UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8931

July 21, 2003

Southern Nuclear Operating Company, Inc.
ATTN: Mr. J. Gasser, Jr., Vice President
Vogtle Electric Generating Plant
P. O. Box 1295
Birmingham, AL 35201-1295

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT - NRC INTEGRATED INSPECTION REPORT 05000424/2003003 AND 05000425/2003003

Dear Mr. Gasser:

On June 28, 2003, the US Nuclear Regulatory Commission (NRC) completed an inspection at your Vogtle Electric Generating Plant, Units 1 and 2. The enclosed integrated inspection report documents the inspection results, which were discussed on July 3, 2003, with Mr. W. Kitchens 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. 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, its enclosure, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

James H. Moorman, III, Acting Chief
Reactor Projects Branch 2
Division of Reactor Projects

Docket Nos.: 50-424 and 50-425
License Nos.: NPF-68 and NPF-81

Enclosure: Inspection Report 05000424/2003003 and
05000425/2003003
w/Attachment: Supplemental Information

cc w/encl: (See page 2)

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U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket Nos.:	50-424, 50-425
License Nos.:	NPF-68, NPF-81
Report Nos.:	05000424/2003003 and 05000425/2003003
Licensee:	Southern Nuclear Operating Company, Inc. (SNC)
Facility:	Vogtle Electric Generating Plant, Units 1 and 2
Location:	7821 River Road Waynesboro, GA 30830
Dates:	April 6, 2003 - June 28, 2003
Inspectors:	J. Zeiler, Senior Resident Inspector T. Morrissey, Resident Inspector C. Rapp, Senior Project Engineer (Sections 1R01 and 4OA1) L. Mellen, Senior Emergency Preparedness Inspector (Sections 1EP2, 1EP3, 1EP4, 1EP5, and 4OA1)
Approved by:	James H. Moorman, III, Acting Chief Reactor Projects Branch 2 Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000424/2003-003, 05000425/2003-003; 04/06/2003-06/28/2003; Vogtle Electric Generating Plant, Units 1 and 2; routine integrated report.

This report covers a three month period of inspection by resident inspectors, a senior project engineer, and announced inspection by a senior emergency preparedness inspector. 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.

A. NRC-Identified and Self-Revealing Findings

No findings of significance were identified.

B. Licensee-Identified Violations

None.

REPORT DETAILS

Summary of Plant Status

Unit 1 operated at 100 percent rated thermal power (RTP) until May 8 when the unit was shutdown for a planned steam generator chemistry hideout return study. The unit was restarted on May 10 and attained 100 percent RTP on May 12. The unit operated at essentially 100 percent RTP for the remainder of this inspection period.

Unit 2 operated at essentially 100 percent RTP for the duration of this inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R01 Adverse Weather Protection

a. Inspection Scope

The inspectors reviewed the procedures and other documents listed in the Attachment and walked down risk-significant heat loads for the Turbine Plant Closed Cooling Water and Turbine Plant Cooling Water systems to verify these systems were capable of providing adequate heat removal during hot weather. The inspectors reviewed the condition reports (CRs) listed in the Attachment to verify the licensee was identifying and resolving problems related to these two systems. The inspectors also reviewed the procedures listed in the Attachment and walked down various site areas to verify the licensee's ability to respond to high winds or tornado conditions.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. Inspection Scope

Partial Walkdowns: The inspectors performed partial walkdowns of the following four systems to verify correct system alignment while redundant or backup equipment was inoperable. The inspectors checked for correct valve and electrical power alignments by comparing positions of valves, switches, and breakers to the procedures and drawings listed in the Attachment. Additionally, the inspectors reviewed the CR database to verify that equipment alignment problems were being identified and appropriately resolved.

- 2A Emergency Diesel Generator (EDG) on April 14 while the 2B EDG was out of service
- Unit 1, Train B Component Cooling Water (CCW) system on April 29 while CCW Pump 1 was out of service
- 1B High Head Safety Injection (HHSI) system on May 19 while 1A HHSI, system was out of service
- 1A HHSI system on June 2 while 1B HHSI system was out of service

Complete Walkdown: The inspectors conducted a detailed review of the accessible portions of the Unit 1 HHSI system. The inspectors used Procedure 11006-1, "Chemical and Volume Control System Alignment;" Procedure 13006-1, "Chemical and Volume Control System;" and Drawings 1X4DB116-1,-2 to verify adequate system alignment, electrical power availability, labeling, hangers and support installation, and support systems status. The inspectors also reviewed system health reports, maintenance rule monthly reports, CRs, and outstanding maintenance work orders (MWOs) to verify that alignment and equipment discrepancies were being identified and appropriately resolved.

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

The inspectors toured the following eight plant areas to verify the licensee was controlling combustible materials and ignition sources as required by Procedure 92015-C, "Use, Control, and Storage of Flammable/Combustible Materials" and Procedure 92020-C, "Control of Ignition Sources." The inspectors assessed the observable condition of fire detection, suppression, and protection systems and reviewed the licensee's fire protection Limiting Condition for Operation log and CR database to verify that the corrective actions for degraded equipment were identified and appropriately prioritized. The inspectors also reviewed the licensee's fire protection program to verify the requirements of Updated Final Safety Analysis Report (UFSAR) Section 9.5.1, "Fire Protection Program," and Appendix 9A, "Fire Hazards Analysis," were met. Documents reviewed are listed in the Attachment.

- 2A EDG room
- Unit 1 and Unit 2 Auxiliary Building Level #1
- Unit 1, Train B CCW pump room
- 1B HHSI pump room
- Unit 2, Train A cable spreading room
- 1B HHSI pump room and valve gallery
- Unit 1 Auxiliary Feedwater (AFW) Building
- Unit 1 and Unit 2 Auxiliary Buildings Level A and B

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance

a. Inspection Scope

Between June 2 and June 5, the inspectors observed the licensee perform inspections and eddy current testing of the Unit 2 Auxiliary Component Cooling Water (ACCW) Heat Exchanger 2. The inspectors observed the as-found condition of the heat exchanger to determine if deficiencies existed that could mask degraded heat exchanger problems. The inspectors discussed the eddy current test results, tube plugging criteria, heat exchanger monitoring schedule and historical performance with engineering personnel. Additionally, the inspectors reviewed the licensee's corrective action program for heat exchanger performance issues to ensure that discrepancies were being identified and appropriately resolved. Documents reviewed are included in the Attachment.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

On May 12, the inspectors observed operator performance during licensed operator simulator training associated with Requalification Segment 20033. The inspectors evaluated operator performance during the conduct of Simulator Exercise Guide RQ-SE-03303, "Loss of Instrument Air/Loss of Heat Sink." The exercise began with a steam generator pressure transmitter failure followed by a loss of electrical bus 1NA01, lowering instrument air pressure, and ended with a major steam leak inside containment with a loss of all AFW. The inspectors specifically assessed the following areas:

- Correct use of abnormal and emergency operating procedures including 18001-C, "Primary Systems Instrumentation Malfunction;" 18028-C, "Loss of Instrument Air;" 18008-C, "Secondary Coolant Leakage;" 19000-C, "E-0 Reactor Trip or Safety Injection;" and 19231-C, "FR-H.2, Response to Loss of Secondary Heat Sink"
- Ability to identify and implement appropriate Technical Specification (TS) actions
- Ability to identify and implement appropriate reporting and emergency plan actions in accordance with licensee Procedure 91001-C, "Emergency Classification and Implementing Instructions"
- Clarity and formality of communications in accordance with Procedure 10000-C, "Conduct of Operations"
- Proper control board manipulations including critical operator actions
- Quality of supervisory command and control
- Effectiveness of the post-evaluation critique

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness

a. Inspection Scope

The inspectors reviewed the following two equipment issues and associated licensee condition reports to evaluate the effectiveness of the licensee's handling of equipment performance problems and to verify the licensee's maintenance efforts met the requirements of 10 CFR 50.65 (the Maintenance Rule) and Procedure 50028-C, "Engineering Maintenance Rule Implementation." The reviews included adequacy of the licensee's failure characterization, establishment of performance criteria or 50.65 (a)(1) performance goals, and adequacy of corrective actions. Other documents reviewed during this inspection included control room logs, system health reports, the maintenance rule database, and MWOs. Also, the inspectors interviewed system engineers and the maintenance rule coordinator, to assess the accuracy of identified performance deficiencies and extent of condition. Documents reviewed are listed in the Attachment.

- Repeated safety-related battery charger failures (CR 2003000318)
- Thermography identified hot wires in 120 VAC Inverter 1CD1I3 (CR 2003001333)

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

The inspectors reviewed the following seven risk significant and emergent MWOs to verify plant risk was properly assessed by the licensee prior to conducting the activities. The inspectors reviewed risk assessments and risk management controls implemented for these activities to verify they were completed in accordance with Procedure 00354-C, "Maintenance Scheduling," and 10 CFR 50.65(a)(4). The inspectors also reviewed the CR database to verify that maintenance risk assessment problems were being identified at the appropriate level, entered into the corrective action program, and appropriately resolved.

- 2B Essential Chill Water system outage (MWOs 20201978, 20201975, 20201978, and 20201930)
- Unit 1 QIP#4 power supply replacement (MWO 10201445)
- Unit 1 CCW drain tank cleaning (MWO 10300724)
- Unit 1 CCW Pump 1 outage (MWOs 10103238 and 10102913)
- Vital Battery 1CD1B intercell connection repairs (MWO 10300504)
- Repair of 2B EDG air ventilation damper (MWO 20301415, CR 2003001241)
- Vital Battery 2AD1B cell replacement (MWO 20301592)

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the following four evaluations to verify that they met the requirements of Procedure 00150-C, "Condition Reporting and Tracking System." This scope included a review of the technical adequacy of the evaluations, the adequacy of compensatory measures, and the impact on continued plant operation. Other licensee documents reviewed for the inspection are listed in the Attachment.

- Low differential pressure during operation of 2B Piping Penetration Area Filtration and Exhaust System (PPAFES) (CRs 2003000157 and 2003000160)
- 2B Safety Injection pump mini-flow determined to be above value used in Westinghouse accident analysis (CR 2003001126)
- Torque and thrust limits exceeded on motor operated valve 1HV8509B during testing (CR 2003001305)
- Unit 2, NSCW Pump 6 discharge valve failure to open during pump start attempt (CR 2003001422)

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications

a. Inspection Scope

The inspectors reviewed Design Change Package (DCP) No. 99-V2N0057, "Remove Unit 2 Nuclear Service Cooling Water Pump Motor Cooler Throttle Valves and Modify Size of Flow Restricting Orifices," and observed portions of the modification implementations to verify they met the requirements of Procedures 00056-C, "10CFR50.59 Screenings and Evaluations;" 00400-C, "Plant Design Control," and 58007-C, "Design Change Packages." This review was conducted to verify that the modification did not degrade the system design bases, licensing bases, or performance capability and that plant risk was not increased unnecessarily during implementation of the modification.

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors either observed post-maintenance testing or reviewed the test results for the following five maintenance activities to verify that the testing met the requirements of Procedure 29401-C, "Work Order Functional Tests," for ensuring equipment operability and functional capability were restored. The inspectors also reviewed the test procedures to verify the acceptance criteria was sufficient to meet the TS operability requirements.

- 2B Essential Chill Water system outage (MWOs 20201978, 20201975, 20201978, and 20201930)
- Unit 1 CCW Pump 1 System Outage (MWOs 10103238, 10203289, and 10102913)
- Vital Battery 1CD1B intercell connection repairs (MWO 10300504)
- 1A HHSI system outage (MWOs 10300362, 10300556 and 10203401)
- 1B HHSI system and ESF Room Chiller outage (MWOs 10202220, 10203036, 10102105, 10300363, 10202290, and 10202172)

b. Findings

No findings of significance were identified.

1R20 Refueling and Other Outage Activities

Unit 1 Planned Outage to Conduct Steam Generator Chemistry Hideout Return Study

a. Inspection Scope

On May 8, the licensee initiated a shutdown to Mode 3 to conduct a steam generator chemistry hideout study. The inspectors reviewed the outage plans to confirm that the licensee had appropriately considered risk in developing and implementing the plans. During the outage, the inspectors observed or reviewed portions of the unit cooldown, outage activities, and the subsequent heatup and preparations for unit restart to verify these activities were conducted in accordance with TS and licensee procedures. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors reviewed the following six surveillance test procedures and either observed the testing or reviewed test results to verify that testing was conducted in accordance with the procedures and that the acceptance criteria adequately demonstrated that the equipment was operable. This review included one inservice test

(IST) (i.e., surveillance Procedure 14825-2) involving the quarterly stroke test of Motor Driven AFW pump mini-flow valve, 2FV5154. Additionally, the inspectors reviewed the CR database to verify that the licensee had adequately identified and implemented appropriate corrective actions for surveillance test problems.

- 14825-2, "Quarterly Inservice Valve Test," (on valve 2FV5154)
- 14905-2, "RCS Leakage Calculation," (Inventory Balance)
- 14980A-2, "Diesel Generator Operability Test," (2A EDG)
- 14980B-2, "Diesel Generator Operability Test," (2B EDG)
- 28820-C, "Battery Charger Load Test," (Charger 2BD1CB)
- 54059-1, "ECCS Piping Penetration Ventilation System Performance Test," (Train A)

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP2 Alert Notification System Testing

a. Inspection Scope

The inspector reviewed the alert (siren) and notification system (ANS) designed to meet the acceptance criteria of Section B of Appendix 3, NUREG-0654, "Radiological Emergency Response Plan (REP)." The weekly complete cycle tests were reviewed against the test frequencies commitments listed in the licensee's Emergency Plan (EP). The inspector reviewed testing results, assessed the failure rate of individual sirens and the effectiveness of repairs, and reviewed any changes related to the siren system.

b. Findings

No findings of significance were identified.

1EP3 Emergency Response Organization Augmentation Testing

a. Inspection Scope

The inspector reviewed the EP to determine the licensee's commitment for on-shift and augmentation staffing. The results of the augmentation drills were evaluated against the annual requirement identified in EP, Rev 37, "Conduct of Drills and Exercises Supporting the EP."

b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspector reviewed changes to the EP as contained in Revisions 35, 36, and 37 against the requirements of 10 CFR 50.54(q) to determine whether any of the changes decreased EP effectiveness. Documents reviewed are listed in the Attachment.

b. Findings

No findings of significance were identified.

1EP5 Correction of Emergency Preparedness Weaknesses and Deficiencies

a. Inspection Scope

The inspector evaluated the efficacy of licensee programs that addressed weaknesses and deficiencies in emergency preparedness. Items reviewed included exercise and drill critique reports, emergency preparedness assessment reports done by the Nuclear Assessment Section, and the licensee's Corrective Action Program.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors sampled licensee submittals for the PIs listed below to verify the accuracy of the PI data reported during the indicated period. The PI definitions and guidance contained in Procedure 00163-C, "NRC Performance Indicator Preparation and Submittal," and NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Rev. 2, were used to verify the basis in reporting for each data element.

Mitigating Systems Cornerstone
- Safety System Functional Failures

The inspectors reviewed LERs, operator log entries, monthly operating reports, monthly PI summary reports, and NRC inspection reports for the PI data submitted by the licensee during the period from July 1, 2002, through March 31, 2003, for Unit 1 and Unit 2.

Barrier Integrity Cornerstone
- Reactor Coolant System (RCS) Activity
- RCS Leak Rate

The inspectors reviewed completed radiochemistry data sheets from Procedure 35110-C, "Chemistry Control of the Reactor Coolant System," operating logs, leakage calculation results obtained from Procedures 14905-1,-2, "RCS Leakage Calculation (Inventory Balance)," and the licensee's monthly PI Summary reports for the PI data submitted by the licensee during the period from July 1, 2002, through March 31, 2003, for Unit 1 and Unit 2.

Emergency Preparedness Cornerstone

- Emergency Response Organization (ERO) Drill/Exercise Performance
- ERO Drill Participation
- Alert and Notification System Reliability

The inspectors assessed the accuracy of the PI for ERO drill and exercise performance (DEP) from April 1, 2000, through March 31, 2003, by reviewing a sample of drill and event records. The inspectors reviewed training records to assess the accuracy of the PI for ERO drill participation during the previous eight quarters for personnel assigned to key positions in the ERO. The inspectors assessed the accuracy of the PI for the alert and notification system reliability through review of a sample of the licensee's records of full-cycle and growl tests conducted for the past eight quarters.

b. Findings

No findings of significance were identified.

4OA5 Other

Licensee Strike Contingency Plans

a. Inspection Scope

The inspectors reviewed the content of the licensee's strike contingency plans to verify that reactor operation, facility security, fire protection, and emergency response capabilities were to be maintained consistent with TS and regulatory requirements. Interviews were conducted with operations, maintenance, security, emergency preparedness managers to determine if the minimum number of qualified personnel would be available as required for the proper operation and safety of the facility. The inspectors reviewed training records of selected strike replacement personnel to determine if they were qualified for the positions assigned. In addition, the inspectors witnessed operators reactivating their licenses to an active status to verify they were meeting the requirements of 10CFR55.53, "Conditions of License."

b. Findings

No findings of significance were identified.

4OA6 Meetings, Including Exit

Exit Meeting Summary

On July 3, 2003, the resident inspectors presented the inspection results to Mr. W. Kitchens and other members of his staff, who acknowledged the findings. The inspectors confirmed that proprietary information was not provided or examined during the inspection.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel:

W. Bargeron, Assistant General Manager - Plant Support
W. Burmeister, Manager, Engineering Support
D. Carter, Superintendent, Chemistry
J. Dixon, Superintendent, Health Physics
S. Douglas, Manager, Operations
K. Holmes, Manager, Training and Emergency Preparedness
W. Kitchens, General Manager - Nuclear Plant
I. Kochery, Manager, Health Physics & Chemistry
T. Tynan, Assistant General Manager - Plant Operations

NRC Personnel:

J. Moorman, Acting Chief, Region II, Reactor Projects Branch 2

LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather

Procedures
Abnormal Operating Procedure 18023-C, Loss of Turbine Plant Cooling and Closed Cooling Water Systems
20054-C, Maintenance Support of the Severe Weather Checklist
11889-C, Severe Weather Checklist

Condition Reports
200300464, 2003000259, 2002003396, 2002002907, 2002002558, 2002002533, 2002001542, 2002001278, 2002001533, 2001001232, 2002000470, 2002001831, 2002001243

Other Documents
TPCCW Heat Exchanger 1A, 1B, and 2B tube plugging maps
TPCCW pump vendor data sheet
UFSAR Chapters 9.2 and 9.3

Section 1R04: Equipment Alignment

Procedures
13145-2, Diesel Generators
11715-1, Component Cooling Water System Alignment
11006-1, Chemical and Volume Control System Alignment
13006-1, Chemical and Volume Control System

Drawings
1X4DB116-1, -2, Chemical and Volume Control System

Section 1R05: Fire Protestion

Procedures

92861-1, -2, Zone 161 - Diesel Generator Building Fire Fighting Preplan
92746-1, -2, Zone 46 - Auxiliary Building Level 1 Open Area Fire Fighting Preplan
92747-1, -2, Zone 47 - Auxiliary Building Level 1 Fire Fighting Preplan
92748-1, -2, Zone 48 - Auxiliary Building Level 1 Fire Fighting Preplan
92737-1, Zone 37 - Auxiliary Building Level A Fire Fighting Preplan
92755-1, Zone 55 - Auxiliary Building Level 2 Fire Fighting Preplan
92719-1, Zone 19 - Auxiliary Building CVCS Centrifugal Charging Pump Rooms Fire Fighting Preplan
92855-1, Zone 155 - Auxiliary Feedwater Pumphouse Train B Fire Fighting Preplan
92856-1, Zone 156 - Auxiliary Feedwater Pumphouse Fire Fighting Preplan
92857A-1, Zone 157A - Auxiliary Feedwater Pumphouse Train C Fire Fighting Preplan
92795-2, Zone 95 - Control Building Level A, Train “A” Spreading Room Fire Fighting Pre Plan

Drawings

AX4DJ8046, Fire Areas Diesel Fuel Oil Storage, Pump Room and Diesel Generator Building Floor Plans
AXDJ8017 and AXDJ8018, Fire Areas Auxiliary Building Floor Plan EL. 220'-0" Level 1
AXDJ8011, Fire Areas Auxiliary Building Floor Plan EL. 143'-6'' Level C
AXDJ8038, Fire Areas Auxiliary Feedwater Pump House Roof and Floor Plan and Details

Section 1R07: Heat Sink Performance

Procedures

83305-C, Heat Exchanger Testing/Maintenance Program

Other Documents

Preliminary Inspection Report Results of Unit 2, ACCW Heat Exchanger #2 Eddy Current Testing

Section 1R12: Maintenance Effectiveness

Procedures

13431-1, 120V AC 1E Vital Instrument Distribution System

Other Documents

Standardized Checklist 02849, Replace Control Battery Charger Circuit Board
CRs 2001001455, 2001001652, 2001001801, 2001001518, 2003001334, and 2003000579

Section 1R15: Operability Evaluations

Procedures

13105-2, Safety Injection System
10024-C, Equipment Troubleshooting

Other Documents

Limitorque Maintenance Update 92-01
MWO 10102088, Clean, lube, inspect and VOTES test 1HV8509B

Section 1R20: Refueling and Other Outage Activities

Procedures

12002-C, Unit Heatup to Normal Operating Temperature and Pressure
12003-C, Reactor Startup (Mode 3 to Mode 2)
12004-C, Power Operations (Mode 1)
12005-C, Reactor Shutdown to Hot Standby (Mode 2 to Mode 3)

Section1EP4: Emergency Action Level and Emergency Plan Changes

Procedures

Radiological Emergency Plan, Rev. 35, 36 and 37
25722-C, Emergency Alert Siren Performance Test, Rev. 10
18037-C, Imminent Security Threat
00012-C, Shift Manning Requirements, Rev. 16
91401-C, Assembly and Accountability, Rev. 15.1
91403-C, Site Dismissal, Rev. 13

Other Documents

CR 2003001569
NOT-03796, Critique of Table Top Drills