

Exhibit 7

PRE-DECISIONAL [PLANT X] PLANT PERFORMANCE SUMMARY

Assessment Period: (month/year) to (month/year)

I Operating Summary

This section should briefly state the operating status during the assessment period. Any reactor trips or forced outages should be mentioned in this section. For example:

“Unit 1 operated at power throughout the assessment period, with minor changes for testing, maintenance and control rod pattern adjustments. Unit 2 operated at or near full power until January 22, when a reactor trip caused by a turbine-driven reactor feedwater pump loss due to an electro-hydraulic control system flow control valve malfunction occurred. The problem was repaired and Unit 2 was restarted and synchronized to the grid on January 24. Unit 2 operated at power throughout the remainder of the assessment period, with minor changes for testing, maintenance and control rod pattern adjustments. Unit 3 completed a 45 day refueling outage and attained 100% power on January 9. Unit 3 operated at or near full power for the remainder of the assessment period, with minor changes for testing, maintenance and control rod pattern adjustments.”

II Performance Overview

A. Current Overall Assessment

This section should include the Action Matrix designation and its basis for the current quarter. For example, “*Plant performance for the most recent quarter was within the Regulatory Response Column of the Action Matrix, based on one white PI (Reactor Coolant System Leakage) in the barrier integrity cornerstone.*”

B. Previous Assessment Results

This section should include the Action Matrix designation and its basis for the previous three quarters of the assessment period. For example, “*Plant performance for the prior three quarters (04/02- 12/31/00) was within the Licensee Response Column of the Action Matrix, based on all inspection findings being classified as having very low*

safety significance (Green) and all Performance indicators indicating performance at a level requiring no additional oversight.”

III Inspection and Performance Indicator Results

A. Results by Strategic Performance Areas and Cornerstones

This section should discuss individual findings and performance indicators by strategic performance areas and cornerstones during the assessment period as well as NRC and licensee actions for these issues. Substantive cross-cutting elements of these issues should also be discussed and summarized in the cross-cutting section of this report. For example:

Reactor Safety

- *Initiating Events*

Inspection Findings: One green finding was identified during the most recent quarter. The finding was associated with inappropriate operator actions in response to a failed feedwater regulating valve controller which resulted in an uncomplicated reactor trip.

Performance Indicators: One performance indicator (Unplanned Power Changes per 7000 Critical Hours) was identified as white in the most recent quarter. Three unplanned power changes during this quarter occurred due to cooling tower structural problems and distribution header leaks. Supplemental inspection procedure 95001 is scheduled to be conducted in June 2001 to better understand the licensee’s declining performance in this area.

- *Mitigating Systems, etc*

IV Other Issues

A. Inspection Results for Cross-Cutting Areas

The three cross-cutting areas (Human Performance, Safety-Conscious Working Environment, and Problem Identification and Resolution) should be discussed by combining the cross-cutting elements of previously discussed findings from the applicable cornerstones. In this section, the regions should review the PIM and describe their collective assessment of a substantive cross-cutting issue. For those cases in which there are substantive cross-

cutting issues, the regions should discuss how these concerns will be addressed within the baseline inspection program or an upcoming supplemental inspection. For example:

Human Performance: *Over the course of the assessment period, the inspectors identified eight green findings where human performance on engineering work products was not adequate. Specifically, the causal relationship of the findings listed below was inadequate human performance in performing, checking, and verifying of engineering products.*

- *The design calculation for the proposed overlay repair used an unjustifiably low crack growth rate. All engineering reviews were completed by the licensee for this weld overlay repair and post modification testing would not have identified this deficiency. Had the NRC not identified this issue, the licensee could have installed a weld overlay repair that was too short to ensure the integrity of the primary coolant pressure boundary.*
- *The initial operability evaluation of the discrepant missile shield support structure over the reactor did not consider the weak axis bending of an I- beam's web, which was critical to the structure's stability. All engineering reviews were completed by the licensee for this operability determination and no further licensee activities would have identified this deficiency prior to returning the missile shield to service. Had the NRC not identified this issue, the beam would potentially be significantly over stressed during a design basis seismic event, allowing the missile shield to fall onto the reactor vessel head, damaging the control rod drives and preventing the reactor from shutting down, and causing leakage from the reactor coolant pressure boundary. A subsequent modification was needed to add lateral braces to the support structure to restore compliance to design basis.*
- *The design calculation for the initial modification to fix the reactor missile shield support structure did not address several crucial components in the load path into the building structure. All engineering reviews were completed by the licensee for this calculation and no further licensee activities would have identified this deficiency prior to returning the missile shield to service. Had the NRC not identified this issue, the missile shield could have been returned to service with components which were significantly over-stressed (e.g. unanalyzed) during a design basis seismic event. A subsequent modification was needed to add lateral braces to the support structure to restore compliance to design basis.*
- *Incorrect and non-conservative design basis loads were used in the calculation supporting the initial proposed replacement for CRDM housing 20. Also, the same incorrect and non-conservative design basis loads were used in the a calculation of critical crack size for the replacement housings. All engineering reviews were completed by the licensee for these calculations and no further licensee activities could have identified this deficiency prior to returning the replacement housing to service. Had the NRC not identified this issue, the licensee could have installed the*

modified housing without evaluating its ability to performed its safety function during a seismic event. Further, the licensee would have applied a non-conservative critical crack size, which could have affected future decisions on the acceptability of housing repairs for inservice flaws.

- The effects of leakage flow rates on control rod function were initially not considered in a calculation evaluating the critical crack size. All engineering reviews were completed by the licensee for this calculation and no further licensee activities would have identified this deficiency prior to returning the plant to service. Had the NRC not identified this issue, the licensee could have allowed control rod drive housings to be in service with a postulated leak (e.g. the control rod would be considered operable), but where the control rods had not been properly analyzed to demonstrate their safety function.*
- For the CRD 25 seal housing failure identified by the licensee in June of 2000, the root cause was TGSCC. Corrective and preventative actions were completed with the licensee's engineering department support and included reuse of the uncracked type 347 seal housings. However, the remaining service life of these housings susceptible to TGSCC was not evaluated prior to returning them to service. All engineering reviews were completed by the licensee and this deficiency was not identified prior to returning the type 347 SS CRD seal housings to service. Had the NRC not identified this issue, the housings could have failed prior to reaching the next refueling outage due to an inadequate service life. This could have resulted in a breach of the primary coolant boundary and associated coolant leakage.*
- The NRC identified that inadequate engineering analysis had been completed to support a temporary modification that removed the underground (backup) steam supply to the Turbine Driven Auxiliary Feedwater Pump P-4B. Specifically, licensee personnel failed to identify that the Post-Fire Safe Shutdown Analysis credited Auxiliary Feedwater Pump P-4B to remove decay heat using the underground (backup) steam supply line for a fire in the turbine building. All engineering reviews were completed by the licensee and the temporary modification was implemented to remove the underground (backup) steam supply to the Turbine Driven Auxiliary Feedwater Pump P-4B. Had the NRC not identified this issue, the licensee would have continued plant operation without knowing the impact on the capability to perform a Post-Fire Safe Shutdown.*
- The NRC identified that the licensee had failed to maintain the design configuration of the containment sump outlet screens. The sump screens were designed to have nominal 0.250 inch square openings, and gaps of up to 0.75 inches were identified. Had the NRC not identified this issue, the licensee would have continued plant operation without knowing the impact of the design deviation on emergency core cooling system performance under loss of coolant accident conditions.*

The potential risk consequence of this substantive human performance cross-cutting design control concern included installation of inadequate plant modifications, and/or return of degraded equipment to service without an adequate basis to confirm operability.

The regional office considers these issues to be a substantive cross-cutting issue in the area of Problem Identification and Resolution. The annual PI&R inspection will be conducted during the next quarter and will focus on the noted weaknesses in engineering work products. Additionally, the regional office's concern in this area will be conveyed to the licensee in the upcoming annual assessment letter.

Safety-Conscious Working Environment: *No issues or findings.*

Problem Identification and Resolution: *Over the course of the assessment period, the inspectors identified two green findings that were examples of poor implementation of the corrective action program such as:*

- *The inspectors identified a failure of the CAP where ASME Code program requirements for work package reviews were not met (IR 1999-03)*
- *The licensee failed to implement modifications to correct a previously identified design deficiency which could have made the motor speed changer inoperable in accident situations (IR 1999-08)*

B. Performance Indicator Verification

The regional offices should discuss the results of the performance indicators that were verified during the assessment period and the results of those inspections. For example, "All 19 performance indicators were reviewed during the assessment period. PI verifications have identified minor deficiencies for Unplanned Power Changes per 7000 critical hours, Occupational Exposure Control Effectiveness, and Drill and Exercise Performance. These discrepancies have been corrected during the most recent PI submittal. In accordance with the Enforcement Policy, no enforcement action was taken."

C. Non-SDP Enforcement Action

The regions should discuss any Non-SDP severity level III or greater violations. For example, "On February 12, 2001, the staff issued a Severity Level III Notice of Violation (NOV) in accordance with the Enforcement Policy. The violation involved an employee's deliberate failure to perform measuring and test equipment (M&TE) nonconformance

evaluations in accordance with Technical Specifications required site procedures. The licensee has responded to the NOV and the staff will follow-up on their corrective actions through the baseline inspection program.

V Miscellaneous Topics/Conclusions/Recommendations

Review the Action Matrix for appropriate actions and the proposed inspection plan. In this section, the regions should document their preliminary conclusions and recommendations for discussion at the meeting. Other topics may be discussed during the meeting that may not be required in accordance with IMC 0305, but are beneficial for the regional office to discuss at these meetings. Several potential topics include the following: (1) Outages scheduled to determine any specific outage activities to be inspected, (2) Technical needs to support scheduled Problem Identification and Resolution (IP 71152) inspections, (3) the results of INPO audits, and (4) Completion status of previously scheduled inspections since the last review meetings.

V Attachments

Plant Issues Matrix
Proposed Inspection Plan
Previous Mid-cycle or Annual Assessment Letter