Mr. William O'Connor, Jr. Vice President Nuclear Generation Detroit Edison Company 6400 North Dixie Highway Newport, MI 48166

SUBJECT: FERMI 2 NUCLEAR POWER STATION -

NRC INSPECTION REPORT 50-341/02-04(DRS)

Dear Mr. O'Connor:

On May 10, 2002, the NRC completed an inspection at your Fermi 2 Nuclear Power Station. The enclosed report documents inspection findings which were discussed on May 10, 2002, with you, and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, the inspection focused on permanent plant modifications and changes, tests and experiments done in accordance with 10 CFR 50.59.

Based on the results of this inspection, no findings of significance were identified

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/index.html (the Public Electronic Reading Room).

Sincerely,

/RA/

John M. Jacobson, Chief Mechanical Engineering Branch Division of Reactor Safety

Docket No. 50-341 License No. NPF-43

Enclosure: Inspection Report 50-341/02-04(DRS)

See Attached Distribution

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NAME PLougheed:jb JJacobson MRing

DATE 05/17/02 05/23/02 05/23/02

cc w/encl: N. Peterson, Manager, Nuclear Licensing

P. Marquardt, Corporate Legal Department

Compliance Supervisor

R. Whale, Michigan Public Service Commission Michigan Department of Environmental Quality Monroe County, Emergency Management Division

Emergency Management Division MI Department of State Police

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U. S. NUCLEAR REGULATORY COMMISSION REGION III

Docket No: 50-341 License No: DPR-43

Report No: 50-341/02-04(DRS)

Licensee: Detroit Edison Company

Facility: Enrico Fermi, Unit 2

Location: 6400 N. Dixie Hwy.

Newport, MI 48166

Dates: May 6 through 10, 2002

Inspectors: P. Lougheed, Reactor Inspector

D. Schrum, Reactor Inspector H. Walker, Reactor Inspector R. Winter, Reactor Inspector

Approved by: John M. Jacobson, Chief

Mechanical Engineering Branch Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000341-02-04, on 05/06-10/02, Detroit Edison Company, Fermi 2 Nuclear Power Station. Permanent plant modification and changes, tests, and experiments.

This report covers a five day announced inspection conducted by four regional engineering specialist inspectors. No findings of significance were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000, and can be found on the NRC website at: http://www.nrc.gov/NRR/OVERSIGHT/ASSESS/index.html

A. <u>Inspector Identified Findings</u>

Cornerstone: Mitigating Systems

None

Report Details

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R02 Evaluations of Changes, Tests, or Experiments (71111.02)

Review of Evaluations and Screenings for Changes, Tests, or Experiments

a. <u>Inspection Scope</u>

The inspectors reviewed twelve 10 CFR 50.59 evaluations, ten of which were performed under the original 10 CFR 50.59 process, and eighteen screenings performed under the revised 10 CFR 50.59 process. These documents were reviewed to ensure consistency with the requirements of 10 CFR 50.59. The inspectors used Nuclear Energy Institute (NEI) 96-07, "Guidelines of 50.59 Evaluations," Revision 1, to determine acceptability of the completed evaluations, and screenings. The NEI document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, "Changes, Tests, and Experiments," November 2000. The inspectors also consulted Inspection Manual, Part 9900, "10 CFR GUIDANCE: 50.59." Documents reviewed during the inspection are listed at the end of the report.

b. <u>Findings</u>

No findings of significance were identified.

1R17 Permanent Plant Modifications (71111.17)

Review of Recent Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed twenty permanent plant modifications that were performed by the licensee's engineering staff during the last two years. These were divided among the various programs that the licensee used to make changes to the plant. Eleven of the modifications were done under the engineering design procedure process. Five of the modifications were done under the technical service request process; two of these were setpoint changes. In addition, the inspectors evaluated two plant modifications made under the equivalent replacement evaluation process and two commercial grade dedications. All the modifications were chosen based upon the effect on systems that had high probabilistic risk analysis significance in the licensee's individual plant evaluation or high maintenance rule safety significance. The modifications were reviewed to verify that the completed design changes were in accordance with specified design requirements and the licensing bases and to confirm that the changes did not affect the modified system or other systems' safety function. Nine calculations, which were performed or revised to support modifications, were also reviewed. As applicable to the status of the modification, post-modification testing was reviewed to verify that the

system, and associated support systems functioned properly and that the modification accomplished its intended function. The inspectors also verified that the completed modifications did not place the plant in an increased risk configuration. The inspectors evaluated the modifications against the licensee's design basis documents and the updated safety analysis report. The inspectors also used applicable industry standards, such as the American Society of Mechanical Engineers Code, to evaluate acceptability of the modifications.

b. <u>Findings</u>

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA2 Identification and Resolution of Problems

a. <u>Inspection Scope</u>

The inspectors reviewed a selected sample of condition assessment resolution documents associated with Fermi's permanent plant modifications and 10 CFR 50.59 program to verify that the licensee had an appropriate threshold for identifying issues and to verify the effectiveness of corrective actions for the identified issues.

b. Findings

No findings of significance were identified.

4OA5 Management Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. O'Connor and other members of licensee management at the conclusion of the inspection on May 10, 2002. The licensee acknowledged the information presented. No proprietary information was identified.

KEY POINTS OF CONTACT

Licensee

- D. Cobb, Plant Manager
- S. Cashell, Engineer, Licensing
- Q. Dong, Acting Manager, Performance Engineering
- R. Johnson, Supervisor, Nuclear Licensing
- A. Lim, Supervisor, Mechanical & Civil
- W. Miller, Manager, Engineering Projects
- D. Noetzel, Manager, System Engineering
- W. O'Connor, Vice President, Nuclear Generation
- N. Peterson, Manager, Nuclear Licensing
- P. Smith, Manager, Nuclear Fuels and Probabilistic Safety Analysis
- S. Stasek, Director, Nuclear Assessment
- R. Wittschen, 10 CFR 50.59 Program Engineer, Nuclear Licensing
- R. Zyduck, Consultant

NRC

S. Campbell, Senior Resident Inspector

LIST OF ACRONYMS USED

ADAMS Agency-wide Document Access and Management System

DRS Division of Reactor Safety

NEI Nuclear Energy Institute Conduct Manual

PARS Publicly Available Records System

LIST OF DOCUMENTS REVIEWED

<u>Calculations</u>			
DC-0919	Undervoltage Relay Setpoints	July 29, 1991	
DC-1428	Seismic Mounting of Level Probes in the Sub-basement Corner Rooms and Sumps	Revision A	
DC-2912	Fuse Selection of Instrumentation and Control Circuits Connected to 2PA2-5,-6,-14 and 2PC3-16	Revision M	
DC-3233	Class 1E Equipment Qualification Review Wire, Cable and Conduit Seals and Miscellaneous Electrical Interface Components	Revision C	
DC-4959	Locked Valve Program Basis	Revision C	
DC-5314	Seismic Qualification of Anti-Rotation Clamp Assembly on Safety Relief Valves	Revision 0	
DC-5352	Direct Current Control Cable Voltage Drop Calculation for QA1, Division II		
DC-5760	Emergency Equipment Service Water/Emergency Equipment Cooling Water Hydraulic/Nitrogen Supply to Emergency Equipment Cooling Water Make-up Tank	Revision C	
DC-6102	Seismic Analysis of Scaffolding	Revision A	
Commercial Gra	de Dedications		
480-0870	Functional Testing of ASCO Solenoid Valve Purchased under Purchase Request # 9057764	August 6, 2001	
650-8983	Standard Identical Replacement for Chart Drive Motor	September 19, 1997	
Condition Assess	sment Resolution Documents Reviewed During the Inspe	<u>ction</u>	
98-12558	Closeout Review of Condition Assessment Resolution Document	April 7, 2000	
98-13544	Logic Functional Solution Team	May 12, 1998	
99-13905	South Mist Eliminator is Not Functioning Properly	May 15, 1999	
00-10100	Quality 1 Applications That Require As-Building - Identified by Investigation of Condition Assessment Resolution Document 98-12558	April 11, 2000	
00-10863	Blown Division 2 Residual Heat Removal Logic Fuse Due to Shorting of Limit Switch Contacts	April 28, 2000	
00-15469	Debris Found in Reactor Pressure Vessel Annulus at 0 Degrees Azimuth	April 28, 2000	
00-19533	Facility Change Completed Without Determination by System Engineer That No Unreviewed Safety Question Exists	October 4, 2000	

Condition Assessment Resolution Documents Reviewed During the Inspection			
01-13227	Inadequate Posting of Engineering Change Request 29805-17, Revision A, Against Associated Base Configuration Design Documents	July 30, 2001	
01-13244	Inadequate Preliminary Evaluation on Engineering Design Package 30815	August 8, 2001	
01-13942	Audit Finding, 10 CFR 50.59 Review for Scaffolds Currently Installed in the Plant and Procedure MMA08 Upgrade to Implement the New Rule	April 18, 2001	
01-14770	Operation Evolution Orders Potential Deficiency	May 17, 2001	
01-16492	Nuclear Safety Review Group Member Evaluates Safety Evaluation 01-0009 and Rates it a "C"	August 1, 2001	
01-17499	Reactor Core Isolation Cooling Flow Controller Exhibited Oscillations During Performance of Engineering Design Package 30202 Acceptance Test	October 7, 2001	
01-19855	Engineering Design Package 28692 Incorrectly Implemented	November 1, 2001	
01-20215	Engineering Design Package 29109 Added/Modified Electrical Loads on Motor Control Center 72K-2A Without Updating the Electrical Load Monitoring System	November 15, 2001	
01-20271	Inadequate 10 CFR 50.59 Screen for ERE-31584, Revision 0	December 12, 2001	
01-20356	Spent Fuel Pool Rerack Project Not in Conformance with All Aspects of Design Specification 3071-548; Audit Finding	December 19, 2001	
02-11091	10 CFR 50.59 Screen 01-0066, Revision 0, Less than Adequate	February 25, 2002	
Condition Assessment Resolution Documents Written as a Result of the Inspection			
02-12472	Failure to Re-evaluate Drawing Changes Associated with Condition Assessment Resolution Document 00-10016 Compensatory Measure as Permanent Change	May 8, 2002	
02-12563	LCR-00-169-UFS Wording Unclear in Updated Final Safety Analysis Report Section 7.6.2.7	May 9, 2002	
<u>Drawings</u>			
I-2820-33	Traversing Incore Probe System Support Detail	Revision 0	
Engineering Change Request			
30078	Replace Reactor Building Corner Room Sump Level Instrument	February 20, 2001	

Engineering Design Packages		
27387	Increase Spent Fuel Storage Capacity in the Spent Fuel Pool	Revision 0
28140	Install Evaporative Coolers for Drywell	Revision B
28692	Elimination of Annunciator Window "Induced Alternating Current in Fire Detection Protection System Trouble"	July 20, 2001
29213	Replacement of Nuclear Boiler Division 1 and Division 2 Safety Relief Valve Solenoid Valves	Revision 0
29500	Retirement of Control Rod Drive Sample Panel Continuous Monitoring Capabilities	Revision 0
29792	Emergency Equipment Cooling Water Temperature Control Valve and Controller Replacement	Revision A
30078	Replace Reactor Building Corner Room Sump Level Instrument	May 11, 1999
30815	Emergency Diesel Generator Starting Air System Piping and Valve Replacement	July 10, 2000
31049	Install Spray Shield on A & B Reactor Recirculation Motor Generator Fluid Drive Mist Eliminator Rebreather	April 15, 2000
31132	General Service Water to Fire Protection Cross Tie Modification	April 12, 2001
31256	Upgrade for Reactor Recirculation Motor Generator Mist Eliminator	April 9, 2002
Equivalent Replacement Evaluations		
31486	Equivalent Replacement for Emergency Diesel Generator Jacket Water Coolant Standby Pump	Revision A
31552	Equivalent Replacement of Pump Motor Assembly for Emergency Diesel Generator Jacket Coolant Standby Pump	Revision A
Licensing Chang	ne Request	
00-169-UFS	Resolve Discrepancy Between Plant As-Built Condition and Updated Final Safety Analysis Report Table 7.6-14	Revision 0
<u>Memorandum</u>		
TMPE-99-0359	Preliminary Review of Decay Heat Removal Methods for RF07	July 23, 1999
Potential Design Changes		
7448	Emergency Diesel Generator Jacket Water Circulating Pump	July 28, 1987

<u>Procedures</u>		
DSN 2D18	Emergency Equipment Cooling Water Makeup Tank B Level High/Low	Revision 14
DSN 23.131	General Service Water System	Revision 74
DSN 23.501.01	Fire Water Suppression System	Revision 33
DSN 28.501.02	Fire Suppression Water System	Revision 9
DSN MMA08	Fermi Maintenance Conduct Manual - Scaffolding	Revision 6
MES 11	Technical Service Request	Revision 15
MES 15	Design Calculations	Revision 13
MES 19	Preparation and Control of Engineering Design Packages	Revision 13
MES 20	Implementation of Modifications	Revision 11
MES 42	Equivalent Replacement Process	Revision 4
MLS Appendix B	Applicability Determination Manual	Revision 1
MLS Appendix C	10 CFR 50.59 Resource Manual	Revision 1
MLS 08	Licenses, Plans and Programs	Revision 13
MLS 14	Changes, Tests and Experiments	Revision 2
MMM 11	Dedication of Commercial Grade Items	Revision 5
PTS 23.800.07	Reactor Coolant Natural Circulation and Decay Heat Removal	Revision 6
SOP 23.201	Safety Relief Valves and Automatic Depressurization System Operating Procedure	Revision 21
SOP 23.308	120 Volt Alternating Current Instrument and Control Power System Operating Procedure	Revision 33
SOP 23.321	Engineered Safety Features Auxiliary Electrical Distribution System	Revision 30
SOP 23.621	Main Control Room Annunciator and Sequence Recorder Operating Procedure	Revision 54
SOP 23.707	Reactor Water Cleanup System Operating Procedure	Revision 100
Replacement Ins	tallation Documents	
70376	Equivalent Replacement of Pump Motor Assembly	Revision 0
70652	Equivalent Replacement of Pump Motor Assembly for Emergency Diesel Generator Jacket Coolant Standby Pump	Revision 0
Setpoint Changes		
31005	Revise Loss of Power Relay Setpoints	Revision 0
31424	North Turbine Building Heating Ventilation and Air Conditioning Supply Fan Blade Tip Angle Changes	Revision 0

Special Tests			
00-01	Residual Heat Removal Shutdown Cooling Outage	January 12, 2000	
00-04	Emergency Equipment Service Water/ Emergency Equipment Cooling Water Cross Tie Test Division 2	May 1, 2000	
01-05	Withdrawal and Uncoupling of Control Rods During Core Shuffle	August 30, 2001	
02-04	Emergency Equipment Cooling Water Plate Frame Heat Exchanger Differential Pressures - Division 1	March 5, 2002	
Technical Service	e Requests		
27075	Manufacturer Has Provided a Different Pump and Motor for the Emergency Diesel Generator Jacket Water Coolant Standby Pump	Revision 0	
31097	As-Built Notice Generated to Address Condition Assessment Resolution Documents 00-100 and 00-10101	Revision 0	
31106	Administrative Control Energization of Solenoids T23F400A -M	Revision 0	
Technical Requi	rements		
3.12.2	Fire Suppression Water System	Revision 40	
B 3.12.2	Fire Suppression Water System Bases	Revision 44	
10 CFR 50.59 Evaluations			
98-0038	Replace Emergency Service Water Pneumatically Operated Pressure Control Valve With a Spring Operated, Pressure Limiting Valve	Revision B	
00-0024	Retirement of the Continuous Monitoring Function of Control Rod Drive Panel H21P450	Revision 0	
00-0044	Nuclear Steam Supply System Volume of Fluids for Containment Analysis	Revision 0	
00-0046	Revise Updated Final Safety Analysis Report Table 7.6-14 and Section 7.6.2.7.2	Revision 0	
01-0001	Replacement of Tip Support Steel Underneath the Reactor Pressure Vessel	Revision 0	
01-0004	Spent Fuel Pool Expansion Campaign; Engineering Design Package 27387	Revision 0	
01-0005	Underseat Drain Line from B3105F023B Will Be Removed and the Underseat Drain Line B3105F023A Valve Repaired	Revision 0	

10 CFR 50.59 E	<u>valuations</u>	
01-0008	General Service Water to Fire Protection Cross Tie Line Will Change So That Cross Tie Isolation Valves Are Normally Open	Revision 0
01-0009	Revise Technical Requirements Manual Surveillance Requirement 3.12.2.16 and Bases 3.12.2 for Inspecting Diesel Drive Fire Pump Diesel Engine	Revision 0
01-0011	Analyses of Effects of Boraflex Degradation in the High Density Fuel Storage Racks	Revision 0
01-0027	Update DC-4968 Volume 1 to Accept As-is E1150F016A/B and T2300F409 (410) Stroke Times Which Differ from Updated Final Safety Analysis Report	Revision 0
01-0209	Residual Heat Removal Mechanical Draft Cooling Tower Tornado Fan Blade Damage and Repair	Revision 0
10 CFR 50.59 S	<u>creenings</u>	
01-0029	Residual Heat Removal Mechanical Draft Cooling Tower Tornado Fan Blade Damage and Repair	Revision 0
01-0250	Engineered Safety Features Auxiliary Electric Distribution System	Revision 0
01-0261	Emergency Equipment Service Water System Column Separation Mitigation	Revision 0
01-267	Replacement of Globe Valves with Gate Valves for P4100F240 and 241	Revision A
01-0289	Standby System Cooling Water System Pump/ Expansion Tank Trouble	Revision 0
01-0292	Revise Procedure to Reflect Changes to GEMAC Reactor Core Isolation Cooling Flow Controller per Engineering Design Package 30202	Revision 0
01-0299	Revise Updated Final Safety Analysis Report Figure 9.4.2 (M-2847) and Section 6.4.2.3.1	Revision 0
01-0305	Evaluation of Emergency Diesel Generator Governor Linkage Lubrication	Revision 0
01-0401	Pipe Break Outside Containment High Energy Line Break/Medium Energy Line Break Effects	Revision 0
01-0431	Elimination of Keepfill Pressure in Maximum Expected Differential Pressure Calculations	Revision 0
01-0441	Residual Heat Removal System Runout Assessment	Revision 0
01-0581	Emergency Diesel Generator Exciter Regulator Replacement	Revision 0
01-0598	Revision of Updated Final Safety Analysis Report	Revision 0

10 CFR 50.59 Se	<u>creenings</u>	
01-0614	Compressed Air Requirements for Station Blackout Event	Revision 0
02-0005	Combustion Turbine Generator 11-1 Starting Diesel Heater	Revision 0
02-0035	Addition of New Load on Ring Bus	Revision 0
02-0059	Drywell Cooling Fan Vibration Setpoint Change	Revision 0
02-0076	Division II Drywell Fan Bearing Vibration High	Revision 0
Vendor Manual		
VMC2-105	Drag Velocity Control Element	Revision 0

MODIFICATION AND 10 CFR 50.59 INSPECTION DOCUMENT REQUEST

The following information was provided electronically to the licensee prior to the inspection:

Lead Inspector: Andy Dunlop

Team Members: Ken O'Brien, Darrell Schrum, Bob Winter

Information Needed for In-Office Preparation Week

The following information is needed by April 23, 2002, or sooner, to facilitate the selection of specific items that will be reviewed during the onsite inspection week. The team will select specific items from the information requested below and submit a list to your staff by April 30, 2002. We request that the specific items selected from the lists be available and ready for review on the first day of inspection. If you have any questions regarding this information, please contact me at (630) 829-9726 or e-mail axd@nrc.gov as soon as possible. All lists requested should cover the time frame August 2000 until present. All information should be sent electronically if at all possible.

Permanent Plant Modifications

- 1. List of permanent plant modifications/design changes. In addition to the list, please provide a brief (one paragraph) description of each modification (e.g., copy of modification description from DCP or safety evaluation.)
- 2. List of setpoint changes. (Identify system and instrument).
- List of equivalency evaluations or suitability analysis.
- List of commercial grade dedications.
- 5. List of condition reports (open or closed) issued to address permanent plant modification issues, concerns, or process.
- 6. Copy of procedures for the following: modifications, design changes, set point changes, equivalency evaluations or suitability analyses, commercial grade dedications, and post-modification testing.

Changes, Tests, or Experiments (10 CFR 50.59)

- List of all 10 CFR 50.59 completed evaluations involving: (A) changes to facility (modifications); (B) procedure revisions; (C) tests or non-routine operating configurations; (D) changes to the UFSAR; or (E) calculations
- 2. List of all 10 CFR 50.59 screenings that have been screened out as not requiring a full evaluation involving: (A) changes to facility (modifications); (B) procedure revisions; (C) tests or non-routine operating configurations; (D) changes to the UFSAR; or (E) calculations

- 3. List of condition reports (open or closed) issued to address problems associated with 10 CFR 50.59 evaluations, screenings, or process.
- 4. Copy of procedures that specify how 10 CFR 50.59 evaluations and screenings are performed.
- 5. Copy of procedures that delineate how 10 CFR 50.59 FSAR updates are prepared by engineers or staff and how the licensee submits 10 CFR 50.59 FSAR updates.
- 6. List of special tests or experiments and non-routine operating configurations in the last two years (if any.)

General Information

- 1. Latest engineering organization chart
- 2. Site phone list
- System engineering list
- 4. List of maintenance rule high safety significant systems
- 5. List of maintenance rule (a)(1) systems. (Those systems presently in (a)(1) and systems that were (a)(1) in 2001 or 2002 and returned to (a)(2) [List date system went to (a)(1) and date system returned to (a)(2)])

Il <u>Information to be Available on First Day of Inspection</u>

We request that the following information be <u>available</u> to the inspectors once they arrive onsite. (Copies of the updated final safety analysis report, independent plant evaluation probabilistic safety analysis, vendor manuals, or technical specifications do not need to be solely available to the team as long as the inspectors have ready access to them.)

- The latest 10 CFR 50.59 Final Safety Analysis Report Update Submittal
- Updated Final Safety Analysis Report
- Technical Specifications
- Independent Plant Evaluation Probabilistic Safety Analysis Report
- Vendor Manuals
- Equipment Qualification Binders
- Relevant Calculations And Analyses (for selected modifications and 10 CFR 50.59s)

 Copies of previously selected modifications, permanent plant changes, design changes, setpoint changes, procedure changes, equivalency evaluations, suitability analyses, calculations, commercial grade dedications, 10 CFR 50.59 evaluations and screenings and condition reports.