July 19, 2002

Mr. John T. Conway Site Vice President Nine Mile Point Nuclear Station, LLC P.O. Box 63 Lycoming, NY 13093

SUBJECT: NINE MILE POINT NUCLEAR STATION - NRC INTEGRATED INSPECTION REPORT 50-220/02-04, 50-410/02-04

Dear Mr. Conway:

On June 29, 2002, the NRC completed an inspection of your Nine Mile Point Nuclear Station, Units 1 and 2. The enclosed report documents the inspection findings which were discussed on July 12, 2002, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. No findings of significance were identified.

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued an advisory recommending that nuclear power plant licensees go to the highest level of security, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants remain at the highest level of security and the NRC continues to monitor the situation. This advisory was followed by additional advisories, and although the specific actions are not releasable to the public, they generally include increased patrols, augmented security forces and capabilities, additional security posts, heightened coordination with law enforcement and military authorities, and more limited access of personnel and vehicles to the sites. The NRC has conducted various audits of your response to these advisories and your ability to respond to terrorist attacks with the capabilities of the current design basis threat (DBT). On February 25, 2002, the NRC issued an Order to all nuclear power plant licensees, requiring them to take certain additional interim compensatory measures to address the generalized high-level threat environment. With the issuance of the Order, we will evaluate NMPNS's compliance with these interim requirements.

John T. Conway

2

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Sincerely,

/RA/

Michele G. Evans, Chief Projects Branch 1 Division of Reactor Projects

Docket Nos. 50-220 50-410 License Nos. DPR-63 NPF-69

Enclosure: Inspection Report 50-220/02-04, 50-410/02-04

Attachment 1 - Supplemental Information

cc w/encl: M. J. Wallace, President, Nine Mile Point Nuclear Station, LLC

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C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law

J. Vinquist, MATS, Inc.

W. M. Flynn, President, New York State Energy Research and Development Authority

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U.S. NUCLEAR REGULATORY COMMISSION REGION I

Docket Nos: 50-220, 50-410

License Nos: DPR-63, NPF-69

Report No: 50-220/02-04 50-410/02-04

Licensee: Nine Mile Point Nuclear Station, LLC (NMPNS)

Facility: Nine Mile Point, Units 1 and 2

Location: P. O. Box 63 Lycoming, NY 13093

Dates: May 19, 2002 - June 29, 2002

Inspectors: G. Hunegs, Senior Resident Inspector B. Fuller, Resident Inspector T. Burns, Reactor Inspector N. Perry, Senior Project Engineer D. Silk, Senior Emergency Preparedness Inspector G. Smith, Senior Physical Security Inspector

Approved by: Michele G. Evans, Chief Projects Branch 1 Division of Reactor Projects

Summary of Findings

IR 05000220-02-04, IR 05000410-02-04, on 5/19-6/29/02; Nine Mile Point Nuclear Station, LLC; Nine Mile Point, Units 1 & 2. Resident Inspector Report

This inspection was conducted by resident inspectors and four region-based inspectors. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using IMC 0609, "Significance Determination Process," (SDP). Findings for which the SDP 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 in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector Identified Findings

No findings of significance were identified.

Report Details

SUMMARY OF PLANT STATUS

Nine Mile Point Unit 1 (Unit 1) began the inspection period at 100 percent power. On May 22, 2002, a reduction in power was required to take the generator off-line for repairs to switchyard disconnect switch 18. Full power was restored after the successful repair and the unit remained at full power through the end of the inspection period.

Nine Mile Point Unit 2 (Unit 2) began the inspection period at 100 percent power and remained there through the end of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness

- 1R04 Equipment Alignment
- .1 Routine Inspection
- a. Inspection Scope

The inspector selected the Unit 2 division II residual heat removal system (RHS) to conduct a partial system walkdown while the division I was out of service. The walkdown included the control room switch verification and physical inspection and verification of the RHS configuration. N2-OP-31, Residual Heat Removal System, Revision 15, was used for this review.

The inspector selected the Unit 1 112 containment spray loop to conduct a partial system walkdown while the 111 containment spray loop was out of service. The walkdown included the control room switch verification and physical inspection and verification of the containment spray configuration. N1-OP-14, Containment Spray System, Revision 42, was used for this review.

b. Findings

No findings of significance were identified.

- .2 <u>Periodic Evaluation</u>
- a. <u>Inspection Scope</u>

The inspector performed a complete walkdown of the Unit 2 standby gas treatment system (GTS). The inspector reviewed the system health report and maintenance rule status, and discussed the system status with the system engineer. In order to verify that personnel were identifying equipment alignment problems at an appropriate threshold, the inspector sampled the corrective action program related to the GTS for the prior two years. Using the documents listed below, the inspector verified that GTS valves were correctly positioned and appeared functional, components were properly labeled, supports appeared functional, valves were locked as required, and material condition of

the components was acceptable. Additionally, the inspector verified proper GTS valve indication and switch alignment in the main control room. Minor discrepancies were brought to the attention of control room personnel. The following documents were used for this review:

- Updated Safety Analysis Report (USAR), Revision 13, Section 6.5
- System Health Reports for 2001
- Unit Two Operations Technology Standby Gas Treatment System, Revision 3
- N2-OP-61B, Standby Gas Treatment System, Revision 9
- Attachment 61B: N2-OP-61B, Walkdown Valve Lineup, Revision 00
- PID-61B-20, Primary Containment Purge & Standby Gas Treatment, Revision 20
- PID-061C-5, Stand-by Gas, Revision 5

b. Findings

No findings of significance were identified.

1R05 Fire Protection

a. <u>Inspection Scope</u>

The inspectors conducted walkdowns of the fire areas to determine if there was adequate control of transient combustibles and ignition sources. The condition of fire detection devices, the readiness of the sprinkler fire suppression systems and the fire doors were also inspected against industry standards. In addition, the passive fire protection features were inspected, including the ventilation system fire dampers, structural steel fire proofing, and electrical penetration seals. The following plant areas were inspected:

- Fire zones 212, 213 Reactor Building 196'/198' (Unit 2)
- Fire zones 222, 223 Reactor Building 214'/215' (Unit 2)
- Fire zones R2A/B/C Reactor Building 261' (Unit 1)
- Auxiliary Control Room Turbine Building 261' (Unit 1)

b. Findings

No findings of significance were identified.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors reviewed the licensed operator requalification training activities to assess the licensee's training program effectiveness. The inspectors observed Unit 1 licensed operator simulator training on May 30. The inspectors reviewed performance in the areas of procedure use, self and peer-checking, completion of critical tasks, and training performance objectives. Following the simulator exercise, the inspectors observed the crew debrief and critique, and reviewed simulator fidelity through a sampling process.

b. Findings

No findings of significance were identified.

1R12 Maintenance Rule Implementation

- .1 Routine Inspection
- a. Inspection Scope

The inspectors reviewed performance based problems involving selected in-scope structures, systems, and components (SSCs) to assess the effectiveness of the maintenance program. Reviews focused on: (1) proper maintenance rule scoping, in accordance with 10 CFR 50.65; (2) characterization of failed SSCs; (3) safety significance classifications; (4) 10 CFR 50.65 (a)(1) and (a)(2) classifications; and, (5) the appropriateness of performance criteria for SSCs classified as (a)(2), and goals and corrective actions for SSCs classified as (a)(1). The inspectors reviewed the licensee's system scoping documents and system health reports.

The following DERs were reviewed:

- 2-2001-5609, 2 FWS*P1A electrical fault (Unit 2)
- 1-2002-0482, Emergency service water (ESW) Pump 12 failed to run (Unit 1)

<u>Findings</u>

No findings of significance were identified.

.2 Periodic Evaluation

a. Inspection Scope

The inspector reviewed the periodic evaluation required by 10 CFR 50.65 (a)(3) for Nine Mile Point Nuclear Station to verify that structures, systems and components (SSCs) within the scope of the maintenance rule were included in the evaluation, and balancing of reliability and unavailability was given adequate consideration. The inspector reviewed the licensee's most recent periodic evaluation report dated May 17, 2002, which covered the interval March 2000 through December 2001. The inspector verified that the periodic evaluation was completed within the required two year time period.

The inspector selected a sample of safety significant systems that were in a(1) status to verify that: (1) goals and performance criteria were appropriate, (2) industry operating experience was considered, (3) problem identification and resolution of maintenance rule-related issues are addressed, (4) corrective action plans were effective, and (5) performance was being effectively monitored. The inspector verified that adjustments were made in action plans for SSCs in a(1) status as a result of the licensee's review of system performance against established goals. As of December 31, 2001, fifteen (15) SSCs at Unit 1 and seventeen (17) at Unit 2 were in a(1) status. Six of these systems were risk significant. The inspector also reviewed a sample of

safety significant SSCs to verify the licensee performed an assessment of the balance between reliability and availability for these systems and, made adjustments as necessary.

The inspector selected a sample of high safety significant SSCs that were in a(2) status to verify that the licensee had established an appropriate performance criteria (PC). Also, the inspector verified that the licensee examined any SSCs that failed to meet their PC and reviewed those SSCs that exhibited repeated maintenance preventable functional failures for consideration of movement to a(1).

The inspector selected the following (a)(1) systems for detailed review:

Emergency Cooling (EC) Primary Containment (CTN) Spent Fuel Pool Cooling (FP) Feedwater/High Pressure Coolant Injection (HPCI) Reactor Building Ventilation(RBAC) Instrument Air System (IAS)

Additionally, the following risk significant (a)(2) systems were reviewed to verify performance or condition was being effectively controlled through the performance of preventive maintenance.

Reactor Recirculation (RR) Instrument Air (IAS), in a(2), December 2000 Reactor Water Cleanup (WCS)

A sample of high safety significant systems going from (a)(1) to (a)(2) were reviewed to assess preventive and corrective actions and goal achievement.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control

a. Inspection Scope

For selected maintenance work orders (WOs), the inspectors evaluated: (1) the effectiveness of the risk assessments performed before the maintenance activities were conducted; (2) risk management control activities; (3) the necessary steps taken to plan and control resultant emergent work tasks; and, (4) the overall adequacy of identification and resolution of emergent work and the associated maintenance risk assessments. The following documents were used for this review:

- GAP-MAI-01, Conduct of Maintenance, Revision 3
- GAP-PSH-01, Work Control, Revision 27
- NEG-CA-010, Online Configuration Risk Management Guidance

The following work item/WO was reviewed:

• Motor operated disconnect 18 hot spot repairs (Unit 1)

a. <u>Findings</u>

No findings of significance were identified.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed operability evaluations affecting risk significant mitigating systems, to assess: (1) the technical adequacy of the evaluation; (2) whether continued system operability evaluations were warranted; (3) whether other existing degraded systems adversely impacted the affected system or compensatory measures; (4) where compensatory measures were used, whether the measures were appropriate and properly controlled; and, (5) the degraded systems impact on TS limiting condition for operations. The following documents were used for this review:

- GAP-OPS-01, Administration of Operations, Revision 19
- S-ODP-OPS-0116, Operability Determinations

The following licensee documents were reviewed:

- 2-2002-2879, Two washers missing on bus bar bolting on 2BYS*Bat2A (Unit 2)
- 2-2001-4997, Engineering evaluation is in conflict with Appendix R design bases (Unit 2)
- 2-2002-2885, Unit 1 Control Room Chiller breaker tripped (Unit 1)
- b. Findings

No findings of significance were identified.

1R19 Post-Maintenance Testing

a. Inspection Scope

The inspectors reviewed post-maintenance testing (PMT) procedures and associated testing activities for selected risk significant mitigating systems to assess whether: (1) the effect of testing on the plant had been adequately addressed by control room and engineering personnel; (2) testing was adequate for the maintenance performed; (3) acceptance criteria were clear and adequately demonstrated operational readiness, consistent with the design and licensing basis documents; (4) test instrumentation had current calibrations, range, and accuracy for the application; (5) tests were performed, as written, with applicable prerequisites satisfied; (6) jumpers installed or leads lifted were properly controlled; (7) test equipment was removed following testing; and (8) equipment was returned to the status required to perform its safety function. The following tests and activities were reviewed:

- N2-PM@11, Service water mollusk biocide treatment (Unit 2)
- N2–OSP-EGS-M@001, Division II Emergency Diesel Generator (Unit 2)
- Various WOs, "C" Reactor feed pump uncoupled run (Unit 2)
- N1-ST-Q6A, 111 Containment Spray (Unit 1)

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors witnessed performance of surveillance test procedures and reviewed test data of selected risk significant SSCs to assess whether the SSCs satisfied Technical Specifications, Updated Final Safety Analysis Report (UFSAR), and licensee procedure requirements; and to determine if the testing appropriately demonstrated that the SSCs were operationally ready and capable of performing their intended safety functions. The following tests were witnessed:

- N2-OSP-GTS-R@001, Division I Standby Gas Treatment System Functional Test (Unit 2)
- N2-PM-M1, Monthly Test of Reactor Core Isolation Cooling Overspeed Device (Unit 2)
- N1-ISP-036-003, Hi/Lo Reactor Water Level (Unit 1)
- N1-St-Q1C, 112 Core Spray (Unit 1)
- b. Findings

No findings of significance were identified.

1EP4 Emergency Action Level and Emergency Plan Changes

a. <u>Inspection Scope</u>

The inspector conducted an in-office review of licensee submitted changes for the emergency plan-related documents to determine if the changes decreased the effectiveness of the plan. A thorough review was conducted of documents related to the risk significant planning standards (RSPS), such as classifications, notifications and protective action recommendations. A cursory review was conducted for non-RSPS documents. These changes were reviewed against 10 CFR 50.54(q) to ensure that the changes do not decrease the effectiveness of the plan, and that the changes as made continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E. These changes are subject to future inspections to ensure that the impact of the changes continues to meet NRC regulations. The submitted and reviewed documents (Plan and Implementing Procedures) follow:

Site Emergency Plan, Rev. 45

EPIP-EPP-11, Hazardous Material Incident Response, Rev. 6 EPIP-EPP-13, Emergency Response Facilities Activation and Operation, Rev. 11 EPIP-EPP-20, Emergency Notifications, Rev. 13 EPIP-EPP-22, Damage Control, Rev. 7 EPIP-EPP-23, Emergency Personnel Action Procedures, Rev. 13 EPMP-EPP-01, Maintenance of Emergency Preparedness, Rev. 14 EPMP-EPP-02, Emergency Equipment Inventories and Checklists, Rev. 25 EPMP-EPP-04, Emergency Exercise/Drill Procedure, Rev 8 EPMP-EPP-06, Emergency Response Organization Notification Maintenance and Surveillance, Rev. 10

b. Findings

No findings of significance were identified.

3. SAFEGUARDS

Cornerstone: Physical Protection

3PP4 Security Plan Changes

a. <u>Inspection Scope</u>

An in-office review was conducted of changes to the Physical Security Plan and Training and Qualifications Plan, identified as Issue 5, Revision 3 and Issue 4, Revision 0, respectively, submitted to the NRC on November 13, 2001, in accordance with the provisions of 10 CFR 50.54(p). The review was conducted to confirm that the changes were made in accordance with 10 CFR 50.54(p), and did not decrease the effectiveness of the plan.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA2 Identification and Resolution of Problems

a. Inspection Scope

Unit 1 emergency diesel generator 102 degraded cooling water flow was identified on November 26, 2001, during a quarterly surveillance test. The degraded flow was documented on DER NM-2001-5495 and entered into the licensee's corrective action program. Licensee analysis showed that the EDG remained operable. The inspectors selected this deficiency as a sample for review under the problem identification and resolution inspection module due to the impact on safety related systems and potential for common cause effects on other raw water systems. The inspectors reviewed the licensee's root cause determination, the immediate and long term corrective actions and the determination of extent of condition.

Each Unit 1 emergency diesel generator is cooled by raw water supplied by a dedicated pump taking suction from the common forebay in the screenhouse. The cooling water is discharged to the service water discharge header after passing though the EDG jacket water heat exchanger. Since this is a raw water cooling system, pipe corrosion and biofouling were concerns.

Degradation of raw water flow was documented in DER 1-1997-3359, and corrective actions were assigned to clean the supply piping during upcoming maintenance periods. A lack of installed cleaning access points resulted in a 49-foot section of the supply piping for the 102 EDG not being cleaned. Cleaning of the piping was deferred based upon an engineering evaluation which cited that cooling flows had been adequate and that the cleaning was considered preventive in nature.

Licensee troubleshooting and root cause evaluation determined that fouling of the supply piping was the cause of the current degraded flow. Corrective actions included addition of cleaning access points in the piping and hydrolazing of the portion of the supply piping which had not been previously cleaned. Cooling flow was restored to acceptable levels following the cleaning.

The licensee's root cause evaluation documented that the corrective actions taken following the 1997 degraded flow were ineffective in preventing further degradation of flow. A preventive action was assigned to revise the qualification cards for Branch Managers and General Supervisors to include this event as an example of improper decision making and its impact on equipment performance.

The licensee's root cause also evaluated the extent of condition for other raw water systems and determined that acceptable preventive measures were in place to preclude blocking of those systems by corrosion products or biofouling.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

<u>(Closed) Unresolved Item (URI) 05000410/2000-011-04</u>, Inconsistencies associated with implementation of the maintenance rule for the EDG ventilation system. The inspector reviewed licensee documentation concerning this URI including DER packages, maintenance rule scope and performance criteria documents and discussed the issues with NMPNS personnel.

The URI was associated with the licensee's performance criteria for the EDG ventilation system, tracking EDG ventilation system unavailability, and classification of failures under the maintenance rule.

The first two concerns were centered on a hypothetical situation where the existing performance monitoring criterion for the EDG ventilation function could allow a large number of functional failures and low unavailability time, possibly masking equipment performance issues. The licensee evaluated these concerns and revised their associated procedures to improve equipment monitoring. The licensee revised N2-MRM-Rel-0104, "Maintenance Rule Scope" to indicate that the failure of a damper to any position would be considered a functional failure. Performance monitoring for the system function was adjusted to allow for better performance tracking. Adjustments included a reduction of the overall number of functional failures (FFs) that would be allowed before the need for (a)(1) goal setting would be considered, the functional failure statements were revised and changes to unavailability determination methodology were completed. These actions were documented in DERs 2-2001-0665, 0712, 0713, and 0487.

The third concern was associated with DER 2-2000-1838 which documented a motor operated damper failure as a functional failure but did not characterize it as maintenance preventable. The failure mode was determined to be improper staking of the internal pump assembly during vendor refurbishment activities. The licensee determined that the failure occurred due to vendor refurbishment practices and not as a result of maintenance being performed by NMPNS. Accordingly the licensee decision that the failure was not maintenance preventable was appropriate.

The conditions which existed which led to the concerns were in accordance with maintenance rule requirements therefore, no violation occurred. This item is closed.

<u>URI 05000410/2000-011-05</u>, Potential increase in risk associated with removal of one EDG ventilation fan from service. The inspector noted that an EDG ventilation train is routinely removed from service when outside ambient temperature is low as allowed by operating procedure OP-57, "Diesel Generator Building Ventilation System." Paragraph (a)(4) of the maintenance rule requires, in part, that before performing maintenance activities, that an assessment of the increase in risk be made prior to performing the activities. Subsequent to the inspection period, the inspector reviewed risk assessment information associated with removal of one EDG ventilation fan from service which

showed that there was no increase in risk associated with the ventilation lineup. The inspector determined that no violation occurred and that this item is closed.

<u>URI 05000410/2000-008-02</u>, Maintenance of the FWS-LV10 valves per the licensee's maintenance rule program. The concern was associated with the licensee's approach to characterizing the valve leakage under the maintenance rule. The inspector noted that the valve leakage should be characterized as a functional failure if the feedwater level control valve, FWS-LV10, leakage adversely impacted the redundant reactivity control system. The inspector reviewed the licensee's analysis and associated maintenance rule documents.

Valve leakage has an impact on a feedwater runback by limiting the reduction of subcooling to the reactor core and thus limiting the resulting reduction in power. The licensee documented in an engineering supporting analysis (ESA), ESA-2M00-011, the impact of the degraded feedwater main flow control valves on the operability of the redundant reactivity control system. Licensee analysis determined that requirements could be met with the feedwater flow control valve leakage as the amount of feedwater flow due to the degraded valves will have minimal impact. The inspector determined that no violation occurred and this item is closed.

4OA6 Management Meetings

Exit Meeting Summary

The inspectors presented the inspection results to Mr. J. Conway, Site Vice President, and other members of licensee management at the conclusion of the inspection on July 12, 2002. The licensee acknowledged the findings presented. The inspectors asked the licensee whether any of the material examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT 1

a. Key Points of Contact

Licensee

- J. Conway, Site Vice President
- R. Dean, Manager Unit 2 Engineering
- L. Hopkins, Unit 1 Plant General Manager
- T. Lee, Maintenance Rule Manager, Unit 2
- S. Minihan, Unit 2 Operations Manager
- B. Montgomery, General Manager Nuclear Engineering
- M. Peckham, Unit 2 Plant General Manager
- B. Randall, Manager Unit 1 Engineering
- T. Syrell, Maintenance Rule Manager, Unit 1
- C. Terry, General Manager, Quality Assurance
- D. Topley, Unit 1 Operations Manager
- D. Wolniak, Licensing Manager
- b. List of Items Closed

05000410/2000-011-04	URI	Inconsistencies associated with implementation of the maintenance rule for the EDG ventilation system
05000410/2000-011-05	URI	Potential increase in risk associated with removal of one EDG ventilation fan from service
05000410/2000-008-02	URI	Maintenance of the FWS-LV10 valves per the licensee's maintenance rule program

c. List of Documents Reviewed

Periodic Assessment Of Maintenance Rule Program, April 1, 1998 through March 1, 2000 Periodic Assessment Of Maintenance Rule Program, March 2000 through December 2001 Maintenance Rule Unavailability Monitoring, Unit 2, 01/31/2002 Maintenance Rule Reliability Monitoring, Unit 2, 01/31/2002 Maintenance Rule Unavailability Monitoring, Unit 2, 05/31/2002 Maintenance Rule Reliability Monitoring, Unit 2, 05/31/2002 Maintenance Rule Unavailability Monitoring, Unit 2, 11/30/2001 Maintenance Rule Reliability Monitoring, Unit 2, 11/30/2001 Maintenance Rule Unavailability Monitoring, Unit 1, 4/30/2002 Maintenance Rule Reliability Monitoring, Unit 1, 4/30/2002 DER-2-2001-1092, 2IAS-C3C Failed to Start for Scheduled Equipment Rotation DER-NM-2000-705, RCIC Turbine Trip DER-NM-2001-5373, RCIC flow indicator is reading approximately 100 gpm DER-NM-2002-652, Torus Water Level Indication 58-05A Declared Inoperable Maintenance Rule Progress Report, Electrical Tie and Feeder Breakers Maintenance Rule Progress Report, RCS Reactor Recirculation RVDT's DER's-NM-2002-2454, 2455, 2458, 2460, Recommendations Identified in Periodic Assessment, Unit 2, 2002 WO 00-11092-02, Leak test of 2WCSMOV102000 WO 00-16439-00, Replace Valve 2WCSMOV200 During RFO8 NIP-REL-01, Rev 7, Maintenance Rule (Nuclear Interface Procedure) N1-MRM-REL-0105, Rev 13, Unit 1, Maintenance Rule Performance Criteria N2-MRM-REL-0105, Rev 11, Unit 2, Maintenance Rule Performance Criteria S-MRM-REL-0101, Rev 10, Maintenance Rule Manual N2-MRM-REL-0104, Rev 13, Maintenance Rule Scope, Unit 2 N1-MRM-REL-0104, Rev 13, Maintenance Rule Scope, Unit 1 NIP-ECA-01, Rev 24, Deviation/Event Report (Nuclear Interface Procedure) Action Plan, DW Average Temperature Indication Channel #12, Unit 1 Action Plan, Fuel Pool Cooling Pump PMP-54-01, Unit 1 Action Plan, Main Turbine EHC Oil and Control, Unit 2 Maintenance Rule Unavailability Tracking-System Report, System Engineer Input, Unit 1