Entergy	NUCLEAR MANAGEMENT MANUAL	NON-QUALITY RELATED	EN-OE-100	REV. 2
		INFORMATIONAL USE	PAGE 1 OF 25	

Title: Operating Experience Program

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Effective Date	**EN Common**	☒	**12/6/2005**	**Effective Date Exception**	**GGNS**		**VY**	
	ENN	☐			**IPEC**		**W3**	
	ENS	☐			**JAF**		**WPO**	
					IPEC		**W3**	
					JAF		**WPO**	

Procedure Contains NMM REFLIB Forms: YES ☐ NO ☒

Basis Statement

Rev. 2

- Includes requirements to perform SOER effectiveness reviews, including the attributes.
- Update Commitments from Sites

Site and NMM Procedures Canceled or Superseded By This Revision

NONE

Process Applicability Exclusion (ENN-LI-100) / Programmatic Exclusion (ENS-LI-101)

All Sites: ☐ Specific Sites: ANO ☐ GGNS ☐ IPEC ☐ JAF ☐ PNPS ☐ RBS ☐ VY ☐ W3 ☐

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1.0 PURPOSE

[1] This procedure provides a methodology for evaluating and initiating action for operating experience information (OE) at all Entergy nuclear stations. The primary objective of assessing OE is to identify and transfer lessons learned from other stations into actions that enhance the safety and reliability of Entergy's nuclear plants.

2.0 REFERENCES

[1] 1.3.121.1 Corrective action program (PNPS)

[2] Entergy System Policy - Copyright, Trademark, and Copyright Infringement

[3] INPO 94-001, Significant Event Evaluation and Information Network (SEE-IN) Program Description

[4] INPO 97-011, Guidelines for the Use of Operating Experience

[5] INPO 02-003, Selected Significant Operating Experience Report Recommendations 1980 - 2002

[6] EN-LI-102, Corrective Action Process

[7] EN-LI-104, Self Assessment and Benchmark Process

[8] MP-101, Materials, Purchasing and Contracts Processes - Passport

[9] NUREG-0737, Section I.C.5, Clarification of TMI Action Plan Requirements

[10] EN-OP-103, Reactivity Management Program

[11] PL-145, Notification of off-Normal Situations

[12] EN-WM-105, Planning

[13] EN-OM-128, Notification of Off-Normal Situations

[14] INPO 00-005, SEE-IN Coordinator's Guide

[15] SOER 03-2, Managing Core Design Changes

[16] Letter CNRO-2004-0081 dated 12/17/04, Request for Use of Delta Protection, Supplied Air Suits

3.0 DEFINITIONS

[1] 10CFR21 Notification (Part 21) A report submitted to the USNRC pursuant to the requirements of 10CFR21.

[2] Condition Review Group (CRG) - A management group responsible for site CR review, classification, categorization and assignment of responsibilities.

[3] Equivalent Tracking Report - Report generated for the purpose of tracking/assigning OE impact evaluations and 10CFRPart21 reviews. Equivalent Tracking Reports are used at stations where the Paperless Condition Reporting System (PCRS) is not being used. The corporate or site corrective action programs do not govern equivalent Tracking Reports.

[4] Impact Evaluation - Analysis of an OE event or problem that requires additional information and research to determine impact or potential impact, as it relates to plant operation and/or configuration. Impact Evaluations are typically documented with an OPX/OEN condition report.

[5] Information Notice (IN) - A document prepared by the U.S. Nuclear Regulatory Commission that transmits information that may be relevant to safety, safeguards or environmental issues. A licensee response is not required.

[6] INPO Daily Download - Published INPO OE reports, and/or SEE-IN documents uploaded for screening purposes.

[7] INPO Nuclear Network ™ - Computerized information system to which subscribing utilities may connect. It provides means for rapid, widespread dissemination of operating experience information relevant to reactor safety, design, and operation of nuclear power stations. Information is provided by utilities, INPO, NSSS suppliers, architect engineers, or others with Nuclear Network access.

[8] Internal Operating Experience - Operating experience that originates as a condition report or request from plant personnel which warrants consideration for possible Entergy-wide distribution. Internal OE can originate from any Entergy plant or headquarters. Internal OE is considered for distribution to INPO as an OE report, but is typically lower threshold information or may address specific Entergy issues that would be of little value to the industry.

[9] NRC Daily Download - Events, Morning Reports, Preliminary Notification Reports, and other relevant NRC releases uploaded for screening purposes.

[10] Operating Experience (OE) - - Information received from various industry sources that describes events, issues, equipment failures, etc. that may represent opportunities to apply lessons-learned to avoid negative consequences or to recreate positive experiences as applicable. Some examples of Operating Experience are: INPO SEE-IN Documents, NRC Information Notices, Vendor Bulletins, 10CFR Part 21 Reports, NRC Daily Event Reports, INPO Nuclear Network download, NSSS owners group reports, etc.

[11] Operating Experience Reports - Internet forum in the INPO Nuclear Network. This forum is intended for industry personnel to post information describing operating events at their sites, recurring problems, and corrective actions taken in response to these events.

[12] OPX/OEN Condition Report (OPX/OEN) -Type of condition report initiated for the purpose of tracking/assigning OE Impact Evaluations and 10 CFR Part 21 reviews. OPX/ OEN condition reports are initiated and stored in the Paperless Condition Reporting System database (PCRS) but are not governed by EN-LI-102, "Corrective Action Process." Only personnel designated by the OE organization should initiate OPX/OEN CR's.

[13] Proprietary - of or relating to the rights of the proprietor to allow or prevent any use, presentation, distribution and/or alteration of something. See/use the Entergy system policy "Copyright, Trademark and Patent Infringement"

[14] Screening Process - A review of events or problems that have occurred throughout the industry including items that have been reported to the NRC or INPO. These documents are reviewed by the OE staff for impact to Entergy based on the potential for a similar event or problem to occur within Entergy, and the possible consequences if a similar event or problem did occur.

[15] Significant Event Evaluation and Information Network (SEE-IN) - SEE-IN is managed by INPO for the purpose of screening nuclear plant events occurring worldwide and disseminating information on those events considered to be significant to safety and reliability. The SEE-IN program is described in reference 2.0[3]. Information provided by plants on significant in-house events with generic implications is a key input to SEE-IN. The following documents are generated within the SEE-IN program, and are listed in order of priority:

- INPO Significant Operating Experience Reports (SOERs)
- INPO Significant Event Reports (SERs)
- INPO Significant Event Notifications (SENs)
- INPO Operations and Maintenance Reminder (O&MRs)

[16] Vendor Bulletins - Documents prepared by various equipment vendors that transmit information pertaining to equipment problems and recommended corrective actions. Some examples of these include:

- Westinghouse Nuclear Safety Analysis Letter (NSAL)
- Westinghouse Technical Bulletins (TB's)
- General Electric (GE) Rapid Information Communication Service Information Letter (RICSIL)
- General Electric (GE) Service Advice Letter (SAL)
- General Electric (GE) Service Information Letter (SIL)
- General Electric (GE) Technical Information Letter (TIL)
- B&W Owners Group TAP Reports

Vendor documents that are received by the OE coordinators are considered in the screening call. Typically, this information is forwarded to the Configuration Management group for information, regardless of the screening outcome.

4.0 RESPONSIBILITIES

[1] Director, Nuclear Support - has overall responsibility for the Operating Experience (OE) Program.

[2] Manager, Operating Experience or Designee - is responsible for the implementation of the OE program within Entergy Nuclear. This includes:

(a) Final review and closure of OPX/OEN condition reports or equivalent tracking reports.

(b) Review external OE releases.

(c) Discuss the benefits of OE information with the station groups.

[3] Site Vice Presidents – Operations - Responsible for establishing the culture of learning on-site in which OE information is considered beneficial and vital for maintaining excellence in nuclear performance.

[4] The Condition Review Group (CRG) - Responsible for reviewing CRs to classify, categorize, and assign responsibility. In addition, the CRG determines if CRs should be shared as Operating Experience, either internally or externally.

[5] Manager, Corrective Action/Assessment (CA/A) - Responsible for:

(a) Initial site review/approval of OE external releases.

(b) Review of site condition reports for potential internal sharing within Entergy. (Identified condition reports should be communicated to site OE Coordinator(s) for input to daily screening.)

(c) Dotted-line supervision of the site OE coordinators for administrative purposes such as fitness-for-duty, behavioral observation, vacation scheduling, etc. The CA/A Manager has authority to approve short-term assignments (generally for no more than two working days) as dictated by the needs of the plant. Longer-term assignments or additional duties require the concurrence of the Manager, OE.

(d) Assigning a corrective action to the site OE Coordinator(s) for closure review of site condition reports initiated as a result of incoming operating experience. The review will consider the effectiveness of the documented CR response to the OE information received.

[6] General Managers – Plant Operations (GMPO) - Responsible for ensuring that operating experience information is integrated into daily plant work activities, and for addressing any OE issues that escalate to their level for resolution.

[7] Managers and Superintendents - Responsible for:

(a) Communicating departmental expectations for the use of OE information.

(b) Actively reinforcing the use of OE information (e.g., during pre-job and pre-evolution briefings, training activities, engineering design reviews, self assessment/evaluation activities.)

(c) Identifying and recognizing examples of effective use of OE, "Success Stories" that improve job performance or prevent errors within their organizations. Forward these examples to the site OE Coordinators.

(d) Ensuring that the appropriate resources are devoted to address the review and evaluation of OE items in a technically sound and timely manner.

(e) Ensuring corporate and/or plant specific Condition Reports are generated in accordance with EN-LI-102, or equivalent station corrective action procedures, when adverse conditions are identified during review or evaluation of an OE item.

(f) Identifying corrective/preventive actions in response to OE information, and implement these actions in a timely manner.

(g) Communicating with the site OE Coordinator to maintain and modify the point-of-contact roster for their respective department.

(h) Working with OE coordinators on SOER response if designated as the assigned SOER sponsor by the Condition Review Group (CRG).

[8] OE Points of Contact (POCs) - Responsible for:

(a) Acting as the focal point for Operating Experience in their assigned area. This includes assisting and training department personnel in the use of OE tools such as:

- INPO Website
- Nuclear Forums
- NRC Website

(b) Receiving FYI distribution from daily OE screening:

- Notifying the OE group if an "FYI" item needs further evaluation or action.
- Providing specific feedback to the OE coordinator to provide context or clarity for an OE report that is incomplete or misleading.
- Issuing a request to training when required, based on the information
- Determining the most effective method of sharing the information within the department. Examples include:
  - Forwarding to others
  - Discussing in routine meetings

(c) Getting appropriate info into daily briefs.

(d) When requested, providing a "peer check" on closed OE evaluations in their area to ensure the issue has been appropriately addressed.

(e) Providing feedback to the OE group on:

- Departmental items or trends that should be shared with the other Entergy sites or with the rest of the industry.
- Departmental needs or improvements that may increase the effectiveness of the OE program.

(f) Identify OE success stories in their area that demonstrates the effective use of OE information.

[9] First Line Supervisors - Should be familiar with sources of OE information useful for planning evolutions or work in their respective areas. The supervisor should brief workers on applicable OE aspects of specific jobs immediately before evolutions to help personnel recall pertinent information that could prevent similar problems (awareness). The first line supervisor should identify and recognize examples of effective use of OE that improve job performance or prevent errors within their work groups, forward them to the site OE Coordinators and/or department assigned POC.

[10] Senior Project Manager – Nuclear – Corporate OE Coordinator reports directly to their Manager – OE. Responsibilities include:

(a) Typically participates in screening incoming OE items.

(b) Liaisons with corporate points of contact (POCs).

(c) Coordinates periodic OE self-assessments at the sites per section 5.9

(d) Initiates OPX/OEN condition reports or equivalent tracking reports for OE items requiring evaluations.

(e) Typically serves as editor of periodic OE communications, including the OE Daily Industry Summary.

(f) During absence of OE Manager, assumes Manager duties as directed.

(g) During absence of OE Administrative Services Specialist, assumes or designates duties relevant to OE database and screening process.

(h) Acts as OE Management with regard to OPX/OEN condition report or equivalent tracking report processes and administration.

[11] Operating Experience Coordinator(s) - Site OE Coordinators report to their Manager-OE, but are "dotted-line" reports to the site CA/A Manager for administrative purposes as described in Section 4. The typical duties of the OE Coordinator are:

(a) Screen incoming OE items for potential plant impact.

(b) Determines relevant OE information to be distributed station personnel (typically the POCs.)

(c) Evaluate the impact of applicable OE items to station operation and design, as assigned.

(d) Provide periodic status reports as requested by the OE Manager or Senior Project Manager.

(e) Periodically monitor OE program performance and effectiveness.

(f) Promote the use of OE information.

(g) Ensure that OE information is accessible to appropriate personnel.

(h) Assist in publishing OE information on a periodic basis (e.g. daily summary, newsletters, and facility-wide distribution of a significant OE item.)

(i) Conduct periodic POC briefings.

(j) Prepare or assist responsible department in the preparation of OE reports for selected plant events or issues that will be shared with the industry.

(k) Coordinates SOER response as requested by the assigned department manager.

(l) Maintain the SOER database index to track the respective site responses to each recommendation associated with applicable SOERs.

(m) Write, review and post-daily summaries for distribution.

(n) Input information to the OE database as necessary.

(o) Update the OE 'Just-In-Time' folders.

(p) Assist the root cause evaluation process as necessary.

(q) Perform OE condition report closure review (corrective action assigned by CA&A group).

[12] Site Personnel - Utilize OE information to increase plant safety and reliability in routine and emergent situations such as:

(a) Pre-job briefings.

(b) Preparation for a non-routine major plant evolution.

(c) Planning for a refueling outage.

(d) Initial and continuing training.

(e) Conduct of an Infrequently Performed Test or Evolution (IPTE).

(f) Equipment reliability concern.

(g) Self-assessment / evaluation activities.

(h) Determining the impact to the station of assigned OPX/OEN corrective actions as assigned.

[13] Administrative Services Technical Specialist

a) Downloads the INPO nuclear network forum.

b) Verifies correct format for documents to be added to the OE database.

c) Uploads the INPO nuclear network forum and other documents into the OE database.

d) Prepares the screening report for the OE Coordinators.

e) Distributes relevant OE information to appropriate station personnel.

f) Maintains the OE distribution list.

[14] Significant Operating Experience Report (SOER) Sponsor - An individual, typically a manager or director, assigned oversight for coordinating the response to the SOER for either a site or the region. The manager that is assigned the condition report by the CRG is considered the SOER sponsor. The SOER sponsor is also responsible for review and final approval of the SOER evaluation. In addition, the sponsor should submit the final evaluation to the Onsite Safety Review Committee (OSRC), Corrective Action Review Board (CARB) or equivalent site management group for comment and review.

[15] Work Planner - Retrieves and includes applicable OE information to appropriate work packages. This allows the workers to be briefed on applicable operating experience immediately before evolutions and work activities to help personnel recall pertinent information that could prevent similar problems (awareness).

[16] Work Week Manager - Facilitates the identification of work activities by the site workweek management team in their assigned workweek for which OE information may be relevant. The OE coordinator may participate in this selection process during the development of the weekly work schedule.

5.0 DETAILS

5.1 Precautions and Limitations

None

5.2 General

[1] The OE Program provides the process for assessing OE from industry sources for potential impact to the continued safe and reliable operation of Entergy nuclear units. When conditions are identified as having an impact, Condition Reports are generated to provide for evaluations and corrective action plans.

(a) If at any time during the screening or evaluation process, an "adverse condition" as defined in EN-LI-102 or equivalent station corrective action procedures is identified, then a Condition Report shall be initiated for all Entergy units affected and/or corporate.

(b) Documents that are typically screened and tracked by the OE Group are the following:

- INPO SEE-IN Documents
- NRC Information Notices
- Vendor Bulletins received by OE personnel
- 10 CFR Part 21 reports
- INPO Daily download of industry OE

In addition to the above listed documents, the OE Group may also screen other documents for impact. These documents include:

- NRC Download
- Other Nuclear Network information
- Applicable NSSS owners group reports
- Internal OE, as described in section 3.[8]
- Reactivity Management Event

[2] Screening and Dissemination

(a) Incoming OE items are screened by the site OE coordinators for impact to their respective units with one of three possible outcomes (see Attachment 9.1 for all screening and evaluation codes and sub-codes):

- Screened as code "A" - "Evaluation Required"
- Screened as code "B" - "Useful for Site Awareness"
- Screened as code "C" - "Not Applicable"

(b) Documents received by the OE coordinators relating to industry OE are screened for potential impact. This is accomplished by each site screening the documents and then by a means of an inter-site conference call;

- Documents received that are identified as copyrighted or proprietary may be added to the OE database in compliance with the corporate policy on Copyright, Trademark, and Patent Infringement.

(c) The criteria used by Entergy personnel to determine potential impact in the screening process includes the following:

- Similar equipment or components are used at the station (or in the warehouse), although not necessarily in the same application.
- Similar design exists, if design was determined to be a main contributor to the issue.
- **Current Organizational and or Programmatic practices that could increase the chances of a similar problem.**
- Similar conditions, such as aquatic life, sea grass, severe weather, or extreme temperatures, could be present.
- A similar event has already been experienced.
- Similar management expectations, personnel behaviors, processes, or programs have been observed in the station.
- Reactivity Management Events.
- Equipment and Plant Reliability Events.

(d) The screening of incoming OE documents is performed using the codes found in Attachment 9.1. Screening codes are recorded for all screened documents, including those screened as "not applicable," for tracking purposes.

Documents that may have no impact, (or may have only a small probability of impact) but are considered of informational value to selected plant staff, should be assigned code "B – Useful for Site Awareness." The associated document should be sent to the appropriate departmental "Point of Contact" (POC) for review or saved as "Entergy Just-In-Time" information.

Documents that indicate the presence of an Entergy "adverse condition" or require formal evaluations for a proper impact assessment are classified as code "A – Evaluation Required." The sub-code assigned per Attachment 9.1 determines the course of action.

[3] Sharing Internal OE

(a) Entergy nuclear stations may use similar equipment, materials, and processes. Because of this, special attention must be given to sharing OE with the other Entergy stations, as well as incorporating their lessons learned. To accomplish this, each site's CA/A Manager, Condition Review Group (CRG) and/or OE Coordinator should consider the daily condition reports to determine if the other Entergy sites would benefit from the information. The OE Coordinator(s) should include the selected CRs in the OE screening.

(b) All root cause reports should be screened in the normal OE process.

[4] Evaluation and Analysis

NOTE

Unless separate site-specific Condition Reports are initiated for every Entergy nuclear site (or corporate CR), an OPX/OEN condition report or equivalent tracking report may also be needed for the remaining sites to determine impact.

(a) If a document is determined to have an impact and requires an evaluation, then it is classified as code "A" - "Evaluation Required". The document requires the initiation of a site-specific condition report, a corporate condition report, or an OPX/OEN condition report (or equivalent tracking report) depending on the assigned sub-code. The priority sub-codes and suggested due

dates for OE documents that require an evaluation are determined in accordance with Attachment 9.1.

(b) The individual performing the OPX/OEN (or equivalent tracking report) evaluation is responsible for:

- Determining impact or potential impact of the event.
- Assuring the adequacy of scope for the evaluation.
- Initiation of a site-specific CR, when OPX/OEN or equivalent tracking reports are determined to have an impact on the site, and corrective actions are required.

(c) OPX/OEN condition reports (or equivalent tracking reports) will be reviewed by the Manager-OE or designee prior to closure.

(d) OE evaluations concerning site equipment that may require inclusion into technical manuals should be processed in accordance with appropriate station procedures.

[5] Responses To SOERS & SER's

(a) The Site OE Coordinator should review the SOER & SER's for:

- Recommendation of a site, regional, or fleet response.
- Review of the recommendations.
- Other departments needed for recommendation reviews.
- Ensure initiation of a CR with recommended actions.

(b) SOERs & SER's contain recommendations that are required/recommended to be implemented in a timely manner. When the OE coordinators receive an SOER/SER's for screening, an evaluation is required and site-specific or corporate condition reports are required to be initiated in accordance with EN-LI-102 or equivalent station corrective action procedures by the OE Coordinator if not already initiated.

(c) An individual, typically a manager or director, should be assigned oversight for coordinating the response to the SOER for either a site or the region. The manager that is assigned the condition report by the CRG is considered the SOER sponsor. The SOER sponsor is also responsible for review and final approval of the SOER evaluation. In addition, the sponsor should submit the final evaluation to the site Onsite Safety Review Committee, Corrective Action Review Board or equivalent site management group for comment and review.

(d) The SOER sponsor should assign a team lead and hold a team meeting within 14 days.

(e) A preliminary review and brief summary of proposed actions should be documented on the condition report to aid in subsequent department assignments. It is recommended that the complete SOER document be attached electronically to the condition report in PCRS. CA's to address the initial recommendations should be assigned within seven days of the initial team meeting by the team leader.

(f) SOER condition report due date assignments should reflect that yellow tab SOER responses are required to be evaluated within 150 days, and red tab SOER responses are required to be evaluated within 90 days.

(g) An action should be assigned in the initiating condition reports to the lead SOER Manager as appropriate, to perform a final review of the initial response to the SOER within 14 days of the 90 or 150 day time allotment.

[6] Reports and Tracking

(a) Each site OE group should prepare a monthly OE status report. The report is submitted to the Manager, OE, or Senior Project Manager who determines the attributes of the report.

(b) Each site will maintain an SOER database to track the respective site responses to each recommendation associated with applicable SOERs. The OE Coordinators are custodians of the index, but the respective departments assigned the recommended actions are responsible for the accuracy of the content.

[7] SOER Updates and Effectiveness Reviews

(a) The site OE Coordinators are responsible for ensuring that the OE SOER data base is updated with the site-specific responses to the SOER recommendations.

1. SOER Data Base updates should be provided on a 2 year period

2. All SOER recommendations on the Selected List should have completed effectiveness reviews on a period not to exceed 3 years.

(b) The site OE Coordinators will assist in developing a periodic effectiveness review with the Recommendation of selected SOERs by maintaining schedule for those reviews. This review should be documented in the corrective action process (PCRS).

The Attribute of a continual and effective SOER response should be demonstrated by:

1. Station events related to the SOER's have been reduced – no or few events trending to zero.

2. SOER lessons learned are included where appropriate in both initial and continuing Training programs.

3. SOER Lessons learned are included in RCA and higher level ACE evaluations.

4. SOER sponsors conduct regular and independent evaluations on the programs assigned to SOER responses(FME, RP, etc,)

(c) Effectiveness reviews for SOER's should be performed by the SOER Recommendation owner and include/document the following:

1. Station Coordinators and SOER Recommendation owners should conduct a periodic analysis and reviews of the Stations CA&A Quarterly Trend report to evaluate emerging trends or issues relative to SOER's. The results should be documented in PCRS as either a learning organization document or a condition report.

2. Review SOER actions implemented since last SOER data base update. Check if a station's Condition Report's have been written relative to the SOER recommendations.

3. No repeat findings from internal Entergy audits or assessments relative to SOER recommendations.

4. Information provided for SOER data base periodically updated, and is valid (procedure steps are checked & verified, etc.)

[8] 10 CFR Part 21 Reports

a. 10CFR Part 21 reports received by an Entergy nuclear plant require the initiation of a site-specific or corporate condition report upon receipt, when it can be quickly determined that the Part 21 report is directly applicable to a particular Entergy plant. For example, an Entergy plant being on the customer mailing list for the Part 21 report received directly from the vendor in question may help determine this. OPX/OEN condition reports or equivalent tracking reports may be generated to determine the impact for the remaining Entergy units if impact at the other sites is still in question.

b. Any other generic document or report that is generated under the auspices of 10CFR Part 21, and is obtained by an Entergy nuclear plant (NRC download, sister-unit receipt, etc.) may require the initiation of an OPX/OEN condition report or equivalent tracking report after screening. (An OPX/OEN condition report or equivalent tracking report is considered the preferred course of action, if site impact cannot be determined relatively quick and accurately). If necessary, the OPX/OEN evaluator may assign a corrective action for Part 21 Applicability Review to the responsible Manager. The CA response should detail the Part 21's material history relating to its procurement, issue to plant personnel, and whether or not the material remains in inventory (including support documentation). If the Part 21 being addressed impacts plant equipment and/or requires remedial action by site personnel, then the OPX/OEN condition report or equivalent tracking report is closed, and a site-specific condition report is then required to document the plant impact. Part 21 OPX/OEN corrective actions should be assigned a 30 day due date, with the impact review completed by the OE coordinators within 60 days

[9] Effectiveness Reviews and Self-Assessments

a. Each Entergy site performs self-assessments on a routine basis, not to exceed a two-year interval, to determine if station personnel are using OE information effectively. These self-assessments may be broken into several more targeted assessments versus an assessment which evaluates the entire program. The entire program should be evaluated on a 2 year basis. A team selected per the guidance of EN-LI-104 "Assessment Process" should perform the review using the guidance found in the procedure. Refer to Attachment 9.2.

[10] Release of internally generated OE to the Industry

a. Each Entergy nuclear site is required to submit event information to the "INPO Plant Events OPEX Reports" forum in the Nuclear Network. This forum is intended for industry personnel to describe operating events, recurring problems, and corrective actions taken in response to plant events.

   Entergy shall report any defects of Delta Protection Mururoa Enclosed Suits in a timely manner to the United States nuclear industry through our operating experience process as required by reference 2.0[16].

OE reports should be made only for event information that would prove beneficial to personnel at other stations. (See Attachment 9.2) Examples would include items such as those that:

- Are important to nuclear, public, or personnel safety
- Are important to generation capabilities
- Are important generic implications
- Reveal lessons learned from root cause investigations that that would be beneficial for application to other stations.

NOTE

INPO has established guidelines to make industry notifications within 50 days of the event date.

b. A preliminary OE report could be posted to the Nuclear Network as soon as feasible following the decision to share the information.

The site OE coordinator contacts the group responsible for the associated condition report disposition, and drafts the release document with their assistance. The draft release should then be reviewed by the OE Manager or Senior Project Manager and then by the site CA/A Manager. The OE Coordinator shall lastly obtain final approval from the GMPO or designee. The OE report is then submitted to the Nuclear Network forum.

Updates to initial release information, such as facts revealed from completed root cause investigations should be provided as the information becomes available.

[11] OE into Daily Work Activities

NOTE

Supervisors responsible for emergent work issues are responsible for obtaining applicable OE for resulting work packages. The OE Coordinator(s) should be contacted if training on OE tools is desired.

a. Work schedules should be reviewed by the site management planning team for potential inclusion of OE into work activities. The potential inclusion areas should be identified to work planning personnel.

b. The OE Coordinator should provide relevant OE information for the work activities as requested.

c. Routine work packages should also be considered for the inclusion of applicable relevant OE information for use in pre-job briefings. The planner is responsible for retrieving OE information for inclusion in appropriate work packages.

d. First-line supervisors are responsible to ensure that applicable OE information is provided as part of the pre-job brief for appropriate work activities, including emergent work.

6.0 INTERFACES

[1] EN-LI-102, Corrective Action Process

[2] EN-WM-105, Work Management Process

[3] EN-LI-104, Self Assessment and Benchmark Process

7.0 RECORDS

None

8.0 OBLIGATION AND REGULATORY COMMITMENT CROSS-REFERENCES

8.1 OBLIGATIONS AND COMMITMENTS IMPLEMENTED OVERALL

None

8.2 SECTION SPECIFIC OBLIGATIONS AND COMMITMENTS

Step	Document	Commitment
ALL	ANSI N45.2.11	2.2.Sent.2(14) (P34631)

8.3 SITE SPECIFIC COMMITMENTS

Step	Site	Document	Document or Reference
2.0[9]	ANO	Commitment	P10487
5.2.[4](d)	ANO	Commitment	P8060
5.0	WF3	Commitment	P15300
5.0	WF3	Commitment	P15301
5.2[1](b), 5.2[7]	WF3	Commitment	P15303
5.2.1b	WF3	Commitment	P15298
ALL	WF3	Commitment	P2273
ALL	GGNS	UFSAR_Commitment	18.1.12. Response Para 2 - P-22975
5.9.a	GGNS	NUREG-0737_Commitment	IC5(7)_P23729
ALL	IP2	NRC Inspection 50-247/93-10	OE-100, Rev. 0 Section 5.2 replaces SAO 420, Rev. 14, Section 4.1.1
ALL	IP3	Commitment	COM-80-0219
ALL	IP3	Commitment	COM-80-02178
ALL	IP3	Commitment	COM-80-0219
ALL	IP3	Commitment	COM-80-02178

9.0 ATTACHMENTS

9.1 OE Screening and Priority Codes

9.2 OE Release Guidance

ATTACHMENT 9.1 OE SCREENING AND PRIORITY CODES

Sheet 1 of 1

The following codes are used to identify the screening classification of specific OE documents as they are entered into the OE database.

A. Evaluation Required.

1. Priority 1: Adverse Condition. This priority is assigned to a document that has a potential plant impact with a high probability of occurrence and a high potential for adverse consequences.

   Evaluation documents in this category require the initiation of site-specific or corporate condition reports, in accordance with EN-LI-102 or equivalent station corrective action procedure."

2. Priority 2: Potential Impact. This priority is assigned to documents that have potential plant impact, but an evaluation is required to determine if an adverse condition exists. Evaluations in this category require the initiation of an OE Condition Report (OPX/OEN) or equivalent tracking report. To ensure a timely determination of plant impact, OPX/OEN CR's should be assigned due dates not to exceed 90 days. Items that are determined to be potentially significant or sensitive can be "fast tracked" or "red flagged" and require responses to the OPX/OEN CR in a time frame that is determined by the significance of the issue identified. Typically a "Red Flagged" OE item is responded to within two working days and a "Fast Track" OE item is responded to within thirty days. Extensions past the 90 day due date require the approval of the Manager-OE. If an OPX/OEN CR determines that the OE document (in question) represents an adverse condition for the site, then a priority 1 evaluation is initiated, and the OPX/OEN CR is closed - referencing the resulting condition report.

B. Useful for Site Awareness.

1. Typically sent to Point-of-Contacts (POCs)

2. Saved into OE Just-in-Time folder

C. Not Applicable.

1. Contains No Useful Information (Includes updates, retractions, and repeat reports with no useful info.)
2. No Cause Identified.

3. Different Reactor Type, Manufacturer, or Plant Specific Issue. (Includes instances of components or processes "not used" or "not found" at referenced plant)
4. Previously Evaluated or Covered by Another Document.

Items considered for sharing OE messages include;

- important to nuclear, public, and personnel safety
  - — events that could lead to serious degradation of operating safety margin
  - — events that affect reactivity management, core reactivity, core cooling, or decay heat removal
  - — significant personnel injuries or life-threatening situations
  - — events that exceed, or have a strong potential to exceed, administrative limits because of:
    - – fission product barrier breaches
    - – uncontrolled release of radioactive material
    - – exposures significantly greater than planned
    - – adverse reactor core or fuel performance events. Include evidence of fuel leakage (including minor leaks), core performance prediction shortfalls, malfunctions of core components or rod control systems, or deficiencies found in the core design process. This notification should occur as soon as practical, consistent with SEE-IN program reporting guidelines. The reporting criteria should be conservative in that events are reported even if causal analysis is incomplete or if the significance of an event initially appears minimal

- important to generation capability
  - — transients, including reactor scrams, main turbine trips, feedwater control problems, and other conditions
  - — equipment malfunctions or human errors
  - — major equipment damage
  - — frequent or extended outages
- events with important generic implications
  - — deficiencies in areas such as design, analysis, testing, or procedures with potentially generic implications
  - — component failures with generic implications
  - — events involving discovery of information significantly different from what was assumed to be an industry norm
  - — unique solutions to known industry problems that could benefit other utilities
  - — transients that required extraordinary actions to terminate even though actual consequences were minor

- events for which a comprehensive root cause investigation was performed, and lessons learned would be beneficial for you to know about if the event had occurred at another station

If it is determined that a root cause will not be shared with the industry, then document the explanation in the associated condition report.