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J. E. Pollock
Site Vice President
Administration

May 16, 2008

Re: Indian Point Units 2 and 3
Docket Nos. 50-247/50-286
NL-08-082

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

Subject: Revised Action Plan to Address the Procedure Adequacy Substantive Cross-Cutting Issue for Indian Point Units 2 and 3

- 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".
 3. Entergy letter NL-07-130, dated November 5, 2007, F.R. Dacimo to Document Control Desk, "Supplemental Response to Request for Action Plan to Address the Procedure Adequacy Substantive Cross-Cutting Issue for Indian Point Unit 2".
 4. NRC letter, dated March 3, 2008, "Annual Assessment Letter – Indian Point Nuclear Generating Units 2 and 3".

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 planned actions 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. A supplemental letter was submitted on November 5, 2007 (Reference 3) that provided additional information on planned activities. As noted in that submittal the action plan is a working document subject to changes and the purpose of this letter is to inform you of recent action plan changes.

In the annual assessment letter (Reference 4), the NRC concluded that the criteria for clearing the substantive cross-cutting issue have not been met for Unit 2 and that the substantive cross-cutting issue also applies to Unit 3. The reasons specified included a concern regarding progress for Operations procedures.

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NRR

Entergy has recently completed an assessment of the progress made in resolving the procedure adequacy substantive cross-cutting issue. The assessment included a root cause and common cause evaluation. These evaluations found, in part, that Indian Point had not properly evaluated recent NRC findings to validate and prioritize the scope of work needed to address the cross-cutting issue, that personnel have inconsistently demonstrated usage of human performance error reduction tools to preclude events involving procedures, and that there was an insufficient focus on Operations procedures. To address these and other evaluation findings the action plan has been revised. Attachment 1 provides an overview of the revised action plan.

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.

Sincerely,



J. E. Pollock
Site Vice President
Indian Point Energy Center

Attachment 1: IPEC Procedure Adequacy Cross-Cutting Issue Resolution 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, IPEC

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

Mr. John P. Boska, Senior Project Manager, NRC NRR DORL

ATTACHMENT 1 TO NL-08-082

IPEC Procedure Adequacy Cross-Cutting Issue Resolution Plan Summary

ENERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNITS 2 and 3
DOCKET Nos. 50-247/50-286

IPEC PROCEDURE ADEQUACY CROSS-CUTTING ISSUE RESOLUTION PLAN SUMMARY

This document summarizes Indian Point Energy Center's (IPEC's) revised resolution plan for the procedure adequacy cross cutting issue.

Plan Background

In mid 2006, IPEC identified through the corrective action program that procedure issues existed and that an upgrade plan for department level implementing procedures was warranted.

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

In the NRC's 2006 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 for Unit 2. For the 2006 annual assessment, there were seven inspection findings for the 12 month review period that were attributable to human performance cross-cutting aspects of procedure adequacy for Unit 2. The 2007 mid-cycle report dated August 31, 2007 noted five findings for the 12 month review period related to procedure adequacy for Unit 2.

The NRC's 2007 annual assessment letter dated March 3, 2008 noted three findings for the 12 month review period related to procedure adequacy for Unit 2 and identified a new cross-cutting issue in procedure adequacy for Unit 3. Additionally, the annual assessment letter identified slow progress of the procedure upgrade project specifically for Operations and raised a concern about the screening process for I&C procedures based on the extended timeframe for upgrading these procedures. The NRC further identified that the cross-cutting issue has now continued for three grading cycles for Unit 2 and as noted above, the issue was also considered a cross-cutting issue for Unit 3.

As a result of the 2007 annual assessment letter, IPEC entered condition report CR-IP2-2008-01056 into the corrective action program. The condition report was categorized a level A requiring a formal root cause team evaluation. The team evaluation resulted in identification of two root causes. The first root cause identified that following the initial evaluation of procedure adequacy (CR-IP2-2006-03930), the station did not properly evaluate subsequent NRC findings to validate and prioritize the scope of work needed to address the cross-cutting issue. The second root cause identified that the level of commitment to the improvement of procedures was not sufficient to ensure the plan's success.

A corrective action from the root cause evaluation required a common cause be conducted to evaluate the findings that led to the cross-cutting issue. The purpose of the common cause was to determine any underlying themes that could then be used to focus work efforts and actions on the area's needed to address the cross-cutting issue. Other procedure issues in the corrective action program were also included as part of this evaluation.

The common cause evaluation was completed in May 2008 and identified four common causes:

- (1) Personnel have inconsistently demonstrated usage of human performance error reductions tools sufficiently to preclude events involving procedure usage. Continuing training on the expectations for using human performance error reduction tools is not a formalized program.
- (2) Insufficient focus on the Operations procedures in need of improvement had prevented significant reduction in the number of findings associated with procedure adequacy.
- (3) Personnel (both procedure writers and reviewers) have not consistently produced products free of technical inaccuracies, or of a sufficient level of detail to support station needs.
- (4) Procedure owners have not consistently utilized change management methods to improve personnel understanding of the changes contained in new or revised procedures.

As a result of the root/common cause evaluations and a recent INPO assist visit in this area, the plan was revised in May 2008 to factor in human performance elements related to procedures and to focus procedure revision efforts on those specific procedure types that were the dominant contributors to the cross-cutting issue.

As identified in the common cause evaluation, procedure adequacy issues associated with certain types of Operations procedures were the dominant contributor to both the NRC findings related to procedure adequacy and other procedure issues identified under the corrective action program. The conclusions drawn from both the root and common cause evaluations were that the previous plan, which had been geared toward upgrade of Operations, Maintenance and I&C implementing procedures, was much too broad and not focused on the specific procedures and actions that would drive resolution of the cross-cutting issue and improve performance. The broad scope of the procedure upgrade plan further resulted in challenges to the level of commitment and resources needed to assure success.

Whereas Entergy acknowledges the importance of continually improving the quality of procedures in general, the procedures that need to be prioritized for review to specifically address the cross-cutting issue have been determined to be in the Operations area. Procedure improvement initiatives in other areas, such as Maintenance and Instrumentation & Controls, are intended to continue as part of our normal procedure improvement processes.

A number of initiatives related to human performance and use of human performance tools have been included as part of this resolution plan. These initiatives will serve to address the procedure adequacy issue as it relates to Operations procedures and will be equally beneficial in other areas, such as Maintenance and I&C.

The resolution plan includes specific assessments to identify procedure issues captured under the corrective action program which will serve to identify performance trends. Any such trends will be reviewed to identify any needed changes to the resolution plan.

Plan Overview

The plan will address the cross-cutting issue in four ways:

1. Human performance as it relates to procedures.
2. Review/revision of the top most risk significant PRA procedures in the Operations area.
3. Training of personnel (writers and reviewers) to produce procedures of high quality.
4. Change management methods to improve personnel understanding of procedure changes.

Human Performance

A number of initiatives to improve human performance as it relates to procedures and procedure usage are planned or have been completed. A site business plan has been developed which includes a focus area associated with human performance/procedure upgrade. Some of the elements that would be universally beneficial to procedure writers, reviewers and users include training on fleet procedure EN-HU-102 "Human Performance Tools", and training for supervisors and above to improve coaching techniques. Additionally, a fleet-wide coaching program has been developed and implemented to document interactions and resulting behavior changes in the area of human performance. Specific training for managers related to human performance was recently provided by the INPO Manager of Human Performance. In addition, INPO provided a training session on "Procedure Writing Principles and Practices" to procedure writers and work control planners.

Procedure Review/Revision

The main areas of Operations procedure deficiencies stem from "legacy issue" differences in similar procedures between both operating units, removing of human performance error traps, technical shortcomings and not taking advantage of the best practices between Units 2 and 3.

As discussed above the resolution plan is focused on the top most risk significant PRA procedures that are specific to Operations. The specific elements of this plan will focus on several programmatic issues to include resolution of open condition report corrective actions and procedure feedbacks as well as standardization of procedures where possible.

The plan will improve procedure quality in several areas;

- Ensure the level of detail is appropriate for the specific tasks and qualifications of the performers.
- Remove human performance error traps
 - As an example, the use of the terms "as appropriate" and "as required" are avoided from use
- Identify best practices. When possible the best practices used in one unit will be verified to be reflected in the opposite unit's procedures. Also, industry best practices are incorporated as applicable
- Remove poor practices from the procedures
- Ensure procedure is technically accurate-this action will be performed as part of the cross disciplinary review

Training of Writers and Reviewers

Training for personnel assigned to develop, revise, technically review or approve procedures will be conducted to improve the identification and resolution of level of detail and accuracy issues in

procedures. This training will serve to improve procedures in all areas including Operations, Maintenance and I&C.

Change Management

Improve procedure owners' awareness of change management practices to successfully implement new and revised procedures. Improving performance in change management practices will serve to improve implementation of new and revised procedures by procedure users.

Milestones

1. Determine Focus Area of Operations Procedure Revision Status: Complete

- a. Focus Area
 - i. Condition Report CR-IP2-2008-01056 common cause analysis identified that the dominant contributor to NRC procedure adequacy findings and other related condition reports are in the Operations area.
 - ii. Additional analysis identified the specific types of Operations procedures requiring revision:
 - 1. Abnormal Operating Procedures (AOPs)
 - 2. System Operation Procedures (SOPs)
 - 3. Plant Operating Procedures (POPs)
 - iii. The defined focus area of the plan is the top most risk significant PRA SOPs and AOPs for both Unit 2 and Unit 3. The remaining AOPs, SOPs and POPs are prioritized as defined in Milestone 2.

2. Establish Procedure Revision Priority Status: Complete

- a. The Operations procedures are being prioritized for revision based on the following (refer to Table below for Operations procedure revision focus areas):
 - i. Safety Significance
 - 1. Abnormal Operating Procedures and System Operating Procedures
 - a. Procedures are ranked according to PRA significance
 - b. The top most risk significant PRA system procedures will be reviewed/revised
 - c. Those procedures categorized PRA rank number one will be revised first, followed by rank two, etc.
 - 2. Following the completion of the top most risk significant PRA systems for AOP's and SOP's, the remaining procedures will be revised as part of our normal procedure improvement processes with the following revision priorities:
 - a. Plant Operating Procedures
 - i. This set of procedures will be revised following top most risk significant PRA as these procedures operate the plant on a continuous basis.
 - b. Abnormal Operating Procedures and System Operating Procedures
 - i. Remaining PRA procedures according to risk significance will be revised
 - c. Procedures are also categorized as they relate to the Single Point Vulnerability (SPV) study. For those SPV procedures not previously

reviewed/revised based on PRA ranking, these will be revised following the completion of PRA related procedures.

	Unit 2	Unit 3	Total
PRA Risk Significant (AOP's & SOP's)	12	9	21
POP's	11	11	22
Remaining PRA (AOP's & SOP's)	81	70	151
SPV (AOP's & SOP's)	13	6	19
Total	117	96	213

- b. The Maintenance and Instrumentation & Controls procedures are prioritized by PRA ranking and the SPV study and will be revised as part of our normal procedure improvement processes.
- c. Under Milestone 7, periodic assessments will be performed to make any needed adjustments to procedure revision priorities.

3. Determine Revision Criteria

Status: Complete

- a. The criteria to be applied when reviewing and revising procedures focus on the following:
 - i. Ensure the level of detail is appropriate for the specific tasks and qualifications of the performers.
 - ii. Remove human performance error traps.
 - 1. As an example, terms such "as appropriate" and "as required" are avoided from use.
 - iii. Identify best practices. When possible the best practices used in one unit need to be reflected in the opposite unit's procedures. Also, industry best practices are incorporated as applicable.
 - iv. Remove poor practices from the procedures.
 - v. Ensure procedure is technically accurate-this action will be performed as part of the cross disciplinary review.

4. Develop a Work Down Curve for the Top Most Risk Significant PRA Procedures

Status: Complete

- i. A work down curve for the top most risk significant PRA procedures for the Operations AOP's and SOP's has been developed (see Figure 1: PRA Risk Significant Procedures Work Down Curve). The plan will perform a check and balance of progress being made and will provide the means to adjust the work down curve and/or resources as the plan proceeds.

5. Develop Verification and Validation Process (V&V) Status: Complete

- a. 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:
 - i. Utilize benchmarking results to develop new IPEC V&V process
 - ii. Field test new process
 - iii. Revise based on user feedback
 - iv. Revise SMM-AD-102 "IPEC IMPLEMENTING PROCEDURE PREPARATION, REVIEW AND APPROVAL" to include updated V&V process. (Figure 2 provides the procedure validation checklist developed as part of this new process)

6. Develop Performance Monitoring Metrics Status: May 2008

- a. Productivity
 - i. Monthly performance indicator of progress
 - 1. Maintained on the Entergy web site with other station performance indicators
- b. Monthly progress report
 - i. Detailed input from Operations indicating procedure revision status.
- c. Monthly revision status report
 - i. Performance Indicator of how many procedures are in the revision process categorized as follows:
 - 1. Markup
 - 2. Writing
 - 3. Internal review
 - 4. External review
 - 5. Process Applicability Determination (PAD) Review
 - 6. Approval
- d. Weekly Project Meetings
 - i. Discuss any issues affecting progress
 - ii. Review previous week's progress reports
 - iii. Discuss any new Condition Reports concerning procedure adequacy
 - iv. Review any new or open action items
 - v. Attended by:
 - 1. Project Manager
 - 2. Operations Department Project Lead
- e. Trending and Monitoring
 - i. Monthly PCRS trend report for procedure inadequacy
 - ii. NRC findings
 - iii. Oversight Reports
 - iv. Licensing cross-cutting matrix

7. Self Assessments Status: On Going

- a. Perform a project focused assessment in 2008, including INPO assist visit recommendations, in accordance with EN-LI-104 "SELF-ASSESSMENT AND BENCHMARK PROCESS".

- b. Perform quarterly assessments in accordance with EN-LI-104 "SELF-ASSESSMENT AND BENCHMARK PROCESS".
- c. The assessments are normally performed by project personnel; however independent assessments may be used as necessary. The assessments will include the following elements:
 - i. Evaluation of a sample of procedures to ensure revision criteria are being met
 - ii. Productivity review (Check and adjust curve and/or resources as appropriate)
 - iii. Evaluation of rework for process improvements
 - iv. Analysis of PCRS trends
 - v. Additional assessment scope as determined by plan progress and effectiveness
- d. On going dialogue with INPO
- e. External bench mark of industry input
 - i. Professional Procedure Writers Association

8. External Assistance

Status: Complete

- a. Request INPO to conduct an assist visit on procedure adequacy
 - i. Assist visit completed in January 2008
 - ii. Recommendations for improvement
 - 1. Perform a review of the key procedure issues identified at the station, focusing beyond the quality aspect to understand other human performance elements.
 - 2. Consider using the recent single-point vulnerability information to evaluate procedures for upgrading, as well as those procedures selected using a probabilistic risk assessment methodology.
 - 3. Increase the use of fleet and external benchmarking in revising procedures and in developing metrics for the procedure upgrade plan.
 - iii. Beneficial practices
 - 1. Leadership and staff personnel from within IPEC are used to support the procedure upgrade plan.
 - 2. Station leadership recognizes the need to revise the plan scope, focusing on a risk-based approach to achieve timely, quality results.
- b. Conducted procedure writers training
 - i. Full day of training titled "Procedure Writing Principles and Practices"
 - ii. Training was performed by the INPO Manager of Human Performance.

9. Root Cause Evaluation Corrective Actions

- a. Assemble a team [Operations, PS&O, Maintenance and Engineering at minimum] to perform a common cause evaluation of the findings that led to the cross-cutting issue to determine any underlying themes that could then be used to focus the work efforts and actions on the areas needed to address the cross-cutting issue. Other procedure issues in PCRS to be included in this evaluation.
Status: Complete
- b. Based on the common cause evaluation, review a sample of previously upgraded procedures against the criteria established to determine the need to add to the plan scope.
Status: Complete

- c. Obtain the resources needed and establish plan hierarchy to ensure the cross-cutting issue is addressed on both units.
Due Date: June 2008
- d. Identify specific department owner/resources for the procedure adequacy cross-cutting resolution. Return ownership of the plan to the line management team.
Due Date: July 2008
- e. Identify and provide training to the procedure writers assigned to the plan to ensure an adequate skill set. (Note: additional training to be performed under item #10b below)
Status: Complete
- f. Develop work down curves and plan milestones for the top most risk significant Operations procedures. Work down curves shall be sponsored and owned by the Operations department. Incorporate these PIs (work down curves) into the Operations department PIs reported to site management.
Due Date: May 2008
- g. Establish a periodic Managers meeting to review PIs and communicate plan successes and challenges.
Due Date: July 2008
- h. Share Lessons Learned from the root cause with the IPEC Department Managers
Due Date: July 2008

10. Common Cause Evaluation Corrective Actions

- a. Review human performance training to determine if there is sufficient emphasis on error reduction tools. Periodic refresher and initial training should also be considered to continue to improve human performance barriers related to procedure use.
 - 1. Due Date: June 2008
 - 2. Previously completed elements include:
 - a. In March 2008, the INPO Manager of Human Performance conducted a training class titled "Leadership Fundamentals of Human Performance". The attendees were managers and above.
 - b. Several departments have conducted departmentally driven training to improve use of human performance error reduction tools.
 - c. Safety/Human Performance has developed human performance mock ups.
- b. Training needs for the personnel assigned to develop, revise, technically review or approve procedures should be determined and conducted to ensure level of detail and accuracy issues in procedures are identified and resolved.
 - 1. This action will be completed in two phases:
 - a. Operations personnel assigned to develop, revise procedures in support of the cross cutting plan
 - i. Due Date: July 2008
 - b. Remaining station personnel

- i. Due Date: December 2008
- c. The Operations procedures were determined to be the dominant contributor of procedure adequacy issues; (both in the NCV review and the CAT B condition report evaluation) consequently focusing on Operations procedures is expected to resolve the cross-cutting issue.
Due Date: Complete
- d. Improve procedure owners' awareness of change management practices that are available for them to successfully implement a new (or revised) procedure.
Due Date: September 2008

11. Additional Actions

- a. Perform a snapshot assessment of procedure usage in accordance with EN-LI-104 "SELF-ASSESSMENT AND BENCHMARK PROCESS".
 - i. Elements of the assessment to include:
 - 1. Pre-job briefs include procedure review
 - 2. Procedure use and adherence
 - 3. Use of Human Performance tools
 - 4. Post job briefs include procedure feedback
 - 5. Procedure feed back process
 - 6. Customer satisfaction
 - ii. Due Date: July 2008
- b. Evaluation of the Procedure Adequacy Cross Cutting Issue Resolution Plan relating to the corrective actions from condition report IP3-2007-01843 in regards to reactor trip reduction.
 - i. Due Date: August 2008

FIGURE 1
PRA Risk Significant Procedures Work Down Curve

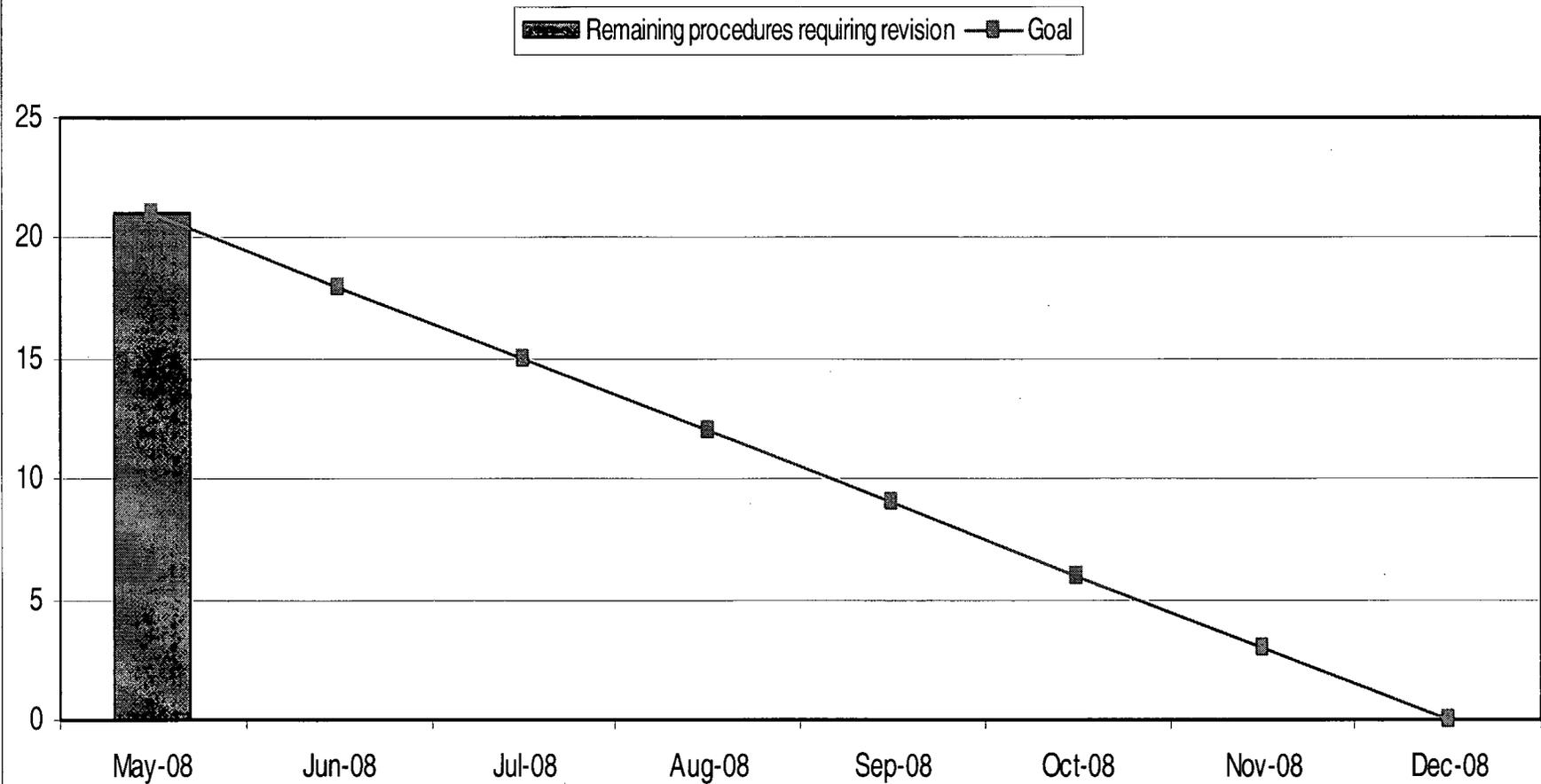


FIGURE 2

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: _____

