



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I**  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

March 4, 2013

Mr. John Ventosa, Site Vice President  
Entergy Nuclear Operations, Inc.  
Indian Point Energy Center  
450 Broadway, GSB  
P.O. Box 249  
Buchanan, NY 10511-0249

**SUBJECT: ANNUAL ASSESSMENT LETTER FOR INDIAN POINT NUCLEAR  
GENERATING UNITS 2 AND 3 (REPORT 05000247/2012001 AND  
05000286/2012001)**

Dear Mr. Ventosa:

On February 13, 2013, the U. S. Nuclear Regulatory Commission (NRC) completed its end-of-cycle performance review of Indian Point Nuclear Generating Units 2 and 3 (Indian Point). The NRC reviewed the most recent quarterly performance indicators in addition to inspection results and enforcement actions from January 1, 2012 through December 31, 2012. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, Indian Point operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Indian Point during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all performance indicators demonstrated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The enclosed inspection plan lists the inspections scheduled through June 30, 2014. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the mid-cycle performance review. In addition to the baseline inspections, the NRC will perform Inspection Procedure (IP) 60855.1, "Operation of an Independent Spent Fuel Storage Installation at Operating Plants," and TI-182, "Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping and Tanks." The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security related inspections, which will be sent via separate, non-publicly available correspondence.

We have also scheduled a review of your proposed commitments made during the license renewal application process, regarding Indian Point Unit 2. This activity will include a review of Aging Management Program (AMP) implementation and will be conducted using Temporary

Instruction 2516/001, "Review of License Renewal Activities." The overall purpose of the review is to assess progress of your actions associated with monitoring passive components within the scope of license renewal and as tentatively accepted by the staff's safety evaluation report. The Temporary Instruction is available on the NRC Website at:

<http://pbadupws.nrc.gov/docs/ML1106/ML110620255.pdf>

In 2011, based on years of inspection results and assessment insights associated with the site-wide organization at Indian Point, the NRC determined that it was appropriate to modify the inspection program at Indian Point to more closely resemble other dual-unit sites. On January 1, 2012, the NRC implemented a modified inspection program that performed major team inspections, with the exception of triennial fire protection inspections, on a site basis versus a unit basis. Effective January 1, 2013, the NRC modified the inspection requirements for the resident baseline inspection program. The modified inspection program has reduced inspection samples compared to previous years but maintains an increased NRC inspection effort, when compared to similar plants in the U.S. The NRC will accordingly change resident staffing from four to three permanent resident inspectors in the next several months. The three resident inspectors at Indian Point are necessary to complete the modified inspection program requirements. The NRC will periodically evaluate the implementation of the baseline inspection program at Indian Point and make adjustments as appropriate.

In accordance with Title 10 of the *Code of Federal Regulations*, Part 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 610-337-5069 with any questions you have regarding this letter.

Sincerely,

/RA/

Arthur L. Burritt, Chief  
Projects Branch 2  
Branch Chief

Docket Nos. 50-247; 50-286  
License Nos. DPR-26; DPR-64

Enclosure: Indian Point 2 & 3 Inspection / Activity Plan

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Based on years of inspection results and assessment insights with the site-wide organization at Indian Point, the NRC determined that it was appropriate to modify the inspection program at Indian Point to more closely resemble other dual-unit sites. On January 1, 2012, the NRC implemented a modified inspection program that performed major team inspections, with the exception of triennial fire protection inspections, on a site basis versus a unit basis. Effective January 1, 2013, the NRC modified the inspection requirements for the resident baseline inspection program. The modified inspection program has reduced inspection samples compared to previous years but maintains an increased NRC inspection effort, when compared to similar plants in the U.S. The NRC will also change resident staffing from four to three permanent resident inspectors in the next several months. The three resident inspectors at Indian Point are necessary to complete the modified inspection program requirements.

In accordance with Title 10 of the *Code of Federal Regulations*, Part 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 610-337-5069 with any questions you have regarding this letter.

Sincerely,  
*/RA/*  
 Arthur L. Burritt, Chief  
 Projects Branch 2  
 Branch Chief

Docket Nos. 50-247; 50-286

Lic\*See prior concurrence

nse Nos. DPR-26; DPR-64

Enclosure: Indian Point 2 & 3 Inspection / Activity Plan

DOCUMENT NAME: \\nrc.gov\\nrc\\R1\\Shared\\ROP-13 EOC Review\\Branch 2\\IPEC 2013 AAL rev2.doc  
 ADAMS ACCESSION NUMBER: **ML13006A402**

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| OFFICE                                           | RI/DRP   | RI/DRP                                                                                  | RI/DRP                                                                                                    | RI/DRP   |
| NAME                                             | BBickett | PCataldo/via email                                                                      | SStewart via email                                                                                        | ABurritt |
| DATE                                             | 02/25/13 | 02/25/13                                                                                | 02/26/13                                                                                                  | 03/04/13 |

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**Indian Point**  
**Inspection / Activity Plan**  
**01/01/2013 - 06/30/2014**

| Unit Number | Planned Dates Start | Planned Dates End | Inspection Activity | Title                                                                                            | No. of Staff on Site |
|-------------|---------------------|-------------------|---------------------|--------------------------------------------------------------------------------------------------|----------------------|
| 2           | 01/14/2013          | 01/18/2013        | IP 71124.05         | - RETS                                                                                           | 1                    |
| 2           | 01/14/2013          | 01/18/2013        | IP 71124.06         | Radiation Monitoring Instrumentation<br>Radioactive Gaseous and Liquid Effluent Treatment        |                      |
| 2           | 01/28/2013          | 02/01/2013        | IP 7111105T         | <b>TRI FI - TRIENNIAL FIRE PROTECTION INSPECTION</b>                                             | 5                    |
| 2           | 02/11/2013          | 02/15/2013        | IP 7111105T         | Fire Protection [Triennial]<br>Fire Protection [Triennial]                                       | 1                    |
| 2           | 01/15/2013          | 02/15/2013        | IP 92702            | <b>92702 - NOV FOLLOWUP OMA</b>                                                                  | 1                    |
|             |                     |                   | IP 92702            | Followup On Corrective Actions For Violations And Deviations                                     |                      |
| 2           | 03/18/2013          | 03/22/2013        | IP 71124.01         | <b>71124 - HP - EXPOSURE &amp; ALARA CONTROLS</b>                                                | 1                    |
| 2           | 03/18/2013          | 03/22/2013        | IP 71124.02         | Radiological Hazard Assessment and Exposure Controls<br>Occupational ALARA Planning and Controls |                      |
| 2           | 04/29/2013          | 05/03/2013        | IP 71124.01         | <b>71124 - HP - EXPOSURE CONTROLS &amp; DOSE ASSESSMENT</b>                                      | 1                    |
| 2           | 04/29/2013          | 05/03/2013        | IP 71124.02         | Radiological Hazard Assessment and Exposure Controls<br>Occupational ALARA Planning and Controls |                      |
| 2           | 04/29/2013          | 05/03/2013        | IP 71124.03         | In-Plant Airborne Radioactivity Control and Mitigation                                           |                      |
| 2           | 04/29/2013          | 05/03/2013        | IP 71124.04         | Occupational Dose Assessment                                                                     |                      |
|             |                     |                   |                     | <b>EP PROGR - EP PROGRAM INSPECTION</b>                                                          | 2                    |
| 2           | 05/13/2013          | 05/17/2013        | IP 7111402          | Alert and Notification System Testing                                                            |                      |
| 2           | 05/13/2013          | 05/17/2013        | IP 7111403          | Emergency Preparedness Organization Staffing and Augmentation System                             |                      |
| 2           | 05/13/2013          | 05/17/2013        | IP 7111405          | Correction of Emergency Preparedness Weaknesses and Deficiencies                                 |                      |
|             |                     |                   |                     | <b>2516-001 LR COMMITMENT INSP PHASE II</b>                                                      | 7                    |
| 2           | 05/06/2013          | 05/10/2013        | IP 2516/001         | Review of License Renewal Activities                                                             |                      |
| 2           | 05/20/2013          | 05/24/2013        | IP 2516/001         | Review of License Renewal Activities                                                             |                      |
|             |                     |                   |                     | <b>60855 - ISFSI LOADING INSPECTION</b>                                                          | 1                    |
| 2           | 06/01/2013          | 08/31/2013        | IP 60855            | Operation Of An ISFSI                                                                            |                      |
| 2           | 06/01/2013          | 08/31/2013        | IP 60855.1          | Operation of an Independent Spent Fuel Storage Installation at Operating Plants                  |                      |
|             |                     |                   |                     | <b>2561 - SAFSTOR</b>                                                                            | 1                    |
| 1           | 06/24/2013          | 06/27/2013        | IP 36801            | Organization, Management, And Cost Controls At Permanently Shutdown Reactors                     |                      |
| 1           | 06/24/2013          | 06/27/2013        | IP 37801            | Safety Reviews, Design Changes, And Modifications At Permanently Shutdown Reactors               |                      |
| 1           | 06/24/2013          | 06/27/2013        | IP 40801            | Self-Assessment, Auditing, And Corrective Action At Permanently Shutdown Reactors                |                      |
| 1           | 06/24/2013          | 06/27/2013        | IP 60801            | Spent Fuel Pool Safety At Permanently Shutdown Reactors                                          |                      |
| 1           | 06/24/2013          | 06/27/2013        | IP 62801            | Maintenance And Surveillance At Permanently Shutdown Reactors                                    |                      |
| 1           | 06/24/2013          | 06/27/2013        | IP 71801            | Decommissioning Performance And Status Review At Permanently Shutdown Reactors                   |                      |
| 1           | 06/24/2013          | 06/27/2013        | IP 83750            | Occupational Radiation Exposure                                                                  |                      |

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

**Indian Point**  
**Inspection / Activity Plan**  
**01/01/2013 - 06/30/2014**

| Unit Number | Planned Dates Start | Planned Dates End | Inspection Activity   | Title                                                                                                | No. of Staff on Site |
|-------------|---------------------|-------------------|-----------------------|------------------------------------------------------------------------------------------------------|----------------------|
|             |                     |                   | <b>2561</b> - SAFSTOR | Radioactive Waste Treatment, And Effluent And Environmental Monitoring                               | 1                    |
| 1           | 06/24/2013          | 06/27/2013        | IP 84750              | Solid Radioactive Waste Management And Transportation Of Radioactive Materials                       | 1                    |
| 1           | 06/24/2013          | 06/27/2013        | IP 86750              | <b>71124</b> - HP - EXPOSURE AND ALARA CONTROLS                                                      | 1                    |
| 2           | 08/19/2013          | 08/23/2013        | IP 71124.01           | Radiological Hazard Assessment and Exposure Controls                                                 | 4                    |
| 2           | 08/19/2013          | 08/23/2013        | IP 71124.02           | Occupational ALARA Planning and Controls                                                             |                      |
| 2           | 08/19/2013          | 08/23/2013        | IP 71124.03           | In-Plant Airborne Radioactivity Control and Mitigation                                               |                      |
| 2           | 08/19/2013          | 08/23/2013        | IP 71124.05           | Radiation Monitoring Instrumentation                                                                 |                      |
| 2           | 10/07/2013          | 10/11/2013        | IP 71152B             | - P&R Problem Identification and Resolution                                                          | 4                    |
| 2           | 10/21/2013          | 10/25/2013        | IP 71152B             | Problem Identification and Resolution                                                                |                      |
| 2           | 09/09/2013          | 09/13/2013        | IP 2516/001           | <b>2516-001</b> - TI 2516-001 LR COMMITMENT INSP PHASE III                                           | 2                    |
| 2           | 01/13/2014          | 01/17/2014        | U01890                | FY14-INDIAN POINT 2 INITIAL OPERATOR LICENSING EXAM                                                  |                      |
| 2           | 02/10/2014          | 02/19/2014        | U01890                | FY14-INDIAN POINT 2 INITIAL OPERATOR LICENSING EXAM                                                  |                      |
| 2           | 11/04/2013          | 11/08/2013        | IP 71124.08           | <b>71124.08</b> - RADWASTE                                                                           | 1                    |
| 2           | 03/03/2014          | 03/14/2014        | IP 711108P            | Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation    |                      |
| 2           | 03/10/2014          | 03/14/2014        | IP 711108P            | <b>7111108P</b> - INSERVICE INSPECTION                                                               | 1                    |
| 2           | 03/10/2014          | 03/14/2014        | IP 711108P            | Inservice Inspection Activities - PWR                                                                |                      |
| 2           | 03/10/2014          | 03/14/2014        | IP 71124              | <b>71124</b> - HP                                                                                    | 1                    |
| 2           | 03/10/2014          | 03/14/2014        | IP 71124.01           | Radiological Hazard Assessment and Exposure Controls                                                 |                      |
| 2           | 03/10/2014          | 03/14/2014        | IP 71124.02           | Occupational ALARA Planning and Controls                                                             |                      |
| 2           | 03/31/2014          | 04/04/2014        | IP 25/15/182          | <b>TI-182</b> - DEGRAD UNDERGROUND PIPING - PHASE 2                                                  | 1                    |
| 2           | 03/31/2014          | 04/04/2014        | IP 25/15/182          | Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping |                      |
| 2           | 06/09/2014          | 06/13/2014        | IP 71124.07           | <b>71124.07</b> - REMP                                                                               | 1                    |
| 2           | 06/09/2014          | 06/13/2014        | IP 71124.07           | Radiological Environmental Monitoring Program                                                        |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 36801              | <b>2561</b> - SAFSTOR                                                                                | 1                    |
| 1           | 06/23/2014          | 06/25/2014        | IP 37801              | Organization, Management, And Cost Controls At Permanently Shutdown Reactors                         |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 40801              | Safety Reviews, Design Changes, And Modifications At Permanently Shutdown Reactors                   |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 60801              | Self-Assessment, Auditing, And Corrective Action At Permanently Shutdown Reactors                    |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 62801              | Spent Fuel Pool Safety At Permanently Shutdown Reactors                                              |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 71801              | Maintenance And Surveillance At Permanently Shutdown Reactors                                        |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 71801              | Decommissioning Performance And Status Review At Permanently Shutdown Reactors                       |                      |

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

Indian Point  
Inspection / Activity Plan  
01/01/2013 - 06/30/2014

| Unit Number | Planned Dates Start | Planned Dates End | Inspection Activity                                                                         | No. of Staff on Site |
|-------------|---------------------|-------------------|---------------------------------------------------------------------------------------------|----------------------|
| 1           | 06/23/2014          | 06/25/2014        | IP 83750 - SAFSTOR                                                                          | 1                    |
| 1           | 06/23/2014          | 06/25/2014        | IP 84750 Occupational Radiation Exposure                                                    |                      |
| 1           | 06/23/2014          | 06/25/2014        | IP 86750 Radioactive Waste Treatment, And Effluent And Environmental Monitoring             |                      |
|             |                     |                   | Solid Radioactive Waste Management And Transportation Of Radioactive Materials              |                      |
|             |                     |                   | <b>MODS - PERMANENT PLANT MODIFICATIONS</b>                                                 | 4                    |
| 2           | 06/23/2014          | 06/27/2014        | IP 71111177 Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications |                      |

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

**Indian Point 3**  
**Inspection / Activity Plan**  
**01/01/2013 - 06/30/2014**

| Unit Number | Planned Dates Start | Planned Dates End | Inspection Activity                       | Title                                                                                             | No. of Staff on Site |
|-------------|---------------------|-------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------|----------------------|
| 3           | 01/14/2013          | 01/18/2013        | U01866                                    | <b>2/11 EXM - IP3 INITIAL EXAM</b>                                                                | 3                    |
| 3           | 02/11/2013          | 02/15/2013        | U01866                                    | FY-13 IP3 INITIAL OPERATOR LICENSING EXAM                                                         |                      |
| 3           | 01/14/2013          | 01/18/2013        | IP 71124.05                               | FY-13 IP3 INITIAL OPERATOR LICENSING EXAM                                                         |                      |
| 3           | 01/14/2013          | 01/18/2013        | <b>71124 - RETS</b>                       | Radiation Monitoring Instrumentation                                                              | 1                    |
| 3           | 01/14/2013          | 01/18/2013        | IP 71124.06                               | Radioactive Gaseous and Liquid Effluent Treatment                                                 |                      |
| 3           | 01/15/2013          | 02/15/2013        | IP 92702                                  | <b>- NOV FOLLOWUP OMA</b>                                                                         | 1                    |
|             |                     |                   |                                           | Followup On Corrective Actions For Violations And Deviations                                      |                      |
| 3           | 03/11/2013          | 03/22/2013        | IP 92702                                  |                                                                                                   |                      |
| 3           | 03/11/2013          | 03/22/2013        | <b>7111108P - U3 INSERVICE INSPECTION</b> | Inservice Inspection Activities - PWR                                                             | 1                    |
| 3           | 03/18/2013          | 03/22/2013        | IP 7111108P                               |                                                                                                   |                      |
| 3           | 03/18/2013          | 03/22/2013        | IP 71124                                  | <b>- HP - EXPOSURE AND ALARA CONTROLS</b>                                                         | 1                    |
| 3           | 03/18/2013          | 03/22/2013        | IP 71124.01                               | Radiological Hazard Assessment and Exposure Controls                                              |                      |
| 3           | 03/18/2013          | 03/22/2013        | IP 71124.02                               | Occupational ALARA Planning and Controls                                                          |                      |
| 3           | 04/29/2013          | 05/03/2013        | IP 71124.01                               | <b>71124 - HP - EXPOSURE &amp; DOSE ASSESSMENT</b>                                                | 1                    |
| 3           | 04/29/2013          | 05/03/2013        | IP 71124.01                               | Radiological Hazard Assessment and Exposure Controls                                              |                      |
| 3           | 04/29/2013          | 05/03/2013        | IP 71124.02                               | Occupational ALARA Planning and Controls                                                          |                      |
| 3           | 04/29/2013          | 05/03/2013        | IP 71124.03                               | In-Plant Airborne Radioactivity Control and Mitigation                                            |                      |
| 3           | 04/29/2013          | 05/03/2013        | IP 71124.04                               | Occupational Dose Assessment                                                                      |                      |
| 3           | 05/13/2013          | 05/17/2013        | IP 711110B                                | <b>EP PROGR - EP PROGRAM INSPECTION</b>                                                           | 2                    |
| 3           | 05/13/2013          | 05/17/2013        | IP 711110B                                | Alert and Notification System Testing                                                             |                      |
| 3           | 05/13/2013          | 05/17/2013        | IP 711110B                                | Emergency Preparedness Organization Staffing and Augmentation System                              |                      |
| 3           | 05/13/2013          | 05/17/2013        | IP 711110B                                | Correction of Emergency Preparedness Weaknesses and Deficiencies                                  |                      |
| 3           | 09/16/2013          | 09/20/2013        | IP 711111B                                | <b>711111B - IP3 REQUAL INSPECTION WITH P/F RESULTS</b>                                           | 2                    |
| 3           | 09/16/2013          | 09/20/2013        | IP 711111B                                | Licensed Operator Requalification Program                                                         |                      |
| 3           | 08/19/2013          | 08/23/2013        | IP 71124                                  | <b>- HP - EXPOSURE AND ALARA CONTROLS</b>                                                         | 1                    |
| 3           | 08/19/2013          | 08/23/2013        | IP 71124.01                               | Radiological Hazard Assessment and Exposure Controls                                              |                      |
| 3           | 08/19/2013          | 08/23/2013        | IP 71124.02                               | Occupational ALARA Planning and Controls                                                          |                      |
| 3           | 08/19/2013          | 08/23/2013        | IP 71124.03                               | In-Plant Airborne Radioactivity Control and Mitigation                                            |                      |
| 3           | 08/19/2013          | 08/23/2013        | IP 71124.05                               | Radiation Monitoring Instrumentation                                                              |                      |
| 3           | 10/07/2013          | 10/11/2013        | IP 71152B                                 | <b>PI&amp;R - PI&amp;R</b>                                                                        | 4                    |
| 3           | 10/21/2013          | 10/25/2013        | IP 71152B                                 | Problem Identification and Resolution                                                             |                      |
| 3           | 11/04/2013          | 11/08/2013        | IP 71124.08                               | <b>71124.08 - RADWASTE</b>                                                                        | 1                    |
|             |                     |                   |                                           | Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation |                      |
|             |                     |                   |                                           | This report does not include INPO and OUTAGE activities.                                          |                      |
|             |                     |                   |                                           | This report shows only on-site and announced inspection procedures.                               |                      |

Indian Point 3  
Inspection / Activity Plan  
01/01/2013 - 06/30/2014

| Unit Number | Planned Dates Start | Planned Dates End | Inspection Activity | Title                                                                                                                                                       | No. of Staff on Site |
|-------------|---------------------|-------------------|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| 3           | 03/10/2014          | 03/14/2014        | IP 71124.01         | - HP                                                                                                                                                        | 1                    |
| 3           | 03/10/2014          | 03/14/2014        | IP 71124.02         | Radiological Hazard Assessment and Exposure Controls<br>Occupational ALARA Planning and Controls                                                            | 1                    |
| 3           | 03/31/2014          | 04/04/2014        | IP 2515/182         | <b>TI-182 - DEGRAD UNDERGROUND PIPING - PHASE 2</b><br>Review of the Implementation of the Industry Initiative to Control Degradation of Underground Piping | 4                    |
| 3           | 05/05/2014          | 05/09/2014        | IP 7111105T         | <b>TRI FI - TRIENNIAL FIRE PROTECTION</b><br>Fire Protection [Triennial]                                                                                    | 1                    |
| 3           | 05/19/2014          | 05/23/2014        | IP 7111105T         | Fire Protection [Triennial]                                                                                                                                 | 4                    |
| 3           | 06/09/2014          | 06/13/2014        | IP 71124.07         | <b>71124.07 - REMP</b><br>Radiological Environmental Monitoring Program                                                                                     | 1                    |
| 3           | 06/23/2014          | 06/27/2014        | IP 7111117T         | <b>MODS - PERMANENT PLANT MODIFICATIONS</b><br>Evaluations of Changes, Tests, or Experiments and Permanent Plant Modifications                              | 4                    |

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