

ATTACHMENT 71111.14

INSPECTABLE AREA: Operator Performance During Non-Routine Evolutions and Events

CORNERSTONES: Initiating Events
Mitigating Systems
Barrier Integrity

INSPECTION BASES: Human performance particularly during recovery actions from event initiators are the major contributors to plant risk. Performance during non-routine operations can be used as an indicator of plant personnel performance during emergencies.

LEVEL OF EFFORT: During the period of one year, review personnel performance for approximately six non-routine or transient operations, all reactor trips which require more than routine expected operator response, and evaluate all LERs which describe personnel performance issues as a causal factor. Actual level of effort will depend on the numbers of occurrences of non-routine and transient operations.

71111.14-01 INSPECTION OBJECTIVES

01.01 To review personnel performance during planned non-routine plant evolutions and/or contribution to unplanned non-routine evolutions, events and transient operations.

01.02 To review selected licensee event reports where personnel performance issues were identified as a causal factor to the event or condition.

01.03 To review operator response and/or contribution to reactor trips which require more than routine expected operator response, or which involved operator errors.

71111.14-02 INSPECTION REQUIREMENTS

02.01 Review Personnel Performance

- a. This review will generally be performed for planned and unplanned non-routine plant evolutions and during events and transients. Observe operator performance in coping with non-routine events and transients. Samples selected for operator performance review should include any planned non-routine activities. Evaluate the initiating causes of unplanned activities regarding personnel error contribution.
- b. Review operator logs, plant computer data, or strip charts to determine what occurred and how the operators responded.
- c. Determine if operator response was in accordance with the response required by procedures and training.

02.02 Identification and Resolution of Problems. Verify that the licensee is identifying problems in personnel performance during non-routine evolutions and events at an appropriate threshold and entering them in the corrective action program. For a sample of significant problems documented in the corrective action program, verify that the licensee has identified and implemented appropriate corrective actions. See Inspection Procedure 71152, "Identification and Resolution of Problems," for additional guidance.

71111.14-03 INSPECTION GUIDANCE

General Guidance

This inspectable area is intended to review personnel performance which contributed to off-normal and transient conditions, as well as operator response to these conditions. In most cases, since these occurrences are unplanned, the inspector will not directly observe operator performance and will be required to review the occurrence and operator response after stable plant operations have been resumed.

Consistent with the above paragraph, licensee event reports will be screened as part of IP 71153, "Event Followup", and those that involve operator errors will be reviewed under IP 71111.14. Closeout documentation of LERs will be in accordance with IMC 0612 (formerly 0610*), "Power Reactor Inspection Reports".

Independently evaluate the initiating cause of any reactor trip involving operator errors, and evaluate the personnel response to any reactor trip which involved more than routine expected operator actions in response to the trip. Determine if the response was

appropriate to the event and in accordance with procedures and training. Review plant data and procedures as necessary.

For planned non-routine evolutions, inspectors should review the plan for the evolution, procedures, briefings, and contingency plans.

The table below provides inspection guidance to assist the inspector in selecting inspection activities to achieve each cornerstone objective and to those activities that have a risk priority.

INSPECTION GUIDANCE TABLE

Cornerstone	Inspection Objective	Risk Priority	Example
Initiating Events Mitigating Systems Barrier Integrity	Review operator performance related to non-routine plant evolutions	Operator performance under non-routine and transient conditions that differs from the expected or intended response.	Operator errors which affect the function of mitigating system equipment during a transient or off normal event (e.g., operator turns off safety injection) Transients during which operators use abnormal operating procedures.

71111.14-04 RESOURCE ESTIMATE

The annual resource expenditure for this inspection procedure is estimated to be on average as follows: 50 hours for one reactor unit sites; 60 hours for two reactor unit sites; and 62 hours for three reactor unit sites.

71111.14-05 REFERENCES

IP 71152, "Identification and Resolution of Problems,"
IP 71153, "Event Followup"

END