

 Nuclear Department Fleet Procedure	FP-WM-IRM-01	Revision: 3
	Issue Date: 11/16/2009	
	Page 1 of 18	
Title: Integrated Risk Management		
Approval: Hank Butterworth		
Director, Fleet Operations Standardization		

INFORMATION USE
<ul style="list-style-type: none"> • Procedure should be available, but not necessarily at the work location. • Procedure may be performed from memory. • User remains responsible for procedure adherence.

Table of Contents

	<u>Page</u>
1.0 PURPOSE.....	3
2.0 APPLICABILITY	4
3.0 RESPONSIBILITIES.....	4
4.0 DEFINITIONS	8
5.0 REQUIREMENTS	9
6.0 RECORDS	15
7.0 REFERENCES.....	15
7.1 SOURCE DOCUMENTS	15
7.2 REFERENCE DOCUMENTS	16
7.3 COMMITMENTS.....	16
7.4 REVISION SUMMARY	16
8.0 ATTACHMENTS.....	16
<u>ATTACHMENT 1</u>	17
<u>ATTACHMENT 1 CONTINUED</u>	18

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 3 of 18</p>
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1.0 PURPOSE

1.1 Introduction

- 1.1.1 Identification and control of higher risk activities at the nuclear stations is a key strategy in the prevention of station events. The intent of screening plant work for risk levels is to identify early in the planning process any plant work that may need additional controls to assure successful completion.

1.2 There are four phases to an Integrated Risk Management process:

1. Screening of risk at the Work Order/Task level for:
 - a. Nuclear Safety
 - b. Industrial Safety
 - c. Radiological Safety
 - d. Environmental Safety
 - e. Corporate and Regulatory Safety
2. An aggregate screening of increased risk or work involving multiple tasks that poses a schedule risk.
3. A Probability Risk Assessment (PRA) per 10CFR50.65, Maintenance Rule (MR), paragraph (a)(4) or Shut Down Safety Assessment (SDSA).
4. An Integrated Risk Assessment of the Schedule for Plant Effect and Operational Risk.

This procedure establishes the administrative controls, responsibilities, and duties for screening, control, and oversight of an Integrated Risk Management program.

Probabilistic Risk Screening (PRA) is used when a plant is on line. Complex models calculate risk to the core based on the probability of safety system failures. On line scheduling adjusts the week's maintenance schedule to minimize the risk. Operations and the work week manager screen how emergent equipment issues affect PRA. Significant emergent equipment issues during a work week can force a change in the schedule.

Shutdown Safety Screening (SDSA) is used when a plant is off line. The outage group assesses the outage schedule before the outage begins to minimize risk. The schedule is then adjusted to minimize risk to the plant. During the outage, operations uses SDSA to monitor risk based on current plant conditions. SDSA focuses on safety systems and the support of safety systems.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p>Revision: 3</p> <p>Page 4 of 18</p>
--	--

There are risks that are not assessed in either PRA or SDSA. PRA and SDSA primarily focus on managing risk when scheduling safety systems or the support of safety systems equipment out of service. The IRM process is intended to complement PRA and SDSA.

2.0 APPLICABILITY

- 2.1 The scope of this procedure applies to all plant work at all Northern States Power Company, a Minnesota Corporation (NSPM), d/b/a Xcel Energy Nuclear Sites (collectively referred to as “Work” throughout this procedure). Plant Work includes corrective, preventive, modification, troubleshooting, inspection, or testing activity performed on installed or temporary plant equipment.

This procedure applies to all Company employees and contractors conducting Work activities at Xcel Energy nuclear sites.

3.0 RESPONSIBILITIES

- 3.1 Online Manager

- 3.1.1 Responsible for implementation of Integrated Risk Management Process.

- 3.1.2 Assigns Schedule Risk Coordinator.

- 3.1.3 Assists in identifying work that should go to a Management Challenge Board (MCB) and participates in the MCB.

- 3.2 Cycle Scheduler

- 3.2.1 Ensures Medium and High Risk work is identified on online schedules.

- 3.2.2 Ensures proper coding of the risk level in the attributes field of passport and/or the plant scheduling tool and notifies the lead responsible work group that work has been classified as High or Medium Risk.

- 3.3 Outage Manager

- 3.3.1 For unit outage scope, verifies Task Risk and risk classifications are identified and coded.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 5 of 18</p>
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- 3.3.2 Forwards potential outage Scheduled Risk to the Production Manager for review. Assignments are communicated for oversight of the outage scheduled risk.
- 3.4 Maintenance Planners
 - 3.4.1 Perform the initial Risk Screening for Industrial and Environmental Risk.
 - 3.4.2 Enter medium or high risk levels and basis on the X270 Attribute Panel for the task by choosing the applicable attribute and documenting the basis in the notes field for that attribute.
 - 3.4.3 Include documents that may support development of risk plan with the WO.
- 3.5 Radiation Protection Planners
 - 3.5.1 Perform the initial Risk Screening for Radiological Risk.
 - 3.5.2 Enter medium or high risk levels and basis on the X270 Attribute Panel for the task by choosing the applicable attribute and documenting the basis in the notes field for that attribute.
 - 3.5.3 Include documents that may support development of risk plan with the WO.
- 3.6 Operations Planners / WCC Representative
 - 3.6.1 Perform the initial Risk Screening for Nuclear and Corporate safety.
 - 3.6.2 Enter medium or high risk levels and basis on the X270 Attribute Panel for the task by choosing the applicable attribute and documenting the basis in the notes field for that attribute.
 - 3.6.3 Include documents that may support development of risk plan with the WO.
- 3.7 Operations SRO / WCC Representative
 - 3.7.1 Include documents in Sharepoint that may support development of risk plan with the WO.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 6 of 18</p>
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- 3.8 Work Week Manager (WWM)/Coordinator (WWC)
 - 3.8.1 Monitor and Review the development of QF-2007 “Planning and Approval of High Risk or Schedule Risk Work” as required.
 - 3.8.2 Ensure that Risk is identified in Passport or the weekly schedule.
 - 3.8.3 Manage additions of Emergent Work to the schedule.
- 3.9 Department Managers and General Supervisors (GS)
 - 3.9.1 Review and approve High Risk Work activities using QF-2007 “Planning and Approval of High Risk or Schedule Risk Work” as required.
 - 3.9.2 Assign a Responsible Group Supervisor or recommend a Schedule Risk Coordinator following identification of High or Medium Risk Tasks or Schedule Risk.
 - 3.9.3 Identify work that should go to an MCB.
- 3.10 Responsible Group Supervisor (RGS)
 - 3.10.1 Complete a QF-2007, “Planning and Approval of High Risk or Schedule Risk Work” form for activities.
 - 3.10.2 Assist the Schedule Risk Coordinator.
 - 3.10.3 Establish and approve actions to manage Medium Risk Work with support from the Planner. There is no need to document the risk management plans for medium risk activities. Ensure requirements from Attachment 1 for medium risk are implemented.
- 3.11 Schedule Risk Coordinator
 - 3.11.1 Ensure Work is properly planned, briefed, approved, and executed.
 - 3.11.2 Validate QF-2007, is completed and communicated to the General Supervisors/Department Managers for approval.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 7 of 18</p>
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- 3.11.3 The Schedule Risk Coordinator will validate Organizational readiness to perform Schedule Risk Tasks by ensuring appropriate contingencies, job preparation, and task oversight.
- 3.11.4 Coordinate efforts to define the job scope and align departments responsible for the overall schedule window.
- 3.11.5 The Schedule Risk Coordinator provides detailed work plans, contingency work orders and schedules (fragnets) resulting in efficient work execution to minimize equipment out of service time reducing overall operational work risk.
- 3.11.6 Coordinate activities with site Responsible Group Supervisors.
- 3.12 Management Challenge Board (MCB)
 - 3.12.1 The MCB's responsibilities include holding a joint meeting to approve High Risk Work plans as presented on QF-2007, "Planning and Approval of High Risk or Schedule Risk Work" as needed.
- 3.13 Work Control Center Supervision
 - 3.13.1 Validates High Risk Work activities using QF-2007 have been approved.
 - 3.13.2 Validates Schedule Risk Screening has been completed.
- 3.14 Shift Manager (SM)
 - 3.14.1 The Operations Shift Manager is responsible to ensure Risk Screening is preformed for Emergency Maintenance, emergent work and schedule changes during T-0 week.
 - 3.14.2 Activities required to be worked immediately may be exempt from the requirements of this procedure with the approval from the Operations Shift Manager. Work SHALL then be performed under applicable procedures.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: right;">Revision: 3</p> <p style="text-align: right;">Page 8 of 18</p>
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4.0 DEFINITIONS

- 4.1 **Schedule Risk** - Multiple work orders or work order tasks involving more than one work group, significant coordination, supplemental work groups, multiple shifts or time limitations that has the potential to challenge nuclear, industrial, radiological, environmental or corporate and regulatory safety. Evolutions meeting these criteria require enhanced preparation, execution, and oversight.
- 4.2 **Department Manager or General Supervisor** - Individual assigned to provide oversight and mentor Schedule Risk Coordinator to facilitate the successful completion of risk tasks or multiple activities that pose schedule risk.
- 4.3 **Schedule Risk Coordinator** - Individual assigned to coordinate work activities that due to increased level of schedule risk provide additional oversight to mitigate the risk, these can be single tasks or multiple tasks related to a system or component work window. The work may involve multiple work groups, multiple shifts, time limitations and/or supplemental work groups which have the potential to challenge an area of safety.
- 4.4 **Management Challenge Board (MCB)** - A group of individuals representing stakeholders associated with the successful work task completion. High Risk or Schedule Risk Plans may be presented to this group to ensure readiness to perform work task(s).
- 4.5 **Risk** - Product of probability of occurrence and consequences of occurrence. Risk encompasses what can happen (scenario), its likelihood (probability), and its level of damage (consequences).
- 4.6 **Task Risk Screening** - The methodology to screen the risk to safe and reliable plant operation associated with performing single work order tasks. This establishes the necessary requirements and contingency actions for managing the conduct of Risk Significant Work. Work is evaluated for Nuclear Risk, Industrial Safety Risk, Radiological Risk, Environmental Risk, Corporate Risk, and PRA.
- 4.7 **Risk Significant Work** - Activity classified as High or Medium Risk that poses a potential hazard to Nuclear Safety, Industrial Safety, Radiological Safety, Environmental Safety, or Corporate Safety, which requires additional planning, special precautions, and management oversight to adequately manage the risks.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 9 of 18</p>
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4.8 **Task Risk Classification** – Is the product of the probability of failure and the consequences of the failure occurring

1. High
 - a. Work Orders or Tasks with a high likelihood to fail with severe consequences.
2. Medium
 - a. Work Orders or Tasks with a high likelihood to fail with moderate or low consequences.
 - b. Work Orders or Tasks with a moderate likelihood to fail with moderate or severe consequences.
 - c. Work Orders or Tasks with a low likelihood to fail but severe consequences.
3. Normal
 - a. Work Orders or Tasks with a low likelihood to fail with moderate to low consequences.

4.9 **Work Order Contingency Levels**

- Level 1: Planning complete (status 25).
- Level 2: Planning and Reviews complete (status 30).
- Level 3: Planning and Reviews complete with parts/materials on site (status 30 no parts holds).
- Level 4: Planning and Reviews complete with parts/materials on site with craft prejobbed (status 45 and no parts holds).

5.0 **REQUIREMENTS**

5.1 **Background**

1. All plant Work SHALL be screened using this procedure to determine the potential risk significance.
2. The responsibilities for screening the potential risk of Work and determining actions for managing these risks are described in Section 5.2, “Screening and Classifying the Risk Significance of Work”, and Section 5.3, “Specifying and Approving Actions for Managing Medium and High Risk Work”.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: right;">Revision: 3</p> <p style="text-align: right;">Page 10 of 18</p>
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3. Repetitive tasks with a frequency < 12 months once screened and the model W/O updated need not be screened each occurrence unless there is scope change.
4. There is no requirement to retain Risk Screening Worksheets once the Risk Level and Basis have been entered in Passport.

5.2 Screening and Classifying the Risk Significance of Work

NOTE:	PINGP is authorized to use internal forms PING 1680 and PING 1681 as an additional (not alternate) means to assess and categorize risk for Rev 0 of FP-WM-IRM-01
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1. Maintenance, RP and OPS planners perform the initial Task Risk Screening of WO tasks by following QF-2010, "Work Order Risk Screening Worksheet". {C001}
 - a. Work that answers "**NO**" to **ALL** questions in assigned review sections of Section 1 of QF-2010, "Work Order Risk Screening Worksheet" SHALL be classified as Normal Risk. Performance of this Work poses Normal Risk to Nuclear, Industrial, Radiological, Environmental or Corporation.
 - 1) For Scheduled Work, proceed to Section 5.4.
 - 2) For Emergent Work, proceed to Section 5.5.
 - b. Work that answers "**YES**" to **ANY** of the questions in Section 1 SHALL be further screened for High Risk by completing Section 2 of QF-2010, "Work Order Risk Screening Worksheet."
 - c. Completion of Section 2 of QF-2010, "Work Order Risk Screening Worksheet."
 - 1) Work that answers "**YES**" to **ANY** of the questions in Section 2 of QF-2010, "Work Order Risk Screening Worksheet" SHALL be classified as High Risk. Performance of this Work poses High Risk to Nuclear, Industrial, Radiological, Environmental or Corporation.
 - a) For the assigned review section (i.e. Nuclear, Industrial) document the Risk Levels and Basis on the X270 Attribute Panel for the task by choosing the applicable "High" risk attribute and documenting the basis in the notes field for that attribute.
 - b) For Scheduled Work, proceed to Section 5.3.
 - c) For Emergent Work, proceed to Section 5.5.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: right;">Revision: 3</p> <p style="text-align: right;">Page 11 of 18</p>
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- 2) Work that answers “**NO**” to **ALL** of the questions in Section 2 of QF-2010, “Work Order Risk Screening Worksheet” SHALL be classified as Medium Risk. Performance of this Work poses Medium Risk to Nuclear, Industrial, Radiological, Environmental, or Corporation.
 - a) For the assigned review section (i.e. Nuclear, Industrial) document the Risk Levels and Basis on the X270 Attribute Panel for the task by choosing the applicable “Medium” risk attribute and documenting the basis in the notes field for that attribute.
 - b) For Scheduled Work, proceed to Section 5.3.
 - c) For Emergent Work, proceed to Section 5.5.

5.3 Actions for Managing Medium and High Risk Tasks

NOTE:	<p>The table provided in Section 1 of Attachment 1, Managing and Approving Risk Significant Work, specifies minimum mandatory actions to manage Medium and High Risk Work.</p> <p>Minimum mandatory actions to manage Medium and High Risk Work may be supplemented with additional requirements contained in Section 2 of Attachment 1, Managing and Approving Risk Significant Work, to provide assurance that the risk is adequately managed.</p>
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1. IF the Work is classified as Medium risk THEN:
 - a. Responsible Group Supervisor SHALL:
 - 1) Specify actions to manage the Work using Attachment 1, Managing and Approving Risk Significant Work. There is no need to document risk management actions.
2. IF the Work is classified as High Risk, THEN the Department Manager/General Supervisors SHALL:

NOTE:	<p>High Risk Work that is repetitive may be preplanned and approved for use. Specific approval for each time is not required provided conditions and practices are consistent with the approved QF-2007, “Planning and Approval of High Risk or Scheduled Risk Work.”</p>
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- a. Assign a Responsible Group Supervisor.
- b. Ensure QF-2007, “Planning and Approval of High Risk or Scheduled Risk Work,” is completed.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 12 of 18</p>
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- c. Approve actions to manage High Risk Work referencing Section 1 of Attachment 1, Managing and Approving Risk Significant Work.
- 3. If designated, the Management Challenge Board (MCB) SHALL (as defined in Attachment 1, Section 1) approve actions to conduct High Risk Work by signing QF-2007, "Planning and Approval of High Risk Work or Schedule Risk Work."
- 4. For repetitive High Risk Work, the Responsible Group Supervisor SHALL ensure:
 - a. The activity is within the scope approved by the specific QF-2007, "Planning and Approval of High Risk Work or Schedule Risk Work."
 - b. Conditions and hazards are within any planning assumptions in QF-2007, "Planning and Approval of High Risk Work or Schedule Risk Work."
 - c. All requirements and actions to manage the activity as identified in QF-2007, "Planning and Approval of High Risk Work or Schedule Risk Work" are met.
 - d. Any changes identified are updated in the model task.

5.4 Scheduled Risk Screening

- 1. The Work Week Manager/Coordinator (WWM/WWC), Operations SRO and Responsible Group Supervisor for High Risk Tasks:
 - a. Schedule Risk Coordinator should be assigned at T-12. Emergent work and projects issues may change the assignment date.
 - b. Initial schedule risk screening should be performed per QF-2008, "Risk Screening Worksheet for Schedule Risk of Operating Units (Modes 1, 2, & 3)" and presented during the T-5 meeting for review using form QF-2011A, "Scheduled Risk Screening Summary Table."
 - c. Shift Manager approves of schedule risk after schedule freeze.
 - d. QF-2007, "Planning and Approval of High Risk Work or Schedule Risk Work" will be used to manage/approve schedule risk. For example, if a modifications project has multiple WO/Tasks a single QF-2007 may be used to document the risk of the total project.
 - e. Based on review of Schedule Risk the On-Line work manager will recommend the Management Challenge Board (MCB).
 - f. All High Risk Tasks and should be reviewed for Contingency Work Orders needs. These will be included in the QF-2007, "Planning and Approval of High Risk Work or Schedule Risk Work." The department manager will take lead on resource and parts allocation cost expenditures. Consider Contingency Plan levels per table below.

Probability or Likelihood	Rank	Contingency Level
<ul style="list-style-type: none"> • Known industry or internal experience of failures • Significant work coordination interfaces required • Highly Critical Work scope • First time evolution • Time Critical 	High	2, 3 or 4
<ul style="list-style-type: none"> • Infrequently performed work task • Non-routine activities within skill of work force • Work coordination interfaces required • Control of Supplemental workers • Multiple turnovers and/or shifts • More than one craft • Unusual plant conditions 	Moderate	1, 2 or 3
<ul style="list-style-type: none"> • Routine activities within skill of work force 	Low	1 or 2

5.5 Emergent Work Risk Screening

1. The WWM/WWC and SM SHALL risk Screen Emergent Work:
 - a. Activities required to be worked immediately may be exempt from the requirements of this procedure with the approval from the Operations Shift Manager. Work SHALL then be performed under applicable procedures.
 - b. Verify Emergent Work will not adversely impact scheduled maintenance activities, e.g., area conflicts, concurrent risk significant activities.
 - c. Verify Probability Risk Assessment (PRA) is completed for emergent work by Operations Duty Crew.

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: center;">Revision: 3</p> <p style="text-align: center;">Page 14 of 18</p>
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5.6 Conduct of Work

1. The SM and WWM/WWC SHALL:
 - a. IF plant conditions do not remain within specified limits, initial plant conditions have changed OR modes have changed, THEN review risk profile and contingency plans for Operating Units.
 - b. Evaluate the potential impact of severe weather or other external conditions relative to the proposed scheduled maintenance. The impact needs to be considered if such severe weather conditions are imminent or have a high probability of occurring during the planned out-of-service duration. Consider rescheduling or expedite the return to service of equipment important to safety.
2. The RGS SHALL:
 - a. Perform the work in keeping with the expectations of the risk plan
 - b. May downgrade an activity planned as High Risk to Medium if:
 - 1) Actual plant conditions are not within the High Risk sections of Attachment 1, Risk Assessment Worksheet.

AND

 - 2) Agreement is obtained from the SM.
 - c. Suspend Work and rescreen the risk associated with work activities if stop work conditions are reached or changes in original scope of work are identified.
3. The Schedule Risk Coordinator SHALL:
 - a. Monitor work conditions, prereqs and plant conditions for changes during work activities for Stop Work conditions.
 - b. Ensure actions to manage risk are appropriate for the Work according to Attachment 1, Managing and Approving Risk Significant Work.
 - c. Suspend Work and rescreen the risk associated with work activities if stop work conditions are reached or changes in original scope of work are identified
 - d. Ensure a Post-Job Review is conducted during T+1

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: right;">Revision: 3</p> <p style="text-align: right;">Page 15 of 18</p>
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6.0 RECORDS

None

7.0 REFERENCES

7.1 SOURCE DOCUMENTS

- 7.1.1 FP-WM-OVM-01, "Work Management Process Overview"
- 7.1.2 FP-WM-SCH-01, "Online Scheduling Process"
- 7.1.3 FP-WM-WOI-01, "Work Identification, Screening and Validation"
- 7.1.4 FP-WM-PLA-01, "Work Order Planning Process"
- 7.1.5 FP-WM- WOE-01, "Work Order Execution Process"
- 7.1.6 FP-RP-JPP-01, "RP Job Planning"
- 7.1.7 FP-RP-RWP-01, "Radiation Work Permit"
- 7.1.8 Off-Site Dose Calculation Manual (ODCM)
- 7.1.9 National Pollutant Discharge Elimination System Permit (NPDES Permit)
- 7.1.10 XCEL Energy Safety Pocket Guide
- 7.1.11 QF-2007A, "Contingency Plan Evaluation"
- 7.1.12 QF-2007B, "Shift Coverage / Contact List"
- 7.1.13 QF-2008, "Risk Screening Worksheet for Schedule Risk of Operating Units (Modes 1,2 & 3)"
- 7.1.14 QF-2010, "Work Order Risk Screening Worksheet"

<p style="text-align: center;">Integrated Risk Management</p> <p style="text-align: center;">FP-WM-IRM-01</p>	<p style="text-align: right;">Revision: 3</p> <p style="text-align: right;">Page 16 of 18</p>
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7.1.15 QF-2011A, "Schedule Risk Screening Summary Table"

7.2 REFERENCE DOCUMENTS

7.2.1 QF-2007, "Planning and Approval of High Risk or Schedule Risk Work"

7.2.2 QF-2008, "Risk Screening Worksheet for Schedule Risk of Operating Units (Modes 1,2,& 3)"

7.2.3 QF-2010, "Work Order Risk Screening Worksheet"

7.2.4 SOER 1998-01, Safety System Status Control

7.3 COMMITMENTS

{C001} AR 01157726 CAPR assignment for "PI Rad Shipment Arrives at Consignee Above DOT Rad Limits"

7.4 REVISION SUMMARY

Added 7.2.4, SOER 1998-01, Safety System Status Control

8.0 ATTACHMENTS

8.1 Attachment 1 – Managing and Approving Risk Significant Work

<p>Integrated Risk Management</p> <p>FP-WM-IRM-01</p>	<p>Revision: 3</p> <p>Page 17 of 18</p>
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ATTACHMENT 1

MANAGING AND APPROVING RISK SIGNIFICANT WORK

Section 1. MANAGING AND APPROVING RISK SIGNIFICANT WORK		
MINIMUM MANDATORY ACTIONS TO MANAGE RISK (as listed in Section 2)		
RISK	MEDIUM	HIGH
Nuclear	1, 10, 30	1 through 7, 9, 30, 34, 35
Industrial	1, 10, 30	1 through 7, 9, 30, 34
Environmental	1, 10, 30	1 through 7, 9, 30, 34
Radiological	1, 10, 30	1 through 7, 9, 30, 34
Corporate	1, 10, 29, 30	1 through 7, 9, 11, 29, 30, 32, 34, 35
APPROVAL AUTHORITY FOR RISK MITIGATION PLANS		
RISK	MEDIUM	HIGH
Nuclear	Responsible Group Supervisor	Responsible GS. & Department Manager
Industrial	Responsible Group Supervisor	Responsible GS. & Department Manager
Environmental	Responsible Group Supervisor	Responsible GS. & Department Manager
Radiological	Responsible Group Supervisor	Responsible GS. & Department Manager
Corporate	Responsible Group Supervisor	Responsible GS. & Department Manager

ATTACHMENT 1 CONTINUED

MANAGING AND APPROVING RISK SIGNIFICANT WORK

Section 2. CONSIDERATIONS TO HELP MANAGE RISK SIGNIFICANT WORK

Actions to Manage Risk Significant Work:

1. **Perform a Pre-Job Brief with participants performing the tasks and support personnel directly supporting performance of the Work.**
2. **Designated Work Window Coordinator - assigned to coordinate performance of Work.**
3. **GS SHALL attend the Pre-Job Brief.**
4. **Prepare QF-2007, "Planning and Approval of High Risk OR Schedule Risk Work"**
5. **Responsible Group General Supervisors or Department Manager SHALL approve the Work plan and action to manage the risk.**
6. **Prepare Post-Job Critique for High Risk Work.**
7. **RGSs are to provide field supervisory monitoring of the High Risk activities, as determined by the approval General Supervisors.**
8. **Schedule the Work in the Integrated Site Schedule and distribute as part of the POD.**
9. **A procedure, instruction or Maintenance Order SHALL be used to control the conduct of the Work.**
10. **Provide field supervisory monitoring of the Work (job coverage) as determined by the RGS for MEDIUM Risk Work.**
11. **Provide temporary barriers for transient trip sensitive risk areas as determined by the Shift Manager or SS.**
12. System Outage Window (SOW) time NOT to exceed 50% of AOT or LCO.
13. System Engineer or Alternate available on site for job coverage.
14. Two-shift coverage required.
15. "Round-the-Clock" coverage required.
16. Special coordination for equipment tagging required.
17. Parts and materials for maintenance to be pre-staged.
18. Specific Job Skills needed.
19. WCCS approval required for Work plan and compensatory measures.
20. Tagout and work activity walked down.
21. Switchyard off limits for any other Risk Significant Work activities.
22. No Work SHALL be performed (approved) on redundant safety-related equipment at the same time, unless approved by OPS.
23. Review applicable industry OE (operating experience) prior to job execution.
24. Task-experienced workers selected to perform Work.
25. Mock-up and rehearsal or other special training is required to perform the Work.
26. Develop a response plan for personnel injury.
27. **Conduct Integrated Work Planning Meeting.**
28. **Perform an Integrated Pre-Job Brief, involving the RGSs, GS, and participants performing the tasks.**
29. **Provide a plan for restoration of equipment if it is determined that the Tech Spec Action Statement or TRM requirements frame will be exceeded.**
30. Other applicable requirements to manage the risk of Work as determined by the approval authorities.
31. RGS SHALL consider the use of Peer Checks.
32. Project schedule reviewed by GS, WWM and OPSS.
33. Use of peer checks is mandatory.
34. Determine If a Management Challenge Board is required
35. PORC review is required of WO/Task if LCO AOT is >60%