ATTACHMENT II

NPQA INTERIM SURVEILLANCE PROCEDURE FOR CORRECTIVE ACTION TAKEN IN RESPONSE TO THE STEAM GENERATOR DRY OUT EVENT

Revision 0

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Approved: _____ 1/16/88
B. Marguglio Date
Manager, NPQA

Acknowledged: _____ 1/16/88
J. Basile Date
General Manager,
Nuclear Power Generation

I. Introduction

The purpose of this document is to describe the Quality Assurance Surveillances which shall be implemented as elements of the corrective action program responding to the steam generator dry out event. There are two types of surveillances which shall be implemented, as follows:

A. Effectiveness of Pre-planning Activities

Surveillance to assess the effectiveness of pre-planning activities shall be performed prior to the start of the shift during which an operational evolution is to occur. These pre-planning activities are described in Attachment I to the Company's letter to the NRC dated January 16, 1988.

B. Effectiveness of Control Room Activities

Surveillance will be performed of the effectiveness of the Control Room activities which were described in Attachment II to the Company's letter to the NRC dated January 13, 1988.

II. NPQA Surveillances of Pre-Planning Activities

NPQA shall perform surveillances of the pre-planning activities. The factors to be covered by these surveillances are enumerated in Section A of Appendix I to this document.

III. NPQA Surveillances of Control Room Activities

NPQA shall perform surveillances of Control Room activities. The factors to be covered by these surveillances are enumerated in Sections B through F of Appendix I to this document.

IV. Surveillance Reports

Shortly after the completion of each surveillance performed pursuant to this plan, NPQA shall issue sufficient copies of the draft Surveillance Report to the Manager, Operations and the Manager, Generation Support, to facilitate their discussion of the surveillance findings with those who participated in the activities covered by the surveillance. In a reasonable time thereafter, the formal Surveillance Report shall be issued to the Vice President, Nuclear Power; General Manager, Nuclear Power Generation; General Manager, Technical Support; Director, Quality Assurance; Manager, NPQA; Manager, Operations; and Manager, Generation Support,

as a minimum. The Vice President, Nuclear Power shall receive periodic oral briefings of the results of surveillances and summary assessments of implementation progress (VI, below).

V. Schedule

The surveillances described in II and III, above, shall be performed on a weekly basis, as a minimum, for at least four weeks after startup commences. These surveillances may continue on a this basis for a longer period, should it be evident to the management that the desired level of performance is not being achieved. Thereafter, for the next two months, these surveillances shall be performed at least monthly. If during this period there is any significant degradation in the performance level, the schedule shall revert to weekly and the cycle will be repeated. If, for the two month period, desired performance levels are achieved, the surveillances thereafter shall be performed quarterly and shall remain at that frequency until such time as there may be performance degradation. In that event, the schedule shall revert to monthly or weekly, depending upon the severity of the degradation.

VI. Measures

NPQA shall provide quarterly summary reports of the number of findings per surveillance for each major surveillance category given in Appendix I. The report shall provide the measures for the past quarters as well as the current quarter, to facilitate the recognition of trends. The report shall be distributed to the V.P., Nuclear Power; Assistant V.P., Power Generation Services; Director, Quality Assurance; General Manager, Nuclear Power Generation; General Manager, Technical Support; Manager, NPQA; Manager, Operations; and Manager, Generation Support, as a minimum.

APPENDIX I

CHECKLIST FOR PERFORMING NPQA SURVEILLANCES

A. Pre-Planning

1. Did the pre-planners accurately assess current plant conditions and planned activities which will change conditions?

2. Did the pre-planners identify any procedural inadequacies relative to:

   a. Tech Spec requirements.

   b. Procedural appropriateness.

   c. Procedural completeness.

   d. Procedural clarity.

3. Did the pre-planners prepare and process any needed permanent procedural changes?

4. Did the pre-planners recognize that the procedures cannot be implemented with the given plant equipment conditions, e.g., equipment required for the performance of the procedure being out of service?

5. Did the pre-planners prepare and process any needed temporary procedural changes?

6. Were the permanent and temporary procedural changes technically adequate, complete and clear?

7. Were the permanent and temporary procedural changes made ready to the watch on a timely basis?

8. Did the pre-planners account for any reasonable contingencies?

9. Did the pre-planners prepare the procedures or procedural changes necessary for the operations under the contingency conditions?

10. Did the pre-planners recognize the modifications, maintenance or tests which will be occurring during the operational phase and did they assess any adverse operational impact because of these activities?

11. Are the proper persons involved in the pre-planning process and are the appropriate persons making the final pre-planning decisions?

12. How many procedural changes were required to be initiated by the watch which could have been initiated through the pre-planning activity?

13. Did pre-planners solicit feedback from Operations personnel as to the adequacy of second opportunities for improvement in the preplanning process?

B. Walk Downs

1. Are the walk downs performed with a consistent methodology and discipline?

2. Are the walk downs performed at the specified times?

3. Are the walk downs performed as a team?

4. During shift turnover, are the walk downs performed on a position-with-position basis - e.g., offgoing SRO with oncoming SRO?

5. Is sufficient time taken to perform the walk downs?

6. Do the walk downs address all alarms?

7. Do the walk downs address equipment status, as appropriate?

8. Are all sections of the board covered in the walk downs?

C. Communications

1. During or following the walk downs, are team meetings held?

2. Are the SWS, SRO and STA fully participating in these meetings?

3. Are watch goals and plant evolutions discussed?

4. Are the procedures to be used discussed and is there a written document which identifies the procedure applicable to each plant evolution?

5. Are contingency and alternate plans discussed and are the discussions in depth relative to:

   a. The availability of procedures for these contingencies and alterate plans;

   b. The impact of these contingencies and alternate plans on overall plant operation;

   c. Alternate equipment which is available for equipment which is out of service.

6. Are watch goals and plant evolutions discussed?

7. Are all alarms discussed in terms of their reasons, the actions to be taken, the estimates as to when the alarms will be cleared and the need for, or existence of, jumpers?

8. Are LCOs in effect discussed in terms of their beginning and ending times and their status?

9. Are oral directives played back by the receiver to the sender?

10. Are written directions complete and clear?

D. Logs

1. Are log books complete, clear and legible relative to board walks, out of service equipment, planned evolutions, procedures to be used, procedural adequacy and contingency plans?

2. Are STA and SRO log books compatible?

3. Are alarms logged?

4. Are tours of vital areas logged?

5. Are log entries such that events are recreatable?

E. Procedural Compliance

1. Are procedures used - i.e., read.?

2. Are procedures reviewed with "aggressive suspicion" - i.e., challenged as appropriate?

3. Are procedures complied with absolutely?

4. Are TPCs originated or implemented when necessary before taking evolutionary steps?

F. Management

1. Did the Operations Manager enter the CCR and assess plant status?