



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

August 11, 2022

Mr. Terry Brown
Site Vice President
Energy Harbor Nuclear Corp.
Davis-Besse Nuclear Power Station
5501 N. State Rte. 2, Mail Stop A-DB-3080
Oak Harbor, OH 43449-9760

**SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION – INTEGRATED INSPECTION
REPORT 05000346/2022002**

Dear Mr. Brown:

On June 30, 2022, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Davis-Besse Nuclear Power Station. On July 27, 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.

Two findings of very low safety significance (Green) are documented in this report. One of these findings 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.

A licensee-identified violation which was determined to be Severity Level IV is documented in this report. 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 violations or the significance or severity of the violations 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 III; the Director, Office of Enforcement; and the NRC Resident Inspector at Davis-Besse Nuclear Power Station.

If you disagree with a cross-cutting aspect assignment or a finding not associated with a regulatory requirement 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 III; and the NRC Resident Inspector at Davis-Besse Nuclear Power Station.

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,



Signed by Burket, Elise
on 08/11/22

Elise C. Eve, Acting Branch Chief
Branch 2
Division of Reactor Projects

Docket No. 05000346
License No. NPF-3

Enclosure:
As stated

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Letter to Terry Brown from Elise C. Eve dated August 11, 2022.

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION – INTEGRATED INSPECTION REPORT 05000346/2022002

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

Docket Number: 05000346

License Number: NPF-3

Report Number: 05000346/2022002

Enterprise Identifier: I-2022-002-0043

Licensee: Energy Harbor Nuclear Corp.

Facility: Davis-Besse Nuclear Power Station

Location: Oak Harbor, OH

Inspection Dates: April 01, 2022 to June 30, 2022

Inspectors: D. Mills, Senior Resident Inspector
K. Barclay, Reactor Inspector
R. Cassara, Resident Inspector
J. Cassidy, Senior Health Physicist
E. Fernandez, Reactor Inspector
M. Garza, Emergency Preparedness Inspector
T. Ospino, Resident Inspector
J. Reed, Health Physicist

Approved By: Elise C. Eve, Acting Branch Chief
Branch 2
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 Davis-Besse Nuclear Power Station, 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. A licensee-identified non-cited violation is documented in report section: 71114.02.

List of Findings and Violations

Failure to Use Procedure during Loss of Letdown Event			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Event	Green FIN 05000346/2022002-01 Open/Closed	[H.8] - Procedure Adherence	71152A
<p>A self-revealed finding of very low safety significance (Green) was identified when the licensee failed to use procedures when responding to a loss of letdown. Specifically, the licensee failed to enter the annunciator response procedure, and isolated letdown with valve MU2B instead of valves MU6 and MU4 per procedure. The licensee also failed to utilize procedures while attempting to restore letdown during the initial response to the loss of letdown.</p>			

Failure to Provide Adequate Procedural Instructions when Swapping Purification Demineralizer Trains			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000346/2022002-02 Open/Closed	[H.2] - Field Presence	71152A
<p>A self-revealed finding of very low safety significance (Green) and an associated non-cited violation (NCV) of Technical Specification (TS) 5.4.1(a) were identified for the licensee’s failure to establish and implement procedural guidance for performing a change of the on-service purification demineralizer. Specifically, the guidance in licensee procedure DB-OP-6006, "Makeup and Purification System," revision 53, for switching purification demineralizers did not provide instructions to ensure that the purification demineralizer being placed on-service was not manually isolated. This lack of procedural guidance resulted in control room operators inadvertently isolating letdown because they failed to un-isolate the manually closed outlet valve of purification demineralizer 1 prior to putting it on-service. This resulted in high pressure in the letdown system, lifting of the relief valve MU-1890, and subsequent increase of pressurizer level to over 228 inches. This required the licensee to enter TS LCO 3.4.9 conditions A and B, resulting in a rapid reduction in power to roughly 15 percent.</p>			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
URI	05000346/2021050-06	Potential Adverse Changes During 2006 Emergency Diesel Generator Modifications	93812	Discussed

PLANT STATUS

The unit began the inspection period shut down for refueling outage. On April 18, the unit entered startup, and on April 21 the unit reached full power. On May 17, the unit was down powered to 64 percent to allow repair of a cracked small diameter instrument line on the secondary side. On May 19, the unit was returned to rated thermal power, and remained at or near rated thermal power for the remainder of the 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.w.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

71111.04 - 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) Decay heat train 2 during the week ending April 30, 2022
- (2) Containment spray train 1 during train 2 scheduled maintenance during the week ending June 30, 2022

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

- (1) The inspectors evaluated system configurations during a complete walkdown of the control room emergency ventilation system through the week ending June 11, 2022.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection Sample (IP Section 03.01) (4 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) Containment closeout walkdown, fire areas D, AB, and A, during the week ending April 9, 2022

- (2) Emergency core cooling system train 2 room 115, fire area A-04, during the week ending April 16, 2022
- (3) Low voltage switchgear rooms E and F, fire areas X and Y, during the week ending May 7, 2022
- (4) Radioactive waste exhaust equipment and main station exhaust fan room, fire area EE, during the week ending June 30, 2022

71111.08P - Inservice Inspection Activities (PWR)

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

- (1) The inspectors verified that the reactor coolant system boundary, steam generator tubes, reactor vessel internals, risk-significant piping system boundaries, and containment boundary are appropriately monitored for degradation, and that repairs and replacements were appropriately fabricated, examined and accepted by reviewing the following activities from March 7, 2022 to March 18, 2022:

03.01.a - Nondestructive Examination and Welding Activities

- Ultrasonic examination (UT) of cold leg inlet nozzle to pipe weld, component ID RC-MK-B-59-1-FW-113B
- Ultrasonic examination (UT) of hot leg outlet nozzle to shell weld, component ID RC-RPV-WR-13/14/72-Z
- Liquid penetrant (PT) examination of fillet weld on RCTC CLNT 1-2-1 seal return line component ID DB-FTMU60A
- Liquid penetrant (PT) examination of fillet weld on RCTC CLNT 1-2-1 seal return line component ID DB-FTMU60B
- Visual examination (VT) of reactor vessel interior keyways
- Visual examination (VT) of control rod guide tubes per MRP-227
- Welding of 2 to 1 fillet weld on RCTC CLNT 1-2-1 seal return line component ID DB-FTMU60B (WO 200747521)

03.01.b - Pressurized-Water Reactor Vessel Upper Head Penetration Examination Activities

- Visual examinations of 69 penetrations on the reactor vessel closure head

03.01.c – Pressurized-Water Reactor Boric Acid Corrosion Control Activities

- Condition Report (CR)-2020-05467 containment spray pump 1 pipe cap at CS32
- CR-2021-07323 BWST SFAS channel 2 level transmitter
- CR-2021-07401 decay heat pump casing vent
- CR-2021-02688 makeup pump 2 outlet isolation

03.01.d – Pressurized-Water Reactor Steam Generator Tube Examination Activities

- Eddy current (ET) testing of 15502 steam generator tubes in SG 2A
- Eddy current (ET) testing of 15538 steam generator tubes in SG 1B

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 control room during power ascension, including syncing main generator to grid, delta cold leg temperature adjustments, and starting of second main feed pump during the week ending April 23, 2022.

71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (3 Samples)

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

- (1) Replacement of station battery 2 during the week ending March 12, 2022
- (2) Decay heat pump 2 bearing and oil seal replacement due to oil leak during the week ending April 16, 2022
- (3) 10-year overhaul of the YVB inverter static transfer switch channel 'B' during the week ending May 7, 2022

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (1 Sample)

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) Reactor power reduction and emergent work related to instrument line steam leak repairs from May 17 – 19, 2022

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (4 Samples)

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

- (1) Main steam isolation valve 2 inoperable due to scaffold pole in path of MS100, CR 2022-01484, during the week ending April 9, 2022
- (2) Decay heat pump 2 pump outboard constant level oiler empty, CR 2022-02550, during the week ending April 16, 2022
- (3) Decay heat pump 1 inboard/outboard bearings constant level oilers were found empty, CR 2022-03669, during the week ending April 30, 2022
- (4) RCP 1-2 seal leak / lower differential pressure, CR 2022-03463, and CR 2022-03482, during the week ending June 30, 2022

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (1 Sample)

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

- (1) Containment air cooler 2 outlet temperature control valve SW1357 during the week ending May 14, 2022

71111.20 - Refueling and Other Outage Activities

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

- (1) The inspectors evaluated refueling outage 1R22 activities from March 4, 2022 through April 19, 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) (5 Samples)

- (1) Steam feed rupture control system channel 2 integrated testing during the week ending April 9, 2022
- (2) Physics testing during power ascension during the week ending April 23, 2022
- (3) Emergency diesel generator 1 monthly test during the week ending April 30, 2022
- (4) Steam feed rupture control system channel 1 differential pressure inputs surveillance on May 16, 2022
- (5) Low pressure injection quarterly test during the week ending June 11, 2022

FLEX Testing (IP Section 03.02) (1 Sample)

- (1) Annual run of FX-P1A alternate low pressure flex emergency feed water pump and FX-P2A flex emergency feed water storage tank replenishment and spent fuel pool spray N+1 pump during the week ending 30 June, 2022

71114.02 - Alert and Notification System Testing

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

- (1) The inspectors evaluated the following maintenance and testing of the alert and notification system:
 - 2020 annual siren preventive maintenance (PM) results
 - 2021 annual siren PM results

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 emergency preparedness organization

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

71114.06 - Drill Evaluation

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

The inspectors evaluated:

- (1) Integrated drill on May 24, 2022

RADIATION SAFETY

71124.05 - Radiation Monitoring Instrumentation

Walkdowns and Observations (IP Section 03.01) (8 Samples)

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

- (1) ARGOS-5 number Li 2.12.112 at the main exit of the radiologically controlled area
- (2) SAM-11 number Li 2.12.54 at the main exit of the radiologically controlled area
- (3) GEM-5 number Li 2.12.115 at the main exit of the radiologically controlled area
- (4) AMP-100 number Li 2.7.502 in the calibration facility
- (5) Chronos-4 number Li 2.12.113 in the rad waste truck bay
- (6) Telepole Li.2.7.337 ready for issuance in radiation protection counting room
- (7) Area radiation monitor RE-8426 in the fuel handling building
- (8) Area radiation monitor RE-1998 in the auxiliary building

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

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

- (1) ARGOS 5-AB number Li 2.12.112
- (2) GEM-5 number Li 2.12.115
- (3) SAM-11 number Li 2.12.54
- (4) FUJI neutron detector number Li 2.7.682
- (5) AMP-100 number Li 2.7.502
- (6) Chronos-4 number Li 2.12.113

- (7) Whole body counter number Li 2.12.42
- (8) TopTrak air flow calibration standard number 65775
- (9) Benchtop counter model L-177 number Li 2.7.545
- (10) Benchtop counter model L-177 number Li 2.7.558
- (11) Failed fuel monitor number RE-1998
- (12) Control room normal air supply monitor number RE-4597
- (13) Containment air normal monitor number RE-4597

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) Batch tank liquid effluent monitor, RE-1878A
- (2) Station vent accident range noble gas monitor, RE-4598AB

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

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

- (1) January 1, 2021 through March 31, 2022

EP02: Emergency Response Organization (ERO) Drill Participation (IP Section 02.13) (1 Sample)

- (1) January 1, 2021 through March 31, 2022

EP03: Alert And Notification System (ANS) Reliability Sample (IP Section 02.14) (1 Sample)

- (1) January 1, 2021 through March 31, 2022

71152A - Annual Follow-Up Problem Identification and Resolution

Annual Follow-Up of Selected Issues (Section 03.03) (1 Sample)

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

- (1) February 5, 2022, forced downpower due to loss of letdown

71153 - Follow-Up of Events and Notices of Enforcement Discretion

Event Follow-Up (IP Section 03.01) (1 Sample)

- (1) The inspectors evaluated forced downpower and licensee's response on February 5, 2022

INSPECTION RESULTS

Licensee-Identified Non-Cited Violation	71114.02
<p>This violation of very low safety significance was identified by the licensee and has been entered into the licensee corrective action program and is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.</p>	
<p><u>Violation:</u></p> <p>On July 19, 2020, Ottawa County, Ohio notified the licensee that a single emergency siren sounded spuriously. On July 20, 2020, the licensee notified the Ottawa County Dispatch that the affected siren was out of service for repair. Title 10 CFR 50.72(b)(2)(xi) requires the licensee to report within four hours, any event related to the health and safety of the public for which notification to other government agencies has been made. Initially on July 19, the licensee concluded that the siren actuation was not reportable because less than 25 percent of the local population was affected. On July 20, the licensee reviewed the circumstances surrounding the siren, and concluded that 10 CFR 50.72(b)(2)(xi) applied and a four-hour report should have been made. NUREG-1022 includes as an example that an emergency notification is needed if county governments are informed of an actuation by concerned members of the public. The licensee made the notification at 1636 on July 20, 2020. The inspectors concluded that the failure to make the required four-hour notification in timely fashion was a performance deficiency. Because the violation impacted the regulatory process, in that the licensee failed to make a required report on time, the inspectors assessed the performance deficiency using traditional enforcement. The licensee entered the condition into the corrective action process as Condition Report 2020-05859. Corrective actions included clarifications to licensee procedures to prevent similar occurrences.</p> <p>Significance/Severity: Severity Level IV. The inspectors concluded that the finding was a Severity Level IV violation in accordance with the Enforcement Policy, which includes a failure to make a report required by 10 CFR 50.72 as an example of a SL IV violation. Because the licensee self-identified the condition, entered the condition in the corrective action program, and took action to address the causes, the inspectors concluded that the issue could be addressed as a licensee-identified non-cited violation.</p> <p>Corrective Action References: CR 2020-05859</p>	

Failure to Use Procedure during Loss of Letdown Event			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Event	Green FIN 05000346/2022002-01 Open/Closed	[H.8] - Procedure Adherence	71152A
<p>A self-revealed finding of very low safety significance (Green) was identified when the licensee failed to use procedures when responding to a loss of letdown. Specifically, the licensee failed to enter the annunciator response procedure and isolated letdown with valve MU2B instead of valves MU6 and MU4 per procedure. The licensee also failed to utilize procedures while attempting to restore letdown during the initial response to the loss of letdown.</p>			

Description:

On February 5, 2022, a switching of on-service purification demineralizers was performed. During operator performance of this evolution, letdown was inadvertently isolated. Letdown pressure raised above 150psig, sounding annunciator alarm 2-2-A, "Letdown Pressure High," and letdown system pressure relief valve MU-1890 lifted. The annunciator response procedure corresponding to annunciator 2-2-A, "Letdown Pressure High," was not entered. Entering the correct annunciator response procedure is required by NOP-OP-1002 "Conduct of Operations" revision 16. The annunciator response procedure, DB-OP-02002, 2-2-A, step 3.1 states, "verify MU-4, pressure reducing valve closed," and step 3.2 states "verify MU-6 letdown flow control valve closed." Operators did not reference a procedure but instead used their system knowledge and isolated letdown by closing letdown isolation valve MU-2B. Operators attempted to restore letdown by closing MU10A (1 purification demineralizer inlet), opening MU10B (2 purification demineralizer inlet), and then opened MU-2B. Makeup system pressure increased to 145psig, and indications of rising reactor coolant drain tank (RCDT) level again caused operators to isolate letdown with MU2B again. Operators then entered abnormal procedure DB-OP-02512 "Makeup and Purification System Malfunctions," section 4.3 "Loss of letdown flow path." Following the loss of letdown, the level in the pressurizer increased. When pressurizer level reached 228 inches, operators entered LCO 3.4.9 condition A "restore level to within limit" within 1 hour. Operators attempted to restore letdown again by opening MU104 purification demineralizer bypass and closing MU10B before opening MU2A and slowly raising letdown flow through MU6. Operators correctly diagnosed that letdown relief valve MU1890 failed to reseat based on indications of increasing RCDT level, and operators isolated letdown by closing MU6 and MU4. Operators again attempted to restore letdown through MU104 to allow mechanical agitation of MU1890 to seat the relief valve, but continuing indications of increasing RCDT level indicated MU1890 did not reseat. Operators then entered DB-OP-02504, "Rapid Shutdown," and commenced a power reduction at 10 percent per minute. Operators did not restore pressurizer level to within limit and entered LCO 3.4.9. condition B "be in mode 3 within 6 hours and be in mode 4 within 12 hours." Letdown was isolated by closing MU4 and MU6, and MU1890 was manually cycled and resealed. Letdown was then restored with a stable level in the RCDT. Pressurizer level was restored to within limits and LCO 3.4.9 was exited with reactor power at approximately 15 percent.

Corrective Actions: Corrective actions included the removal of operators from duty for training remediation including simulator training specific to alarm response and procedural adherence, revisions to operating procedures, and improved control board markings.

Corrective Action References: CR 2022-00879, "Abnormal procedure entries for loss of letdown flow path"

Performance Assessment:

Performance Deficiency: The inspectors reviewed this finding using the guidance contained in IMC 0612, "Issue Screening," Appendix B, "Issue Screening Directions," dated July 23, 2021. The inspectors determined that the licensee's failure to use procedures during the initial response to the loss of letdown constituted a performance deficiency that was reasonably within the licensee's ability to foresee and correct and should have been prevented. Specifically, the licensee failed to enter the annunciator response procedure for letdown pressure high requiring isolation with valve MU6 and valve MU4 but operators isolated letdown with valve MU2B by memory without procedural guidance.

Screening: The performance deficiency was more than minor in accordance with IMC 0612, "Issue Screening," Appendix B, "Issue Screening Directions," dated July 23, 2021, because, if left uncorrected the performance deficiency had the potential to lead to a more significant safety concern. Specifically, by not performing activities affecting quality in accordance with a procedure, the operators could improperly manipulate plant equipment and challenge plant safety by causing unexpected transients or impact safety-related equipment.

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors determined the finding to be of very low safety significance (Green) since it did not cause a reactor trip and the loss of mitigation equipment relied upon to transition the plant from the onset of the trip to a stable shutdown condition.

Cross-Cutting Aspect: H.8 - Procedure Adherence: Individuals follow processes, procedures, and work instructions. Specifically, the licensee failed to enter the annunciator response procedure for letdown pressure high during the initial response to loss of letdown.

Enforcement: Inspectors did not identify a violation of regulatory requirements associated with this finding.

Failure to Provide Adequate Procedural Instructions when Swapping Purification Demineralizer Trains

Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Initiating Events	Green NCV 05000346/2022002-02 Open/Closed	[H.2] - Field Presence	71152A

A self-revealed finding of very low safety significance (Green) and an associated non-cited violation (NCV) of Technical Specification (TS) 5.4.1(a) were identified for the licensee's failure to establish and implement procedural guidance for performing a change of the on-service purification demineralizer. Specifically, the guidance in licensee procedure DB-OP-6006, "Makeup and Purification System," revision 53, for switching purification demineralizers did not provide instructions to ensure that the purification demineralizer being placed on-service was not manually isolated. This lack of procedural guidance resulted in control room operators inadvertently isolating letdown because they failed to un-isolate the manually closed outlet valve of purification demineralizer 1 prior to putting it on-service. This resulted in high pressure in the letdown system, lifting of the relief valve MU-1890, and subsequent increase of pressurizer level to over 228 inches. This required the licensee to enter TS LCO 3.4.9 conditions A and B, resulting in a rapid reduction in power to roughly 15 percent.

Description:

On February 5, 2022, a switching of on-service purification demineralizers was performed. A turnover for the command senior reactor operator and the balance of plant reactor operator was conducted so they could participate in a concurrent fire brigade drill. A pre-job brief for swapping to purification demineralizer 1 was conducted in the control room. The brief did not include a discussion of the caution tagged purification demineralizer outlet isolation valve MU139 that was closed due to leak-by of purification demineralizer 1 inlet isolation valve MU10A. A pre-job brief form was not used as required by procedure. The demineralizer swap was performed per DB-OP-6006, "Makeup and Purification System," revision 53.

DB-OP-6006 does not have a step to address the plant conditions encountered, namely that MU139 purification demineralizer 1 outlet had been manually isolated for an extended period due to leak-by of purification demineralizer 1 inlet, MU10A. The procedure does have such a step applying to purification demineralizer 3 outlet, for similar leak-by conditions. Operators inadvertently isolated letdown when taking purification demineralizer 2 off service because the purification demineralizer 1 lineup was not complete due to MU139 being closed. Letdown pressure increased above 150 psig, resulting in annunciator alarm 2-2-A, "letdown pressure high." Operators attempted to restore letdown but were unsuccessful. Following the loss of letdown, the level in the pressurizer rose. When pressurizer level reached 228 inches, the operators appropriately entered LCO 3.4.9 condition A "restore level to within limit" within one hour. Operators did not restore pressurizer level to within limit and entered LCO 3.4.9 condition B, "be in mode 3 within 6 hours and be in mode 4 within 12 hours." Operators entered DB-OP-02504, "Rapid Shutdown," and commenced a power reduction at 10 percent per minute. During the rapid shutdown, letdown was reestablished, and pressurizer level was restored to within limits, allowing operators to exit LCO 3.4.9 conditions A and B. Reactor power was reduced to approximately 15 percent before the restoration of letdown and proper pressurizer level.

Corrective Actions: Corrective actions included the removal of operators from duty for training remediation, issuance of standing order 22-001 for crew engagement in briefs and observations of evolutions, revision of the system procedure (DB-OP-6006, "Makeup and Purification System," revision 55) to address manipulation of each purification demineralizer outlet valve as required if there is known leak-by of the inlet valve, control room crew reorganization and assessment, and senior crew mentor implementation.

Corrective Action References: CR 2022-00879, "Abnormal procedure entries for loss of letdown flow path"

Performance Assessment:

Performance Deficiency: The inspectors reviewed this finding using the guidance contained in IMC 0612, "Issue Screening," Appendix B, "Issue Screening Directions," dated July 23, 2021. The inspectors determined that the licensee's failure to provide adequate procedural instructions to plant operators for performing a change of the on-service purification demineralizer constituted a performance deficiency that was reasonably within the licensee's ability to foresee and correct and should have been prevented. Specifically, the licensee failed to provide procedural instructions to open purification demineralizer 1 outlet, MU 139, if it had been isolated due to leak-by of the purification demineralizer 1 inlet, MU 10A. However, the procedure has a step for purification demineralizer 3.

Screening: The inspectors determined the performance deficiency was more than minor in accordance with IMC 0612, "Issue Screening," Appendix B, "Issue Screening Directions," dated July 23, 2021, because it was associated with the configuration control (or human performance) 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. This issue is similar to example 4.b from IMC 0612 Appendix E, "Examples of Minor Issues."

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix A, "The Significance Determination Process (SDP) for Findings At-Power." The inspectors determined the finding had resulted in a transient initiator for the Initiating Events cornerstone and using, "Exhibit 1 - Initiating Events Screening Questions," determined that the finding was of very low safety significance (Green). Specifically, because the finding did result in a turbine trip, and not a reactor trip, the finding screened directly to Green without the need for a detailed risk evaluation.

Cross-Cutting Aspect: H.2 - Field Presence: Leaders are commonly seen in the work areas of the plant observing, coaching, and reinforcing standards and expectations. Deviations from standards and expectations are corrected promptly. Senior managers ensure supervisory and management oversight of work activities, including contractors and supplemental personnel.

Specifically:

- A procedural change order was in progress to address procedural inadequacies in DB-OP-6006 but was not yet implemented at the time of the event.
- The reactivity manipulation pre-job brief that occurred in the control room prior to the evolution did not accurately review the activity, or potential consequences, and supervision did not identify or correct the deviation from the standards and expectations.
- Concurrent fire drill and relief turnover distractions occurred that impacted the brief, peer checks, and supervisory oversight of the reactivity manipulation for changing purification demineralizers with no intervention of supervision to mitigate the distractions.

Enforcement:

Violation: Technical Specification Section 5.4.1.a requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. NRC Regulatory Guide 1.33, Revision 2, Appendix A, Section 3 addresses "Procedures for Startup, Operation, and Shutdown of Safety-Related PWR Systems, Instructions for energizing, filling, venting, draining, startup, shutdown, and changing modes of operation should be prepared, as appropriate, for the following systems," Section 3.n, addresses "Chemical and Volume Control System (including Letdown/Purification System)." The licensee established procedure DB-OP-6006, "Makeup and Purification System," revision 53, to provide instructions for operating the makeup and purification system.

Contrary to the above, between September 2, 2020 and February 7, 2022, the licensee failed to maintain a written procedure for the chemical and volume control system (including letdown/purification system). Specifically, the licensee failed to maintain procedure DB-OP-6006, "Makeup and Purification System," such that it accurately directed operations personnel to un-isolate purification demineralizer 1 if it was manually isolated by MU-139 outlet for purification demineralizer 1.

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

URI (Discussed)	Potential Adverse Changes During 2006 Emergency Diesel Generator Modifications URI 05000346/2021050-06	93812
<p>Description:</p> <p>The NRC continues to evaluate an unresolved item documented in inspection report 2021050-06 (ADAMS Accession Number ML21348A767). Generally, the staff is assessing the adequacy of the site's modification associated with the installation of the emergency diesel generator field flash selector switches.</p>		

EXIT MEETINGS AND DEBRIEFS

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

- On July 27, 2022, the inspectors presented the integrated inspection results to Mr. T. Brown, Site Vice President, and other members of the licensee staff.
- On March 18, 2022, the inspectors presented the ISI Exit Meeting inspection results to Mr. T. Brown, Site Vice President, and other members of the licensee staff.
- On May 16, 2022, the inspectors presented the radiation protection baseline inspection results to Mr. T. Brown, Site Vice President, and other members of the licensee staff.
- On July 1, 2022, the inspectors presented the emergency preparedness program inspection results to Mr. T. Brown, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Corrective Action Documents	2022-03619	BACC: Boric Acid Leak from DH154 Pipe Cap	04/26/2022
71111.04	Corrective Action Documents	2022-03714	Maintenance Rule Reviews for CREVS System	04/29/2022
71111.04	Corrective Action Documents	2022-03879	CREVS Refrigerant Line Insulation and Support Degradation	05/05/2022
71111.04	Procedures	DB-OP-06012	Decay Heat and Low-Pressure Injection System Operating Procedure	84
71111.04	Procedures	DB-OP-06013	Containment Spray System	28
71111.04	Procedures	DB-OP-06505	Control Room Emergency Ventilation System Procedure	22
71111.05	Fire Plans	PFP-AB-115	ECCS Pump Room 1-2, Rooms 115, Fire Area A-04	06
71111.05	Fire Plans	PFP-AB-428	Low Voltage Switchgear Room F – Bus, Room 428, Fire Area X	05
71111.05	Fire Plans	PFP-AB-429	Low Voltage Switchgear Room E – Bus, Room 429, Fire Area Y	05
71111.05	Fire Plans	PFP-AB-500	Radwaste and Fuel Handling Areas Air Supply Equipment Area, Room 500, Fire Area EE	05
71111.05	Fire Plans	PFP-AB-501	Radwaste Exhaust Equipment and Main Station Exhaust Fan Room, Rooms 501 and 501DC, Fire Area EE	06
71111.05	Fire Plans	PFP-AB-515	Purge Exhaust Equipment Room, Room 515, Fire Area EE	05
71111.05	Fire Plans	PFP-CB-214	Core Flooding Tank Area, Room 214, Fire Area D	06
71111.05	Fire Plans	PFP-CB-215	Let Down Coolers Area, Room 215, Fire Area D	06
71111.05	Fire Plans	PFP-CB-216	Steam Generator West D Ring Area, Room 216, Fire Area D	06
71111.05	Fire Plans	PFP-CB-218	Steam Generator East D Ring Area, Room 218, Fire Area D	06
71111.05	Fire Plans	PFP-CB-317	Containment Air Cooler Area, Room 317 and 317A, Fire Area D	08
71111.05	Fire Plans	PFP-CB-410	East Elevation 603' and Valve Room Elevation 636', Rooms 410 and 508, Fire Area D	05
71111.05	Fire Plans	PFP-CB-A208	Southwest Penetration Area of Annulus Space Elevations 585' and 603', Partial Room 127W, Fire Area AB	08
71111.05	Fire Plans	PFP-CB-A236H	East and Southwest Penetration Areas at Elevations 585' and 603', Partial Rooms 127W and 127W, Fire Area A and	08

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			AB	
71111.05	Fire Plans	PFP-CB-A236L	East Penetration Area of Annulus Space Elevations 585' and 603', Partial Room 127E, Fire Area A	05
71111.05	Fire Plans	PFP-CB-EL565	North Area 565' Elevation, Rooms 213, 217 and Normal Sump Area, Fire Area D	08
71111.05	Fire Plans	PFP-CB-EL603	Fuel Transfer Pool and North and West 603' Elevation, Rooms 219, 407 and 410A, Fire Area D	05
71111.08P	Corrective Action Documents	2022-02047	Foreign Material Found During Control Rod Guide Tube MRP-227-A Exam	04/08/2022
71111.08P	Engineering Evaluations	INR-DB1R22-001	Reactor Vessel – RPV Interior – Keys Examination	03/14/2022
71111.08P	Procedures	54-IISI-400-024	Multi-Frequency Eddy Current Examination of Tubing	12/07/2020
71111.08P	Procedures	54-ISI-808-000	Automated Phased Array Ultrasonic Examination of PPWR Vessel Shell Welds	03/24/2020
71111.08P	Procedures	54-ISI-809-000	Automated Phased Array Ultrasonic Examination of PWR Vessel Nozzle to Shell Welds from Nozzle Bore	03/24/2020
71111.08P	Procedures	NA-QC-00191	Liquid Penetrant Examination	9
71111.08P	Procedures	NOP-CC-5763	Appendix VIII Procedure for Ultrasonic Examination of Austenitic Pipe Welds	5
71111.08P	Procedures	NOP-CC-5765	Appendix VIII Procedure for Straight Beam Ultrasonic Examination of Bolts and Studs	6
71111.08P	Procedures	NOP-ET-2001	Boric Acid Corrosion Control Program	19
71111.08P	Procedures	WPS A8-2-1	Gas Tungsten (GTAW) of Stainless Steel (P8), Groove with or Without Backing	03
71111.12	Corrective Action Documents	2015-15566	Document NA of Step in DB-ME-09205 During YVA PM	11/15/2015
71111.12	Corrective Action Documents	2022-03731	Decay Heat Pump Problem Solving	04/29/2022
71111.12	Corrective Action Documents	2022-03860	X2 Replacement Board for YVB Found Bad	05/05/2022
71111.12	Corrective Action Documents	2022-03869	Document NA of Step in DB-ME-09205 During YVB PM	05/05/2022
71111.12	Corrective Action Documents	2022-04131	P42-2, 2 Decay Heat Oil Pump 2, Pump O/B Bearing Level Low	05/15/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.12	Corrective Action Documents	2022-04174	Turbine Building Ventilation Concerns	05/17/2022
71111.12	Corrective Action Documents	2022-04175	Annunciator 5-1-B Delayed During SFAS CH 1 Monthly Functional	05/17/2022
71111.12	Corrective Action Documents	2022-04452	YVB Normal Operations Light is Out	05/26/2022
71111.12	Corrective Action Documents	2022-04722	DH Pump 2 Pump O/B Oil Leak	06/09/2022
71111.12	Miscellaneous		80-9230400-90 Oscillator Board Technical Description	
71111.12	Procedures	DB-ME-09202	Maintenance of Essential SC1 UPS	10
71111.12	Procedures	DB-ME-09205	Maintenance of Inverters YVA and YVB	11
71111.13	Corrective Action Documents	2022 -04032	Main Feed Pump 2 Recirculation Valve FW438 Packing Leak	05/12/2022
71111.13	Drawings	OS-012A SH 1	Main Feedwater System	26
71111.13	Miscellaneous		IR22 Shutdown Defense In-Depth Report	00
71111.13	Procedures	NOP-OP-1007	Risk Management	36
71111.15	Corrective Action Documents	2020-01652	1R21 BACC: Boric Acid Crystals and Oil Underneath West Fuel Transfer Tube Flange	03/01/2020
71111.15	Corrective Action Documents	2020-01664	1R21 BACC: Fuel Transfer Tube 1-2 Flange	03/02/2020
71111.15	Corrective Action Documents	2022-03169	1R22 BACC: Active Leak in Refueling Canal/ Deep End	04/11/2022
71111.15	Corrective Action Documents	2022-03435	Main Feed Pump 2 Recirculation Valve FW438 Packing Leak	05/19/2022
71111.15	Corrective Action Documents	2022-03566	Minor Cooling Water Leak on Decay Heat Pump 2	04/24/2022
71111.15	Corrective Action Documents	2022-03570	AFPT 1 Steam Admission Valve Leak-By	04/24/2022
71111.15	Corrective Action Documents	2022-03614	Periodic Verification Testing of MS106, MS107 and MS107A Missed Frequency	04/26/2022
71111.15	Corrective Action Documents	2022-03669	Decay Heat Pump 1 IB/OB Bearings Constant Level Oilers Were Found Empty	04/28/2022
71111.15	Corrective Action Documents	2022-03704	RCP 1-2 Motor Lower Bearing High Oil Level Alarm	04/29/2022

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.15	Corrective Action Documents	2022-03879	CREVS Refrigerant Line Insulation and Support Degradation	05/05/2022
71111.15	Corrective Action Documents	2022-04128	RCP 1-2 Seal Leakage Increased Following CAC Swap/CAC 2 Monthly Testing	05/15/2022
71111.15	Corrective Action Documents	2022-04380	RCP 2-2 Seal Return TIRC17A2 Failed to Mid-Scale (Approx. 214 F)	05/24/2022
71111.15	Corrective Action Documents	2022-04523	Reactor Coolant Pump 1-2 Leakage Missed 1R22 Learning Opportunity	05/31/2022
71111.15	Corrective Action Documents	2022-04535	Main Steam Line 1 MS131 Leaks by the Closed Seat	06/01/2022
71111.15	Corrective Action Documents	2022-04574	Found CCW Train 1 Ventilation Damper Open with Fan Off	06/01/2022
71111.15	Corrective Action Documents	2022-04651	Component Cooling Water Pump 1 Outboard Bearing Oil Leak	06/06/2022
71111.15	Corrective Action Documents	2022-04668	Potentiometer Dead Spots Found While Cycling SBODG MOC	06/07/2022
71111.15	Corrective Action Documents	2022-04688	SBODG Overfilled with Lube Oil	06/07/2022
71111.15	Corrective Action Documents	2022-04691	DH Pump 2 Outboard Bearing Oil Leak	06/07/2022
71111.15	Corrective Action Documents	2022-04695	Foreign Material Identified in New Hoses for Replacement on SBODG	06/08/2022
71111.15	Corrective Action Documents	2022-04722	DH Pump 2 Pump O/B Oil Leak	06/09/2022
71111.15	Corrective Action Documents	2022-04759	Potential FME Falling into Cooling Tower Basin	06/09/2022
71111.15	Corrective Action Documents	2022-04788	Station Blackout Diesel Generator Water Jacket Specific Gravity High Out of Specification	06/10/2022
71111.15	Corrective Action Documents	2022-04789	Unexpected Alarm Received for Control Valve 4 Output Current Voting Mismatch	06/10/2022
71111.15	Corrective Action Documents	2022-04807	Entered DB-OP-02515 Reactor Coolant Pump And Motor Abnormal Operation Due to RCP 1-2 Third Stage Seal Pressure Lowering and Bringing in Computer Point P814	06/12/2022
71111.15	Miscellaneous	ODMI 22-02	Operation with Reactor Coolant Pump 1-2 Indications of	00

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Degraded Seal Performance	
71111.19	Corrective Action Documents	2022-03912	Service Water SW1357 Failed to Stroke Open	05/07/2022
71111.19	Corrective Action Documents	2022-04063	SW1357 Open Stroke Time Exceeded Maximum Time	05/13/2022
71111.19	Corrective Action Documents	2022-04101	Service Water SW1357 Nitrogen Supply Box Shield has Stripped, Broken Fasteners	05/13/2022
71111.19	Procedures	DB-PF-03027	Service Water Train 2 Valve Test	40
71111.20	Procedures	DB-MI-05253	Nuclear Instrumentation NI 06 (RPS Channel 1) Power Range Adjustment	15
71111.20	Procedures	DB-MI-05254	Nuclear Instrumentation NI 05 (RPS Channel 2) Power Range Adjustment	15
71111.20	Procedures	DB-MI-05255	Nuclear Instrumentation NI 08 (RPS Channel 3) Power Range Adjustment	15
71111.20	Procedures	DB-MI-05256	Nuclear Instrumentation NI 07 (RPS Channel 4) Power Range Adjustment	15
71111.20	Procedures	DB-NE-03212	Zero Power Physics Testing	13
71111.22	Corrective Action Documents	2022-04169	PDS-2686B Preconditioned During Performance of DB-MI-03203	05/16/2022
71111.22	Corrective Action Documents	2022-04169	PDS-2686B Preconditioned During Performance of DB-MI-03203	05/16/2022
71111.22	Procedures	DB-MI-03203	Channel Functional Test and Calibration of SFRCS Actuation Channel 1, Steam Generator Differential Pressure Inputs PDS-2686A, PDS-2686B, PDS-2685C AND PDS-2685D	18
71111.22	Procedures	DB-PF-03001	Main Steam Safety Valve Setpoint Test	10
71111.22	Work Orders	200821891	RT 11915 DB-FX-P1A Operational Inspection	05/04/2020
71111.22	Work Orders	200821891	RT 11915 DB-FX-P1A Operational Inspection	05/04/2020
71111.22	Work Orders	200822483	SFRCS Channel 2 Integrated Test	03/06/2022
71111.22	Work Orders	200825784	Decay Heat Train 2 Pump and Valve Test (Mode 1-3)	06/06/2022
71111.22	Work Orders	200842476	MI3203-001 08.000 CH1 SFRCS ACH1	05/16/2022
71111.22	Work Orders	200842476	MI3203-001 08.000 Channel 1 SFRCS ACH1	05/16/2022
71111.22	Work Orders	200860045	PM 5554 SP17A1 Test MSSVs	02/27/2022
71114.02	Corrective Action Documents	2020-03003	Communication Failure on Siren 803 and Battery Failures on Sirens 402&507	04/08/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71114.02	Corrective Action Documents	2020-05101	Siren Computer Remote Access Phone Lines Issues	06/16/2020
71114.02	Corrective Action Documents	2020-05859	Late 10 CFR 50.72 Notification of Siren Activation	08/20/2020
71114.02	Corrective Action Documents	2020-06246	DB Sirens 309 and 504 Reported False Failures	09/04/2020
71114.02	Corrective Action Documents	2021-00752	4 DB EPZ Sirens Indicated Chopper Motor Current Fail After the 02/05/2021 One Minute Audible Siren	02/05/2021
71114.02	Corrective Action Documents	2021-03470	Trending of Alert and Notification System (Sirens)	04/29/2021
71114.02	Corrective Action Documents	2021-04458	Trending of Alert and Notification System Sirens – Siren 504	06/04/2021
71114.02	Corrective Action Documents	2022-04213	DB Siren 2 Failure	05/18/2022
71114.03	Corrective Action Documents	2020-06204	Missed ERO 3rd Quarter Tabletop Drill	07/30/2020
71114.03	Corrective Action Documents	2020-06317	On Duty ERO Member Did Not Respond Appropriately	08/10/2020
71114.03	Corrective Action Documents	2021-03367	Emergency Response Organization Not Notified When Individual Assigned to On-Call Position Went on Short Term Leave	04/27/2021
71114.03	Corrective Action Documents	2021-03667	CANS Weekly Test Phone Call Issue	05/05/2021
71114.03	Corrective Action Documents	2021-03929	Individual Did Not Complete All Required Requalification Training to Support SCBA Quals	05/13/2021
71114.03	Corrective Action Documents	2021-04224	Strategic Engineer Call-Tree Individual Did Not Respond to Augmented Call-In Drill in a Timely Manner	05/25/2021
71114.03	Corrective Action Documents	2021-04233	RP Call-Tree Individual Did Not Respond to the Augmented Call-In Drill in a Timely Manner	05/25/2021
71114.03	Corrective Action Documents	2021-04271	Chemistry Call-Tree Individual Failed to Respond to Augmented Call-In Drill	05/26/2021
71114.03	Corrective Action Documents	2021-06935	Ops Advisor Call-Tree Position Individual Did Not Respond to the ERO Call-In Drill	09/15/2021
71114.03	Corrective Action	2021-09314	ERO Call-Tree Position Individual Did Not Respond to CANS	12/08/2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents		Call-In Drill	
71114.03	Corrective Action Documents	2022-01665	Effective Review for ERO Call-In Response Did Not Meet Success Metrics	03/03/2022
71114.03	Corrective Action Documents	ATA-2021-13077	4th Quarter 2021 Unannounced Call-In Drill	10/14/2021
71114.03	Miscellaneous	ATA-2020-12191	3rd Quarter 2020 Unannounced Call-In Drill	11/06/2020
71114.03	Miscellaneous	ATA-2020-15528	4th Quarter 2020 Unannounced Call-In Drill	12/19/2020
71114.03	Miscellaneous	ATA-2021-13075	2nd Quarter 2021 Unannounced Call-In Drill	04/12/2021
71114.03	Miscellaneous	ATA-2021-13076	3rd Quarter 2021 Unannounced Call-In Drill	07/01/2021
71114.03	Miscellaneous	ATA-2021-4521	1st Quarter 2021 Unannounced Call-In Drill	03/26/2021
71114.05	Corrective Action Documents	2021-01242	EP Drill: Drill Objective C.7 Not Met Due to Failing to Communicate Entire PAR	02/24/2021
71114.05	Corrective Action Documents	2021-01253	EP Drill: EOF Controller Interject For State and County Communication	02/24/2021
71114.05	Corrective Action Documents	2021-06491	EP Drill: CTRM Simulate Initial Notification Objective C.1 Met with Comments	08/27/2021
71114.05	Corrective Action Documents	2021-06496	EP Drill: Drill Objective F.6 Not Met for DA due to Controller Inject	08/27/2021
71114.05	Miscellaneous		DBNPS Emergency Plan	35
71114.05	Miscellaneous	ATA-2020-13695	2020 Medical Emergency Drill	11/06/2020
71114.05	Miscellaneous	ATA-2021-5276	EP Integrated Drill Evaluation	04/07/2021
71114.05	Miscellaneous	ATA-2021-5372	Evaluate 1st Quarter 2021 ERO Proficiency Table Top Drills	04/09/2021
71114.05	Miscellaneous	ATA-2022-10418	Evaluation the Performance of the ERO During the August 24, 2021 EP Integrated Drill	06/07/2022
71114.05	Miscellaneous	ATA-2022-10737	3rd Quarter 2021 ERO Proficiency Tabletop Drill Summary	06/11/2022
71114.05	Miscellaneous	ATA-2022-9175	Assess the Performance During the 2021 Post-Accident Sample Drills	05/15/2022
71114.05	Miscellaneous	ATA-2022-9176	Evaluated Performance During October 15, 2021, Ops DA Focus Area Drill	05/15/2022
71114.05	Miscellaneous	CA-SA-DB-2020-0005	2020 RMT Environmental Sample Drill Results	10/13/2020
71114.05	Miscellaneous	DBRM-EMER-1500A	Davis-Besse Emergency Action Level Basis Document	09
71114.05	Miscellaneous	RA-EP-01500	Davis-Besse Nuclear Power Station Emergency Plan	16

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
			Implementing Procedure	
71114.06	Corrective Action Documents	2022-04375	Simulator Malfunction Could Not be Removed During an Evaluated Scenario	05/24/2022
71114.06	Corrective Action Documents	2022-04396	EP Drill 5/24/22 Integrated Drill UE Classification	06/24/2022
71114.06	Corrective Action Documents	2022-04403	EP Drill Simulator Computer Point Did Not Display Correctly	06/24/2022
71114.06	Corrective Action Documents	2022-04413	05/24/22 EP Integrated Drill Started 1 Hour Late Due to Phone Issues in Simulator	05/25/2022
71114.06	Corrective Action Documents	2022-04415	EP Drill – Incorrect Release Path Analyzed Caused Missed Drill Objective F.13	05/25/2022
71114.06	Miscellaneous		Davis-Besse Nuclear Power Station Drill/Exercise May 24, 2022	05/24/2022
71124.05	Calculations	Library 105	Gamma Spectroscopy Nuclide Library	01
71124.05	Calibration Records	LI 2.12.112	ARGOS-5 Calibration Record	12/31/2020
71124.05	Calibration Records	LI 2.12.112	ARGOS-5 Calibration Record – Partial Calibration Completed for Detector Replacement	03/05/2021
71124.05	Calibration Records	LI 2.12.112	ARGOS-5 Calibration Record	01/19/2022
71124.05	Calibration Records	LI 2.12.113	Chronos-4 Calibration Record	10/08/2020
71124.05	Calibration Records	LI 2.12.113	Chronos-4 Calibration Record	10/19/2021
71124.05	Calibration Records	LI 2.12.115	GEM-5 Calibration Record	02/04/2021
71124.05	Calibration Records	LI 2.12.115	GEM-5 Calibration Record	02/11/2022
71124.05	Calibration Records	LI 2.12.42	Whole Body Counter Calibration Record	11/03/2021
71124.05	Calibration Records	LI 2.12.42	Whole Body Counter Calibration Record	02/28/2022
71124.05	Calibration Records	LI 2.12.54	SAM-11 Calibration Record	07/21/2021

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71124.05	Calibration Records	LI 2.7.233	ASP-1 with Neutron Radiation Detector Calibration Record	04/14/2021
71124.05	Calibration Records	LI 2.7.233	ASP-1 with Neutron Radiation Detector Calibration Record	07/08/2021
71124.05	Calibration Records	LI 2.7.502	Amp-100 Calibration Record	03/01/2022
71124.05	Calibration Records	LI 2.7.502	AMP-100 Calibration Record	03/01/2021
71124.05	Calibration Records	LI 2.7.545	Model L-177 Stationary Frisker Calibration Record	01/04/2021
71124.05	Calibration Records	LI 2.7.545	Model L-177 Stationary Frisker Calibration Record	01/03/2022
71124.05	Calibration Records	LI 2.7.558	Model L-177 Stationary Frisker Calibration Record	02/22/2021
71124.05	Calibration Records	LI 2.7.558	Model L-177 Stationary Frisker Calibration Record	02/11/2022
71124.05	Calibration Records	LI 2.7.682	FUJI Electric Model NSN3 Calibration Record	11/08/2021
71124.05	Calibration Records	M&TE FAF0047	Calibration of Mass Thermal Flowmeter	09/21/2022
71124.05	Corrective Action Documents	2020-07352	RE5328A Will Not Calibrate	09/21/2020
71124.05	Corrective Action Documents	2020-07798	Station Vent Flow Computer Point F885 Step Change	10/08/2020
71124.05	Corrective Action Documents	2020-07980	2020 D-B Mid-Cycle Assessment Observation – Radiation Element Belt Guards	10/14/2020
71124.05	Corrective Action Documents	2020-08509	RE4597A Flow Reg Valve is >60 Percent Open	11/02/2020
71124.05	Corrective Action Documents	2020-09062	RP Section Gamma-Spec Failed Daily QC Check	11/25/2020
71124.05	Corrective Action Documents	2020-09113	Gamma-Spec Failed Daily QC Check	11/29/2020
71124.05	Corrective Action Documents	2020-09482	451B 2.7.525 Failed Source Check	12/15/2020

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71124.05	Corrective Action Documents	2020-09645	HPGe 3 (Radiation Protection) Failed Daily Source Check	12/22/2020
71124.05	Corrective Action Documents	2021-00174	Gamma-Spec Failed Daily Quality Control Check	01/10/2021
71124.05	Corrective Action Documents	2021-00727	J.L. Shepherd Model 89 Gamma Irradiator Safety Lock Failure	02/04/2021
71124.05	Corrective Action Documents	2021-01230	RE4597BA Flow Regulating Valve is >60 Percent Open	02/24/2021
71124.05	Corrective Action Documents	2021-08786	IPA Quarterly Trending – Radiation Monitoring Equipment	11/17/2021
71124.05	Corrective Action Documents Resulting from Inspection	2022-04055	NRC Identified: Full Standardization of the Model 89 Calibrator	05/12/2022
71124.05	Corrective Action Documents Resulting from Inspection	2022-04146	NRC Identified: DB-HP-04029 Inconsistencies	05/16/2022
71124.05	Corrective Action Documents Resulting from Inspection	2022-04147	NRC Identified: Documentation of Dose Study for Measuring RE4598 Grab Samples	05/16/2022
71124.05	Miscellaneous	DB-0395-2	Model 89 Standardization Check	01/13/2022
71124.05	Miscellaneous	DB-0395-2	Model 89 Standardization Check	01/15/2021
71124.05	Miscellaneous	Interlab Cross Check Program	Results of Radiochemistry Cross Check Program	01/01/2020 – 12/31/2021
71124.05	Miscellaneous	NOP-OP-3201-06	2020 and 2021 Interlaboratory Testing Program Results	01/01/2020 – 12/31/2021
71124.05	Procedures	DB-0500-0	Instrument Evaluation Form	00
71124.05	Procedures	DB-HP-00010	Radiation Measuring and Test Equipment Calibration and Control Program	12
71124.05	Procedures	DB-HP-01103	Use of Portable Radiation, Contamination, and Airborne Survey Equipment	07
71124.05	Procedures	DB-HP-01407	Calibration and Use of the J.L. Shepherd Model 89	09

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71124.05	Procedures	DB-HP-01458	Ludlum Model 2000 Portable Scaler Operation and Calibration	02
71124.05	Procedures	DB-HP-1407	Calibration and Use of the J.L. Shepherd Model 89	09
71124.05	Procedures	DB-MI-04559	Channel Calibration if RE-1998 (Failed Fuel)	19
71124.05	Procedures	DBBP-RP-1007	Meter Source and Response Testing	48
71124.05	Procedures	NOP-OP-4416	ARGOS-5 Personnel Contamination Monitor Calibration and Use	00
71124.05	Work Orders	200761572	DB-HP4029-001 Review Rad Monitor Setpoints	12/30/2020
71151	Miscellaneous		NRC Performance Indicator Data; Emergency Preparedness Drill/Exercise Performance	01/01/2021 – 03/30/2022
71151	Miscellaneous		NRC Performance Indicator Data; Emergency Preparedness: ERO Participation Drill	01/01/2021 – 03/30/2022
71151	Miscellaneous		NRC Performance Indicator Data; Emergency Preparedness: Alert and Notification System	01/01/2021 – 03/30/2022
71152A	Corrective Action Documents	2022-00879	Abnormal Procedure Entries for Loss of Letdown Flow Path	02/05/2022
71152A	Corrective Action Documents	2022-00879	Abnormal Procedure Entries for Loss of Letdown Flow Path	02/05/2022
71152A	Procedures	DB-OP-01003	Operations Procedure Use Instructions	16
71152A	Procedures	DB-OP-02002	Letdown/Makeup Alarm Panel 2 Annunciators	15
71152A	Procedures	DB-OP-02512	Makeup and Purification System Malfunctions	19
71152A	Procedures	DB-OP-06006	Makeup and Purification System	56
71152A	Procedures	DBBP-DCU-0109	Processing Engineering Change Packages	33
71152A	Procedures	NOBP-OP-0012	Operator Work-Arounds, Burdens, Control Room Deficiencies and Operations Aggregate Assessment	09
71152A	Procedures	NOBP-SS-4001	Change Management	04
71152A	Procedures	NOP-LP-2601	Procedure/Work Instruction Use and Adherence	08
71152A	Procedures	NOP-OP-1001	Clearance/Tagging Program	34
71152A	Procedures	NOP-OP-1002	Conduct of Operations	16 & 17
71152A	Procedures	NOP-OP-1014	Plant Status Control	08