



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

April 15, 2002

Otto L. Maynard, President and
Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

SUBJECT: NRC INTEGRATED INSPECTION REPORT 50-482/01-06

Dear Mr. Maynard:

On March 23, 2002, the NRC completed an inspection at your Wolf Creek Generating Station. The enclosed report documents the inspection findings which were discussed with Mr. B. T. McKinney and other members of your staff on March 22, 2002.

This 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. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one violation of NRC requirements occurred. This violation is being treated as a noncited violation (NCV), consistent with Section VI.A of the Enforcement Policy. The NCV is described in the subject inspection report. If you contest the violation or significance of the NCV, 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, U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at the Wolf Creek Generating Station facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made 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).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

David N. Graves, Chief
Project Branch B
Division of Reactor Projects

Docket: 50-482
License: NPF-42

Enclosure:
NRC Inspection Report
50-482/01-06

cc w/enclosure:
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ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No: 50-482
License No: NPF-42
Report No: 50-482/01-06
Licensee: Wolf Creek Nuclear Operating Corporation
Wolf Creek Generating Station
Location: 1550 Oxen Lane NE
Burlington, Kansas
Dates: December 30, 2001, through March 23, 2002
Inspectors: F. L. Brush, Senior Resident Inspector
J. Cruz, Resident Inspector
K. D. Weaver, Resident Inspector
C. E. Johnson, Senior Reactor Inspector
W. C. Sifre, Reactor Inspector
Approved By: D. N. Graves, Chief, Project Branch B

ATTACHMENT: Supplemental Information

SUMMARY OF FINDINGS

Wolf Creek Generating Station NRC Inspection Report 50-482/01-06

IR 500482/01-06; on 12/29/2001 - 03/23/2002; Wolf Creek Nuclear Operating Corporation; Wolf Creek Generating Station. Integrated Resident/Regional Report. Fire Protection

The report covers a 12-week period of resident inspection and an announced inspection by Region IV inspectors. The significance of issues is indicated by their color (Green, White, Yellow, Red) and was determined by the Significance Determination Process in Inspection Manual Chapter 0609. Findings for which the significance determination process does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

Cornerstone: Mitigating Systems

No Color. A noncited violation of Technical Specifications Section 5.4.1 when the licensee failed to follow Procedure AP 10-102, "Control of Combustible Materials," Revision 6. The inspectors identified that the licensee placed transient combustibles weighing approximately 530 pounds inside the turbine building within 20 feet of the auxiliary building without the required permit. A permit was required in this area if the transient combustibles weight is greater than 100 pounds.

This finding was greater than minor because it had a credible impact on safety. This finding did not involve an impairment or degradation of a fire protection feature. The finding was of No Color because the issue was determined to be a violation greater than minor. The placement of the transient combustible material did not affect any installed fire protection features and it would not have impeded access to the area by the licensee's fire brigade (Section 1R05).

Report Details

Summary of Plant Status

The plant operated at essentially 100 percent power for the report period, with the following exception. On February 1, 2002, the licensee reduced plant power to approximately 80 percent following the failure of a 345 kV power line. The line was repaired and the licensee returned the plant to 100 percent power the same day. On March 21, 2002, the licensee commenced the power reduction in preparation for Refueling Outage XII. On March 23, 2002, the licensee opened the main generator output breaker to start the refueling outage.

1. **REACTOR SAFETY** **Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness**

1R04 Equipment Alignment (71111.04)

a. Inspection Scope

Partial walkdowns

The inspectors performed the following partial walkdowns:

- Auxiliary feedwater Train B during an auxiliary feedwater Train A outage
- Emergency Diesel Generator A during an Emergency Diesel Generator B outage
- Residual Heat Removal Train B during a Residual Heat Removal Train A outage

The inspectors performed the walkdowns to verify equipment alignment and identify discrepancies that could impact redundant system operability. The inspectors used the Updated Safety Analysis Report, system drawings, system lineup checklists, and other documents to perform the walkdowns. The inspectors also discussed the walkdowns with various licensee personnel.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

a. Inspection Scope

The inspectors performed a walkdown of the following areas to determine that the licensee implemented a fire protection program for the control of combustibles that maintains the fire detection and suppression equipment and passive fire protection features and adequately compensates for inoperable or degraded fire protection equipment, systems, or features:

- Auxiliary building 2026 foot level, auxiliary shutdown panel room
- Control building 2032 foot level, lower cable spreading room

- Control building 2073 foot level, upper cable spreading room
- Fuel building 2026 foot level, electrical equipment and heating, ventilation and air conditioning supply equipment rooms
- Fuel building 2000 foot fuel pool cooling heat exchanger Room B
- Turbine building 2000 foot level, general floor area south

b. Findings

On March 14, 2002, the inspectors identified that the licensee placed transient combustible materials in excess of procedure requirements in the turbine building approximately 15 feet from the auxiliary building. Licensee Procedure AP 10-102, "Control of Combustible Materials," Revision 6, requires a combustible materials permit for a fire loading of more than 100 pounds within 20 feet of a safety-related structure. The licensee placed approximately 530 pounds of Class A material approximately 15 feet from the auxiliary building.

This finding was greater than minor because it had a credible impact on safety. This finding did not involve an impairment or degradation of a fire protection feature and was of No Color because the issue was determined to be a violation greater than minor.

The placement of the transient combustible material did not affect any installed fire protection features and it would not have impeded access to the area by the licensee's fire brigade.

Technical Specification Section 5.4.1 requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Regulatory Guide 1.33 requires, in part, written procedures for the Plant Fire Protection Program. Licensee fire protection program Procedure AP 10-102, "Control of Transient Combustible Materials," Revision 6, requires a transient combustible permit if the loading of a fire area exceeds 100 pounds of Class A material within 20 feet of any safety-related structure. Contrary to the above, the licensee placed approximately 530 pounds of Class A material in the turbine building approximately 15 feet from the auxiliary building auxiliary feedwater area.

This violation is associated with an inspection finding that is characterized by the Significance Determination Process as having No Color and is being treated as a noncited violation, consistent with Section VI.A.1 of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as Performance Improvement Request 2002-0626 (Noncited Violation 50-482/0601-01).

1R06 Flood Protection Measures (71111.06)

a. Inspection Scope

The inspectors verified that the licensee's flooding mitigation plans and equipment were consistent with the licensee's design requirements and the risk assumptions in the Updated Safety Analysis Report for the auxiliary feedwater system rooms. The inspectors reviewed the following information:

- M-12LE01, Piping and Instrumentation Diagram, Turbine Building and Auxiliary Feedwater Pump Rooms Oily Waste System, Revision 05
- Updated Safety Analysis Report

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification (71111.11)

a. Inspection Scope

The inspectors observed licensed operator requalification training for a fuel handling accident. The inspectors compared the training with the objectives listed in Training Plan LR 10 040 02, "OFN KE-018, Fuel Handling Accident," Revision 2. The inspectors also reviewed licensee off-normal Procedure OFN KE-018, "Fuel Handling Accident," Revision 7, while the instructor discussed the procedure. The training met the objectives listed in the training plan. The inspectors discussed the training with various licensee personnel.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation (71111.12)

a. Inspection Scope

The inspectors reviewed the licensee's maintenance rule implementation for the following:

- Component cooling water system
- Fuel handling - fuel storage and handling
- Functional failure determination for Emergency Diesel Generator A lube oil keep warm Pump PKj03A dated December 20, 2001

- Main feedwater system
- Plant service water system
- Spent fuel pool cooling and cleanup

The inspectors assessed the effectiveness of maintenance efforts that apply to scoped structures, systems, and components in accordance with 10 CFR 50.65. The inspectors reviewed the licensee information listed in the attachment to this report and discussed the maintenance rule program with various licensee personnel.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13)

a. Inspection Scope

The inspectors reviewed the licensee's risk assessment for equipment outages as a result of planned and emergent maintenance in accordance with the requirements of 10 CFR 50.65(a)(4) and licensee Procedure AP 22C-003, "Operational Risk Assessment Program," Revision 7. The inspectors evaluated the licensee's effectiveness in assessing risk for planned and emergent maintenance. The inspectors also discussed the planned and emergent work activities with planning and maintenance personnel. The inspectors reviewed the following:

- Operational risk assessments for planned maintenance for the weeks of December 31, 2001, February 4 and 18, and March 11 and 18, 2002.
- Actual, planned, and emergent work schedules and any revised risk assessments for the same weeks

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following to ensure that operability was properly justified and the component or system remained operable:

- Configuration Change Package 10068, "Component Cooling Water Heat Exchanger EEG01A Essential Service Water Drain Line," Revision 0,

- Performance Improvement Request 2001-2745, Potential for internal flooding in Auxiliary Building Rooms 1206 and 1207

The inspectors review also included applicable portions of the Updated Safety Analysis Report, Technical Specifications, and system drawings and they discussed the operability evaluations with licensee personnel.

b. Findings

No findings of significance were identified.

1R16 Operator Workarounds (71111.16)

a. Inspection Scope

The inspectors reviewed operator workarounds to determine the following:

- Effect of the workarounds on system reliability, availability, and potential for misoperation
- Whether the cumulative effects of the workarounds could affect multiple mitigating systems
- The cumulative effects of the workarounds on operator response to plant transients and accidents

The inspectors reviewed licensee Administrative Procedure AI 22A-001, "Operator Workarounds," Revision 0, and the licensee's operator work around/burdens list.

The inspectors discussed with licensee operations personnel long-term equipment problems that were not included in the work around list. The inspectors reviewed 10 deficiencies that were not on the list and did not meet the licensee's definition of a workaround or operator burden. The inspectors reviewed the cumulative effects of the operator workarounds, burdens, and long-term equipment problems to determine whether they could affect mitigating system response during normal and emergency plant operations.

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications (71111.17B)

a. Inspection Scope

The inspectors reviewed procedures governing plant modifications to evaluate the effectiveness of the programs for implementing modifications to risk-significant systems, structures, and components, such that these changes did not adversely affect the

design and licensing basis of the facility. The inspectors also reviewed 10 permanent plant modification packages and associated documentation, such as 10 CFR 50.59 review screens and safety evaluations, to verify that they were performed in accordance with plant procedures. Procedures and permanent plant modifications reviewed are listed in the attachment.

The inspectors interviewed the cognizant design and system engineers for the identified modifications as to their understanding of the modification packages.

The inspectors evaluated the effectiveness of the licensee's corrective action process to identify and correct problems concerning the performance of permanent plant modifications. In this effort, the inspectors reviewed corrective action documents (listed in the attachment) and the subsequent corrective actions pertaining to licensee identified problems and errors in the performance of permanent plant modifications.

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed or observed the postmaintenance testing on the following equipment to verify that procedures and test activities are adequate to verify system operability:

- Emergency Diesel Generator A
- Emergency Diesel Generator B - two maintenance outages
- Essential Service Water Pump B and Traveling Water Screen B
- Residual Heat Removal Pump A
- Safety Injection Pump A
- Turbine-Driven auxiliary feedwater pump

b. Findings

No findings of significance were identified.

1R20 Refueling and Outage Activities (71111.20)

a. Inspection Scope

1. Outage Plan Review (02.01)

The inspectors reviewed the Refuel Outage XII risk control plan and compared it with the outage work schedule and Technical Specifications requirements. The inspectors

also confirmed that the licensee had mitigation/response strategies for loss of key safety functions. The inspectors discussed the overall refueling outage risk reduction plan with various licensee personnel.

2. Monitoring Shutdown Activities (02.02)

The inspectors observed portions of the reactor coolant system cooldown at the start of the refueling outage. The inspectors verified that the cooldown rates were in accordance with the Pressure and Temperature Limits Report, Revision 0. The inspectors also observed the transfer to shutdown cooling.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed or observed all or part of the following surveillance activities to verify that risk significant structures, systems, and components are capable of performing their intended safety functions and assessing their operational readiness:

- STS AL-102, "MDAFW Pump B Inservice Pump Test," Revision 26
- STS EF-100A, "ESW System Inservice Pump A & ESW A Discharge Check & Return Check Valve Test," Revision 21
- STS EJ-100A, "RHR System Inservice Pump A Test," Revision 22
- STS EJ-100B, "RHR System Inservice Pump B Test," Revision 18
- STS IC-615A, "Slave Relay Test K615 Train A Safety Injection," Revision 17
- STS IC-914B, "Channel Calibration Containment Hydrogen Recombiner B," Revision 6
- STS KJ-015A, "Manual/Auto Fast Start, Sync, & Loading of EDG NE01," Revision 14

b. Findings

No findings of significance were identified.

1R23 Temporary Plant Modifications (71111.23)

a. Inspection Scope

The inspectors reviewed the following temporary modification to ensure it did not affect the safety function of the vital switchgear room cooler:

- Temporary Modification Order 01-013-EF - Removed disk for vital switchgear room Cooler SGK05B essential service water outlet isolation Valve EFV0082

The inspectors reviewed the 10 CFR 50.59 screening, the Updated Safety Analysis Report, and discussed the temporary modification with licensee personnel

b. Findings

No findings of significance were identified.

4OA1 Performance Indicator Verification (71151)

a. Inspection Scope

The inspectors performed a review of the following performance indicator data. The inspectors reviewed the licensee's data submittals using NEI 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2. The inspectors reviewed various licensee performance indicator input information and observed data collection in one instance to determine the accuracy and completeness of the performance indicator:

- Reactor coolant system activity - January 2001 through December 2001
- Scrams with loss of normal heat removal - October 1999 through December 2001
- Unplanned power changes - January through December 2001

The inspectors also discussed performance indicator information with various licensee personnel.

b. Findings

No findings of significance were identified.

4OA3 Event Followup (71153)

(Closed) LER 50-482/2001-001-00: Potential Submergence of Safety-Related Equipment Due to an Inadequate Flooding Calculation.

On November 16, 2001, the licensee identified an error in an internal flooding calculation for two rooms in the auxiliary building. The corrected calculation predicted

that safety-related equipment required for the swap over of the auxiliary feedwater pumps from the condensate storage tank to the essential service water system could have been submerged in a seismic event. The licensee throttled a valve in the main condenser condensate makeup system as an interim corrective action. An in-office review determined that the issue was not safety significant. The licensee documented this issue in Performance Improvement Request 2001-2745.

4OA6 Meetings

.1 Exit Meeting Summary

The inspectors presented the permanent plant modifications inspection results to Mr. O. L. Maynard, Chief Executive Officer, and other members of licensee management on January 18, 2002.

The inspectors presented the resident inspector inspection results to Mr. B. T. McKinney, Vice President of Operations, and other members of licensee management after the conclusion of the inspection on March 22, 2002.

The inspectors were given proprietary information during the report period. All proprietary information was returned to the licensee prior to the inspection report exit meeting. No proprietary information is included in this report.

ATTACHMENT

Supplemental Information

PARTIAL LIST OF PERSONS CONTACTED

Licensee

K. A. Harris, Manager, Regulatory Affairs
M. W. Hicks, Manager, Operations
D. Jacobs, Plant Manager
J. W. Johnson, Manager, Resource Protection
O. L. Maynard, President and Chief Executive Officer
B. T. McKinney, Vice President Operations
R. Muench, Vice President Technical Services

ITEMS OPENED AND CLOSED

Opened

50-482/0106-01 NCV Fire Protection (Section 1RO5)

Closed

50-482/01-001-00 LER Potential Submergence of Safety-Related Equipment Due to an Inadequate Flooding Calculation (Section 4OA3)

50-482/0106-01 NCV Fire Protection (Section 1RO5)

LIST OF DOCUMENTS REVIEWED

Equipment Alignment

- CKL AL-120, "Auxiliary Feedwater Normal Lineup," Revision 30
- CKL EJ-120, "RHR Normal System Lineup," Revision 29
- CKL KJ-121, Diesel Generator NE-01 and NE-02 Valve Checklist," Revision 22

Fire Protection

- FPP A-28, "Auxiliary Building 2026 Foot Auxiliary Shutdown Panel Room," Revision 5
- FPP C-21, "Control Building 2032 Foot Lower Cable Spreading Room," Revision 5
- FPP C-22, "Control Building 2073 Foot Upper Cable Spreading Room," Revision 6

- FPP F-4, "Fuel Bldg El. 2026 Foot HVAC Supply Equipment Room," Revision 5
- FPP F-2, "Fuel Building 2000 Foot, 'B' Fuel Pool Cooling Heat Exchanger Room," Revision 5
- FPP F-5, "Fuel Building 2026 Foot Electrical Equipment Room," Revision 5
- FPP T-2, "Turbine Building General Floor Area 2000 Foot South," Revision 4
- Updated Safety Analysis Report fire hazards analysis

Maintenance Rule Documents

- Final Scope Evaluation for AE-01, AE-02, AE-05, AE-09, main feedwater system
- Final Scope Evaluation for EC-01, spent fuel pool cooling and cleanup system
- Functional failure evaluations for AE-01, AE-02, AE-05, AE-09, main feedwater system
- Functional failure evaluations for EC-01, spent fuel pool cooling and cleanup system
- Functional failure evaluations for EG-01, component cooling water system
- Functional failure evaluations for KE1-1, fuel handling - fuel storage and handling
- Functional failure evaluations for WS-01, plant service water system
- Maintenance rule bases information for EC-01, spent fuel pool cooling and cleanup system
- Maintenance rule bases information for EG-01, component cooling water system
- Maintenance rule bases information for KE1-1, fuel handling - fuel storage and handling
- Maintenance rule bases information for WS-01, plant service water system
- Maintenance rule (A1) disposition checklist and document summary for EG-01, component cooling water system
- Maintenance rule expert panel meeting minutes for AE-01, AE-02, AE-05, AE-09, main feedwater system
- Maintenance rule expert panel meeting minutes for EC-01, spent fuel pool cooling and cleanup system
- Maintenance rule expert panel meeting minutes for EG-01, component cooling water system

- Maintenance rule expert panel meeting minutes for KE1-1, fuel handling - fuel storage and handling
- Maintenance rule expert panel meeting minutes for WS-01, plant service water system
- Maintenance rule performance evaluation for AE-01, AE-02, AE-05, AE-09, main feedwater system
- Maintenance rule performance evaluation for EC-01, spent fuel pool cooling and cleanup system
- Maintenance rule performance evaluation for EG-01, component cooling water system
- Maintenance rule performance evaluation for KE1-1, fuel handling - fuel storage and handling
- Maintenance rule performance evaluation for WS-01, plant service water system

Performance Indicator Verification

- Licensee performance indicator worksheets
- Performance indicator summary reports
- Selected NRC inspection reports
- Selected control room operator logs
- CHS SJ-143, "SJ-143 Sample Station Sampling Instructions," Revision 14
- CHSF SJ-143-01, "Sampling of the Reactor Coolant System Depressurized at the SJ-143 Panel," Revision 2

Postmaintenance Testing

- STN PE-037A, "ESW Train A Heat Exchanger Flow and DP Trending," Revision 4
- STN PE-037B, "ESW Train B Heat Exchanger Flow and DP Trending," Revision 6
- STS AL-103, "TDAFW Pump Inservice Pump Test," Revision 34
- STS EJ-100A, "RHR System Inservice Pump A Test," Revision 23
- STS EM-100A, "Safety Injection Pump A Inservice Pump Test," Revision 20
- STS KJ-015B, "Manual/Auto Fast Start, Sync & Loading of EDG NE02," Revision 14

- SYS EF-100B, "ESW System Inservice Pump B & ESW B Discharge Check & Return Check Valve Test," Revision 21
- SYS EF-201, "ESW Screen Wash Operation," Revision 12
- SYS KJ-123, "Post Maintenance Run of Emergency Diesel Generator A," Revision 16
- SYS KJ-124, "Post Maintenance Run of Emergency Diesel Generator B," Revision 13
- Work Order 01-226337-002, Residual Heat Removal Pump A postmaintenance testing
- Work Order 01-228733-002, governor for Emergency Diesel Generator B
- Work Order 01-229167-007 and -012, Intercooler Heat Exchanger EKJ03A
- Work Order 01-229167-006, Intercooler Heat Exchanger EKJ03B
- Work Order 01-230885-000 and -001, Safety Injection Pump A Discharge Accumulator Injection Isolation Valve EMHV8821A
- Work Order 01-230886-000 and -001, Safety Injection Pump A Suction Isolation Valve EMHV8923A
- Work Order 01-230939-01, Essential Service Water Traveling Water Screen FEF01B
- Work Order 01-230983-000 and -001, Safety injection Pump A Discharge Hot Leg Isolation Valve EMHV8802A