



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931

October 28, 2002

Carolina Power & Light Company
ATTN: Mr. John W. Moyer
Vice President
H. B. Robinson Steam Electric Plant
Unit 2
3851 West Entrance Road
Hartsville, SC 29550

SUBJECT: H.B. ROBINSON STEAM ELECTRIC PLANT- NRC INTEGRATED INSPECTION
REPORT 50-261/02-03

Dear Mr. Moyer:

On September 28, 2002, the Nuclear Regulatory Commission (NRC) completed an inspection at your Robinson facility. The enclosed integrated inspection report documents the inspection findings which were discussed on October 2, 2002, with Mr. Chris Burton 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 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/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/ (G. MacDonald for)

Brian R. Bonser, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Docket No.: 50-261
License No.: DPR-23

Enclosure: (See page 2)

Enclosure: Inspection Report 50-261/02-03
w/Attachment

cc w/encl:

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DATE	10/28/2002	10/28/2002	10/28/2002	10/28/2002			
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO			

U. S. NUCLEAR REGULATORY COMMISSION

REGION II

Docket No: 50-261
License No: DRP-23

Report No: 50-261/02-03

Licensee: Carolina Power & Light (CP&L)

Facility: H. B. Robinson Steam Electric Plant, Unit 2

Location: 3581 West Entrance Road
Hartsville, SC 29550

Dates: June 30, 2002 - September 28, 2002

Inspectors: B. Desai, Senior Resident Inspector
A. Hutto, Resident Inspector
G. Kuzo, Senior Radiation Specialist (2OS3, 2PS3)

Approved by: Brian R. Bonser, Chief
Reactor Projects Branch 4
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000261-02-03; Carolina Power & Light Company; on July 30, 2002 - September 28, 2002; H. B. Robinson Steam Electric Plant, Unit 2; baseline integrated resident inspection report.

The inspection was conducted by resident inspectors and a senior reactor inspector. No findings of significance were identified during this inspection. 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. Inspector Identified Findings

None

B. Licensee Identified Violations

None

Report Details

Summary of Plant Status

The unit operated at or near full power for most of the report period with the following exceptions. On July 19, power was reduced to approximately 25 percent for turbine valve testing and reactor coolant pump bay entry. The unit was returned to 100 percent power on July 20. On August 9, power was reduced to 55 percent for auxiliary transformer breaker repair. The unit was returned to 100 percent power on August 10.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Protection

a. Inspection Scope

The inspectors reviewed the Updated Final Safety Analysis Report (UFSAR) and licensee procedure OMM-21, Operation During Adverse Weather Conditions, which is applicable for adverse weather conditions. This review was performed to assess licensee readiness for coping with summer weather conditions. The inspectors focus of the inspection was to ensure Technical Specification (TS) compliance with the temperature limits on the ultimate heat sink as well as the lake level. The inspectors periodically verified the service water (SW) temperature as well as the lake level at Lake Robinson. The inspectors checked the installed temporary digital thermometers used to determine TS SW temperature requirements to verify they were functioning properly and the calibrations current. Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignment

a. Inspection Scope

The inspectors reviewed plant documents including plan-of-the-week, system descriptions (SD), UFSAR, TS, and piping and instrument diagrams (P&IDs) to determine correct system lineup. The inspectors performed four partial system walkdowns to verify proper equipment alignment and to identify any discrepancies that could impact the safety function of the system or could contribute to an initiation of a plant transient. Documents reviewed are listed in the attachment to this report.

Partial system walkdowns included:

- B emergency diesel generator (EDG)/start-up transformer (SUT) during A EDG outage
- Motor driven (MD) auxiliary feedwater (AFW) pumps during steam driven AFW maintenance
- B & A-1 Battery chargers, while A battery charger was out-of-service (OOS)
- Electrical breaker alignment for the A, B, and C safety injection (SI) pump replacements following spare SI pump realignment

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. Inspection Scope

Within the areas identified below, the inspectors observed the following to determine whether any conditions adversely affected fire protection defense-in-depth features:

- transient combustible materials;
- any welding or cutting being performed in the area;
- the physical condition of the fire detection devices;
- the physical condition of the automatic suppression system (where used);
- the availability and general condition of portable fire extinguishers;
- the physical condition of manual suppression systems, including fire hoses;
- the material condition of electrical raceway fire barrier systems;
- the material condition of the fire doors;
- the condition of ventilation fire dampers;
- the physical condition of seals in accessible electrical and piping penetrations;
- the adequacy of compensatory measures, where degraded features were identified.

The inspected areas included the following:

- 4160 KV room
- Component Cooling Water pump room
- Battery room/cable spread room
- Feedwater regulating valve area
- 4160 KV room permit during battery charger maintenance
- Turbine Building AR 70664 Improper Storage of Transient Combustibles

Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R07 Heat Sink Performance

a. Inspection Scope

The inspectors witnessed the cleaning and inspection of the A AFW pump oil cooler to verify that no deficiencies existed which could impair cooler performance. The inspectors observed the as found condition of the cooler and checked for the presence of debris and sludge, as well as evidence of corrosion or microbiological growth that could result in cooler fouling. The inspectors also observed the condition of the end bell for any degradation. The inspectors reviewed the as found cooler inspection report performed by the system engineer for accuracy and completeness. Additionally, the inspectors assessed the results of the B AFW pump oil cooler inspection to determine whether current inspection and cleaning frequencies were adequate to detect degradation prior to loss of the design basis heat removal function. Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors observed licensed operator requalification training activities which included simulator scenarios. The training scenario observed involved a shutdown LOCA. The inspectors assessed licensed operator performance during the scenarios to verify that the crew correctly diagnosed abnormal conditions and that the appropriate emergency operating procedures (EOP) and abnormal operating procedures (AOP) were used. The inspectors observed the effectiveness of command and control demonstrated by the crew and reviewed the emergency classification performed by the participating operators. The inspectors attended the post-scenario critique to verify that areas for improvement were being captured by the licensee's training program. Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors assessed the effectiveness of the licensee's maintenance efforts by evaluating several conditions that occurred during the inspection period. The inspection determined the risk significance of the condition, licensee implementation of the maintenance rule (MR) (10 CFR 50.65) with respect to characterization of failures, the appropriateness of the associated MR a(1) or a(2) classification as well as the associated performance criteria, and the utilization of the corrective action program.

Documents reviewed are listed in the attachment to this report. The specific conditions evaluated by the inspectors included:

- A EDG outage
- C SI pump bearing wear/damage
- Replacement of air start solenoid for B EDG
- Pressurizer pressure protection instrument lead lag failure
- Control room damper functional failure
- A Charging pump problems

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation

a. Inspection Scope

The inspectors reviewed the licensee's risk assessments for the following plant configurations. The inspectors reviewed the licensee's implementation of MR 10 CFR 50.65 (a)(4) requirements during scheduled and emergent maintenance activities. The licensee evaluated plant risk in accordance with Operations Management Manual OMM-048, Work Coordination and Safety Assessment, during the scheduling of planned and emergent work items. The inspectors reviewed the effectiveness of licensee actions to plan and control scheduled work to minimize overall plant risk while the emergent work items were being addressed. The inspectors reviewed the applicable plant risk profiles, work week schedules, and maintenance work requests associated with the following out of service equipment:

- Emergent N41 potentiometer replacement with D instrument air compressor OOS and MST-16 scheduled
- Degraded auxiliary transformer with scheduled EDG surveillance
- PORV PIC 477 B main steam controller maintenance, RVI-2 OOS
- Access to switchyard granted without proper approval
- Dedicated shutdown diesel generator scheduled maintenance with A charging pump OOS for emergent valve work.

Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R14 Personnel Performance During Non-Routine Plant Evolutions

a. Inspection Scope

The inspectors observed operator performance and reviewed operator logs, plant computer data, and control room annunciator panels during a power reduction to 25

percent to perform maintenance due to a turbine lube oil leak and during a power reduction to 55 percent to replace the auxiliary transformer cooling fan breaker. The inspectors observed the operators' procedure usage, command and control techniques, and adherence to TS reactor coolant sampling requirements. Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors selected operability evaluations/engineering changes (ECs)/action requests (ARs) affecting the risk significant mitigating systems listed below to assess as appropriate: (1) the technical adequacy of the evaluations; (2) whether continued component or system operability was warranted; and (3) whether other existing degraded conditions were considered for compensatory measures. Documents reviewed are listed in the attachment to this report. These reviews were performed for the following:

- AR 65202, A EDG DP-24A broken valve guide casting
- AR 66689, A EDG fuel oil piping corrosion
- AR 67977, SI spectacle flange thread engagement
- IST evaluation 02-17 for B SW pump re-baseline

b. Findings

No findings of significance were identified.

1R16 Operator Work-Arounds

a. Inspection Scope

The inspectors performed a cumulative review of existing operator work-arounds to determine any change from the previous review. The review also considered the effect of the work-arounds on the operators ability to implement AOPs or EOPs. The inspectors periodically reviewed ARs and held discussions with operators to determine if any conditions existed that should have been identified by the licensee as operator work-arounds. Additionally, the inspectors reviewed the licensee's compensatory actions put in place as a result of the startup/auxiliary transformer deluge system being out of service due to a broken valve. The inspectors reviewed these actions to determine if the functional capability of the transformers or human reliability in responding to an initiating event was affected, and to evaluate the effect on operators' ability to implement AOPs or EOPs. Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors witnessed the following post maintenance tests (PMT) and/or reviewed the test data to determine if the tests were adequate for the scope of maintenance and if the acceptance criteria and test results demonstrated the operational readiness of the systems structures and components (SSCs) in accordance with plant TS. Documents reviewed are listed in the attachment to this report. The activities were selected based on a risk assessment associated with the scheduled or emergent activity.

- OP-604 EDG Break-in and overspeed trip
- OST-201-2 Pressure instrument calibrations
- OST-151-3 SI Pump seal/bearing replacement
- OST-401-2 B EDG air start solenoid replacement
- OST-902 Containment cooler valve maintenance
- OST-151-3 C SI pump

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors witnessed the following surveillance tests and/or reviewed test data to verify that the surveillance test results demonstrated that the structures, systems, and components (SSCs) were capable of performing their intended safety functions. Specifically, the inspectors considered the following: pre-conditioning, plant risk, appropriate acceptance criteria, adequate test equipment, procedure adherence, completeness of data, adequate test frequency, and configuration control. Documents reviewed are listed in the attachment to this report.

- OST-251-1 Residual Heat Removal (RHR) Pump A and Components Test
- OST-101-3 Chemical and Volume Control System (CVCS) Component Test
- OST-151-1 Safety Injection System Components Test - Pump A
- OST-252-2 RHR System Valve Test - Train B
- OST-401-1 EDG A Slow Speed Start
- OST-201-1 MDAFW A System Component Test - Train A
- OST-621 Diesel Generator CO₂ System Cylinder Weight Test (semi-annual)
- OST-910 Dedicated Shutdown Diesel Generator (monthly)

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications

a. Inspection Scope

The inspectors reviewed the following temporary modifications to determine their impact on safety functions. This review included the associated 10 CFR 50.59 screening performed for the modifications against the system design basis, UFSAR and TS as well as the configuration control of the modification to verify that any affected plant documents, such as drawings and procedures were properly controlled.

- Deepwell to Containment HVH (SW)
- CVCS procedure OP-301-1 revision that added manually valving in the deborating demineralizers

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation

a. Inspection Scope

The inspectors observed and evaluated the licensee's conduct of a simulator based emergency preparedness drill held on September 3. The drill scenario involved an RCS leak during shutdown cooling. The inspectors observed the scenario from the simulator control room, the technical support center, and the emergency operations center. The inspector's observed performance of the licensee's ability to correctly classify the event, notify state and county authorities, and to formulate the appropriate protective action recommendations. The inspectors also reviewed the post-drill critique that was developed by the licensee evaluators.

k. Findings

No findings of significance were identified.

2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS3 Radiation Monitoring Instrumentation

Portable Survey Instrumentation

a. Inspection Scope

Current program guidance, including calibration and operation procedures, and its implementation to maintain operability and accuracy of selected portable survey instruments was reviewed and evaluated at the Harris Nuclear Plant calibration facilities used by the licensee. During the week of July 8, 2002, the inspectors reviewed current calibration data for selected personnel survey instruments and assessed operability of various portable survey instruments ready for use. Responsible staff's knowledge and proficiency regarding portable survey instrumentation calibration activities were evaluated through interviews, record reviews, and direct observation of an RO-2 portable survey instrument calibration. The inspectors assessed licensee program activities for portable instruments received from the licensee and found to be out-of-calibration/tolerance.

Licensee activities associated personnel radiation monitoring instrumentation were reviewed against TS, 10 CFR Part 20, and Health Physics Nuclear Generating Group Corporate Procedure - 0005. Calibration of Portable Radiation/Contamination/Air Sampling Survey Instruments, Rev. 2.

b. Findings

No findings of significance were identified.

2PS3 Radiological Environmental Monitoring Program (REMP)

Radiological Environmental Monitoring Program (REMP) Implementation

a. Inspection Scope

During the week of June 17, 2002, analytical laboratory activities conducted by Harris Energy and Environmental Center (HEEC) to analyze the licensee's REMP samples were reviewed and evaluated. The inspectors reviewed and evaluated procedural guidance and its implementation; instrument calibration and performance checks for gamma spectroscopy, liquid scintillation counting, and gross beta analysis instrumentation; and assessed knowledge and proficiency through interviews of responsible staff. In addition, laboratory analysis quality control (QC) activities were reviewed and evaluated including inter-laboratory sample comparison results; analytical measurement instrumentation performance checks and background determinations; analysis sensitivities and Lower Limit of Detection capabilities for gamma spectroscopy analyses and gross beta analyses; and sample preparation.

Program guidance for the analytical laboratory activities were reviewed against TS, 10 CFR Part 20, FSAR §12, Offsite Dose Calculation Manual (ODCM), and applicable procedures as documented in the Attachment to this report. Laboratory QC activities were evaluated against RG 1.21, Measuring, Evaluating and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials In Liquid and Gaseous Effluents from Light-Water Cooled Nuclear Power Plant, June 1974; and RG 4.15, Quality Assurance for Radiological Monitoring Programs (Normal Operation) - Effluent Streams and the Environment, December 1977. Documents reviewed are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

3. SAFEGUARDS

Cornerstone: Physical Protection (PP)

3PP3 Response to Contingency Events

The Office of Homeland Security (OHS) developed a Homeland Security Advisory System (HSAS) to disseminate information regarding the risk of terrorist attacks. The HSAS implements five color-coded threat conditions with a description of corresponding actions at each level. NRC Regulatory Information Summary (RIS) 2002-12a, dated August 19, 2002, "NRC Threat Advisory and Protective Measures System," discusses the HSAS and provides additional information on protective measures to licensees.

a. Inspection Scope

On September 10, 2002, the NRC issued a Safeguards Advisory to reactor licensees to implement the protective measures described in RIS 2002-12a in response to the Federal government declaration of threat level "orange." Subsequently, on September 24, 2002, the OHS downgraded the national security threat condition to "yellow" and a corresponding reduction in the risk of a terrorist threat.

The inspector interviewed licensee personnel and security staff, observed the conduct of security operations, and assessed licensee implementation of the threat level "orange" protective measures. Inspection results were communicated to the region and headquarters security staff for further evaluation.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES [OA]

40A1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors verified the following PIs for accuracy. To verify data for PIs under Initiating Events, Mitigating Systems and Barrier Integrity, the inspectors reviewed control room logs, maintenance rule logs, system engineer leak rate data, data reported to the NRC, and condition reports. PI data for the period of April through June 2002 was reviewed using the guidance in Nuclear Energy Institute (NEI) 99-02 Regulatory Assessment Performance Indicator Guideline, Revision 2. Documents reviewed are listed in the attachment to this report.

<u>Cornerstone</u>	<u>Performance Indicator</u>
Initiating Event	Unplanned power changes per 7000 critical hrs.
Barrier Integrity	Reactor coolant system leakage
Mitigating Systems	Safety system unavailability, residual heat removal system

b. Findings

No findings of significance were identified.

40A2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors performed an in-depth review of four ARs.

During this review, the inspectors determined whether:

- identification of the problem was complete and accurate;
- the problem was identified in a timely manner;
- the licensee properly classified and prioritized resolution;
- the licensee considered extent of condition, generic implications, common causes, and previous occurrences; and
- corrective actions were completed in a timely manner.

The ARs reviewed were:

- AR 72182, Deborating demineralizer inservice longer than intended
- AR 70811, Part 21 Rosemount Model 1153/1154 pressure transmitters

- AR 70356, ECs do not document elements of testing as described in EGR-NGGC-005
- AR 62410, B EDG unsatisfactory piston bushing inspection.

b. Findings

No findings of significance were identified.

4OA6 Meetings, Including Exit

Exit Meeting Summary

The inspectors presented the inspection results to Mr. Chris Burton and other members of licensee management on October 2, 2002.

The inspectors asked the licensee whether any of the material examined during the inspections should be considered proprietary. No proprietary information was identified.

SUPPLEMENTARY INFORMATION

A. Key Points of Contact

Licensee Personnel

R. Ivey , Operations Manager
E. Caba, Engineering Superintendent
D. Stoddard, Robinson Engineering Support Services Manager
E. Rothe, Maintenance Manager
C. Burton, Director of Site Operations
R. Steele, Outage Management Manager
T. Cleary, Plant General Manager
W. Farmer, Engineering Superintendent
J. Fletcher, Regulatory Affairs Manager
S. Weise, Training Manager
J. Moyer, Vice President, Robinson Nuclear Plant
S. Young, Superintendent Security
D. Crook, Supervisor Access Authorization
A.G. Cheatham, Radiation Protection Superintendent

NRC Personnel

Brian R. Bonser, Branch Chief, DRP, RII
M. Shannon, Acting Branch Chief, DRP, RII
S.K. Mitra, License Renewal Project Manager, NRR
Rich Emch, License Renewal Environmental Project Manager, NRR

B. Items, Opened, Closed, and Discussed

None.

C. List of Documents Reviewed

Section 1R01

- OMM-021, Operations During Adverse Weather
- UFSAR Section 9.2
- ITS Section 3.7

Section 1R04

- OP 604, Diesel Generators A and B Operating Procedure
- CAP-NGGC-200 Corrective Action
- ITS Section 3.6, 3.7, 3.5

- UFSAR Sections 8.3
- OP-202, Safety Injection
- Drawing 5379-1082

Section 1R05

- UFSAR Section 9.5.1, 9.5.1A
- OMM-002, Fire Protection Manual
- FP-003, Control of Transient Combustibles

Section 1R07

- ITS 3.7
- OST-201-1, MDAFW System Component Test - Train A
- OST-201-2, MDAFW System Component Test - Train B
- CM-201, Safety Related and Non-safety Related Heat Exchanger Maintenance

Section 1R11

- Emergency Action Level Matrix

Section 1R12

- ADM-NGGC-0101, Maintenance Rule Program
- RNP Maintenance Rule Database

Section 1R13

- OMM-48, Work Condition and Risk Assessment
- OST-401-2, EDG B Slow Speed Start
- OP-604, Diesel Generators A and B
- NUMARC 93-01
- OST-910, DSGD

Section 1R14

- GP-005, Power Operation
- OP-105, Maneuvering the Plant When Greater Than 25% Power

Section 1R15

- EGR NGGC-0005, Engineering Change
- UFSAR Sections 3.10, 6.3, 8.3, 9.2.1, 15.0
- Drawing G-19204A, 5379-1082
- ASME, Section XI

Section 1R16

- OMM-001-8, Operator Work-Arounds

Section 1R19

- PLP-033, Post Maintenance Testing (PMT) Program

Section 1R19

- ITS 3.5.2, 3.4.6, 3.4.7, 3.4.8, 3.5.2, 3.5.3, 3.6.3, 3.9.4, 3.9.5, 5.5.8
- H.B. Robinson Inservice Testing Database
- FP-013, Fire Protection System Surveillance Requirements
- OMM-015, Operations Surveillance Testing
- ASME, Section XI

Section 2PS3Procedures, Guidance Documents

- Nuclear Generation Group Standard Procedure ENV-NGGC-009, Determination of Tritium Activity in Aqueous or Solid Samples, Rev. 1.
- Nuclear Generation Group Standard Procedure ENV-NGGC-010, Determination of Gross Alpha and Beta Activities, Rev. 0.
- Nuclear Generation Group Standard Procedure ENV-NGGC-0011, Determination of Radiodine in Milk, Water, and Charcoal, Rev. 0
- Nuclear Generation Group Standard Procedure ENV-NGGC-012, Preparation and Counting of Samples for Determination of Gamma Activity, Rev. 0

Records

- Harris Energy and Environmental Center (HEEC) Environmental Cross Check Program Results, Quarters 1 through 4, Calender Year 2001.
- Quality control (QC) data for the following HEEC analytical instrumentation:
 - Gamma Analysis System Detectors 1, 2, 5, 6 including May 1, 2002, through June 19, 2002, background data, selected energy performance check results, and peak resolution values
 - Tennelec Alpha/Beta Counting System Serial Number (S/N) 35869 QC May1, 2002, through June 11, 2002, Daily reliability alpha and beta source and background check data and graphs
 - Liquid Scintillation Counting System S/N 428 and S/N 404281 QC May1, 2002, through June 11, 2002, monthly tritium efficiency data and daily background check data and graphs

Section 4OA1

- REG-NGGC-0009, NRC Performance Indicators