

Omaha Public Power District

QUALITY ASSURANCE PLAN

QAP-10.3

Title: Plant Review Committee

Change No:	N/A
Reason for Change:	N/A
Procedure Sponsor:	Manager-Quality
Revision:	R1
Issue Date:	08-01-88 3:00 pm

Quality Assurance Plan

Fort Calhoun Station

Plant Review Committee

QAP-10.3

R1

Page 1 of 1

1. SCOPE

This Plan Section establishes requirements and functions for the Fort Calhoun Station Plant Review Committee (PRC).

2. SPECIAL DEFINITIONS

None

3. RESPONSIBILITY AND AUTHORITY

3.1 The Manager - Fort Calhoun Station, advised by the PRC, shall be responsible for the overall safety of plant operations.

3.2 The Plant Review Committee shall be responsible for advising the Manager - Fort Calhoun Station on all matters related to nuclear safety.

4. REQUIREMENTS AND CONTROLS

4.1 PRC Operation

The PRC shall serve in accordance with the Technical Specifications, USAR, and the Standing Orders.

4.2 Records and Procedures

4.2.1 The PRC shall maintain written minutes of each meeting with copies provided to the Division Manager - Nuclear Operations and the SARC Chairman. Meeting minutes and documented reviews, investigations, and determinations shall be retained as a record in accordance with Plan Section 3.4, "Records Management."

4.2.2 Procedures which implement this Plan section and describe the administration of the PRC shall be contained in the Standing Orders.

WP10

Fort Calhoun Station
Unit No. 1

SO-R-1

STANDING ORDER

Title: REPORTABILITY DETERMINATIONS

FC-68 Number: EC 33772

Reason for Change: Add clarification to the reportability requirements of a manual reactor
scram as an RCA action in response to CR 200303492.

Requestor: Erick Matzke

Preparer: G. Derrick

ISSUED: 12-12-03 3:00 pm

R11

Table of Contents

1. PURPOSE AND SCOPE 3

2. STATEMENT OF APPLICABILITY 3

3. DEFINITIONS 4

4. RESPONSIBILITIES 5

5. PROCEDURE 7

 5.1 Reportability Determinations 7

 5.1.1 General 7

 5.1.2 Initiating a Reportability Determination 8

 5.1.3 Determining Reportability 8

 5.1.4 Identification of Additional Information 10

 5.2 Reportability Evaluations 11

 5.2.1 General 11

 5.2.2 Completion of a Reportability Evaluation 12

 5.2.3 Processing of a Completed Reportability Evaluation 14

 5.2.4 Open Reportability Evaluations 15

 5.3 Notification of the NRC Operations Center 15

 5.4 Preparation and Submittal of LERs 18

 5.4.1 Notifications and Assignment of Event Investigation 18

 5.4.2 Completion of Event Investigation 19

 5.5 Reporting of Defects and Noncompliance - 10 CFR 21 19

 5.5.1 Interim Report 19

 5.5.2 Notifications and Submittal of Written Report 20

 5.6 Reporting under 10 CFR 50.9(b) - Completeness and Accuracy of Information 20

 5.7 Reporting under 10 CFR 50.46(a)(3)(ii) 21

 5.7.1 Notifications and Preparation of the Special 30 Day Written Report 21

 5.7.2 Changes or Errors Not Meeting the Requirements of 10 CFR 50.46 22

 5.8 Retractions of Event Notifications or Reports 23

 5.9 Records 23

6. REFERENCES/COMMITMENT DOCUMENTS 23

 6.1 Standing Orders 23

 6.2 Misc References 24

 6.3 Ongoing Commitments 24

7. ATTACHMENTS 24

 General Guidelines on Determining or Evaluating Reportability and
 Using the Reportability Evaluation Checklist 26

 10 CFR 50.72/50.73 (1, 4 and 8 hours, and 60 day event) Reportability 33

 10 CFR 21 (Reporting of Defects and Noncompliances) Reportability 79

10 CFR 20.2201/20.2202/20.2203 (Radiation Related Incidents) Reportability 90
10 CFR 26.73 (Fitness for Duty) Reportability 99
10 CFR 50.9(b) (Errors in Completeness and Accuracy of
Information Provided to the NRC) Reportability 104
10 CFR 73.71 (Safeguards and Security Events) Reportability 107
10 CFR 50.46(a)(3)(ii) Reportability 113
Simplified Reportability Determination or Evaluation Flowchart 116

REPORTABILITY DETERMINATIONS

1. PURPOSE AND SCOPE

1.1 Purpose

This procedure provides guidance on determining the reportability of applicable events and conditions to the Nuclear Regulatory Commission (NRC). The reportability determinations and evaluations performed in accordance with this procedure require initiation of a Condition Report. This procedure addresses the steps involved in performing verbal notifications and, when applicable, preparing written reports for events or conditions that are determined to be reportable.

1.2 Scope

This procedure applies to any event or condition associated with the Fort Calhoun Station (FCS) that is or may be within the scope of the following reporting requirements:

- 10 CFR 50.72 - Immediate notification requirements for operating nuclear power reactors
- 10 CFR 50.73 - Licensee Event Report system
- 10 CFR 21 - Reporting of defects and noncompliance
- 10 CFR 20.2201 - Reports of theft or loss of licensed material
- 10 CFR 20.2202 - Notification of incidents
- 10 CFR 20.2203 - Reports of exposures, radiation levels, and concentrations of radioactive material exceeding the limits
- 10 CFR 26.73 - Fitness for duty program reporting requirements
- 10 CFR 50.9(b) - Completeness and accuracy of information
- 10 CFR 73.71 - Reporting of safeguards events
- 10 CFR 50.36 - Technical Specifications
- 10 CFR 50.46 - Acceptance criteria for emergency core cooling systems for light water nuclear power reactors

2. STATEMENT OF APPLICABILITY

This procedure applies to personnel associated with determining or evaluating the reportability of events or conditions associated with FCS. This procedure also applies to personnel associated with completing NRC notifications and, when applicable, preparing written reports to the NRC following the determination that an event or condition is reportable.

3. DEFINITIONS

Definitions that apply to the body of the procedure are provided below. Definitions associated with individual reportability criteria are provided in the appropriate associated attachment.

- 3.1 Condition Report (CR) Program: A program that provides a mechanism for documentation and resolution of conditions adverse to quality (as described in SO-R-2).
- 3.2 Determining Individual: The individual responsible for determining the reportability of an event or condition. Appropriate responsible personnel will depend on the nature of the event or condition and on availability of personnel. One of the following individuals will ordinarily serve as the "Determining Individual": (See Section 4 for additional information regarding responsibilities of applicable personnel.)
 - Manager-FCS (or designee)
 - Manager-Operations (or designee)
 - Shift Manager
 - Manager-Security and Emergency Planning (or designee) (for safeguards events)
 - Shift Security Supervisor (for safeguards events)
 - Manager-Nuclear Licensing (or designee) (for fitness-for-duty events)
- 3.3 Licensee Event Report (LER): A written report submitted to the NRC pursuant to 10 CFR 50.73, or a report using NRC Form 366 which is submitted voluntarily, or a report submitted in order to fulfill reporting requirements of 10 CFR Parts 20.2201, 20.2203, 21, 50.36 or 73.71.
- 3.4 Reportable: An event or condition determined to meet any of the reporting or notification criteria specified in the "Scope" of this procedure. For the purposes of SO-R-2 and T.S. 5.5.1.6(I), a reportable event is an event that is 10 CFR 50.73 reportable.
- 3.5 Reportability Determination: A decision by an appropriate Determining Individual, as defined above, as to whether an event or condition is or is not Reportable.
- 3.6 Reportability Evaluation: A documented assessment of the reportability of an event or condition that addresses the associated technical and engineering issues. The assessment is ordinarily performed using a Reportability Evaluation Checklist. (A Reportability Evaluation is to be followed by a Reportability Determination by the appropriate Determining Individual.)

4. RESPONSIBILITIES

- 4.1 As directed by SO-R-2, Condition Reporting and Corrective Action; Each OPPD employee, contractor, or vendor having unescorted access to, and performing activities associated with, FCS has the responsibility and authority to initiate Condition Reports. For conditions which are immediate safety or operational concerns, notification to the Shift Manager shall precede writing of the Condition Report. For immediate security concerns, personnel shall immediately notify the Shift Security Supervisor.

Conditions that may warrant a reportability evaluation shall be reported using the Condition Reporting System (CRS) as indicated above. In addition to the notifications indicated by SO-R-2, the originator of a Condition Report (CR) shall ensure that appropriate personnel are notified of the event or condition as indicated by this procedure. Personnel are also responsible to provide support as required for investigation, analysis, and/or review of issues associated with a reportability determination or evaluation.

- 4.2 The Manager-FCS (Plant Manager), or designee, is responsible for:

- 4.2.1 Determining reportability for applicable events or conditions. This authority may be invoked when the Shift Manager and/or the Manager-Operations have insufficient information to make a determination (See definition of "Determining Individual").
- 4.2.2 Assuring that the Shift Manager is aware of reportability determinations which require appropriate actions in accordance with procedures and regulations, including the Technical Specifications.
- 4.2.3 Ensuring compliance with the notification and reporting requirements addressed by this procedure.

- 4.3 The Manager-Operations, or designee, is responsible for determining reportability of applicable events or conditions. This authority may be invoked when the Shift Manager has insufficient information to make a determination (See definition of "Determining Individual"). The Manager-Operations also assures that the Shift Manager is aware of reportability determinations which require appropriate actions in accordance with procedures and regulations, including the Technical Specifications.

- 4.4 The Shift Manager is responsible for determining reportability of events or conditions, in accordance with applicable procedural and regulatory guidance. When time limits allow and assistance or concurrence is required, responsibility for reportability determinations may be assumed by the Manager-Operations or the Plant Manager (See definition of "Determining Individual"). Any Technical Specification actions required to address the event or condition are the responsibility of the Shift Manager.

- 4.5 The Manager-Security and Emergency Planning, or designee, is responsible for providing reportability determinations for safeguards or security related events or conditions (See definition of "Determining Individual"). This process shall be coordinated with the Shift Manager and as time allows (reports must be made within the required time limits) with the Manager-FCS, and the Station Licensing staff.
- 4.6 The Shift Security Supervisor is responsible for determining reportability of safeguards or security related events or conditions, in accordance with applicable procedural and regulatory guidance. When time limits allow and assistance or concurrence is required, responsibility for these reportability determinations may be assumed by the Manager-Security and Emergency Planning (See definition of "Determining Individual"). Reportability Determinations for safeguards or security events shall be coordinated with the Shift Manager, the Manager-FCS, and the Station Licensing staff.
- 4.7 The Shift Technical Advisors (STAs) assist the Shift Manager in determining reportability of events or conditions.
- 4.8 The Supervisor-Station Licensing, or designee, is responsible for providing support, as necessary, for reportability determinations, and assisting, as necessary, with notification of the NRC Resident Inspectors and other regulatory personnel.
- 4.9 The Manager-Nuclear Licensing (NL), or designee, is responsible for:
 - 4.9.1 Supporting personnel directly responsible for determining reportability by providing (or ensuring that appropriate Licensing department personnel provide) recommendations and/or interpretations of regulatory guidance, as requested.
 - 4.9.2 Determining reportability of events associated with the Fitness-for-Duty Program (See definition of "Determining Individual") and ensuring that the NRC is promptly notified of any reportable events associated with the Fitness-for-Duty Program.
 - 4.9.3 Coordinating 10 CFR 21 notifications and reports to the NRC.
 - 4.9.4 Coordinating submittal of Licensee Event Reports (LERs) to the NRC.
- 4.10 The Plant Review Committee (PRC) members are responsible for assisting the Manager-FCS in performing reportability determinations, if requested. For the purposes of SO-R-2 and T.S. 5.5.1.6(l), a reportable event is 10 CFR 50.73 reportable.

- 4.11 The Condition Review Group (CRG) members are responsible for reviewing Condition Reports (CRs) in accordance with SO-R-2. In conjunction with this review the CRG may initiate a Reportability Evaluation (See Section 5.2) or reassessment of an initial Reportability Determination (See Step 5.1.4). Also, during this review the CRG is responsible for assigning and scheduling an event investigation for events or conditions that require submittal of an LER.
- 4.12 The Vice President shall be the Responsible Officer as defined in 10 CFR 21 and has overall responsibility for the reporting of defects and noncompliance under this regulation.
- 4.13 The Division Manager-Nuclear Operations (NO) shall be responsible for:
- 4.13.1 Assuring reportability determinations are performed in accordance with applicable requirements.
 - 4.13.2 Assuring notification of the NRC and the responsible officer (Vice President) when there is information reasonably indicating a failure to comply or existence of a defect per 10 CFR 21.
- 4.14 The Division Manager-Nuclear Engineering (NE), or designee, the Division Manager-Nuclear Assessments (NA), or designee, and the Division Manager-Nuclear Support Services (NSS), or designee, provide support from within NE, NSS, and NA as needed for recommendations on reportability of applicable events or conditions.
- 4.15 The Manager-System Engineering is responsible for the conduct and documentation of analyses to determine whether or not a deviation constitutes a substantial safety hazard per 10 CFR 21.

5. PROCEDURE

5.1 Reportability Determinations

5.1.1 General

This procedure is intended to be used in coordination with SO-R-2, "Condition Reporting and Corrective Action." The Condition Report Program is the governing procedure for documenting and resolving conditions adverse to quality. Reportability Determinations are performed and documented as a part of the overall Condition Report Program. Therefore, all documented Reportability Determinations require initiation of a Condition Report (CR) to assure that the event or condition is properly documented and resolved, and to provide retrievability of information regarding Reportability Determinations.

Attachment 7.2 - 10 CFR 50.72/50.73 (1, 4 and 8 hours, and 60 day event) Reportability

6.15.2 In-plant releases must be reported if they require evacuation of rooms or buildings containing systems important to safety and, as a result, the ability of the operators to perform necessary safety functions is significantly hampered. Precautionary evacuations of rooms and buildings that subsequent evaluation determines were not required need not be reported.

6.16 Safety Limits, Limiting Safety System Settings and Limiting Conditions for Operation

Notification / Written Report

10 CFR 50.36(c)(1)(i)(A) - " If any safety limit is exceeded, the reactor must be shut down. ... the licensee shall notify the Commission as required by (10 CFR) 50.72 and submit a Licensee Event Report to the Commission as required by (10 CFR) 50.73. "

10 CFR 50.36(c)(1)(ii)(A) - " If, during operation, it is determined that the automatic safety system does not function as required, the licensee shall take appropriate action, which may include shutting down the reactor. ... the licensee shall notify the Commission as required by (10 CFR) 50.72 and submit a Licensee Event Report to the Commission as required by (10 CFR) 50.73. "

10 CFR 50.36(c)(2) - " When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met. ... the licensee shall notify the Commission if required by (10 CFR) 50.72 and shall submit a Licensee Event Report to the Commission as required by (10 CFR) 50.73."

6.16.1 The reporting requirements of 10 CFR 50.36(c) refer to performing notifications and submitting reports "as required" or "if required" by 10 CFR 50.72 and 10 CFR 50.73. Refer to applicable criteria of 10 CFR 50.72 and 10 CFR 50.73 for additional guidance, especially:

- 10 CFR 50.72(a)(1)(i) (Section 6.1 of this attachment)
- 10 CFR 50.72(b)(1) / 10 CFR 50.73(a)(2)(i)(C) (Section 6.2)
- 10 CFR 50.72(b)(2)(i) / 10 CFR 50.73(a)(2)(i)(A) (Section 6.3)
- 10 CFR 50.72(b)(3)(ii) / 10 CFR 50.73(a)(2)(ii) (Section 6.6)
- 10 CFR 50.72(b)(3)(v) / 10 CFR 50.73(a)(2)(v) (Section 6.7)
- 10 CFR 50.73(a)(2)(i)(B) (Section 6.10)
- 10 CFR 50.73(a)(2)(vii) (Section 6.12)

Attachment 7.2 - 10 CFR 50.72/50.73 (1, 4 and 8 hours, and 60 day event) Reportability

Reportability Evaluation Checklist
Part 1 - 10 CFR 50.72 AND 10 CFR 50.73

CR Number: _____

Does or did the event or condition appear to involve: (Refer to Attachments 7.1 and 7.2 of SO-R-1 for additional information and guidance)	Yes	No
1. Declaration of an Emergency Class (10 CFR 50.72(a)(1)(i)) IMMEDIATE Notification		
2. Deviation from Technical Specifications per 10 CFR 50.54(x) (10 CFR 50.72(b)(1) / 10 CFR 50.73(a)(2)(i)(C)) ONE (1) HOUR Notification		
3. Plant Shutdown Required by Technical Specifications (10 CFR 50.72(b)(2)(i) / 10 CFR 50.73(a)(2)(i)(A)) FOUR (4) HOUR Notification		
4. Emergency Core Cooling System (ECCS) Discharge into the Reactor Coolant System (RCS) (10 CFR 50.72(b)(2)(iv)(A) / 10 CFR 50.73(a)(2)(iv)(A)) Four (4) Hour Notification		
5. Reactor Protective System (RPS) Actuation (10 CFR 50.72(b)(2)(iv)(B) / 10 CFR 50.73(a)(2)(iv)(A)) Four (4) Hour Notification		
6. News Release or Notification of Other Government Agency (10 CFR 50.72(b)(2)(xi)) FOUR (4) Hour Notification		
7. Actuation of systems listed (per FCS system list) (10 CFR 50.72(b)(3)(iv)(A) / 10 CFR 50.73(a)(2)(iv)(A)) EIGHT (8) Hour Notification		
8. Plant seriously Degraded (10 CFR 50.72(b)(3)(ii)(A) / 10 CFR 50.73(a)(2)(ii)(A)) EIGHT (8) Hour Notification		
9. Plant in unanalyzed condition (10 CFR 50.72(b)(3)(ii)(B) / 10 CFR 50.73(a)(2)(ii)(B)) EIGHT (8) Hour		
10. Event or Condition That Could Have Prevented Fulfillment of a Safety Function (10 CFR 50.72(b)(3)(v) / 10 CFR 50.73(a)(2)(v)) EIGHT (8) Hour Notification		
11. Transport of a Contaminated Person Offsite (10 CFR 50.72(b)(3)(xii)) EIGHT (8) Hour Notification		
12. Major Loss of Emergency Preparedness Capabilities (10 CFR 50.72(b)(3)(xiii)) EIGHT (8) Hour Notification		
13. Operation or Condition Prohibited by Technical Specifications (10 CFR 50.73(a)(2)(i)(B)) 60-day Written Report		

Attachment 7.2 - 10 CFR 50.72/50.73 (1, 4 and 8 hours, and 60 day event) Reportability

Reportability Evaluation Checklist
Part 1 - 10 CFR 50.72 AND 10 CFR 50.73 (continued)

Does or did the event or condition appear to involve: (Refer to Attachments 7.1 and 7.2 for additional information or guidance)	Yes	No
14. Natural Phenomenon External Threat to safety 10 CFR 50.73(a)(2)(iii) 60-day Written Report		
15. Inoperability of Independent Trains or Channels in a system Due to a Single Cause or Condition (10 CFR 50.73(a)(2)(vii)) 60-day Written Report		
16. Airborne or Liquid Effluent Release (10 CFR 50.73(a)(2)(viii)(A) or (B)) 60-day Written Report		
17. Single Cause That Could Have Prevented Fulfillment of the Safety Functions of Trains or Channels in Different Systems (10 CFR 50.73(a)(2)(ix)(A)) 60-day Written Report		
18. Internal Threat or Hampering (Including Fires, Toxic Gas, Radioactive Releases) (10 CFR 50.73(a)(2)(x)) 60-day Written Report		
19. Violation of Safety Limits, Limiting Safety System Settings and Limiting Conditions for Operation. (10 CFR 50.36(c)(1) and (2)) Various Reporting Requirements		
<p>NOTE: Any "Yes" answers above indicate that the event or condition appears to be Reportable. Prompt notification of appropriate personnel is required in order to ensure initiation of any necessary immediate actions and completion of a Reportability Determination.</p>		
<p>CONCLUSION: Does event or condition appear to be Reportable under 10 CFR 50.72 and/or 50.73?</p>		

Comments attached: Yes () No ()

NOTE: This Reportability Evaluation must be reviewed by the PRC. Provide original Reportability Evaluation to PRC Technical Secretary.

Completed by: _____ Date: _____

Reportability Determination: Reportable _____ Not Reportable _____

Determining Individual _____ Date/Time _____ / _____