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Fred Dacimo
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November 05, 2007

Re: Indian Point Unit 2
Docket No. 50-247
NL-07-130

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, DC 20555-0001

Subject: Supplemental Response to Request for Action Plan to Address the Procedure Adequacy Substantive Cross-Cutting Issue for Indian Point Unit 2

- Reference
1. NRC letter, dated August 31, 2007, "Mid-Cycle Performance Review and Inspection Plan-Indian Point Nuclear Generating Units 2 and 3".
 2. Entergy letter NL-07-110, dated October 1, 2007, F.R. Dacimo to Document Control Desk, "Action Plan to Address the Procedure Adequacy Substantive Cross-Cutting Issue for Indian Point Unit 2".

Dear Sir or Madam:

In response to Reference 1, Entergy Nuclear Operations, Inc (Entergy) submitted a letter on October 1, 2007 (Reference 2) providing the "details on Entergy's action plans to address the procedure adequacy substantive cross-cutting issue", including schedule, milestones, and performance monitoring metrics as well as plans for evaluating the effectiveness of the procedure upgrade project.

To supplement the information provided in Reference 2, Entergy is providing an updated IPEC Procedure Upgrade Project Plan Summary (Attachment 1). This additional information is being submitted in response to a discussion held with the NRC on October 24, 2007. As noted during the conversation, the project plan is a working document subject to changes during the life of the project and updates will be available for NRC review upon request.

A001
NRR

There are no commitments contained in this letter. Should you or your staff have any questions regarding this matter, please contact Mr. Robert Walpole, Manager, IPEC Licensing at (914) 734-6710.

Very truly yours,



Fred R. Dacimo
Site Vice President
Indian Point Energy Center

Attachment 1: IPEC Procedure Upgrade Project Plan Summary

cc:

Mr. Samuel J. Collins, Regional Administrator, NRC Region I

Mr. David C. Lew, Director, Division of Reactor Projects NRC Region I

NRC Resident Inspector's Office, Indian Point Unit 2

Mr. Paul Eddy, New York State Department of Public Service

ATTACHMENT 1 TO NL-07-130

IPEC Procedure Upgrade Project Plan Summary

ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET No. 50-247

ATTACHMENT 1

IPEC PROCEDURE UPGRADE PROJECT PLAN SUMMARY

This document summarizes Indian Point Energy Center's (IPEC's) current revision of the Procedure Upgrade Project (PUP) Plan.

Project Background

In early 2006 IPEC identified through the corrective action process that a procedure adequacy issue existed and that an upgrade to the sites implementing procedures was warranted. An "inadequate procedure" can cause initiating events by inducing plant personnel to take inappropriate actions during plant operations, maintenance, calibration, testing, or event response. Adequate procedures assure proper functioning of mitigating systems during operation, maintenance and testing. IPEC created and implemented plans to improve the quality of procedures as a site wide effort.

In December 2006 site management determined that the current works down rates for the project were not meeting the sites' needs and expectations. Based on this assessment of progress, additional project plans were developed and implemented, specifically focusing on Operations, Maintenance and Instruments & Controls (I&C). These actions are tracked in the IPEC corrective action program under IP3LO-2007-00069.

In the NRC annual assessment letter dated March 2, 2007 the NRC identified a substantive cross-cutting issue in the area of human performance under "resources" regarding procedure adequacy at Unit 2. During this assessment period there were seven inspection findings that were attributable to human performance cross-cutting aspects of procedure adequacy. These inspection findings involved operations performance of non-routine evolutions and response to plant transients, surveillance and calibration activities, and risk assessment for on-line work activities. As noted in the 2007 mid-cycle report there has been a reduction of identified findings to five for the most recent assessment period in the area of procedure adequacy.

Project Overview

A project oversight team was established to determine the required scope and work down curves to meet the stations needs. The project team concluded that any department with implementing procedures not yet revised since site integration would be included in the scope of the procedure upgrade project. Although each of the three main departments (Operations, Maintenance and I&C) included in this project will be focusing on different types of technical content, the basic implementation plans are aligned. This type of alignment will allow the teams to make use of developing best practices as well as creating a synergy amongst the teams that will improve development progress.

The main areas of inadequacies stem from a lack of eliminating “legacy issue” differences in similar procedures between both operating units, removing of human performance error traps and not taking advantage of the best practices between Units 2 and 3.

Although the oversight team has ultimate accountability for the success of the project, the project is a site wide effort demonstrated by the resources that have been assigned to the project. Technically qualified personnel from across the site have been assigned to accomplish IPEC’s goal. This resource allocation demonstrates the commitment of the Site Leadership for the success of the project. In addition to site resources, IPEC has reached out to the industry to bring in contract personnel to supplement IPEC’s in-house resources. More recently with the ongoing Entergy fleet alignment, assessment of resources continues, including the identification of the need for additional contract personnel.

This Procedure Upgrade Project is focusing on implementation level procedures that are specific to Operations, Maintenance, and I&C. The scope of this project also includes new procedures required to be written from the I&C task sheets that are currently in place. The specific elements of this project will focus on several programmatic issues to include resolution of open condition report corrective actions and procedure feedbacks as well as standardization/consolidation of procedures where possible, utilization of site best practices and elimination of human performance error traps. Project implementation also required the creation of a new infrastructure consisting of work areas to house the project teams, computers, telephones and individual work stations to ensure the teams were provided the proper resources for success.

The project will improve procedure quality in several areas;

- Incorporation of best practices between units.
- Ensuring procedures contain the appropriate level of detail
- Reduction of potential human performance error traps due to procedure inadequacy.
- Incorporation of procedure feed backs.

The project plan has been revised during the course of implementation. Initial plans estimated productivity rates; new productivity rates were applied based on actual results achieved by each discipline based on periodic review and assessment of the plan.

Milestones

1. Determine Project Scope

Status: Complete

- The objective is to have high quality procedures that operate and maintain the plant equipment in a robust and reliable fashion.
- Condition Report IP2-2006-3930 identified an IPEC procedure adequacy issue. Analysis of that condition report identified the following apparent causes:
 - a. Inadequate questioning/overconfidence by procedure performers
 - b. Inadequate interpretation and use of procedure process tools
- As a result of CR IP2-2006-3930 corrective actions included revising Operations system operating procedures to include lessons learned and best practices.
- The project team concluded that any department with implementing procedures not yet addressed since site integration would be included in the scope of the procedure upgrade project. Based on the large number of procedures, three groups, Operations, Maintenance (mechanical/electrical) and Instrument and Controls necessitated additional resources beyond "level of effort". A review of more recent condition reports related to procedure inadequacies have validated that these departments have the most potential for impacting plant operations.
- Entergy fleet and site administrative procedures have been excluded from this project as they are already a result of the best practices from across the fleet and site respectively.
- The oversight team defined the scope of the project to be approximately 3,500 procedures that need to be addressed (1,500 new to be written and 2,000 to be revised and upgraded to meet content and format requirements; the new procedures to be written primarily consist of the existing I&C task sheets.)
- The individual department implementation plans include the specific class of procedures included in the project scope.

2. Establish Priority

Status: Complete

- The department implementing procedures are being prioritized for revision based on the following criteria:
 - a. Safety Significance
 1. Procedures important to reactor safety
 - b. Frequency of Use
 1. Procedures with a greater usage frequency will increase the probability of adversely impacting plant operation or equipment if there is a procedure inadequacy.
 - c. Station Needs
 1. 12 week schedule
 2. Refueling outage

3. Determine Revision Criteria

Status: Complete

- The intent of this action is to have the Unit 2 and the Unit 3 procedures to be as common as possible. The criteria when reviewing and revising the procedures focuses on the following:
 - a. Identify best practices. The best practices used in one unit needs to be reflected in the opposite unit's procedures. Also; industry best practices are incorporated as appropriate.
 - b. Identify poor practices from the procedures and remove as required
 - c. Identify general deltas in the way tasks are accomplished between both units and institute one common method.
 - d. Ensure the level of detail is appropriate for the specific tasks.
 - e. Removal of human performance error traps
 1. As an example, the use of the terms "as appropriate" and "as required" are avoided from use

4. Develop Work Down Curves

Status: Complete

- A Work down curve for each department's procedures has been developed. The works down curves are based on the current resources applied to the project. The curves reflect productivity losses that arise from scheduled refueling outages. Subsequent steps in this action plan will perform a check and balance of progress being made and will provide the means to adjust the work down curves and/or resources as the project proceeds. The following work down curves are included as part of this attachment:
 - a. Figure 1 Operations work down curve
 - b. Figure 2 Maintenance work down curve
 - c. Figure 3 I&C work down curve

5. Develop Verification and Validation Process (V&V)

Status: Complete

- As a result of the weekly project meetings, it was determined that the established V&V process at IPEC was weak. The project team benchmarked different utilities and instituted a new more robust V&V process. Elements of the new process included:
 - a. Utilize benchmarking results to develop new IPEC V&V process
 - b. Field test new process
 - c. Revise based on user feedback
 - d. Revise SMM-AD-102 "IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW AND APPROVAL" to include updated V&V process. (Figure 4 provides the procedure validation checklist developed as part of the new process)

6. Develop Performance Monitoring Metrics

Status: Complete

- Productivity
 - a. Monthly performance indicator of progress
 - 1. Maintained on the Entergy web site with other station performance indicators
 - b. Weekly progress report
 - 1. Detailed input from each discipline indicating total procedures completed.
 - c. Weekly revision status report
 - 1. Performance Indicator of how many procedures for each discipline are in the revision process categorized as follows:
 - Markup
 - Writing
 - Internal review
 - External review
 - 50.59 review
 - Approval
 - d. Weekly Project Meetings
 - 1. Discuss any issues affecting progress
 - 2. Review previous week's progress reports
 - 3. Discuss any new Condition Reports concerning procedure inadequacy
 - 4. Share any best practices between the disciplines
 - 5. Review any new or open action items
 - 6. Attended by:
 - Project Manager
 - Department Project Leads
- Trending
 - a. Monthly PCRS trend report for procedure inadequacy
 - 1. PCRS trend code AP
 - 2. PCRS key word search "procedure"
 - b. NRC findings

- Self Assessments
 - a. The project performs quarterly assessments in accordance with EN-LI-104 "SELF-ASSESSMENT AND BENCHMARK PROCESS".
 - b. The assessments are normally performed by project personnel; however independent assessments may be used as necessary. The assessments will include the following elements:
 1. Evaluation of a sample of procedures to ensure revision criteria are being met
 2. Productivity review (Check and adjust curve and/or resources as appropriate)
 3. Evaluation of Procedure Upgrade Project rework for process improvements
 4. Analysis of PCRS trends
 5. Additional assessment scope as determined by project progress and effectiveness

Operations Strategic Implementation Plan

The Operations Department Procedure Group has the role of maintaining the procedures that support operation of the station. The status of these procedures is detailed below.

Procedure Classification	Number of Procedures	Status	Estimated Completion Date
System Operating Procedures (SOP)	365	In Progress	12/31/2009
Operations Support Procedures (OSP)	83	In Progress	12/31/2009
Alarm Response Procedures (ARP)	154	In Progress	12/31/2009
Off Normal Operating Procedures (ONOP)	13	Scope under review	
Check-Off Lists (COL)	174	Not in scope of PUP	
Periodic Tests (Tech Spec Required) (PT)	1002	Not in scope of PUP	
Abnormal Operating Procedures (AOP)	81	Complete	
Emergency Operating Procedures (EOP)	270	Complete	
Plant Operating Procedures (POP)	19	Complete	
Operations Administrative Procedures (OAP)	48	Complete	
Site Management Manuals (SMM)	6	Complete	

The NRC issued a mid cycle report which stated that IPEC has not effectively implemented corrective actions to upgrade the Operations procedures.

- This condition was self identified by IPEC and resulted in fleet support to assess the lack of productivity in Operations.
- The cause of the delay was due to a scope expansion instituted to thoroughly and carefully resolve differences between the Unit 2 and Unit 3 procedures related to several aspects including, but not limited to, set points, operational limits, and associated actions. In order to expedite resolution of the substantive cross-cutting issue, the procedural review and upgrade has been revised to focus primarily on addressing level of detail, removal of human performance error traps, and incorporating best practices.

1. System Operating Procedures (SOP)

- Determine which SOP's will be the focus of this upgrade project.
Status: Complete
 1. All SOP's are included in project scope
- Develop matrix of SOP's to revise and establish priority for issue.
Status: Complete

2. Operations Support Procedures (OSP)

- The intent of this procedure set is to provide written instructions to Operators in support of special testing or maintenance support functions. (e.g. hooking up a load cell for diesel testing). The procedures are written to the latest guidelines and format requirements and are unique to certain applications. The OSP's will be incorporated in the scope of the SOP project as applicable.

3. Alarm Response Procedures (ARP)

- Determine which ARP's will be the focus of this upgrade project.
Status: Complete
 1. All ARP's are included in project scope
- Develop matrix of ARP's to revise and establish priority for issue.
Status: Complete
 1. The procedures are being revised based upon the following priority:
 - Central Control Room First Out Annunciators
 - Central Control Room Supervisory Annunciators
 - Local Alarm Response Panels

4. Off-Normal Operating Procedures (ONOP/AOI)

- Determine which ONOP/AOI's will be the focus of this upgrade project.

Status: In Progress, Due 12/31/07

1. The intent is to review this procedure set using Figure 5 "Procedure Screening Checklist" and any procedures requiring upgrade will be added to scope.

5. Check-Off Lists (COL)

- This procedure set is not in scope of the procedure upgrade project due to the unique nature of these documents. These documents are listings of component names, specific component numbers and required positions that support the system operating procedures. This class of procedures does not meet the revision criteria.

6. Periodic Surveillance Tests (PT)

- This procedure set is not in scope of the procedure upgrade project. Periodic surveillance tests are routinely revised to incorporate Temporary Procedure Changes and feedbacks. Procedure writers revising these procedures perform re-formatting functions, convert from Word Perfect to Word and compare the surveillance procedures across both units as these procedures are revised. Normal procedure maintenance practices (excluding ASME code revisions, outage preparations, and modification installation) continue with this procedure set since our surveillance requirements are being met with the implementation of these procedures.

7. Abnormal Operating Procedures (AOP)

- The AOP project started in 2002. Unit 2 lessons were added to Unit 3 and as the Unit 3 lessons were learned feedbacks were generated to add best practice to Unit 2. Further as each set of procedures went through training over 2003 & 2004 with more feedbacks being generated. All those inputs from both units were addressed as the feedback was issued. The last of those feedbacks was incorporated in 2007.

8. Emergency Operating Procedures (EOP)

- The Emergency Operating Procedures were revised in accordance with the latest industry guidelines as established by Westinghouse, the plant's NSSS vendor.

9. Plant Operating Procedures (POP)

- The sites Plant Operating Procedures were revised such that they are as similar as plant systems allow across both units. The revision of these procedures started in the first quarter of 2006 and this project was completed in the first quarter of 2007.

10. Operations Administrative Procedures (OAP)

- These procedures were previously integrated and are applicable across the site for all Operations Department personnel. No further work is required except normal procedure maintenance activities.

11. Site Management Manuals (SMM)

- These procedures are site programs administered by the Operations Department. They are applicable across the site for all personnel. Site administrative procedures have previously been completed and no further work is required except normal procedure maintenance activities.

Maintenance Strategic Implementation Plan

The Maintenance Department has the role of maintaining the procedures that support the maintenance of the station equipment. The status of these procedures is detailed below.

Procedure Classification	Number of Procedures	Status	Estimated Completion Date
IPEC Integrated Site Maintenance Component procedures (0- prefixed procedures)	243	In Progress	9/30/08
Unit 2 Specific Maintenance Component procedures (2- prefixed procedures)	206	In Progress	9/30/08
Unit 3 Specific Maintenance Component procedures (3- prefixed procedures)	186	In Progress	9/30/08
IPEC Maintenance Standard Guidance procedures	11	Complete	
Specific Maintenance Component or Activity Unique procedures not assigned to either unit or the site procedure numbering system.	30	In Progress	9/30/08

1. IPEC Integrated Site Maintenance Component procedures (0- prefixed procedures)

- Determine which 0- prefixed procedures will be the focus of this upgrade project.
Status: Complete
 1. All 0- prefixed procedures are included in project scope
- Develop matrix of 0- prefixed procedures to revise and establish priority for issue.
Status: Complete

2. **Unit 2 Specific Maintenance Component procedures (2- prefixed procedures)**
 - Determine which 2- prefixed procedures will be the focus of this upgrade project.
Status: Complete
 1. All 2- prefixed procedures are included in project scope
 - Develop matrix of 2- prefixed procedures to revise and establish priority for issue.
Status: Complete
3. **Unit 3 Specific Maintenance Component procedures (3- prefixed procedures)**
 - Determine which 3- prefixed procedures will be the focus of this upgrade project.
Status: Complete
 1. All 3- prefixed procedures are included in project scope
 - Develop matrix of 3- prefixed procedures to revise and establish priority for issue.
Status: Complete
4. **IPEC Maintenance Standard Guidance procedures**
 - Determine which procedures of this category will be the focus of this upgrade project.
Status: Complete
 1. These procedures are site programs administered by the maintenance department. They are applicable across the units for all personnel performing maintenance activities. Site maintenance administrative procedures, maintenance directives and maintenance standards though revised via previous site integration activities have been captured by this project.
 - Develop matrix of procedures of this category to revise and establish priority for issue.
Status: Complete
5. **Specific Maintenance Component or Activity Unique procedures not assigned to either unit or the site procedure numbering system**
 - Determine which procedures of this category will be the focus of this upgrade project.
Status: Complete
 1. All procedures of this category are included in project scope
 - Develop matrix of procedures of this category to revise and establish priority for issue.
Status: Complete

I&C Strategic Implementation Plan

The I&C Department has the role of maintaining the procedures that support station equipment operation. The status of these procedures is detailed below.

Procedure Classification	Number of Procedures	Status	Estimated Completion Date
Unit 2 ICPM	1072	In Progress	Dec 31, 2014
Unit 3 ICPM	629	In Progress	Dec 31, 2014
Unit 2 Surveillance Tests	280	In Progress	Dec 31, 2014
Unit 3 Surveillance Tests	359	In Progress	Dec 31, 2014
I&C Special Instructions	93	In Progress	Dec 31, 2014

1. ICPMs

- Determine which procedures of this category will be the focus of this upgrade project.

Status: Complete

1. All procedures of this category are included in project scope

- Develop matrix of procedures of this category to revise and establish priority for issue.

Status: In Progress

1. A screening is performed utilizing Figure 5 "Procedure Screening Checklist" for each I&C activity for future work week schedules.
2. The I&C work down curve is based on this methodology which ensures all required revisions are completed prior to the next scheduled performance.

- Generate procedures for Unit 2 ICPMs that mirror quality and detail of existing Unit 3 ICPM's.

Status: In progress

2. I&C Surveillance Tests

- Determine which procedures of this category will be the focus of this upgrade project.

Status: Complete

1. All procedures of this category are included in project scope

- Develop matrix of procedures of this category to revise and establish priority for issue.

Status: In Progress

1. A screening is performed utilizing Figure 5 "Procedure Screening Checklist" for each I&C activity for future work week schedules.
2. The I&C work down curve is based on this methodology which ensures all required revisions are completed prior to the next scheduled performance.

3. I&C Special Instructions

- Determine which procedures of this category will be the focus of this upgrade project.

Status: Complete

1. All procedures of this category are included in project scope

- Develop matrix of procedures of this category to revise and establish priority for issue.

Status: In Progress

1. A screening is performed utilizing Figure 5 "Procedure Screening Checklist" for each I&C activity for future work week schedules.
2. The I&C work down curve is based on this methodology which ensures all required revisions are completed prior to the next scheduled performance.

FIGURE 1

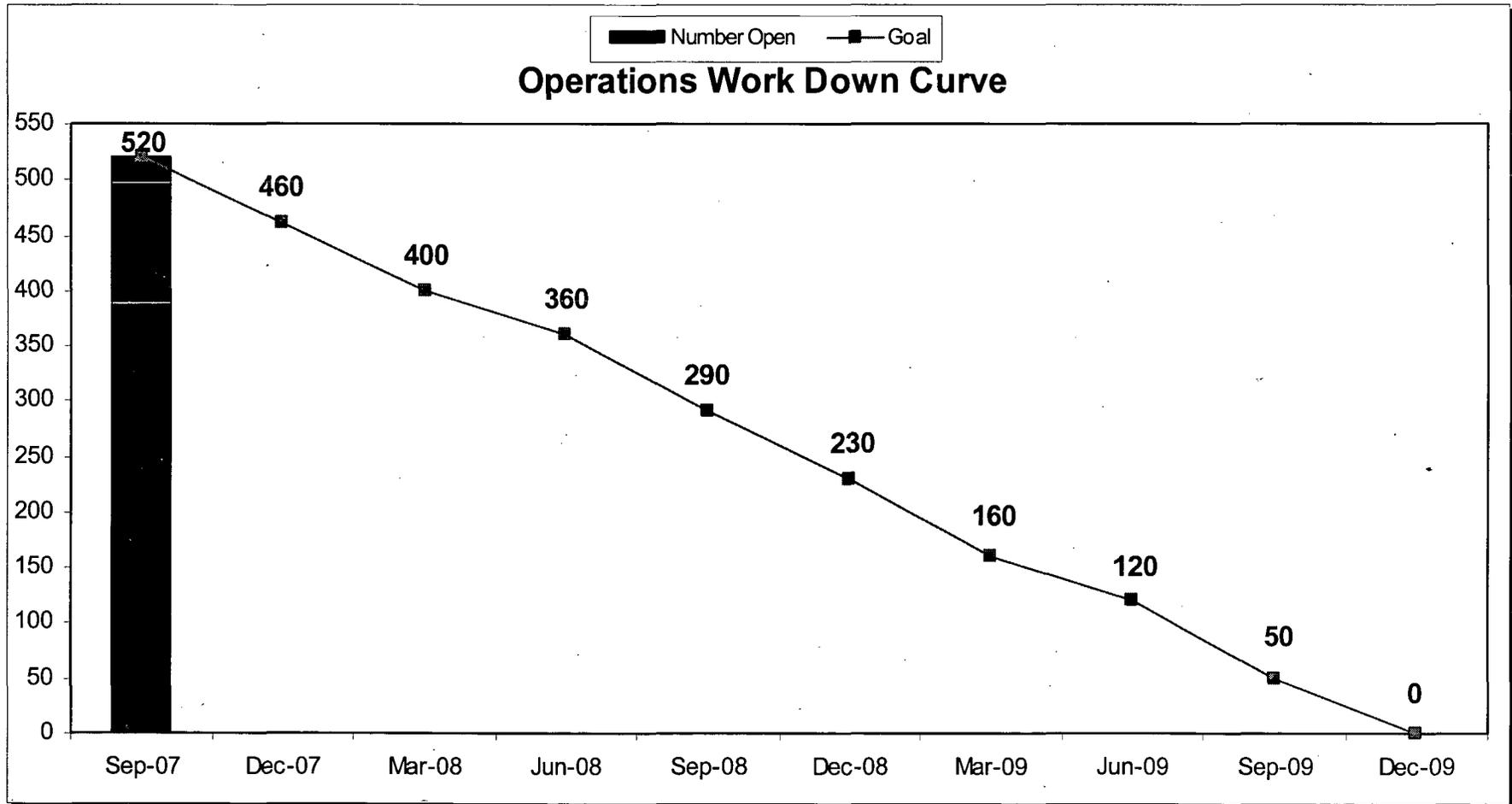


FIGURE 2

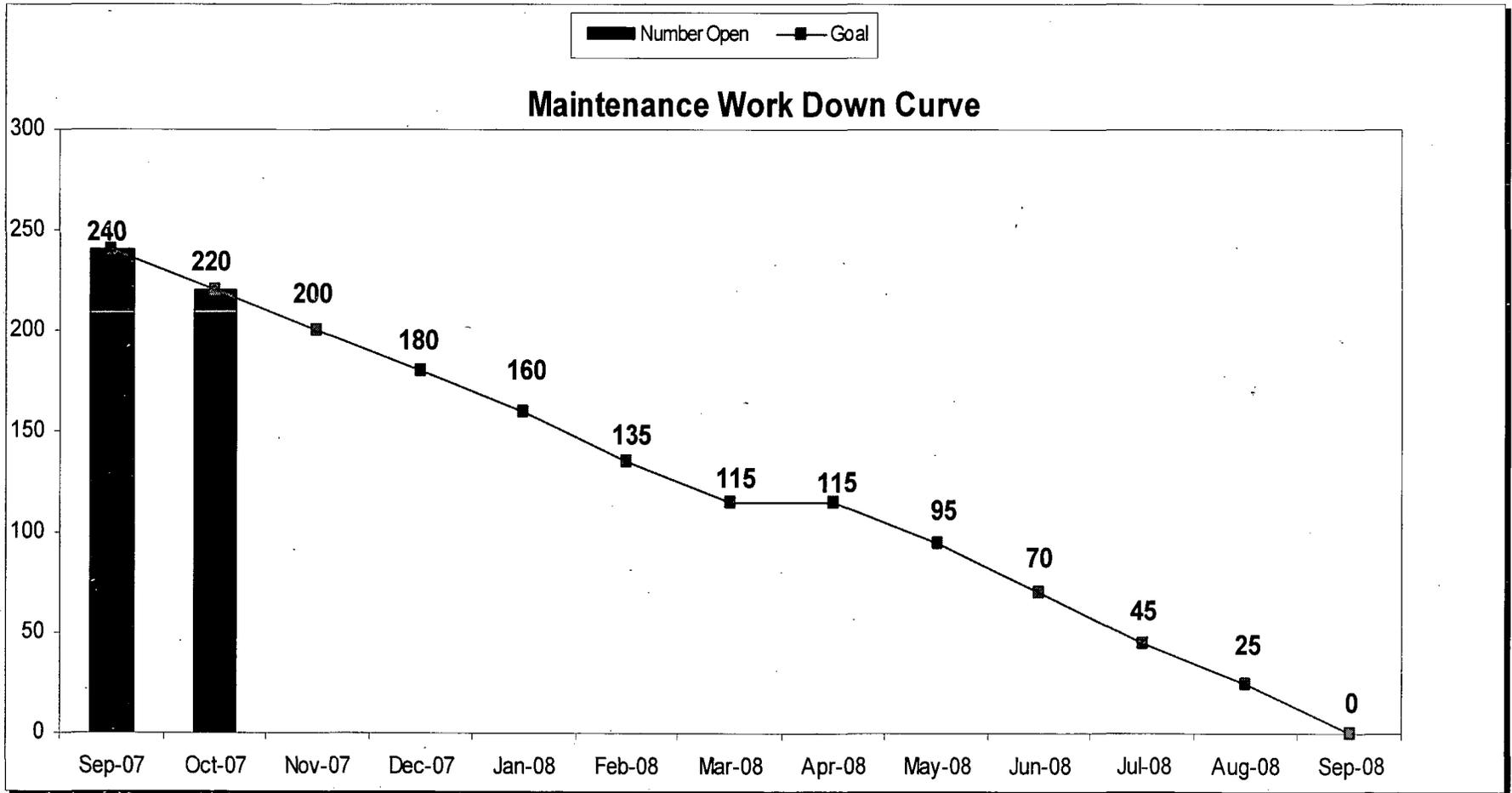


FIGURE 3

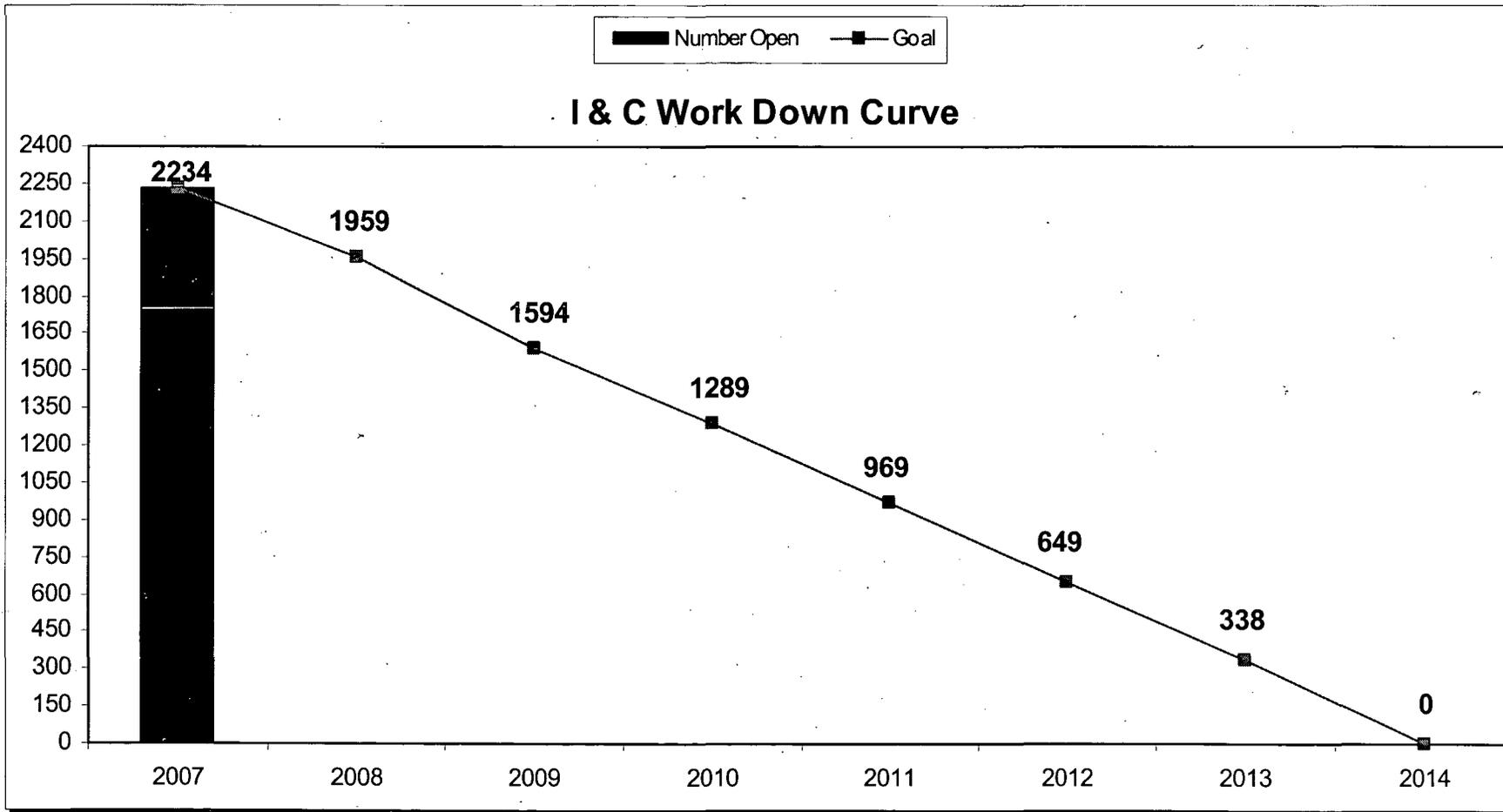


FIGURE 4
Procedure Validation Checklist

(Page 1 of 3)
Validation Method

- Walk-Through Simulation Table-Top Process Comparison

Procedure Identification

Procedure Number: _____

Revision number: _____

Procedure Preparer: (Print)

Name: _____ Date: _____

Validation Performer(s): (Print)

Name: _____ Date: _____

Name: _____ Date: _____

Name: _____ Date: _____

Name: _____ Date: _____

Procedure Validation Checklist

(Page 2 of 3)

<u>Level of Detail</u>	Yes	No	Comment Number	N/A
1. Is the scope of the document appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
2. Are labeling, abbreviations, and nomenclature as provided in the procedure sufficient to enable the performer to find the needed equipment?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
3. Is location information correct?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
4. Are referenced titles and numbers sufficiently descriptive to enable the performer to find referenced instructions?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<u>Understandability</u>				
1. Is the procedure phrased to allow only one interpretation?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
2. Are the individual procedure steps readily understandable?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
3. Are step sequences logical and correct?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
4. Do individual procedure steps provide sufficient detail?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
5. Are references to figures, attachments and other steps correct?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
6. Are Cautions and Warnings readily understandable?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
7. Are Cautions and Warnings phrased to allow only one interpretation?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
8. Are Notes readily understandable?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
9. Are Notes phrased to allow only one interpretation?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
10. Are Notes used only for clarification and not to direct action?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
11. Are tables, figures and attachments easy to read accurately?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
12. Are all abbreviations, letters, symbols, and acronyms readily understandable?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>

Procedure Validation Checklist

(Page 3 of 3)

	Yes	No	Comment Number	N/A
<u>Plant Compatibility</u>				
1. Can the actions be performed in the sequence designated by the procedure?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
2. Can alarm indications stated in the procedure be read from the appropriate annunciators?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
3. Can the values stated in the procedure be read from instruments	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
4. Is all the equipment required to accomplish the task listed in the procedure?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
5. Does the plant equipment agree with the procedure?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
6. Does plant label information agree with the procedure?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
7. Are instrument readings and ranges consistent with values stated in the procedure?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
8. Can the action steps be performed by the personnel specified in the procedure?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<u>Procedure User Compatibility</u>				
1. Are required components accessible to the task performer?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
2. If coordination between performing parties is required, are there adequate communication devices available to aid in the coordination?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<u>Miscellaneous</u>				
1. Does the procedure flow correctly?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
2. Does the procedure correctly identify appropriate MT&E, tools and supplies?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
3. Does the procedure guide personnel to perform the work safely?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
4. Does the procedure ensure that the safety or operability of plant equipment and systems will not be jeopardized?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
5. Unless previously identified, everything else contained in this procedure is correct?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
6. Based on the scope and objective of this procedure, does the procedure satisfactorily meet the expected results?	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>

COMMENTS: _____

FIGURE 5
Procedure Upgrade Project
Procedure Screening Checklist

The purpose of this screening is to ensure all relevant changes have been reviewed to determine if:

- o Revision is required prior to the procedures' next scheduled performance. (reference NRC response letter NL-07-010)
- o The procedure needs to be included in project scope

Procedure Number: _____

Revision: _____

Screener's Name: _____

Date Screen Performed: _____

Work Week: _____

Work Order Number: _____

List and review open CRs or CAs against procedure:

CR/CA Number	Required to be addressed prior to next performance
	YES / NO

List and review feedback forms open against procedure:

Feedback Number	Required to be addressed prior to next performance
	YES / NO

The procedure is acceptable for performance based on the following generic issues:

1. Level of detail	YES / NO
2. Human Performance Traps. Steps, notes, cautions, figures, and tables provide sufficient detail, are readily understandable and only allow one interpretation.	YES / NO
3. Basic Best Practices	YES / NO

Screening Results

Upgrade required: YES [] NO []

Revision required: YES [] NO []

Work Activity Placed on Hold: YES [] NO [] NA []

Comments:
