August 4, 2021

Mr. Brad Berryman  
President and Chief Nuclear Officer  
Susquehanna Nuclear, LLC  
769 Salem Blvd., NUCSB3  
Berwick, PA 18603

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 – INTEGRATED INSPECTION REPORT 05000387/2021002 AND 05000388/2021002

Dear Mr. Berryman:

On June 30, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Susquehanna Steam Electric Station, Units 1 and 2. On July 29, 2021, the NRC inspectors discussed the results of this inspection with Mr. Kevin Cimorelli, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with Title 10 of the Code of Federal Regulations 2.390, “Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Jonathan E. Greives  
Chief Projects Branch 4  
Division of Reactor Projects

Docket Nos. 05000387 and 05000388  
License Nos. NPF-14 and NPF-22

Enclosure:  
As stated

cc w/ encl: Distribution via LISTSERV®
Docket Numbers: 05000387 and 05000388

License Numbers: NPF-14 and NPF-22

Report Numbers: 05000387/2021002 and 05000388/2021002

Enterprise Identifier: I-2021-002-0025

Licensee: Susquehanna Nuclear, LLC

Facility: Susquehanna Steam Electric Station, Units 1 and 2

Location: Berwick, PA

Inspection Dates: April 1, 2021, to June 30, 2021

Inspectors: C. Highley, Senior Resident Inspector
M. Rossi, Resident Inspector
H. Anagnostopoulos, Senior Health Physicist
M. Henrion, Health Physicist
D. Kern, Senior Reactor Inspector
A. Turilin, Reactor Inspector

Approved By: Jonathan E. Greives, Chief
Projects Branch 4
Division of Reactor Projects
SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee’s performance by conducting an integrated inspection at Susquehanna Steam Electric Station, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC’s program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.
PLANT STATUS

Unit 1 began the inspection period at rated thermal power and remained at or near rated thermal power until June 16, 2021, when the unit was down powered to 78 percent for turbine valve testing. The unit was returned to 100 percent power on June 16, 2021. On June 25, 2021, the unit was down powered to 66 percent for a rod sequence exchange. The unit was returned to 100 percent on June 30, 2021.

Unit 2 was shut down at the beginning of the inspection period. The unit was started up on April 22, 2021, and achieved 100 percent power on April 30, 2021. On May 1, 2021, the unit was down powered to 60 percent for a rod pattern adjustment. The unit was returned to 100 percent on May 3, 2021. On May 4, 2021, the unit was down powered to 90 percent for a rod pattern adjustment. The unit was returned to 100 percent on May 4, 2021. On May 5, 2021, the unit was down powered to 90 percent for a rod pattern adjustment. The unit was returned to 100 percent on May 5, 2021. On May 8, 2021, the unit was down powered to 88 percent for a rod pattern adjustment. The unit was returned to 100 percent on May 8, 2021. On May 11, 2021, the unit was down powered to 90 percent for a rod pattern adjustment. The unit was returned to 100 percent on May 12, 2021. On May 15, 2021, the unit was down powered to 62 percent for a rod pattern adjustment. The unit was returned to 100 percent on May 17, 2021, and remained at or near rated thermal power for the remainder of the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, “Light-Water Reactor Inspection Program - Operations Phase.” The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), resident and regional inspectors were directed to begin telework and to remotely access licensee information using available technology. During this time, the resident inspectors performed periodic site visits each week, increasing the amount of time on site as local COVID-19 conditions permitted. As part of their onsite activities, resident inspectors conducted plant status activities as described in IMC 2515, Appendix D; observed risk significant activities; and completed on site portions of IPs. In addition, resident and regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.
REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of summer grid readiness for the following systems:

- 230kV, 500kV, and T-10 switchyard walkdown on May 6, 2021
- ‘B1’ spray pond header inspection on May 12, 2021

71111.04 - Equipment Alignment

Partial Walkdown (IP Section 03.01) (3 Samples)

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

(1) Unit 2, 'A' core spray prior to divisional swap on April 2, 2021
(2) Units 1 and 2, spent fuel pool cooling system heat exchangers prior to removing shutdown cooling from service for residual heat removal system maintenance on April 5 and 6, 2021
(3) Unit 1, standby liquid control system on June 17, 2021

Complete Walkdown (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated system configurations during a complete walkdown of the Unit 2 division 2 residual heat removal system on May 14, 2021.

71111.05 - Fire Protection

Fire Area Walkdown and Inspection (IP Section 03.01) (6 Samples)

The inspectors evaluated the implementation of the fire protection program by conducting a walkdown and performing a review to verify program compliance, equipment functionality, material condition, and operational readiness of the following fire areas:

(1) Unit 2, main steam tunnel (FZ 2-4G) on April 5, 2021
(2) Units 1 and 2, fuel pool cooling heat exchanger rooms (FZ 1-5D and 2-5D) on April 5 and 6, 2021
(3) Unit 1, sump room, 645-foot elevation (FZ 1-1G), on April 15, 2021
(4) Unit 2, drywell (FZ 2-4F) on April 19, 2021
(5) Unit 2, condenser bay (FZ 2-31D, 2-32D, and 2-33C) and main steam pipeway (FZ 2-4G and 2-34B) on April 20, 2019
(6) Unit 2, equipment access area (FZ 2-3C) on May 3 and May 12, 2021
71111.06 - Flood Protection Measures

Inspection Activities - Internal Flooding (IP Section 03.01) (1 Sample)

The inspectors evaluated internal flooding mitigation protections in the:

(1) Unit 1, control rod drive pumps on June 28, 2021

Cable Degradation (IP Section 03.02) (1 Sample)

The inspectors evaluated cable submergence protection in:

(1) Manway hole MH014, MH015, and MH060 vault inspection during monthly water removal on June 10, 2021

71111.07A - Heat Sink Performance

Annual Review (IP Section 03.01) (1 Sample)

The inspectors evaluated readiness and performance of:

(1) Unit 2, 'A' residual heat removal heat exchanger eddy current inspection on April 27, 2021

Heat Exchanger (Service Water Cooled) (IP Section 03.02) (1 Sample)

The inspectors evaluated heat exchanger/sink performance on the following:

- Unit 1, 'A' turbine building, closed cooling water heat exchanger, cooled by service water
- Unit 2, 'B' reactor building, closed cooling water heat exchanger, cooled by service water
- Common, ultimate heat sink, sections 03.04a, 03.04c, and 03.04d

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

(1) The inspectors observed and evaluated licensed operator performance in the control room during Unit 2 startup following a refueling outage U2RIO20 on April 22, 2021.

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

(1) The inspectors observed and evaluated licensed operator performance in response to an inadvertent zone 3 isolation, lowering vacuum, stuck open safety relief valve, and hydraulic anticipated transient without a scram in the plant simulator on May 13, 2021.
71111.12 - Maintenance Effectiveness

Maintenance Effectiveness (IP Section 03.01) (4 Samples)

The inspectors evaluated the effectiveness of maintenance to ensure the following structures, systems, and components remain capable of performing their intended function:

(1) Unit 2, reactor water clean up demineralizer back flush pipe flange corrosion control on June 14, 2021
(2) Unit Common, 'E' emergency diesel generator availability following an unplanned extension of maintenance in March on June 16, 2021
(3) Unit 1, instrument air system based on repetitive compressor failures on June 24, 2021
(4) Unit Common, periodic evaluation of maintenance rule program on June 30, 2021

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management (IP Section 03.01) (4 Samples)

The inspectors evaluated the accuracy and completeness of risk assessments for the following planned and emergent work activities to ensure configuration changes and appropriate work controls were addressed:

(1) Unit 2, yellow shutdown risk during the common shutdown cooling work window (ZWO 2404109) on April 5 to 9, 2021
(2) Unit 2, yellow shutdown risk during cavity letdown on April 13, 2021
(3) Unit 2, yellow risk during change to MODE 2 with drywell de-inerted on April 21, 2021
(4) Unit 2, yellow risk during tie bus 0A107 10-year maintenance and inspection on June 2, 2021

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 03.01) (4 Samples)

The inspectors evaluated the licensee's justifications and actions associated with the following operability determinations and functionality assessments:

(1) Unit 2, prompt functionality assessment for reactor pressure vessel drain line wall thickness issue on April 20, 2021
(2) Unit 1, 1B turbine building chiller trip on May 14, 2021
(3) Unit 2, reactor core isolation cooling F088 valve appears to be mid-position, CR 2021-04202, on May 17, 2021
(4) Unit Common, 'A' emergency service water pump in alert range, CR-2021-08565, on June 23, 2021
71111.18 - Plant Modifications

Temporary Modifications and/or Permanent Modifications (IP Section 03.01 and/or 03.02) (3 Samples)

The inspectors evaluated the following temporary or permanent modifications:

1. Unit 2, temporary modification for reactor pressure vessel drain line flow modification on April 20, 2021
2. Unit 2, permanent modification for emergency service water buried piping replacement on May 15, 2021
3. Unit Common, permanent modification for magnetic trip setting revision of breakers for the 'E' emergency diesel generator starting air compressors on May 18, 2021

71111.19 - Post-Maintenance Testing

Post-Maintenance Test (IP Section 03.01) (11 Samples)

The inspectors evaluated the following post-maintenance test activities to verify system operability and functionality:

1. Unit 2, 'A' loop residual heat removal outage maintenance and repair work on April 2, 2021
2. Unit 2, main steam safety relief valves D, E, F, G, J, K, L, M, N, and R remote actuation following maintenance, OT-283-001, Revision 5, on April 8, 2021
3. Unit 2, 'A' residual heat removal service water heat exchanger disassembly and maintenance on April 13, 2021
4. Unit 2, outboard main steam isolation valve 28A repair on April 14, 2021
5. Unit 2, replaced cells 120 and 108 in 2D660-250VDC battery bank, Work Orders 2299854 and 2136204, on April 15, 2021
6. Unit 2, 2D650 A 250 volts direct current battery replacement, Work Order 2072469, on April 20, 2021
7. Unit 2, reactor core isolation cooling F008 valve repair on April 21, 2021
8. Unit 2, reactor core isolation cooling 10-year overhaul (license renewal commitment) on April 22, 2021
9. Unit Common, 'A' emergency diesel generator control air pressure regulator failure and repairs, SO-024-001A, Revision 29, on May 3, 2021
10. Unit 1, scram discharge volume valve and piping repairs on May 11, 2021
11. Unit Common, 'A' emergency service water pump lift adjustment on June 3, 2021

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage (IP Section 03.01) (1 Sample)

(1) Unit 2, the inspectors evaluated the refueling outage activities from March 21 to April 21, 2021
71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (5 Samples)

1. Unit 2, loss of coolant accident coincident with loss of offsite power testing on April 10, 2021
2. Unit 2, 2-year manual actuation of automatic depressurization system valves, SO-283-002, Revision 18, on April 10, 2021
3. Unit 2, high-pressure coolant injection and reactor core isolation cooling 150 psi test during startup on April 22, 2021
4. Unit 2, rod worth minimizer surveillance and operability test during startup on April 22, 2021
5. Unit 0, 'D' emergency diesel generator monthly operability run May 27, 2021

Reactor Coolant System (RCS) Leakage Detection Testing (IP Section 03.01) (2 Samples)

1. Unit 1, radio iodine specific activity dose equivalent I-131 on June 8, 2021
2. Unit 2, RCS leakage shiftly calculation surveillance on June 15, 2021

Containment Isolation Valve Testing (IP Section 03.01) (2 Samples)

1. Unit 2, reactor core isolation cooling local leak-rate testing on April 2, 2021
2. Unit 2, main steam isolation valve as-found local leak-rate testing on April 22, 2021

71114.06 - Drill Evaluation

Drill/Training Evolution Observation (IP Section 03.02) (1 Sample)

The inspectors evaluated:

1. Emergency operations facility and joint information center focus area drill involving loss of offsite power on May 25, 2021

RADIATION SAFETY

71124.01 - Radiological Hazard Assessment and Exposure Controls

Radiological Hazard Assessment (IP Section 03.01) (1 Sample)

1. The inspectors evaluated how the licensee identifies the magnitude and extent of radiation levels and the concentrations and quantities of radioactive materials and how the licensee assesses radiological hazards.

Instructions to Workers (IP Section 03.02) (1 Sample)

The inspectors evaluated instructions to workers including radiation work permits used to access high radiation areas and reviewed the following:
(1) **Radiation Work Packages (RWPs)**
   - RWP 202124000
   - RWP 20212360
   - RWP 20212126

**Electronic Alarming Dosimeter Alarms**
- Alarm on 2/8/2021
- Alarm on 2/10/2021

**Labeling of Containers**
- Unit 2, Reactor Building, 719-foot elevation, drum of hoses for work on hydraulic control units
- Unit 2, bagged valve parts in the outboard main steam isolation valve room (wingwall area)
- Unit 2, Reactor Building, 719-foot elevation, gang box of tools of the drywell

**Contamination and Radioactive Material Control (IP Section 03.03) (2 Samples)**

The inspectors evaluated licensee processes for monitoring and controlling contamination and radioactive material as follows:

(1) Unit 2, Reactor Building, 719-foot elevation, decontamination of a discrete radioactive particle area for the control rod drive mechanism removal pathway
(2) Unit 2, Reactor Building, 719-foot elevation, routine monitoring of personnel

**Radiological Hazards Control and Work Coverage (IP Section 03.04) (3 Samples)**

The inspectors evaluated in-plant radiological conditions during facility walkdowns and observation of radiological work activities. The inspectors also reviewed the following RWPs for areas with airborne radioactivity:

(1) RWP 2012112
(2) RWP 20212213
(3) RWP 2021353

**High Radiation Area and Very High Radiation Area Controls (IP Section 03.05) (2 Samples)**

The inspectors evaluated licensee controls of the following high radiation areas and very high radiation areas:

(1) Unit 2, Reactor Building, reactor backwash receiving tank room
(2) Unit 2, Reactor Building, outboard main steam isolation valve room (wingwall)

**Radiation Worker Performance and Radiation Protection Technician Proficiency (IP Section 03.06) (1 Sample)**

(1) The inspectors evaluated radiation worker and radiation protection technician performance as it pertains to radiation protection requirements.
Radiological Work Planning (IP Section 03.01) (3 Samples)

The inspectors evaluated the licensee’s radiological work planning for the following activities:

(1) RWP 20212320, Revision 0  
(2) RWP 20212001, Revision 0  
(3) RWP 20212002, Revision 0

Verification of Dose Estimates and Exposure Tracking Systems (IP Section 03.02) (3 Samples)

The inspectors evaluated dose estimates and exposure tracking.

(1) The inspectors reviewed the following ALARA planning documents:  
  • ALARA Pre-Job Review for RWP 20212320, Revision 0

(2) The inspectors reviewed the following radiological outcome evaluations:  
  • ALARA Post-Job Review for RWP 20212320, Revision 0

(3) The inspectors reviewed the following radiological outcome evaluations:  
  • ALARA Post-Job Review for RWP 20212017, Revision 0

Implementation of ALARA and Radiological Work Controls (IP Section 03.03) (2 Samples)

The inspectors reviewed ALARA practices and radiological work controls and reviewed the following activities:

(1) Unit 2, decontamination of the subpile room in the drywell  
(2) Work on the 28A outboard main steam isolation valve

Radiation Worker Performance (IP Section 03.04) (2 Samples)

The inspectors evaluated radiation worker and radiation protection technician performance during the following activities:

(1) Unit 2, decontamination of the subpile room in the drywell  
(2) Unit 2, Reactor Building, decontamination of a discrete radioactive particle area at the control rod drive mechanism removal pathway

71124.04 - Occupational Dose Assessment  
Special Dosimetric Situations (IP Section 03.04) (2 Samples)

The inspectors evaluated the following special dosimetric situation:

(1) The licensee’s implementation of requirements to manage radiation protection of nine declared pregnant workers.  
(2) The licensee’s method of assigning dose exposure when large dose gradients exist.
71124.07 - Radiological Environmental Monitoring Program

Environmental Monitoring Equipment and Sampling (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated environmental monitoring equipment and observed collection of environmental samples.

Radiological Environmental Monitoring Program (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated the implementation of the licensee’s radiological environmental monitoring program.

Groundwater Protection Initiative Implementation (IP Section 03.03) (1 Sample)

(1) The inspectors evaluated the licensee’s implementation of the groundwater protection initiative program to identify incomplete or discontinued program elements.

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

BI01: RCS Specific Activity (IP Section 02.10) (2 Samples)

(1) Unit 1 (January 1, 2020, through December 31, 2020)
(2) Unit 2 (January 1, 2020, through December 31, 2020)

BI02: RCS Leak Rate (IP Section 02.11) (2 Samples)

(1) Unit 1 (January 1, 2020, through December 31, 2020)
(2) Unit 2 (January 1, 2020, through December 31, 2020)

71152 - Problem Identification and Resolution

Semiannual Trend Review (IP Section 02.02) (1 Sample)

(1) The inspectors reviewed the licensee’s corrective action program for potential adverse trends in non-condition adverse to quality (NAQ) documents that might be indicative of a more significant safety issue.

Annual Follow-up of Selected Issues (IP Section 02.03) (1 Sample)

The inspectors reviewed the licensee’s implementation of its corrective action program related to the following issues:

(1) Control structure chilled water system reliability
INSPECTION RESULTS

<table>
<thead>
<tr>
<th>Observation: Corrective Actions to Address Control Structure Chilled Water System Reliability Challenges</th>
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<td>The inspectors selected control structure chilled water (CSCW) system performance/reliability as an annual inspection sample due to the system experiencing 12 unplanned chiller trips or train outages over the last 3 years. The safety-related CSCW system has two 100 percent capacity trains and is designed to remove heat from the control room, computer room, control structure ventilation, and the Unit 1 emergency switchgear room. If a control structure chiller trips, the opposite train chiller is designed to automatically start and assume the system heat removal function. Inspection scope included plant walkdowns of the CSCW system; review of corrective maintenance, preventive maintenance (PM), and design modification records for the last 5-year period; and review of issue documentation and prioritization, causal evaluation, and corrective actions to improve CSCW reliability.</td>
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<td>The inspectors determined the causes of the chiller trips during the last 3 years were typically unrelated. While reviewing recent CSCW chiller modifications, the inspectors identified two recent PM revisions which extended the replacement interval for Agastat 7000 series relays beyond manufacturer recommendations. Engineers verified the affected relays were installed in 2018, remained well within their vendor recommended service life, and therefore did not adversely impact CSCW chiller reliability. The issue was documented in CR-2021-08362 to review the relay replacement PM intervals and potential extent-of-condition.</td>
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<td>The inspectors concluded the licensee appropriately monitored CSCW system operation and documented associated equipment reliability issues in the corrective action program. Periodic testing verified the system was capable of performing its design functions. Additionally, engineers evaluated CSCW equipment issues and initiated corrective actions which addressed the cause of the condition adverse to quality (CAQ) in a timely manner, commensurate with its safety significance. Corrective actions completed and/or scheduled were appropriate to reduce likelihood of additional CSCW chiller trips.</td>
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<table>
<thead>
<tr>
<th>Observation: Semi Annual Trend Review of Non-Condition Adverse to Quality Documents Meeting Definition for a Condition Adverse to Quality or Condition Adverse to Regulatory Compliance</th>
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<td>The inspectors reviewed the licensee’s corrective action program for potential adverse trends in NAQ documents that might be indicative of a more significant safety issue. The inspectors reviewed a sampling, 30 of 480, of NAQ documents that were generated between October 1, 2020, and March 31, 2021, that had a subject indicating a potential to be a CAQ or a condition adverse to regulatory compliance (CARC). Of the 30 reviewed, none seemed to meet the definition of a CAQ or a CARC, and the inspectors determined that Susquehanna was appropriately classifying conditions as NAQs.</td>
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EXIT MEETINGS AND DEBRIEFS

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

- On May 20, 2021, the inspectors presented the triennial heat sink inspection results to Mr. Kevin Cimorelli, Site Vice President, and other members of the licensee staff.
- On July 29, 2021, the inspectors presented the integrated inspection results to Mr. Kevin Cimorelli, Site Vice President, and other members of the licensee staff.
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<td>ESSW Spray Pond Network schematic</td>
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<td>Drywell (II-400, II-516, II-607) Fire Zone 2-4F El. 704' through 807'</td>
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<td>Station Blackout Procedure</td>
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<td>Replacement/Repair of the Unit 2A (Div 1) ESW Supply and Return Header</td>
<td>04/30/2021</td>
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<td>EC-2417619</td>
<td>Revise Magnetic Trip Setting of Breakers</td>
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<td>Quarterly SDV Vent and Drain Valves Operability Check</td>
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<td>Unit 1 Primary Coolant Specific Activity Dose Equivalent I-131</td>
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|       | Corrective Action Documents Resulting from Inspection | CR-2021-08255, CR-2021-08362 |
|       | Drawings | E106291 | Control Structure Chilled Water System "A" Common P&ID | Revision 43 |
|       | Engineering Changes | EC-1684214 | Control Structure Chiller Time Delay Changes | Revision 1 |
|       |          | TDEC-2427915 | Temporary Control Structure Chiller 0K112A Bearing High Temperature Trip Elimination | Revision 0 |
|       | Engineering Evaluations | System 30 Control Structure HVAC Maintenance Rule Basis Document | Revision 5 |
|       | Miscellaneous | IOM 168 | Operating Instructions for Carrier Centrifugal Refrigeration Machines | 09/01/1976 |
|       |          | TRM 3.7.9 | Control Structure HVAC | Revision 3 |
|       |          | TS 3.7.4 | Control Room Floor Cooling System | Revision 271 |
|       |          | UFSAR 9.2.12 | Chilled Water Systems | Revision 70 |
|       | Work Orders | 1739956 |  |  |