



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

November 14, 2023

Joseph Sullivan, Site Vice President  
Entergy Operations, Inc.  
17265 River Road  
Killona, LA 70057

**SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – INTEGRATED  
INSPECTION REPORT 05000382/2023003 AND NOTICE OF VIOLATION**

Dear Joseph Sullivan:

On September 30, 2023, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Waterford Steam Electric Station, Unit 3. On October 16, 2023, 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 inspection report.

The enclosed report discusses a violation associated with a finding of very low safety significance (Green). The NRC evaluated this violation in accordance with Section 2.3.2 of the NRC Enforcement Policy, which can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in Enclosure 1, Notice of Violation (Notice). The violation did not meet the criteria to be treated as a non-cited violation because Entergy Operations, Inc. (licensee) failed to periodically calibrate and process radiation monitors in a timely manner to restore compliance from the previous non-cited violation. Specifically, the licensee failed to ensure that instruments (33 area and radiation monitors) and equipment used for quantitative radiation measurements were calibrated periodically for the radiation measured.

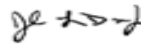
You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response. The NRC's review of your response will also determine whether further enforcement action is necessary to ensure your compliance with regulatory requirements.

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 IV; the Director, Office of Enforcement; and the NRC Resident Inspector at Waterford Steam Electric Station, Unit 3.

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 IV; and the NRC Resident Inspector at Waterford Steam Electric Station, Unit 3.

This letter, its enclosures, 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 Dixon, John  
on 11/14/23

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

Docket No. 05000382  
License No. NPF-38

Enclosures:

- 1) Notice of Violation
- 2) Inspection Report 05000382/2023003

cc w/ encl: Distribution via LISTSERV

WATERFORD STEAM ELECTRIC STATION, UNIT 3 – INTEGRATED INSPECTION REPORT  
05000382/2023003 AND NOTICE OF VIOLATION – DATED NOVEMBER 14, 2023

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## NOTICE OF VIOLATION

Entergy Operations, Inc.  
Waterford Steam Electric Station, Unit 3

Docket No. 05000382  
License No. NPF-38

During an NRC inspection conducted from July 1 through September 30, 2023, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 20.1501(c) states, in part, that the licensee shall ensure that instruments and equipment used for quantitative radiation measurements are calibrated periodically for the radiation measured.

Contrary to the above, from November 2021 to September 30, 2023, the licensee failed to ensure that instruments (radiation monitors) and equipment used for quantitative radiation measurements were calibrated periodically for the radiation measured. Specifically, the licensee failed to periodically calibrate 33 area and process radiation monitors.

This violation is associated with a Green significance determination process finding.

Pursuant to 10 CFR 2.201, Entergy Operations, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, and the NRC Resident Inspector at Waterford Steam Electric Station, Unit 3 and email it to [R4Enforcement@nrc.gov](mailto:R4Enforcement@nrc.gov) within 30 days of the date of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation, NRC Inspection Report 05000382/2023003," and should include for the violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in the Notice of Violation, the NRC may issue an order or a demand for information requiring you to explain why your license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with your basis for denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's ADAMS, accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you are required to post this Notice of Violation within 2 working days of receipt.

Dated this 14th day of November 2023

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

Docket No. 05000382

License No. NPF-38

Report No. 05000382/2023003

Enterprise Identifier: I-2023-003-0009

Licensee: Entergy Operations, Inc.

Facility: Waterford Steam Electric Station, Unit 3

Location: Killona, LA 70057

Inspection Dates: July 1, 2023, to September 30, 2023

Inspectors: C. Alldredge, Health Physicist  
D. Childs, Resident Inspector  
C. Harrington, Operations Engineer  
S. Hedger, Sr Emergency Preparedness Inspector  
J. O'Donnell, Senior Health Physicist  
A. Patz, Senior Resident Inspector  
H. Strittmatter, Emergency Preparedness Inspector  
T. Weir, Physical Security Inspector  
D. You, Operations Engineer

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

## SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at Waterford Steam Electric Station, Unit 3, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

### List of Findings and Violations

Failure to Periodically Calibrate Radiation Monitors			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Occupational Radiation Safety	Green NOV 05000382/2023003-01 Open	[P.3] - Resolution	71124.05
The inspectors identified a violation (Green) of 10 CFR 20.1501(c) for failure to periodically calibrate area, process, and effluent radiation monitoring equipment used to perform (e.g., dose rate and effluent monitoring) measurements. Specifically, on or around July 2006, the licensee began changing the periodic calibrations of process, effluent, and area radiation monitors without proper technical justification or documented bases.			

### Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
LER	05000382/2022-001-02	Non-Compliance with Technical Specifications Due to Incorrect Procedural Guidance for Radiation Monitors	71153	Closed
LER	05000382/2022-001-01	Non-Compliance with Technical Specifications Due to Incorrect Procedural Guidance for Radiation Monitors	71153	Closed
LER	05000382/2022-001-00	Non-Compliance with Technical Specifications Due to Incorrect Conversion Factors in Three Gaseous Radiation Monitors	71153	Closed

## PLANT STATUS

Unit 3 operated at or near rated thermal power 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

### 71111.04 - Equipment Alignment

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

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

- (1) emergency diesel generator B during emergency diesel generator A planned outage from August 7-8, 2023
- (2) auxiliary component cooling water train B and component cooling water train B following unplanned failure of auxiliary component cooling water pump A on August 31, 2023

### 71111.05 - Fire Protection

#### Fire Area Walkdown and Inspection Sample (IP Section 03.01) (1 Sample)

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) fire area RAB-22-001, elevation +21.00' reactor auxiliaries building drumming station (hot tool room) on August 4, 2023

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

#### Requalification Examination Results (IP Section 03.03) (1 Sample)

- (1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam administered on June 19, to July 20, 2023.



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

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

#### (1) Biennial Requalification Written Examinations

The inspectors evaluated the quality of the licensed operator biennial requalification written examination administered on June 28, 2023.

#### Annual Requalification Operating Tests

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

#### Administration of an Annual Requalification 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 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 reactor trip circuit breaker testing and during preparations for a planned outage of emergency diesel generator A on August 6, 2023.

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

- (1) The inspectors observed and evaluated licensed operator simulator training involving a component cooling water pump room fire and a faulted steam generator tube rupture general emergency on August 15, 2023.

## 71111.13 - Maintenance Risk Assessments and Emergent Work Control

### Risk Assessment and Management Sample (IP Section 03.01) (3 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) elevated green risk due to a planned emergency diesel generator A outage from August 7-9, 2023
- (2) yellow risk due to heavy work in the Waterford switchyard concurrent with safety-related equipment surveillances from August 14-18, 2023
- (3) yellow risk due to unplanned failure of component cooling water cross-connect valve between pump A and pump AB from September 20-21, 2023

## 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) high pressure safety injection train A operability following high leakage during testing on July 11, 2023
- (2) containment spray pump A operability following identification of low component cooling water flow on July 25, 2023
- (3) reactor protection system operability following identification of errors in the steam generator narrow range reactor trip setpoint on August 9, 2023
- (4) startup transformers A and B following failure and isolation of multiple 230 kV breakers in the Waterford switchyard on September 14, 2023

## 71111.18 - Plant Modifications

### Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (1 Sample)

The inspectors evaluated the following temporary or permanent modifications:

- (1) auxiliary component cooling water pump A motor was replaced with the component cooling water pump AB motor on September 4, 2023

## 71111.24 - Testing and Maintenance of Equipment Important to Risk

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

### Post-Maintenance Testing (PMT) (IP Section 03.01) (8 Samples)

- (1) control room air conditioning train B following unplanned failure to start of air handler AH-12B on July 20, 2023
- (2) high pressure safety injection pump A following relief valve replacement on July 27, 2023
- (3) dry cooling tower fan 11B after planned maintenance on August 16, 2023
- (4) emergency diesel generator B after planned maintenance on August 23, 2023
- (5) auxiliary component cooling water pump A following failure of motor on September 4, 2023
- (6) containment particulate radiation monitors following failure on September 25, 2023
- (7) containment fan cooling train B following failure of temperature control valve on September 26, 2023
- (8) spent fuel pool pump B following pump replacement on September 28, 2023

### Surveillance Testing (IP Section 03.01) (3 Samples)

- (1) high pressure safety injection pump B on July 26, 2023
- (2) reactor trip circuit breaker testing on August 6, 2023
- (3) emergency diesel generator A overspeed testing on August 10, 2023

### Reactor Coolant System Leakage Detection Testing (IP Section 03.01) (1 Sample)

- (1) reactor coolant system leakage calculation on July 20, 2023

## 71114.01 - Exercise Evaluation

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

- (1) The inspectors evaluated the biennial emergency plan exercise conducted on June 21, 2023. The exercise scenario simulated a reactor coolant pump seal failure followed by a loss of coolant accident, increasing plant and containment radiation levels, multiple failures in high pressure safety injection sub-systems, followed by continued escalating containment radiation levels coupled with a loss of containment spray function. This scenario was complicated later with a penetration failure in containment, involving a simulated radiological release offsite. The licensee

completed its critique process for the exercise on July 10, 2023, and the inspectors subsequently evaluated the effectiveness of the critique process to identify performance weaknesses and deficiencies to ensure they were entered into the corrective action program for resolution.

This documents completion of this inspection sample which was documented as a partial sample in Inspection Report 05000382/2023002 (ADAMS Accession No. ML23216A106).

#### 71114.06 - Drill Evaluation

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

- (1) The inspectors evaluated an emergency preparedness drill involving an earthquake and spent fuel pool loss of coolant inventory on August 30, 2023

##### Drill/Training Evolution Observation (IP Section 03.02) (2 Samples)

The inspectors evaluated:

- (1) simulator based training for a loss of reactor coolant accident on August 29, 2023
- (2) simulator based training for a security threat and automatic failure to shut down the reactor on September 6, 2023

## **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) portable survey instruments "ready for use" at the west side access to the radiologically controlled area
- (2) portable survey instruments in storage, but "available for use" in the instrument lab
- (3) area radiation monitors in auxiliary building
- (4) process radiation monitors in the auxiliary building
- (5) effluent radiation monitors in the auxiliary building
- (6) personnel contamination monitors at the exit(s) to the radiologically controlled area (east and west)
- (7) chemistry count room instruments (gamma spectroscopy and liquid scintillation)
- (8) portal monitors and friskers at the exit to the protected area

##### Calibration and Testing Program (IP Section 03.02) (12 Samples)

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

- (1) Ludlum Model 177, CHP-CR-192, frisker

- (2) Ludlum Model 3030, CHP-C-060, scaler
- (3) Thermo Scientific AMS-4, HP-RD-264, continuous air sampler
- (4) Mirion TelePole II, CHP-TEL173, wide range telescopic survey meter
- (5) Ludlum Model 9-3, CHP-Dr-400, ion chamber
- (6) Ludlum Model 12-4, CHP-MF-154, neutron dose rate
- (7) Mirion iSolo, HP-CS-020, scaler
- (8) Mirion GEM-5, HP-DS-094, gamma exit monitor
- (9) Mirion ARGOS-5AB, HP-DS-103, personnel contamination monitor
- (10) Mirion CRONOS, HP-DS-110, tool/equipment monitor
- (11) General Atomic ARMIR0300,2, fuel handling building airborne isolation radiation monitor
- (12) General Atomic ARMIR5500-A, main steam line radiation monitor

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

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

- (1) PRMIR0647, waste condensate and laundry waste discharge radiation monitor
- (2) PRMIR5700, component cooling water loop return header radiation monitor

71124.08 - Radioactive Solid Waste Processing & Radioactive Material Handling, Storage, & Transportation

Radioactive Material Storage (IP Section 03.01) (3 Samples)

The inspectors evaluated the licensee's performance in controlling, labeling, and securing the following radioactive materials:

- (1) intermodal containers containing oil drums, dry active waste, and outage supplies and shielding of boxes and refuel equipment in the west yard and south yard
- (2) source storage lockers and J.L. Shepherd calibrator in primary chemistry lab.
- (3) two process shields for resin and one process shield for filter in the solidification building

Radioactive Waste System Walkdown (IP Section 03.02) (1 Sample)

The inspectors walked down the following accessible portions of the solid radioactive waste systems and evaluated system configuration and functionality:

- (1) liquid waste management system and portions of the resin waste management system

Waste Characterization and Classification (IP Section 03.03) (3 Samples)

The inspectors evaluated the following characterization and classification of radioactive waste:

- (1) reactor coolant system 2023 10 CFR Part 61 waste stream
- (2) liquid waste management 2023 Part 61 waste stream
- (3) resin waste management 2022 Part 61 waste stream

#### Shipment Preparation (IP Section 03.04)

No shipment was available for observation during this inspection.

#### Shipping Records (IP Section 03.05) (4 Samples)

The inspectors evaluated the following non-excepted radioactive material shipments through a record review:

- (1) RSN-22-1010 dry active waste/metal, May 19, 2022
- (2) RSN-22-1017 CVC resin, July 28, 2022
- (3) RSN-23-1001 dry active waste/metal, April 5, 2023
- (4) RSN-23-2048 reactor coolant pump seal, September 7, 2022

### **OTHER ACTIVITIES – BASELINE**

#### 71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

#### MS08: Heat Removal Systems (IP Section 02.07) (1 Sample)

- (1) Unit 3 (July 1, 2022, through June 30, 2023)

#### MS09: Residual Heat Removal Systems (IP Section 02.08) (1 Sample)

- (1) Unit 3 (July 1, 2022, through June 30, 2023)

#### MS10: Cooling Water Support Systems (IP Section 02.09) (1 Sample)

- (1) Unit 3 (July 1, 2022, through June 30, 2023)

#### 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 that might be indicative of a more significant safety issue. The inspectors performed an in-depth review of repeat equipment failures. During this review, the inspectors noted an adverse trend in the number of issues that fail at least twice. This trend is detailed in an observation in the results section of this report. No more than minor concerns were identified.

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

#### Event Report (IP section 03.02) (1 Sample)

The inspectors evaluated the following licensee event reports (LERs):

- (1) LER 05000382/2022-001-00, 05000382/2022-001-01, and 05000382/2022-001-02, Non-Compliance with Technical Specifications Due to Incorrect Procedural Guidance for Radiation Monitors (ADAMS Accession No. ML23053A354). The inspection conclusions associated with this LER and two updates are documented in Inspection Report 05000382/2023040. An additional inspection conclusion regarding reporting timeliness is documented in this report under Inspection Results Section 71153. This LER and updates are closed.

**INSPECTION RESULTS**

Failure to Periodically Calibrate Radiation Monitors			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Occupational Radiation Safety	Green NOV 05000382/2023003-01 Open	[P.3] - Resolution	71124.05
<p>The inspectors identified a violation (Green) of 10 CFR 20.1501(c) for failure to periodically calibrate area, process, and effluent radiation monitoring equipment used to perform (e.g., dose rate and effluent monitoring) measurements. Specifically, on or around July 2006, the licensee began changing the periodic calibrations of process, effluent, and area radiation monitors without proper technical justification or documented bases.</p> <p><u>Description:</u> As a result of the previous radiation safety inspection conducted in November 2021, the licensee was issued a non-cited violation (NCV) for failure to ensure monitors used for quantitative radiation measurements were calibrated periodically for the radiation measured. The failure to periodically calibrate area, process, and effluent radiation monitors was documented in inspection report 05000382/2021004 as NCV 05000382/2021004-01, "Failure to Periodically Calibrate Radiation Monitors," (ADAMS Accession Number ML22028A000). The original violation documented 29 of 41 radiation monitors as being overdue on their required calibration frequencies. This NCV was entered into the licensee's corrective action program as condition report CR-WF3-2022-00851.</p> <p>There were two aspects to the prior NCV: (1) the changing of the calibration frequencies without technical justification and (2) the failure to periodically calibrate the radiation monitors themselves. During the onsite inspection, July 24-28, 2023, the inspectors determined the aspect of changing the calibration frequencies without a technical justification was addressed by the licensee. The licensee's Final Safety Analysis Report in chapter 11, section 2.5.2 specified an 18-month calibration frequency for process and effluent monitors. The inspectors reviewed several change requests, dated October 21, 2021, to remove the unjustified extension of the calibration frequencies, specifically the 6.75-year and 9-year frequencies. These change requests were more encompassing and included more than the 41 radiation monitors as described in the prior NCV. The change requests were submitted through the licensee's preventive maintenance program which included a work order process to schedule the calibrations at specified frequencies. However, the inspectors determined that the licensee had not periodically calibrated the radiation monitors within their specified frequencies.</p> <p>The NRC Enforcement Policy (Accession Number ML22336A179), section 2.3.2.a described the conditions that allow the NRC to issue NCVs to licensees with credited corrective action programs. Section 2.3.2.a.2 states, in part, that the licensee must restore compliance (or demonstrate objective evidence of plans to restore compliance) within a reasonable period</p>			

after a violation has been identified.

Since November 2021, the licensee had not demonstrated progress toward restoring compliance by calibrating the overdue radiation monitors. The inspectors determined approximately 68 percent of the 41 radiation monitors were outside their new calibration frequencies. In addition, the information requested by the inspectors showed that only one of the 29 radiation monitors had been calibrated since the previous inspection.

During the review of the licensee's progress toward restoring compliance, the licensee provided information on the calibration status of 44 area and process radiation monitors not specifically covered by technical specifications, technical requirements manual, or the offsite dose calculation manual. Of the 44 radiation monitors described, 33 were shown as past due for the new calibration frequencies, with three additional radiation monitor calibrations due within two months after the inspection. This information also showed that 20 of the 33 monitors were already beyond the 6.75-year frequency. Of these 20, three exceeded the 9-year frequency and six were simply identified as greater than 8 years.

The licensee's preventive maintenance program and work order process failed to adequately schedule and complete the radiation monitor calibrations in a timely manner to restore compliance. The prior violation had identified 29 radiation monitors overdue at the time of that inspection. Of the 29 radiation monitors, four were process radiation monitors that required repair prior to calibration. The inspectors observed two of these process radiation monitors not functioning (turned off) during one of the walkdowns (plant tours). In the 20 months since the previous inspection, the calibration of process radiation monitors should have been conducted at least once with an 18-month calibration frequency.

Corrective Actions: The prior NCV's corrective action focused on correcting the calibration frequency in the work management process. At the conclusion of the current inspection, the licensee had calibrated only one radiation monitor as identified in the previous NCV within the last 20 months (since November 2021). The licensee has entered this repetitive issue in their corrective action program to create a plan to restore compliance with 10 CFR 20.1501(c).

Corrective Action References: CR-WF3-2023-14818

Performance Assessment:

Performance Deficiency: Failure to periodically calibrate area and process radiation monitors in accordance with license commitments and regulatory requirements.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the Plant Facilities/Equipment and Instrumentation attribute of the Occupational Radiation Safety cornerstone and adversely affected the cornerstone objective to ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. Specifically, an ineffective radiation program barrier was identified when radiation monitors were observed to be non-functional (i.e., turned off).

Significance: The inspectors assessed the significance of the finding using IMC 0609 Appendix C, "Occupational Radiation Safety SDP." The inspectors determined the finding had a very low safety significance (Green) because: (1) it was not associated with ALARA planning and work controls, (2) it was not an overexposure, (3) there was no potential for an overexposure; and (4) the ability to assess dose was not compromised.



Cross-Cutting Aspect: P.3 - Resolution: The organization takes effective corrective actions to address issues in a timely manner commensurate with their safety significance. Specifically, the licensee failed to schedule and perform timely calibrations of radiation monitors to restore compliance from a previous NCV documented in CR-WF3-2022-00851.

Enforcement:

Violation: Title 10 CFR 20.1501(c) states, in part, that the licensee shall ensure that instruments and equipment used for quantitative radiation measurements are calibrated periodically for the radiation measured.

Contrary to the above, from November 2021 to September 30, 2023, the licensee failed to ensure that instruments (radiation monitors) and equipment used for quantitative radiation measurements were calibrated periodically for the radiation measured. Specifically, the licensee failed to periodically calibrate 33 area and process radiation monitors.

Enforcement Action: This violation is being cited because the licensee failed to restore compliance within a reasonable period after the violation was identified consistent with Section 2.3.2 of the Enforcement Policy.

Observation:

71152S

The inspectors reviewed the licensee's corrective action program to identify performance trends that might indicate the existence of a more significant safety issue. The inspectors noted a trend in human performance. Specifically, the inspectors noted six events in which the licensee had repeat issues that significantly impacted plant operations over the last cycle, from May 2022 to October 2023. Examples include:

- CR-WF3-2022-04112: Auxiliary component cooling water pump B failed due to a bearing high temperature on May 8, 2022. The bearing was repaired and failed again on May 23, 2022.
- CR-WF3-2022-05956: Control element assembly 45 caused an alarm in the control room for high voltage on December 9, 2021. The assembly was returned to normal service and the issue repeated on August 18, 2022.
- CR-WF3-2022-06302: Plant protection system power supply 28 tripped on overvoltage on April 1, 2021. The licensee attempted to identify the cause during the subsequent refueling outage. The power supply tripped again on overvoltage on September 6, 2022.
- CR-WF3-2023-15308: One of the two let down pressure control valves failed on August 27, 2023. The licensee identified water in the compressed air line and returned the valve to service. The valve caused another transient on August 31, 2023.
- CR-WF3-2023-15909: Spent fuel pool pump B experienced leakage issues on March 24, 2023. The reworked pump was brought back onsite after 6 months and had similar issues on September 28, 2023.
- CR-WF3-2023-15947: The train B containment fan cooler flow control valve was not providing adequate flow rates on September 19, 2023. The valve was returned to service and exhibited issues again on October 2, 2023.

The inspectors did not identify any findings or more-than-minor violations. The licensee identified and performed initial corrective actions as well as follow-up corrective actions for all

these issues. In response to this observation, the licensee documented the trend in CR-WF3-2023-16108.

Minor Violation

71153

**Minor Violation**

Minor Violation: All safety-related radiation monitors were being examined as part of an extent of condition review beginning in January 2022 following identification of incorrect engineering conversion factors for multiple wide range gas monitors. These issues were first described in Licensee Event Report 05000382/2022-001-00, "Non-Compliance with Technical Specifications Due to Incorrect Conversion Factors in Three Gaseous Radiation Monitors." These issues were dispositioned by the NRC as a White finding in inspection report 05000382/2022090 (ADAMS Accession Number ML22241A143) and reviewed via a supplemental inspection in accordance with Inspection Procedure 95001 in inspection report 05000382/2023040 (ADAMS Accession Number ML23145A227).

On November 16, 2022, as part of the extent of condition review, the licensee identified that three component cooling water radiation monitors had incorrect engineering correction factors. These monitors check for radiation that leaks from connecting systems into the normally clean, closed-circuit CCW system. The correction factors were based on the detectors' response to cobalt-60 instead of cesium-137, causing the sensitivity of the detectors to be approximately 46 percent lower than the expected response. The licensee recalibrated the CCW radiation monitors on November 17, 2022. The CCW radiation monitors were found to have been incorrectly calibrated for longer than the allowed outage time in technical specification 3.3.3.1 and therefore required an LER in accordance with 10 CFR 50.73(a)(2)(i)(B). The licensee provided this information to the NRC in LER 05000382/2022-001-02 on February 22, 2023, or about 98 days after identification of the issue. This delay does not meet the requirements of 10 CFR 50.73(a)(1) to submit a Licensee Event Report within 60 days of discovery of the event.

Screening: The inspectors determined the violation was minor. The failure to submit a LER in accordance with 10 CFR 50.73 is an example of a Severity Level IV violation in accordance with section 6.9 of the NRC Enforcement Policy. However, the event report was submitted by the licensee before NRC identification and did not impact the ability of the NRC to perform its regulatory oversight function. Therefore, the violation is considered minor in accordance with section 2.2.1 of the NRC Enforcement Policy.

Enforcement: This failure to comply with 10 CFR 50.73(a)(1) constitutes a minor violation that is not subject to enforcement action in accordance with the NRC's Enforcement Policy. This minor violation, in addition to inspection report 05000382/2023040 (ADAMS Accession No. ML23192A764), closes LER 05000382/2022-001-02.

## **EXIT MEETINGS AND DEBRIEFS**

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

- On June 29, 2023, the inspectors presented the exam technical debrief inspection results to Robbie Ledet, Operations Director, and other members of the licensee staff.
- On July 12, 2023, the inspectors presented the emergency preparedness exercise inspection results to John Ferrick, Site Vice President, and other members of the licensee staff.
- On August 7, 2023, the inspectors presented the public radiation safety inspection results to Joseph Sullivan, Site Vice President, and other members of the licensee staff.
- On August 14, 2023, the inspectors presented the exam exit meeting inspection results to Joseph Sullivan, Site Vice President, and other members of the licensee staff.
- On October 16, 2023, the inspectors presented the integrated inspection results to Joseph Sullivan, Site Vice President, and other members of the licensee staff.

## DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.04	Procedures	OP-002-001	Auxiliary Component Cooling Water	320
71111.04	Procedures	OP-002-003	Component Cooling Water	322
71111.04	Procedures	OP-009-002	Emergency Diesel Generator	360
71111.05	Drawings	G-FP-0021	Fire Detection System Raceway & Equipment Layout Reactor Auxiliary Building EL +21.00'	0
71111.05	Fire Plans	RAB 22-001	Drumming Station (Hot Tool Room)	7
71111.11B	Corrective Action Documents	CR-WF3-YYYY-NNNN	2021-04665, 2022-03323, 2022-05400, 2022-06858	
71111.11B	Miscellaneous		Waterford Credit for Standing Watch Logs (8/1/21 to 5/25/23)	
71111.11B	Miscellaneous		Checklist for Upgrading from Inactive to Active Status	314
71111.11B	Miscellaneous		2023 Week 2 SRO/RO Written Exam	
71111.11B	Miscellaneous		Waterford Operator Medical Records	
71111.11B	Miscellaneous		Waterford 2023 Week 1 and 2 Scenarios and JPMs	
71111.11B	Miscellaneous		SBT Package - 2022 NRC Initial Exam Scenario 3	11/28/2021
71111.11B	Miscellaneous		Post-Event Simulator Test - April 12, 2023, and August 2, 2022	
71111.11B	Miscellaneous		Simulator Baseline Testing Data	06/20/2023
71111.11B	Miscellaneous		Tracking Tool Prevent Overlap Written Exam - 2023 Written Exam Worksheet	
71111.11B	Miscellaneous		Tracking Tool Prevent Overlap Operating Test - 2023 Annual Exam Tracking and 2023 JPM Matrix	
71111.11B	Miscellaneous		2021 Biennial Written SRO Remedial Exam	
71111.11B	Miscellaneous	DR 17-0193		
71111.11B	Miscellaneous	DR 21-0096		
71111.11B	Miscellaneous	DR 23-0004		
71111.11B	Miscellaneous	DR 23-0025		
71111.11B	Miscellaneous	DR 23-0031		
71111.11B	Miscellaneous	DR 23-0042		
71111.11B	Miscellaneous	DR 23-0059		
71111.11B	Miscellaneous	DR-23-0055		

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.11B	Miscellaneous	TQF-202-SRB	Simulator Review Board (SRB) Meeting Minutes	02/01/2023
71111.11B	Miscellaneous	WSIM-DIR-003	Simulator Operability Testing - Cycle 25	11/23/2022
71111.11B	Procedures		Simulator Differences List	06/20/2023
71111.11B	Procedures	EN-NS-112	Medical Program	23
71111.11B	Procedures	EN-OP-115-06	Activation and Deactivation of Licenses, and Maintaining Active License Status	3
71111.11B	Procedures	EN-TQ-100	Operations Training Program Description	3
71111.11B	Procedures	EN-TQ-202	Simulator Configuration Control	12
71111.11B	Procedures	EN-TQ-210	Conduct of Simulator Training	17
71111.11B	Procedures	EN-TQ-217	Exam Security	12
71111.11B	Procedures	TQF-210-CC01	Crew Critique	
71111.11B	Procedures	WTRN-OPS-SIMEXAMSECURITY	Site Simulator Exam Security Checklist	1
71111.11Q	Procedures	EN-OP-115	Conduct of Operations	31
71111.11Q	Procedures	EP-001-001	Recognition and Classification of Emergency Conditions	37
71111.11Q	Procedures	OP-903-006	Reactor Trip Circuit Breaker Test	16
71111.11Q	Work Orders		53036043, 54006929	
71111.12	Miscellaneous	TD G080.0095	General Electric Switchgear Magne Blast Breakers	6
71111.12	Procedures	EN-DC-205	Maintenance Rule Monitoring	9
71111.12	Procedures	ME-004-115	4.16/6.9 kV G.E. Magne-Blast Breaker Overhaul	6
71111.12	Work Orders		527902555, 00517244	
71111.13	Procedures	EN-WM-101	On-Line Work Management Process	25
71111.13	Procedures	EN-WM-104	On-Line Risk Assessment	27
71111.15	Calculations	ECI92-019	Plant Protection System Setpoint Uncertainty Calculation	5
71111.15	Corrective Action Documents	CR-WF3-YYYY-NNNN	2023-14217, 2023-14854, 2023-14895, 2023-15179, 2023-15245, 2023-15993, 2023-15602, 2023-15603, 2023-15604, 2023-15605	
71111.15	Corrective Action Documents	OP-903-030	Safety Injection Pump Operability Verification	41
71111.15	Corrective Action Documents Resulting from Inspection	CR-WF3-YYYY-NNNN	2023-14746, 2023-14747	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.15	Procedures	PE-004-024	309	
71111.18	Corrective Action Documents	CR-WF3-YYYY-NNNN	2023-15311	
71111.18	Engineering Changes	EC 54046818	ACCEMTR3A-3 Motor Comparison and EQ Evaluation	09/03/2023
71111.24	Corrective Action Documents	CR-WF3-YYY-NNNN	2023-15594, 2023-15671, 2023-15909, 2023-14384, 2023-14396	
71111.24	Engineering Evaluations	EC 54056366	Containment PIG	09/25/2023
71111.24	Procedures	ME-004-021	Emergency Diesel Generator	40
71111.24	Procedures	ME-007-006	480 VAC and Less Squirrel Cage Induction Motors	22
71111.24	Procedures	MI-003-377	Containment Atmospheric Particulate and Gaseous Radiation Monitor	318
71111.24	Procedures	OI-040-000	Reactor Coolant System Leakage Monitoring	18
71111.24	Procedures	OP-002-003	Component Cooling Water	322
71111.24	Procedures	OP-002-006	Fuel Pool Cooling and Purification	331
71111.24	Procedures	OP-003-014	Control Room Heating and Ventilation	311
71111.24	Procedures	OP-009-002	Emergency Diesel Generator	360
71111.24	Procedures	OP-009-008	Safety Injection System	48
71111.24	Procedures	OP-903-002	Emergency Diesel Generator and Subgroup Relay Operability Verification	327
71111.24	Procedures	OP-903-006	Reactor Trip Circuit Breaker Test	16
71111.24	Procedures	OP-903-008	Reactor Coolant System Isolation Leakage Test	26
71111.24	Procedures	OP-903-024	Reactor Coolant System Water Inventory Balance	26
71111.24	Procedures	OP-903-030	Safety Injection Pump Operability Verification	41
71111.24	Procedures	OP-903-037	Containment Cooling Fan Operability Verification	7
71111.24	Procedures	OP-903-050	Auxiliary Component Cooling Water Pump and Valve Operability Test	47
71111.24	Work Orders		52950139, 52988195, 54017890, 54026996	
71114.01	Corrective Action Documents	Condition Reports (CR-WF3-)	13881, 13921, 13922, 13931, 13932, 13951, 13952, 13960, 13961, 13962, 13964, 13965, 13967, 13969, 13970, 13971, 14019, 14046, 14049, 14053, 14249	
71114.01	Miscellaneous		Management Debrief, 6/21/23 NRC/FEMA Evaluated	07/10/2023

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			Exercise	
71114.06	Procedures	EP-001-001	Recognition and Classification of Emergency Conditions	37
71114.06	Procedures	OP-901-111	Reactor Coolant System Leak	307
71114.06	Procedures	OP-901-403	High Airborne Activity in Containment	4
71114.06	Procedures	OP-901-405	Fuel Handling Incident	8
71114.06	Procedures	OP-901-525	Security Threat	20
71114.06	Procedures	OP-902-000	Standard Post Trip Actions	17
71114.06	Procedures	OP-902-002	Loss of Coolant Accident Recovery	21
71114.06	Procedures	OP-902-009	Standard Appendices	323
71124.05	Calibration Records	52982382-01	ARMIR5400-B Calibrate Radiation Monitor Electronics	06/13/2023
71124.05	Calibration Records	52993552-01	AMIR5500-B Main Steam Line Radiation Monitor Chanel Calibration	06/25/2023
71124.05	Calibration Records	CHP-ARM046	Portable Instrumentation Calibration Data Sheet Amp-100, area radiation monitor	10/10/2022
71124.05	Calibration Records	CHP-CR-227	Portable Instrumentation Calibration Data Sheet LM-177, Frisker	03/07/2022
71124.05	Calibration Records	CHP-DR-664	Portable Instrumentation Calibration Data Sheet Model 9-3, ion chamber	07/19/2022
71124.05	Calibration Records	Detector 4 - 125 mL Charcoal	Efficiency Verification Worksheet 125 milliliter charcoal bottles for Detector 4	06/19/2023
71124.05	Calibration Records	Detector 6 - 1 L Marinelli	Efficiency Verification Worksheet 1 Liter Marinelli container for Detector 6	09/15/2022
71124.05	Calibration Records	Detector 6 - Filter	Efficiency Verification Worksheet 47-millimeter glass fiber filter for Detector 6	09/27/2022
71124.05	Calibration Records	FastScan	Calibration of the Dosimetry FastScan Whole-Body Counting System	03/08/2023
71124.05	Calibration Records	HP-RD-300	Portable Instrumentation Calibration Data Sheet AMS-4, airborne particulate detector	07/20/2022
71124.05	Calibration Records	Source 87-CS-S-117	Confirmation of J.L. Shephard Model 78-2M 400 Curie Cs-137 Source	03/30/2023
71124.05	Calibration Records	Source KR2723	Confirmation of J.L. Shephard Model 78-2M 130 millicurie Cs-137 Source	03/30/2023
71124.05	Corrective Action	CR-WF3-YYYY-	2015-00182, 2015-00186, 2016-05176, 2018-01348,	

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
	Documents	XXXXX	2019-04721, 2021-03832, 2022-00851, 2022-00852, 2022-01430, 2022-01699, 2022-03151, 2022-04636, 2022-04815, 2022-07729, 2023-01153, 2023-13271, 2023-13721, 2023-13758, 2023-14157	
71124.05	Corrective Action Documents Resulting from Inspection	CR-WF3-YYYY-XXXXX	2023-14488, 2023-14540, 2023-14818	
71124.05	Miscellaneous	ARMIRE5500-A/B	Main Steam Line Radiation Monitor Readout Comparison	07/25/2023
71124.05	Miscellaneous	PRM+46 Wing PS Process 2 Flow	Plant Stack Process Flow Chart	01/01/2020 through 06/01/2023
71124.05	Miscellaneous	W3F1-2023-0036	Special Report SR-2023-003-01 Radiation Monitor Inoperable Greater Than 7 days	05/04/2023
71124.05	Procedures	EN-RP-317-08	Calibration of Portable Scalers	3
71124.05	Procedures	MI-003-360	Containment High Range Safety Channel A or B Area Radiation Monitor Calibration ARMIR5400 A or ARMIR5400 B	317
71124.05	Procedures	MI-003-365	Fuel Handling Building Ventilation Monitor Safety Channel A or B Calibration ARMIR300.1, ARMIR300.2, ARMIR300.3, or ARMIR300.4	15
71124.05	Procedures	MI-003-389	Main Steam Line Radiation Monitor Channel Calibration ARMIR5500A or ARMIR5500B	314
71124.05	Procedures	MI-003-459	Component Cooling Water Return Header from Containment Liquid Radiation Monitor Channel Calibration PRM-IR-5700	307
71124.05	Procedures	MI-005-910	Mobile Airborne Radiation Monitor Calibration, ARMIR5132, ARMIR5144	9
71124.05	Procedures	MI-005-913	Reactor Auxiliary Building Duct Airborne Radiation Monitor Calibration PRMIR6710 A, B, C, or D	307
71124.05	Procedures	MI-005-918	General Atomic High Range Area Radiation Monitor Assemblies 0359-470	13
71124.05	Procedures	MI-005-920	General Atomic Area Radiation Monitor Assemblies	310



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			0359-3501 and 0359-3502	
71124.05	Procedures	UNT-005-014	Offsite Dose Calculation Manual	309
71124.05	Self-Assessments	LO-WLO-2021-0065	Pre-NRC Self-Assessment, IP71124.05 Radiation Monitoring Instrumentation	05/31/2023
71124.05	Self-Assessments	QA-2/6-2021-W3-1	Quality Assurance Audit Report: Combined Chemistry, Effluents and Environmental Monitoring	10/05/2021
71124.08	Corrective Action Documents	CR-WF3-YYYY-XXXXX	2021-06506, 2021-06530; 2021-06613, 2022-00853, 2022-01302, 2022-03092, 2022-03196, 2022-04189, 2022-05026, 2022-05444, 2022-06079, 2022-06708, 2022-06969, 2022-07572, 2022-07593, 2022-07668, 2022-00651, 2022-00916, 2022-00987, 2022-01936, 2022-01988	
71124.08	Miscellaneous		Annual Radioactive Effluent Release Report CY 2022	04/24/2023
71124.08	Miscellaneous	EN-RP-143	Semi-Annual Sealed Source Leak Test	05/24/2023
71124.08	Miscellaneous	IAW EN-RP-143	Semi-Annual Source Inventory	11/02/2022
71124.08	Miscellaneous	LWM 2023 L97480	Liquid Waste Management Part 61 Analysis	09/14/2022
71124.08	Miscellaneous	PMID 16018-01	Semi-Annual Sealed Source Leak Test	11/02/2022
71124.08	Miscellaneous	RCS 2023 L98656-1	RCS 2023 Part 61 Analysis	01/23/2023
71124.08	Miscellaneous	RWM 22 Apr L96067-1	Resin Waste Management Part 61 Analysis	05/22/2022
71124.08	Procedures	EN-RP-121	Radioactive Material Control	18
71124.08	Procedures	EN-RP-121-01	Receipt of Radioactive Material	7
71124.08	Procedures	EN-RP-143	Source Control	14
71124.08	Procedures	EN-RW-102	Radioactive Shipping Procedure	20
71124.08	Procedures	EN-RW-104	Scaling Factors	14
71124.08	Procedures	EN-RW-105	Process Control Program	5
71124.08	Procedures	EN-RW-106	Integrated Transportation Security Plan	7
71124.08	Procedures	Energy Solutions CS-OP-PR-010-161017	Bead Resin/Activated Carbon Dewatering Procedure for Energy Solutions 14-215 Or Smaller Liners, Utilizing Energy Solutions Self-Engaging Dewatering System (SEDS) at Waterford 3	2
71124.08	Self-Assessments	LO-WLO-2021-00065 CA00003	Focused Self-Assessment/ Formal Benchmark Report - IP 71124.08	

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71124.08	Shipping Records	22-1010	DAW/Metal	05/19/2022
71124.08	Shipping Records	22-1017	CVC Resin	07/28/2022
71124.08	Shipping Records	22-3048	RCP Seal Box WF-501 and B-25	09/07/2022
71124.08	Shipping Records	23-1003	DAW/Metal	04/05/2023
71124.08	Work Orders		Quarterly Packaging Inspection	12/13/2021
71124.08	Work Orders		Quarterly Packaging Inspection	03/30/2022
71124.08	Work Orders		Quarterly Packaging Inspection	06/15/2023
71124.08	Work Orders		Quarterly Packaging Inspection	09/14/2022
71124.08	Work Orders		Quarterly Packaging Inspection	12/01/2022
71124.08	Work Orders		Quarterly Packaging Inspection	03/02/2023
71124.08	Work Orders		Quarterly Packaging Inspection	06/14/2023