- (10) 2-EMF-36HH, Unit 2 Plant Vent HH Range Radiation Monitor, calibrated 10/03/2021
- (11) 1-EMF-36HH Unit 1 Plant Vent HH Range Radiation Monitor, calibrated 09/13/2021
- (12) 2-EMF-4, Spent Fuel Pool Area Rad Monitor, calibrated 06/18/2020
- (13) 2-EMF-4, Spent Fuel Pool Area Rad Monitor, calibrated 10/17/2018

Effluent Monitoring Calibration and Testing Program Sample (IP Sample 03.03) (2 Samples)

The inspectors evaluated the calibration and maintenance of the following radioactive effluent monitoring and measurement instrumentation:

- (1) 0-EMF-50L, 0-EMF-50H Waste Gas Radiation Monitor, calibrated 09/25/2021 and 07/21/2016 (respectively)
- (2) 0-EMF-49L, 0-EMF-49H Liquid Waste Radiation Monitor, calibrated 11/16/2021 and 12/21/2021 (respectively)

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

MS05: Safety System Functional Failures (SSFFs) Sample (IP Section 02.04) (2 Samples)

- (1) Unit 1 (April 1, 2021, through March 31, 2022)
- (2) Unit 2 (April 1, 2021, through March 31, 2022)

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

- (1) Unit 1 (April 1, 2021, through March 31, 2022)
- (2) Unit 2 (April 1, 2021, through March 31, 2022)

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

- (1) Unit 1 (April 1, 2021, through March 31, 2022)
- (2) Unit 2 (April 1, 2021, through March 31, 2022)

OR01: Occupational Exposure Control Effectiveness Sample (IP Section 02.15) (1 Sample)

(1) August 1, 2021, through January 31, 2022

<u>PR01: Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual</u> <u>Radiological Effluent Occurrences (RETS/ODCM) Radiological Effluent Occurrences Sample</u> (IP Section 02.16) (1 Sample)

(1) August 1, 2021, through January 31, 2022

71152A - Annual Follow-up Problem Identification and Resolution

Annual Follow-up of Selected Issues (Section 03.03) (2 Samples)

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

- (1) NCR 2430807, 1A EDG Struthers-Dunn MU relay not fully seated
- (2) NCR 2408408, pressurizer power operated relief valve block safety function

71152S - Semiannual Trend Problem Identification and Resolution

Semiannual Trend Review (Section 03.02) (1 Sample)

(1) The inspectors reviewed the licensee's corrective action program for potential adverse trends in equipment reliability that might be indicative of a more significant safety issue.

INSPECTION RESULTS

	ely Implement Clearance and Tagout		
Cornerstone	Significance	Cross-Cutting	Report
		Aspect	Section
Initiating Events	Green	[H.8] -	71111.20
	NCV 05000369/2022002-01	Procedure	
	Open/Closed	Adherence	
	en finding and associated non-cited		
	5.4.1 was identified for the licensee's		
	ut procedure, resulting in the uninten		
0	age tank (FWST) to the recycle hold		
<i>y</i> 1	Illy, the licensee did not implement th		v
	ALL-0200, "Clearance and Tagging,"		
	nce position prior to beginning work o		
	ril 5, 2022, at 6:56 a.m., the licensee		
	32-0104 to isolate a portion of the NI	, i	
	it 1 was in a refueling outage at the t		
	way. The clearance required valve 1		
	tor implementing the clearance in the	•	
	he control switch for 1NI-334B and s		
	did not verify if the valve was in the		
	he valve did not need to be manipula		
	llowing shift, work began on valve 1N		
	en reduced to lowered inventory bel		
	le 6 entry. With 1NI-334B open, whe		
maintenance, an ina	advertent flow path was created from	n the FWST to the read	tor coolant
	, the volume control tank level increa		
	ontrol valve automatically opened as		
	tem to the RHT. At 11:55 p.m., the o		
charging and letdow	vn flows, and after a review of the op	perator aid computer gr	aphics,
	I-334B was open and subsequently of		al level in the
reactor coolant syst	em did not change during the event.		

The licensee's administrative procedure for implementing tagouts, AD-OP-ALL-0200, "Clearance and Tagging," Section 4.11, specifies that the tag hanger, "positions the components in accordance with the clearance and plant procedures and verifies the effects of the component manipulations as expected." Contrary to AD-OP-ALL-0200, the tag hanger did not place valve 1NI-334B in the position specified by the clearance.

Corrective Actions: The operators closed 1NI-334B and immediately halted the work on 1NI-332A upon the discovery of the deficient condition. Additionally, the licensee conducted stand-downs with operations personnel to communicate issue lessons-learned relative to procedure use and adherence and clearance briefs.

Corrective Action References: NCR 2422881

Performance Assessment:

Performance Deficiency: The inspectors determined that the licensee's failure to implement the requirements of licensee procedure AD-OP-ALL-0200 for clearance OPS-1-22-NI-1NI332-0104 was a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Configuration Control attribute of the Initiating Events cornerstone and adversely affected the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, if uncorrected, uncontrolled flow paths into and out of the reactor coolant system while in lowered inventory could increase the likelihood of a loss of inventory event.

Significance: The inspectors assessed the significance of the finding using Inspector Manual Chapter 0609 Appendix G, "Shutdown Safety SDP." The finding was determined to be of very low safety significance (green) because the finding did not result in an actual loss of inventory.

Cross-Cutting Aspect: H.8 - Procedure Adherence: Individuals follow processes, procedures, and work instructions. Specifically, the operator did not follow the licensee's procedure for implementing clearance OPS-1-22-NI-1NI332-0104. Enforcement:

Violation: TS 5.4.1 required that procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide (RG) 1.33. RG 1.33, Appendix A, Section 1, Administrative Procedures, recommended procedures for equipment control (e.g., locking and tagging). The licensee's administrative procedure for locking and tagging, AD-OP-ALL-0200, "Clearance and Tagging," required that the tag hanger, "positions the components in accordance with the clearance and plant procedures and verifies the effects of the component manipulations as expected."

Contrary to the above, on April 5, 2022, the licensee failed to adequately implement licensee procedure AD-OP-ALL-0200. Specifically, the tag hanger for clearance OPS-1-22-NI-1NI332-0104 failed to position 1NI-334B in the closed position, resulting in an inadvertent transfer of reactor coolant system inventory while in lowered inventory.

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

Unresolved Item	Technical basis for changes to calibration frequency of	71124.05
(Open)	radiation monitors EMF-36, EMF-44, and EMF-49 LOW and	
	HIGH channels and SLC respective update/clarification.	
	URI 05000369,05000370/2022002-02	

<u>Description</u>: Site Technical Specification 5.5, "Programs and Manuals," Section 5.5.5, "Radioactive Effluent Controls Program," states in part that, "this program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in Chapter 16 of the UFSAR [updated final safety analysis report], shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the offsite dose calculation manual..."

Additionally, Section 5.5.5 b, states in part that, "licensee-initiated changes to the Radiological Effluent Controls of the UFSAR:

- 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - i. Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - ii. A determination that the change(s) maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations or a determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations..."

Chapter 16 of the UFSAR, "Selected Licensee Commitments," (SLCs) states that, "Changes to these Selected Licensee Commitments shall be considered a change in an NRC commitment and shall be made only in accordance with the approved Nuclear Operating Fleet Administrative Procedure for the Control of Selected Licensee Commitments and by use of the 10 CFR 50.59 Process." SLC Section 16.11.2, "Radioactive Liquid Effluent Monitoring Instrumentation," identifies the surveillance frequency requirements and compensatory actions which include channel calibration testing requirement (TR) 16.11.2.7 on a 24-month periodicity. SLC Section 16.11.7, "Radioactive Gaseous Effluent Monitoring Instrumentation," identifies the surveillance frequency requirements and compensatory actions which include channel calibration testing requirement (TR) 16.11.2.7 on a 24-month periodicity. SLC Section 16.11.7, "Radioactive Gaseous Effluent Monitoring Instrumentation," identifies the surveillance frequency requirements and compensatory actions which include channel Calibration TR 16.11.7.7 on an 18-month periodicity.

The inspectors noted that calibration intervals of site effluent radiation monitors used for making decisions related to emergency action level declarations in case of an event were changed from the expected frequencies described in Chapter 16 of the UFSAR. Specifically, effluent monitors EMF-36, EMF-44, and EMF-49 HIGH channels were found calibrated at six-year intervals. The inspectors were unable to review a technical basis study/report or paper justifying the change in calibration frequency nor has the licensee updated Chapter 16 of the UFSAR to reflect the change in calibration frequency, separating the specific channel calibrations that deviated from the descriptions stated in Chapter 16 of the UFSAR. The issue is unresolved because inspectors were unable to determine the significance of the radiation monitors calibration frequency changes.

Planned Closure Actions:

- Review closing/completion of actions related to NCR 02427036, including (1) review of the licensee's technical basis supporting changes in calibration frequencies for radiation monitors EMF-36, EMF-44, and EMF-49 regarding established calibration frequencies for LOW and HIGH range channels and, (2) review of revised SLC tables referring to radiation monitors EMF-36, EMF-44, and EMF-49 calibration of LOW and HIGH channels to ensure commitments are clearly defined.
- 2. Determine whether a performance deficiency occurred and if so, the ROP significance for proper disposition.

Corrective Action References: NCR 02427036

EXIT MEETINGS AND DEBRIEFS

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

- On April 18, 2022, the inspectors presented the Unit 1 ISI inspection results to Ed Pigott, Site Vice President, and other members of the licensee staff.
- On April 27, 2022, the inspectors presented the RP Occupational Radiation Safety Baseline inspection results to Ed Pigott, Site Vice President, and other members of the licensee staff.
- On June 16, 2022, the inspectors presented the Licensed Operator Requalification inspection results to Ed Pigott, Site Vice President, and other members of the licensee staff.
- On July 19, 2022, the inspectors presented the integrated inspection results to Ed Pigott, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
71111.01	Procedures	AD-WC-ALL-0230	Seasonal Readiness	
		PT/0/B/470/039	Warm Weather Equipment Checkout	
71111.04	Corrective Action Documents	2417173	Generate PRRs for 1B diesel governor droop setting	
	Drawings	MCFD-1570- 01.00/01	Flow Diagram of Unit 1 Spent Fuel Cooling System	
		MCFD-1618- 01.00	Flow Diagram of Control Area Chilled Water System	
	Procedures	AD-EG-ALL-1206	Equipment Reliability Classification	
		OP/1/A/6350/002 A	Diesel Generator	
	Work Orders		01991959-01, 2CARL2AFTPBD: Replace Relay	
71111.05	Procedures	AD-EG-ALL-1520	Transient Combustible Control	
		CSD-MNS-PFP- DG1-0736-001	Diesel Generator Building Elevation 736 Pre-Fire Plan	
		CSD-MNS-PFP- DG2-0736-001	U2 Diesel Generator Building Elevation 736 Pre-Fire Plan	
71111.08P	Corrective Action Documents	2422593	Boric Acid residue on Loop B Outlet Nozzle	04/05/2022
	Miscellaneous		McGuire Unit 1 M1R28 Steam Generator Degradation Assessment	0
			CFR80 Steam Generator Site Technique Validation for Catawba Nuclear Station, Unit 1, and McGuire Nuclear Station Units 1 and 2	4
		0224-AST- 101483	Condition Monitoring and Operational Assessment for McGuire Unit 1 M1R25	0
	NDE Reports	UT-22-005	UT examination of 6" 1B Loop Hot Leg Injection	04/07/2022
		VT-22-074	Visual examination of Reactor Pressure Vessel Upper Head Penetrations	04/13/2022
		VT-22-49	Visual Examination of Loop B - Outlet (Hot Leg) Nozzle-to- Safe End	04/10/2022
	Procedures	NDE-NE-ALL-	Visual examination of PWR Reactor Pressure Vessel Upper	5

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
		7202	Head Penetrations	
71111.11B	Miscellaneous		Biennial Written Exam LOCT B-Shift, SRO and RO	
			Simulator scenarios and job performance measures administered to LOCT B-Shift, SRO and RO	
			Medical records for 10 licensed operators, C-Shift	
			Training attendance records, 2020-2022, since last 71111.11B inspection	
			Remediation records, 2020-2022, since last 71111.11B inspection	
			License maintenance hours documentation	
			Simulator fidelity testing records, 2020-2022	
	Procedures	AD-TQ-ALL-0068	Licensed Operator Continuing Training Program	12
		AD-TQ-ALL-0101	Conduct of the Systematic Approach to Training	12
		AD-TQ-ALL-0230	Licensed Operator Requalification Annual and Biennial Exam Development	11
		AD-TQ-ALL-0320	Development of Simulator Training and Evaluation Guides	9
		AD-TQ-ALL-0420	Conduct of Simulator Training and Evaluation	19
		AD-TQ-ALL-0425	Simulator Scenario Based Testing	3
		AD-TQ-ALL-0700	Nuclear Station Unit Specific Training Simulators	3
		CSD-TQ-ALL- 0101-01	Systematic Approach to Training Process	5
71111.11Q	Procedures	AD-OP-ALL-1000	Conduct of Operations	
71111.12	Procedures	AD-EG-ALL-1204	Single Point Vulnerability Identification, Elimination and Mitigation	
		AD-EG-ALL-1206	Equipment Reliability Classification	
		AD-EG-ALL-1209	System, Component, and Program Health Reports and Notebooks	
		AD-EG-ALL-1210	Maintenance Rule Program	
		AD-EG-ALL-1211	System Performance Monitoring and Trending	
71111.13	Procedures	AD-OP-ALL-0201	Protected Equipment	
71111.15	Engineering Changes	420980	Evaluation of 1NC-2 As Found Left Setpoint Test Results - M1R28	
	Procedures	AD-EG-ALL-1211	System Performance Monitoring and Trending	

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
		AD-EG-ALL-1451	Relief Valve Component Program	
		AD-OP-ALL-0102	Operability Decision Making	
		AD-OP-ALL-0105	Operability Determinations and Functionality Assessment	
71111.19	Procedures	AD-EG-ALL-1155	Post Modification Testing	
		PT/1/A/4350/019	1A D/G Governor and Voltage Regulator Benchmark	
		A	Comparison Test	
71111.22	Procedures	AD-EG-ALL-1202	Preventive Maintenance and Surveillance Testing	
			Administration	
		AD-EG-ALL-1720	Inservice Testing (IST) Program Implementation	
		AD-WC-ALL-0250	Work Implementation and Completion	
71124.01	ALARA Plans	21-02	M2R27 21-02 Fleet Reactor Services (Rx Head Team)	11/11/2021
			ALARA Plan, Revision 0 [Including in-progress reviews and	
			ALARA Critique]	
		21-08	M2R27 21-08 Steam Generator Work ALARA Plan,	11/11/2021
			Revision 0 and Revision 2 [Including in-progress reviews	
			and ALARA Critique]	
	Corrective Action	AR 02350424	Unanticipated SRD dose rate alarm	09/25/2020
	Documents	AR02353136,		Various
		AR02386417,		
		AR02398540,		
		AR02400516, and		
		AR02408815		
	Miscellaneous		McGuire Nuclear Station Radiological Key Roster [High	03/31/2022
			Radiation, Locked High Radiation, and Very High Radiation	
			Area key control Log]	
			Spent Fuel Pool Non-SNM Item Inventory	11/2021
			M1R28 Dose Reports [Summary report issue twice daily	Various
			including outage exposure tracking totals vs. goal and	
			breakdown by Radiation Work Permit (RWP) number]	
			04/04/2022 thru 04/22/2022	
		Site ALARA	10/16/2021, 12/13/2021, and 03/01/2022	Various
		Committee		
		Meeting Minutes		
		TSR 22-108	Temporary Shielding Request (TSR) - U-1 Lower	08/25/2021

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
			Containment around Pressurizer Relief Tank	
		TSR 22-125	Temporary Shielding Request - Unit 1 Lower Containment 3" NV piping B/C pipe chase	02/17/2022
	Procedures	HP/0/B/1003/063	Routine Surveillance [Radiological]	49
	Radiation Surveys	MNS-M- 20220406-15	Initial Under Head Survey	04/07/2022
		MNS-M- 20220408-19	Mark and Cut Drive Nozzle F12 & K12	04/08/2022
		MNS-O- 20220406-5	Aux Bldg - Misc - Spent Fuel Pool	04/07/2022
	Radiation Work Permits (RWPs)	Survey # MNS-M- 20220402-1 thru MNS-M- 20220402-13, MNS-M- 20220402-15, MNS-M- 20220402-19, and MNS-M- 20220402-20 RWP # 11 RWP # 1332	Unit 1 (U-1) initial entry radiation and contamination surveys after shutdown Spent Fuel Pool Activities (Excluding Refueling) U-1 Outage: Under Head Inspections and cutting of PLDR's,	04/02/2022 32 1
		RWP# 1332	Preps for Peening U-1 Outage: Under Head Inspections and cutting of PLDR's, Preps for Peening	2
	Self-Assessments	AR02363388	2021 Field Operations Self Assessment	12/28/2021
71124.03	Corrective Action Documents	AR02352910, 02361270, AR02363386, and AR02410694		Various
	Miscellaneous	Air Sample ID: 42254	Air Quality Analysis Report	03/10/2022
		Air Sample ID: 42256	Air Quality Analysis Report	10/25/2021

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
		Air Sample ID: 42250	Air Quality Analysis Report	10/11/2021
		Air Sample ID: 42255	Air Quality Analysis Report	02/03/2022
		RWP 1332	TEDE ALARA Screening evaluation	1
		RWP 1701	TEDE ALARA Screening evaluation	7
		RWP 1702	TEDE ALARA Screening evaluation	6
		RWP-1700	TEDE ALARA Screening evaluation	13
		Various	Respirator Fit Test Records	Various
		Various	SCBA Use Training Records	Various
	Procedures	AD-RP-ALL-0003	RADIOLOGICAL AIR SAMPLING	4
		AD-RP-ALL-0008	USE AND CONTROL OF HEPA FILTRATION AND VACUUM EQUIPMENT	1
		AD-RP-ALL-0010	RADIOLOGICAL JOB COVERAGE	0
		AD-RP-ALL-2014	WORK IN ALPHA ENVIRONMENTS	8
		AD-RP-ALL-6001	QUANTITATIVE FIT TESTING	4
		AD-RP-ALL-6002	INSPECTIONS OF SELF-CONTAINED BREATHING	3
			APPARATUS (SCBA) AND ASSOCIATED EQUIPMENT	
		AD-RP-ALL-6005	POWERED AIR-PURIFYING RESPIRATORS	2
		AD-RP-ALL-7004	OPERATION OF AIR SAMPLING EQUIPMENT	4
		AD-TQ-ALL-0081	BASIC RESPIRATORY PROTECTION TRAINING	2
	Self-Assessments	02363386-05, 02361270-01	Respiratory Protection	
	Work Orders	20258001-01	PT/1/A/4450/001E 1VP FILTER TEST	
		20299507-01	PT/2/A/4450/001B 2VA FILTER TEST	
		20330860-01	PT/2/A/4450/001E 2VP FILTER TEST	
		20366719-01	PT/1/A/4450/001E 1VP FILTER TEST	
		20418590-01	PT/1/A/4450/001B 1VA FILTER TEST	
		20440688-01	PT/2/A/4450/001E 2VP FILTER TEST	
71124.04	Calculations		2021 (M2R27) Alpha Characterization [per AD-RP-ALL-	12/07/2021
			2015, Alpha Radiation Characterization]	
		Dosimetry Technical Report:	MNS (McGuire Nuclear Station) MAGNASTOR ISFSI (Independent Spent Fuel Storage Installation) Neutron	04/23/2015

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
		15-01	Energy Evaluation	
	Corrective Action Documents	AR02349862, AR02351088, AR02352602, and AR02397852		Various
		AR02349862, AR02351088, AR02352602, AR02397852, and AR02400516		Various
	Miscellaneous		NVLAP Certificate of Accreditation to ISO/IEC 17025:2005, NVLAP LAB CODE: 100505-0 Effective Dates: 2020-04-01 through 2021-03-31	
			NVLAP Certificate of Accreditation to ISO/IEC 17025:2017, NVLAP LAB CODE: 100505-0 Effective Dates: 2021-10-01 through 2022-03-31	
			NVLAP Certificate of Accreditation to ISO/IEC 17025:2017, NVLAP LAB CODE: 100505-0 Effective Dates: 2022-04-01 through 2023-03-31	
		AD-RP-ALL-2015	Alpha Radiation Characterization - 2021 (M2R27) Alpha Characterization	12/7/2021
	Procedures	AD-RP-ALL-4005	Dose Management	3
		AD-RP-ALL-4010	Internal Dose Assessment	3
		AD-RP-ALL-4015	Dosimetry in Gradient Radiation Fields	2
		AD-RP-ALL-4016	Declared Pregnant Worker	0
		AD-RP-ALL-7008	Apex InVivo Whole Body Counter Operation, Quality Checks and Data Review	4
		CDS-RP-ALL- 0416	Prospective Determination for Occupational Exposure	0
	Radiation Surveys	-	Area DLR Monitoring Report, 3rd Trimester 2021	02/23/2022
	Self-Assessments	02305430-05	MNS External Dosimetry Self Assessment	11/05/2020
		02357028	2021 Duke Energy Dosimetry Lab Internal Audit [Simulated NVLAP (National Voluntary Laboratory Accreditation	07/09/2021

Inspection Procedure	Туре	Designation	Description or Title	Revision or Date
			Program) on-site assessment]	
		02363386-05 and 02361270-01	MNS Internal Dosimetry Self Assessment	01/05/2022
71124.05	Calibration	AD-RP-ALL-7007	Apex InVivo Whole Body Counter Calibration	10-08-2021
	Records	HP/0/B/1001/045	Calibration of Packard Tri-Carb 2900 TR and 3110 TR Liquid Scintillation Counters	07/27/2021
		HP/0/B1001/048	Calibration of Apex Gamma Spectroscopy System-Source Certificates Creation 2021 Q3	10/08/2021
		HP/0/B1001/048	Calibration of Apex Gamma Spectroscopy System-Efficiency Verifications 2021 Q3	10/10/2021
	Corrective Action Documents	AR02342263, AR02349423, AR02353542, AR02408815, AR02407983, AR02407688, and AR02364462		Various
	Miscellaneous	AD-RP-ALL-7006	GEM-5 - Weekly Response Checklist for Month April 2022	April 2022
		AD-RP-ALL-7006	TEM - Weekly Response Checklist for Month April 2022	April 2022
	Procedures	HP/0/B/1001/045	Calibration of Packard Tri-Carb 2900 TR and 3110 TR Liquid Scintillation Counters	8
		HP/0/B/1001/048	Calibration of Apex Gamma Spectroscopy System	3
		HP/0/B/1009/006	Procedure for Quantifying High Level Radioactivity Releases During Accident Conditions	7
	Work Orders	20351152-03, 20456922-01, 20039840-01, 02037877-01	0-EMF-50L and 0-EMF-50H Calibrations	Various
		20448831-01, 20309402-01, 02134173-01, and 20426943-01	0-EMF-49L and 0-EMF-49H Calibrations	Various
71151	Corrective Action Documents	AR02350424		09/25/2020

Inspection	Туре	Designation	Description or Title	Revision or
Procedure				Date
	Miscellaneous		McGuire Electronic Dosimeter Dose Rate Alarm Logs for the period 8/1/2021 to 3/1/2022	03/01/2022
			McGuire Electronic Dosimeter Dose Alarm Logs for the period 8/1/2021 to 3/1/2022	03/01/2022
		AD-CP-DEC-0021	Projected Offsite Dose from Radioactive Effluents	02/09/2022
		OpenEMS Permit #G2021379	OpenEMS Permit #G2021379	02/28/2022
		OpenEMS Permit #L2021926	OpenEMS Permit #L2021926	02/28/2022
	Procedures	AD-LS-ALL-0004	NRC Performance Indicators and Monthly Operating Report	
		AD-PI-ALL-0100	Corrective Action Program	
71152S	Procedures	AD-LS-ALL-0006	Notification/Reportability Evaluation	
		AD-PI-ALL-0100	Corrective Action Program	
		AD-PI-ALL-0105	Effectiveness Reviews	