Work Order Shop Papers
11/11/2002

PSEG

Sig Level 3

Order:		TARP Procedure non-compliance
Order Type	NUCR	
Status	TECO CNF PRT MANC NMAT PRC SETC	
Notification		
Unit	SH	
Functional Location	SH.OP-AP.ZZ-0101(Q)	POST-TRANSIENT RESPONSE REQUIREMENTS
Equipment		
Assembly		
Location		
Room		
System	OP	
Priority	3	Medium
Main Work Center	R-RP00	NC
Status	TECO CNF PRT MANC NMAT PRC SETC	
Basic Dates:	Start: 07/24/2002	Finish: 07/24/2002 Overdue:
Sfty Rltd/QA Reqd		
Sfty Class		
ule Code	NA	
SEISMIC		
EQ		
Permission to Begin Work		Date: Time: 00:00:00

Description of Work

NC

TARP Procedure non-compliance
07/18/2002 12:03:04
NOTIFICATION SUMMARY:

Procedure non-compliance: SH.OP-AP.ZZ-0101, POST-TRANSIENT RESPONSE REQUIREMENTS (TARP) teams may not be performing required actions and personnel are not aligned with the emergency response organization.

1) DESCRIBE THE ACTUAL CONDITION?

SH.OP-AP.ZZ-0101, POST-TRANSIENT RESPONSE REQUIREMENTS describes the responsibilities of the Transient Assessment Response Plan (TARP) team. The following statements are from SH.OP-AP.ZZ-0101 and all relate to TARP Team transient response responsibilities.

EXHIBIT 12 H/2

C.H.O.I.C.E. SAFETY: The Only
Commitment Help Oversight Involvement

Section 3.12 states, TARP Team Members:

Review all "After-the-Fact" ECG classifications to ensure that the station is not in an emergency situation as well as the circumstances concerning why an "After-the-Fact" classification was made.

EP TARP team personnel should review all Unusual Event classifications and subsequent notifications for accuracy and timeliness. Create a timeline on EP related activities and perform "Observation Checklist" from NC.EP-DG.ZZ-0001(Z), Maintenance of Emergency Preparedness Performance Indicator (PI) Data.

Section 5.2.4, states the TARP Team should review all "After the Fact" ECG classifications to ensure that the station is not in an emergency situation as well as the circumstances under which the "After-the-Fact" classification was made.

Section 5.1.1 expects that TARP Team members to be Emergency Duty Responders or not duty responders to be fit-for duty and within 60 or 90 minutes of the plant

ATTACHMENT 1, TRANSIENT ASSESSMENT RESPONSE PLAN (TARP), requires TARP team initiation for 16 items that may require reporting per ECG. They include:

1. Unplanned ESF activations.
2. Valid ECCS/SI actuations with discharge to the RCS/vessel.
3. Exceeding any Tech Spec Safety Limit.
4. Violations of Tech Spec Action Statements or design basis.
5. Unplanned or inadvertent criticality.
6. Radioactive or non-rad spill/discharge onsite or from offsite that adversely affects the unit(s).
7. Any occurrence resulting in an environmental impact (NJPDES, EPA reportable occurrence, ECG reportable environmental event).
8. Any radiation over-exposure per ECG.
9. Unexpected contamination of > 100 ft2 area outside plant structures OR discovery that contaminated person or material may have left the Protected Area
10. Fatality.
11. Deviation from procedures pursuant to 10CFR50.54(x).
12. Plant in unanalyzed condition that impacts plant safety.
13. Plant in a condition not covered by normal/abnormal or emergency procedures.
14. Significant Loss of Control of Security Protective Measure.
15. PZR code safety valve discharge at Salem.
16. After-the-fact emergency condition reported per ECG.

ATTACHMENT 2, TARP DUTY ROSTER AND CALLOUT LIST, requires consulting with Emergency Preparedness concerning TARP team alignment of personnel.

If an emergency (ALERT or higher) is declared after or during TARP team implementation, the TARP team will be terminated and superseded by the Emergency Response Organization.

Contrary to these procedural requirements, TARP teams may not be performing all Sections and are being staffed without Emergency Preparedness alignment. It appears that the procedure is being leveraged more as a defacto staffing tool, then a transient assessment and Emergency Plan response related activities. This is evident in that D TARP team has only 2 out of 26 reponders are EP responders.

This conclusion was made after reviewing the TARP Team procedural requirements with a former TARP Team Leader who has lead over 20 assessments in the past.

2) HOW DOES THIS ISSUE IMPACT PLANT OR PERSONNEL SAFETY?

Procedure compliance improves human performance by reducing the changes of knowledge based human errors. In this case, the most likely errors are:

Errors of Omission: Transient response is not classified as an emergency when it is.

Errors of Commission: Transient response is misclassification in Emergency Response Plan.

3) PSEG NUCLEAR OR REGULATORY REQUIREMENT NOT MET?

Regulatory and moral obligation to ensure transients are classified correctly relative to Emergency Response Organization with minimum chances of human error to misclassify a emergency during a trasnient.

4) WHAT CAUSED THE CONDITION?

Misuse of safety related #Q# procedure as a staffing tool.
Failure to follow procedures.
Imprecise communication - procedure is vague.

5) WHAT ACTIONS, IF ANY, HAVE BEEN TAKEN TO CORRECT THE CONDITION?

Have had several meetings with supervisor and manager on issue. At manager level the need for a notification was agreed to.

6) RECOMMENDED ACTION/CORRECTIVE ACTION AND WORK CENTER RESPONSIBLE FOR CORRECTING CONDITION.
(USE TITLE/POSITION, NOT NAME)

Recommended Action: Apply a reasonable approach to procedural interpretation and complied with as written.

7) ANY OTHER RELEVANT INFORMATION?(WHO, WHEN, WHERE, WHY, REFERENCES, ESTIMATED COST, EMISTAG, ECT)

Other example of SH.OP-AP.ZZ-0101(Q) non-compliance:

20068549	06/06/2001	3	Pagers did not support TARP team callout
20077260	09/14/2001	3	SH.OP-AP.ZZ-0101(Q) TARP contacts not made
20079140	10/05/2001	3	failure to notify QA onTARP notification
20082863	11/07/2001	3	SH.OP-AP.ZZ-0101(Q) Violation of SHOP-101,TARP Procedure
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20104118	06/27/2002	3	SH.OP-AP.ZZ-0101(Q) TARP page, pager did not function

MC

Oper. ion List Summary
7/11/2002

PSEG

OP	Sub Op.	Work Center	Description	Start Date	Work	No	Durtn
0010		R-RP00	TARP Procedure non-c ompliance	07/24/2002	4.0	1	4.0
0020		R-CRT00	ENTER TREND CODING	07/24/2002	1.0	1	1.0

EXHIBIT 12
PAGE 5 OF 12 PAGE(S)

SAFETY: The Only C.H.O.I.C.E.
Commitment Help Oversight Involvement Communication Empowerment

PSEG

Object Id	Object Description	Location	Room	SFTY RLTD/ QAR	SFTY CLASS/ QGC	SEIS	EQ	QA REQ
SH.OP-AP.ZZ-0101(Q)	POST-TRANSIENT RESPONSE REQUIREMENTS							
	TARP Procedure non-compliance							

07/18/2002 12:03:04
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EXHIBIT 12

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EXHIBIT 12

SEE LONG TEXT
Response to [ ] SL3

No condition adverse to quality could be validated. There is no impact on plant, industrial safety, or business goals.

The initiator noted two concerns with the SH.OP-AP.ZZ-0101 rev 6, Post Accident Response Requirements:

1. Tarp teams may not be performing all sections and are being staffed without EP alignment

2. It appears that the procedure is being used as a defacto staffing tool, then [sic] a transient assessment and emergency plan response related activities.

Review of the procedure and discussion with EP personnel reveal the following.

All procedure sections are being followed.

Alignment with EP teams exist, EP members that are on the TARP team are on the same shift.

There are EP members on the TARP teams to do classification reviews.

There is not a requirement that TARP members be EP members.

Staffing of the TARP team is done by management decision. The procedure describes responsibilities, process, and actions in response to plant transients and events. No issue appears to exist.

No actions or corrective actions are required.

Operation Key Info
11/11/2002

PSEG Public Service Electric and Gas Company

OK

NC

Order:		TARP Procedure non-compliance
Operation:	0010	TARP Procedure non-compliance
Work center:	R-RP00	NNUC
Status:	TECO CNF PRT MANC NMAT	
Number of People:	1	
Scheduled Dates:	Start: 07/24/2002	Finish: 07/24/2002
Planned Hours:	4.0	
Actual Dates:	Start: 07/24/2002	Finish:08/05/2002
Actual Hours:	0.000	Personnel Number: _____
Completion Confirmation Number:		2080975

Confirmation Text: _____

SEE LONG TEXT
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Response to SL3

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Signature:

Confirmation Text:

Concur with response.

Signature:

Confirmation Text:

reviewed response and concur
reviewed response and concur

Signature:

Description of Work: