

# POST-EXAM COMMENTS

(Green Paper)

*CRYSTAL RIVER*  
*2007-201*

Licensee Submitted  
Post-Exam Comments

Attached

None

## Post Exam Comment

This comment applies to administrative JPM EC1, "Develop an Operations Clearance for FWP-7". Crystal River Unit 3 wishes to reiterate its position that the double valve isolation requirement should not be considered critical. This reflects the JPM Crystal River initially submitted, prior to changes made during the prep-week visit. It is Crystal River's position that the safety afforded by double valve isolation is met if a candidate tags only the manual isolation valves on the pump discharge lines. Plant design is such that each discharge line has a safety related check valve between the high energy source and the portion of the system being tagged for work. Consequently, with one valve tagged and the check valves functioning as designed, two failures would have to occur in order to allow a high energy source to the work area.

Additionally, OSHA STD 01-05-019, Titled 29 CFR 1910.147, the Control of Hazardous Energy (Lockout/Tagout) - Inspection Procedures and Interpretive Guidance, states the following:

Following the application of locks or tags, all potentially hazardous stored energy or residual energy shall be relieved, disconnected, restrained, and otherwise rendered safe (29 CFR 1910.147(d)(5)(i)).

(1) Verification of energy isolation shall be monitored as frequently as necessary if there is a possibility of reaccumulation of stored energy (29 CFR 1910.147(d)(5)(ii)).

(2) Monitoring may be accomplished, for example, *by observation* or with the aid of a monitoring device which will sound an alarm if a hazardous energy level is being approached.

We believe that opening the vent valve meets the OSHA requirements above and ensures a continuous safe working environment.

Crystal River Unit 3 proposes that the key for JPM EC1 be changed back to the initially submitted key and that not tagging the discharge check valve be worthy of a comment, but not be a critical task.