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RECORD #128

TITLE: Interpretation - RG 1.33, Meaning of "Procedure
Implementation ..." Section 6.8.1 of STS

FICHE: 68579-2471

INTERPRETATION - REGULATORY GUIDE 1.33, MEANING OF
"PROCEDURE IMPLEMENTATION" AS USED IN SECTION 6.8.1
OF STANDARD TECHNICAL SPECIFICATIONS

1.19.0

PURPOSE

The purpose of this guidance is to provide the NRC position concerning adherence to procedures developed for safety related activities at Nuclear Power Plants.

DISCUSSION

10 CFR 50.36(c)(5) requires licensees to develop Technical Specifications which describe the Administrative Controls necessary to assure operation of the facility in a safe manner. Paragraph 50.36(c)(5) defines Administrative Controls as those provisions relating to organization and management, procedures, recordkeeping, review and audit and reporting functions.

10 CFR 50.34(b)(6)(ii) requires licensees to describe in the final Safety Analysis Report those managerial and Administrative Controls to be used to assure safe operation. Paragraph 50.34(b)(6)(ii) states that Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and for Reprocessing Plants", sets forth the requirements for such controls for nuclear power plants.

Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Revision 1, January 1977 clarifies the NRC staff position regarding ANSI N18.7-1976, endorses it with several exceptions and states that it requires the preparation of many procedures to carry out an effective Quality Assurance Program. R.G. 1.33 also states that its Appendix A should be used as guidance to ensure minimum procedure coverage for plant operating activities, including maintenance activities.

The Administrative Control Section of the Standard Technical Specifications, Section 6.8.1 states that written procedures shall be established, implemented and maintained for activities which include applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33. NRR and IE interpret the term "implemented" as used in Section 6.8.1 to mean "adhered to."

~~It is also interesting to note that ANSI N18.7-1976, Section 5.2.2 Procedure Adherence, states that procedures shall be followed and that the requirements for use of procedures shall be prescribed in writing.~~

The term "adhered to" means that the actions prescribed by the procedure must be accomplished, it does not mean that the operator, technician or engineer must have a copy of the procedure in hand and sign off each step as the function is performed.

Rosen

FBI

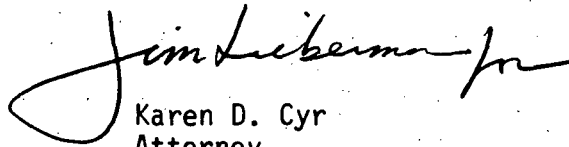
Ji

June 17, 1985

Note to Jim Wigginton, IE

HUMBOLDT BAY RADIATION PROTECTION PROCEDURES

We have reviewed the Humboldt Bay Technical Specification requirements for the Radiation Protection Program. While we recognize that the requirement for radiation control procedures is inartfully drafted and that other sections of the tech. specs. as well as the Standard Tech. Specs. (STS) use the words "prepared, maintained and adhered to", we think the appropriate interpretation of the word "maintained" in the context of the Tech. Spec. is that the procedures not only be kept up-to-date but that they be followed. It defies common sense to require the licensee to establish procedures to meet Part 20, to "maintain" them up-to-date, yet not to follow them. Given the age of the facility, these procedures were probably among the first written and well before the more precise language of the STS was developed. In summary, we think a broader reading of the word "maintain" to include adherence to is consistent with the intent of the Tech. Spec. that the licensee have a radiation protection program to meet Part 20.



Karen D. Cyr
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cc:
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5/23/85

Note To: Karen Cyr, OELD

From: Jim WIGGINTON, OIE

RE: HUMBOLT BAY'S TECHNICAL SPECIFICATIONS

As we discussed yesterday, Region 5 IHPs have a problem with the reported lack of enforceability of radiation protection program procedures. The inspector says that his regional management will not support notices of violations against the licensee's procedures because the "magic words" — "...and adhered to..." are missing from Subpart K in the license (see attached copy, highlighted). Please note that in subpart F (operating procedures), the "magic words" appear.

I don't think the licensee should be allowed to take the defensive posture that his procedures are not citable, because of the missing words. Clearly, procedures are required to implement part 20, by the words "...and shall be consistent with the requirements of 10 CFR 20." While this licensee is not operating the plant, they are in a decommissioning mode, handling radioactive wastes. Procedures should form the basis for assuring work evolutions are performed in a safe, reasonable manner, consistent with good IHP practices.

I'd like your opinion on whether a procedural violation would legally stand, without a direct tie to a specific Part 2 regulation (@ the Severity Level '4' range, for example).

Thanks for your help.

Jin

2. Each reportable occurrence report submitted to the Commission shall be reviewed by the Plant Staff Review Committee and submitted to the Manager of Steam Generation for transmittal to the General Office Nuclear Plant Review and Audit Committee.

Y. OPERATING PROCEDURES

1. Detailed written procedures, including applicable check-off lists and instructions, shall be prepared and adhered to for operation of all systems and components having nuclear safety implications, including:
- a. Normal startup, operation and shutdown of the reactor and of all systems and components.
 - b. Fuel handling operation.

Jim. W.

Here are excerpts from HBPP
TS

- c. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including suspected primary system leaks and abnormal reactivity changes.
 - d. Emergency conditions involving potential or actual release, of radioactivity.
 - e. Abnormal and emergency operation of the reactor and of all systems and components.
 - f. Plant Security Plan implementation.
2. All procedures described in 1. above, and changes thereto, shall be reviewed by the Plant Staff Review Committee and approved by the Plant Superintendent prior to implementation, except as provided in 3. and 4. below.
 3. Rules shall be established which provide methods by which temporary changes to approved procedures can be made, including the designation of those persons authorized to approve such changes. Temporary changes, which clearly do not change the intent of the approved procedure from the standpoint of nuclear safety, may be approved by two members of the plant management staff, at least one whom holds a senior operator license. Such changes shall be documented and, if appropriate, incorporated in the next revision of the affected procedure. on site spots
 4. In the event of an emergency not covered by an approved procedure, operations personnel shall be instructed to take action so as to minimize personnel injury and damage to the facility.

G. SITE EMERGENCY PLAN

The Site Emergency Plan shall provide the necessary prearrangement and organization of personnel to deal effectively with emergencies at the Plant so as to minimize radiation exposure to Plant personnel and the general public. The plan shall describe the specific duties of Plant personnel in the event of an accident or any unplanned incident producing high radiation levels. Periodic drills shall be performed to assure that all plant personnel are thoroughly familiar with the plan.

H. OPERATIONAL TESTING OF NUCLEAR SAFEGUARDS SYSTEMS

Procedures for testing of safety system components, monitors, and other equipment having a potential safeguard function shall be as described in Sections III through VIII. These tests and the frequency of testing are listed in Table IX-1, Operational Testing of Nuclear Safeguards Systems. Each Operational Test shall be performed within the specified time interval with:

1. A maximum allowable extension not to exceed 25% of the test interval.
2. A total interval time for any 3 consecutive test intervals not to exceed 3.25 times the specified test interval.

Appropriate tests shall also be performed following maintenance on these systems which could impair their operation.

- f. Records of radioactivity in liquid and gaseous wastes released to the environment.
- g. Records of reactor tests or experiments.
- h. Records of changes made in operating procedures.
- i. Records of transient or operational cycling for those plant components that have been designed to operate safely for a limited number of transients or operational cycles.
- j. Records of training and qualification for current members of the plant staff.
- k. Records of inservice inspections performed pursuant to these Technical Specifications.
- l. Minutes of meetings of the Plant Staff Review Committee and the General Office Nuclear Plant Review and Audit Committee.
- m. Records of Quality Assurance activities required by the QA Manual.
- n. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59.

K. RADIATION PROTECTION PROGRAM

Radiation control procedures shall be maintained and made available to all plant personnel. ~~These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. The radiation protection program shall be organized to meet the requirements of 10 CFR 20.~~

L. DELETED

M. HIGH RADIATION AREA

Pursuant to the provisions of Section 20.203(c)(5) of 10 CFR Part 20, the licensee is hereby granted approval to use the alternate methods described in its application dated March 8, 1971, for controlling access to temporary high radiation areas established at Unit 3 for a period of 30 days or less as an exception to the provisions of Section 20.203(c)(4) of 10 CFR Part 20.