Operating Experience Program

Procedure Contains NMM REFLIB Forms: YES ☒ NO ☐

Effective Date	Procedure Owner: Title: Site:		Governance Owner: Title: Site:	
04/15/2011		Alan Ettlinger Manager OE&CA HQN		Alan Ettlinger Manager OE&CA HQN

Exception Date*	Site	Site Procedure Champion	Title
	ANO	R. Heuertz	Site OE Coordinator
	BRP	M. Sweet	Site OE Coordinator
	GGN	A. Remskar	Site OE Coordinator
	IPEC	P. Bode	Site OE Coordinator
	JAF	A. Brais	Site OE Coordinator
	PLP	M. Sweet	Site OE Coordinator
	PNP	K. Burke	Site OE Coordinator
	RBS	M. Kelley	Site OE Coordinator
	VY	E. Cota	Site OE Coordinator
	W3	J. Kieff	Site OE Coordinator
	NP	N/A	
	HQN	A. Ettlinger	Manager OE & CA

Site and NMM Procedures Canceled or Superseded By This Revision

Process Applicability Exclusion: All Sites: ☐
Specific Sites: ANO ☒ BRP ☐ GGNS ☒ IPEC ☒ JAF ☒ PLP ☒ PNPS ☒ RBS ☒ VY ☒ W3 ☒ NP ☐

Change Statement Revision 12 (no revision bars):

- Added 2.0[7] and revised 5.2 to include screening requirements for Gas Intrusion and Aging Management
- Revised 5.2[4](m)b to process Fleet Learning CRs as Learning Organization CRs
- Revised 5.2[5](b) to identify that HQN CRs "may", instead of "should", be issued for IER 1s.
- Revised 4.0[2][3][16]&[20] and 5.2[2] and 5.2[9] to change IER Level 3s from CRs to the OE process and remove requirements based on feedback from INPO.
- Corrected Attachment 9.9 to match procedure.
- Added CR Number to Attachment 9.6, Sheet 4.

Change Management:

- *Condition Reports issued for IER Level 3s and 4s that are in progress may be closed to OE Written Actions; however, the due dates should remain as assigned in the CRs.*
- *Sites may close CAs assigned for training review and IER Board review of IER Level 3s and 4s already in progress. Closure of the CA should document that the closure is due to process changes in this revision.*

*Requires justification for the exception

TABLE OF CONTENTS

1.0 PURPOSE

[1] This procedure provides a methodology for evaluating and initiating action for operating experience information (OE) at all Entergy nuclear stations. The primary objective of assessing OE is to identify and transfer lessons learned from other stations into actions that enhance the safety and reliability of Entergy's nuclear plants.

2.0 REFERENCES

[1] Entergy System Policy - Copyright, Trademark, and Copyright Infringement

[2] INPO 97-011, Guidelines for the Use of Operating Experience

[3] INPO 05-003, Performance Objectives and Criteria

[4] INPO 09-08, Achieving Excellence in Transformer, Switchyard, and Grid Reliability

[5] INPO 09-013, SEE-IN Program Guide *(historical reference)*

[6] INPO 10-006, Operating Experience (OE) Program and Construction Experience (CE) Program Description, revision 1

[7] NEI 09-10, Guidelines for Effective Prevention and Management of System Gas Accumulation

[8] NUREG-0737, Section I.C.5, Clarification of TMI Action Plan Requirements

[9] EN-LI-102, Corrective Action Process

[10] EN-LI-104, Self Assessment and Benchmark Process

[11] EN-MP-101, Materials, Purchasing and Contracts Processes - Passport

[12] EN-OM-128, Notification of Off-Normal Situations

[13] EN-OP-103, Reactivity Management Program

[14] EN-WM-105, Planning

[15] Letter NRC to Entergy, dated 10/2/06, Request for Use of Delta Protection Mururoa Air Suits

[16] Letter CNRO-2006-0021 dated 5/16/06, Request for Use of Delta Protection, Supplied Air Suits

[17] Letter CNRO-2004-0081 dated 2/17/04, Request for Use of Delta Protection, Supplied Air Suits

2.0

[18] SOER 10-2, Engaged, Thinking Organizations

3.0 DEFINITIONS

[1] 10CFR21 Notification (Part 21) - A report submitted to the USNRC pursuant to the requirements of 10CFR21.

[2] Condition Review Group (CRG) - A management group responsible for Condition Report (CR) review, classification, categorization and assignment of responsibilities.

[3] Information Notice (IN) - A document prepared by the U.S. Nuclear Regulatory Commission that transmits information that may be relevant to safety, safeguards or environmental issues. A licensee response is not required.

[4] INPO Daily Download - Published INPO OE reports (classified BY INPO as Noteworthy or Significant), and/or INPO OE documents uploaded for screening purposes.

[5] INPO Nuclear Network ™ - Computerized information system to which subscribing utilities may connect. It provides means for rapid, widespread dissemination of operating experience information relevant to reactor safety, design, and operation of nuclear power stations. Information is provided by utilities, INPO, NSSS suppliers, architect engineers, or others with Nuclear Network access.

[6] INPO Operating Experience (OED) or Department/Process Specific (MD, AD, etc.) Digest - Trend/analysis documents issued by INPO.

[7] Internal Operating Experience - Operating experience that originates as a condition report, document or request from plant personnel which warrants consideration for possible Entergy-wide distribution. Internal OE can originate from any Entergy plant or headquarters. Internal OE is considered for distribution to INPO as an OE report, but is typically lower threshold information or may address specific Entergy issues that would be of little value to the industry.

[8] NRC Download - Events, Morning Reports, Preliminary Notification Reports, and other relevant NRC releases identified by the OE Coordinators for screening purposes.

[9] OE Written Review - The documentation resulting from the review/analysis of an OE document. The OE organization is responsible for assigning OE Written Reviews and prescribing the manner in which they are performed. As soon as an adverse condition or non-conformance is identified, a condition report is written and the review/analysis of the OE document is performed under EN-LI-102, “Corrective Action Process”.

3.0

[10] Operating Experience (OE) - Information received from various industry sources that describes events, issues, equipment failures, etc. that may represent opportunities to apply lessons-learned to avoid negative consequences or to recreate positive experiences as applicable. Some examples of Operating Experience are: INPO Event (IER) Documents, NRC Information Notices, Vendor Bulletins, 10CFR Part 21 Reports, NRC Event Reports, INPO Nuclear Network download, NSSS Owners group reports, etc.

[11] Operating Experience Program (per INPO 10-006) – INPOs OE Program is described in INPO 10-006 which supersedes INPO 09-013, *Significant Event Evaluation and Information Network (SEE-IN) and Construction Experience (CE) Program Description*, dated December 2009; it also replaces INPO 00-005, *SEE-IN Coordinator's Guide*. It is an evolution of the Significant Event Evaluation and Information Network (SEE-IN) Program. Many elements of the new programs resulted from a 2009 INPO/industry self-assessment of the SEE-IN Program. The OE Program substantially updates the SEE-IN Program to take into account the many changes in the industry and in technology since the program's inception. None of the original objectives of the SEE-IN Program designers have been altered.

[12] Operating Experience Reports - Internet forum in the INPO Nuclear Network. This forum is intended for industry personnel to post information describing operating events at their sites, recurring problems, and corrective actions taken in response to these events.

[13] OE (INPO) Documents - describe worldwide events screened significant that deserve special attention by operating nuclear plants or that are important for new plant construction. These documents are intended for use by plants in identifying and correcting deficiencies that could lead to similar events.

[14] OE (INPO) Document Types and Importance Classifications - There are four importance levels of an INPO Event Report (IER), each with unique characteristics and expectations for use. The documents convey INPO's analysis of the event or trend, and lessons that should be learned. Different actions, both by the industry and INPO, are needed for the information communicated based on the importance of the information in the document. The following describes the document hierarchy:

(a) INPO Event Report (IER) Importance Level 1 documents provide recommendations based on one or more significant events, an important industry issue or an adverse trend.

3.0[14]

An IER Level 1 identifies the plants at which the events occurred; provides an executive summary, brief discussion of the events, identifies the causes, contributing factors or trend and lessons learned. The most important IER Level 1 section provides recommendations to prevent or address the fundamental problem. IER Level 1 documents receive a thorough INPO and industry review before publication and are distributed to plant senior management once issued.

(b) INPO Event Report (IER) Importance Level 2 documents describe a significant event/trend requiring review of the lessons learned and corrective actions for applicability. Each IER Level 2 identifies one or more events that occurred and provides an executive summary, a brief discussion of the event as well as its causes, contributing factors, and lessons learned.

(c) INPO Event Report (IER) Importance Level 3 documents provide early notification of a significant or potentially significant event or trend, an important critical component failure, or consequential human error. An IER Level 3 alerts utilities in a timely manner that an important event has occurred. Each IER Level 3 provides an executive summary, brief discussion of the event as well as its causes, contributing factors, and lessons learned. Because an IER Level 3 may be issued shortly after an event, some details of the event may not yet be available.

(d) INPO Event Report (IER) Importance Level 4 documents provide noteworthy trends of equipment or human performance problems. Each IER Level 4 is typically based on a review of numerous operating experience reports and other data sources over a period of several years. Each IER Level 4 document contains an executive summary, a discussion of the performance issue, the causes and contributing factors, and corrective actions for consideration. Document reviews by both INPO and appropriate industry personnel are conducted to ensure proper focus, message, and insights. An IER Level 4 document is intended to heighten industry awareness of identified trends, and plant management should use the information contained within these reports to determine plant vulnerabilities.

[15] Proprietary - of or relating to the rights of the proprietor to allow or prevent any use, presentation, distribution and/or alteration of something. See/use the Entergy system policy “Copyright, Trademark and Patent Infringement”.

3.0

[16] Red Flag OE – An OE of a significance that has occurred at an Entergy station necessitating an immediate impact review for applicability from the other Entergy stations. The OE provides a preliminary summary description of the event and may (or may not) include causes and lessons learned. The OE may be in the area of nuclear, industrial and/or radiological safety, or may otherwise require a timely review.

[17] Regulatory Issue Summaries (RIS) are used by the NRC to (1) document NRC endorsement of the resolution of issues addressed by industry-sponsored initiatives, (2) solicit voluntary licensee participation in staff-sponsored pilot programs, (3) inform licensee of opportunities for regulatory relief, (4) announce staff technical or policy positions not previously communicated to industry or not broadly understood, and (5) address matters previously reserved for administrative letters.

[18] Screening Process - A review of events or problems that have occurred throughout the industry including items that have been reported to the NRC or INPO. These documents are reviewed by the OE staff for impact to Entergy based on the potential for a similar event or problem to occur within Entergy, and the possible consequences if a similar event or problem did occur.

[19] Significant Event Evaluation and Information Network (SEE-IN) INPO's OE program **prior to November 1, 2010** which were included in the *Significant Event Evaluation and Information Network (SEE-IN)* program. The following documents were generated within the SEE-IN program, and are listed in order of priority:

- INPO Significant Operating Experience Reports (SOERs)
- INPO Significant Event Reports (SERs)
- INPO Significant Event Notifications (SENs)
- INPO Topical Reports (TRs)

[20] Use of Operating Experience

(a) EVENT-BASED OE - OE derived from adverse events at nuclear operating facilities or supporting or similar industrial or commercial organizations.

(b) OPPORTUNITY-BASED OE - OE derived from beneficial practices, industry working groups, or research, that is in-and-of-itself not event-based. This is OE that is not event-based and is typically defined as Opportunity-based.

3.0[20]

(c) EXEMPLARY USE OF OE - Use of OE that results in a beneficial measurable or observable change to:

- Equipment, its operation, set points, related components or materials.
- System operation
- Documented procedures or observed practices or culture.

'Beneficial' is defined as promoting safety or reliability, promoting stability, reducing risk or reducing cost.

(d) EFFECTIVE USE OF OE - Demonstrating through documentation or periodic observation that a valid, timely technical query of relevant sources of OE was or is routinely performed when expected to be performed, regardless of whether or not relevant OE to support EXEMPLARY USE was obtained. Effective use of OE may also confirm present barriers are adequate.

(e) INEFFECTIVE USE OF OE - The inability to demonstrate EFFECTIVE or EXEMPLARY use of OE.

[21] Vendor Bulletins - Documents prepared by various equipment vendors that transmit information pertaining to equipment problems and recommended corrective actions. Some examples of these include:

- Westinghouse Nuclear Safety Analysis Letter (NSAL)
- Westinghouse Technical Bulletins (TB's)
- General Electric (GE) Rapid Information Communication Service Information Letter (RICSIL)
- General Electric (GE) Service Advice Letter (SAL)
- General Electric (GE) Service Information Letter (SIL)
- General Electric (GE) Technical Information Letter (TIL)
- B&W Technical Services Bulletin (TSB)

Vendor documents that are received by the OE coordinators are considered in the screening call. Updates to vendor information such as vendor manual updates are forwarded to the Configuration Management group for information, regardless of the screening outcome.

4.0 RESPONSIBILITIES

[1] Administrative Services

(a) Downloads the INPO nuclear network forum.

(b) Verifies correct format for documents to be added to the OE database.

(c) Uploads the INPO nuclear network forum and other documents into the OE database.

(d) Prepares the screening report for the OE coordinators.

(e) Distributes relevant OE information to appropriate station personnel.

(f) Maintains the OE distribution list.

[2] Condition Review Group (CRG)

(a) Determines if CRs should be shared as Operating Experience.

1. For CRs to be shared internally (within the fleet) CRG should determine how quickly the CR needs to be shared and what level of review is required for the CR. This applies to CRs being shared prior to the cause analysis being complete.

2. For CRs to be shared externally (with the industry) CRG identifies a subject matter expert to prepare the initial draft of the OE.

   A preliminary OE may be released to the industry when a risk or failure mechanism is recognized, where release may benefit others performing OE searches or in managing site risk. For this situation the cause need not be known at the time of a preliminary OE release.

(b) Assigns Responsible Managers for IERs when condition reports are initiated. CR assignments for Site Sponsors of IER Level 1 (SOER) responses receive assignment recommendation from the Fleet Sponsor and Site Vice Presidents.

(c) Maintains an overall awareness of the Entergy OE CRG Report and recommends any additional plant distribution of specific OE and OE that may warrant a written evaluation verses a “for information’ review.

(d) Reviews the list of IER Level 3s and 4s that are overdue, nominally, on a monthly basis.

4.0

[3] Corrective Action Review Board (CARB)

(a) Determines if an apparent cause document has lessons that should be released as OE to INPO, or to the Fleet, and assigns actions as needed.

(b) May perform the role of SOER/IER Review Board if the relevant station management is present at the CARB

[4] Director, Engineering is responsible for reviewing INPO OE releases as assigned by CRG or CARB for engineering related OE.

[5] Director, Nuclear Safety Assurance is responsible for reviewing INPO OE releases as assigned by CRG or CARB.

[6] Fleet Manager, Operating Experience and Corrective Actions (OE&CA) is responsible for the implementation of the OE program within Entergy Nuclear. This includes:

(a) Final review and closure of OE Written Reviews.

(b) Reviewing external OE releases prior to their approval.

(c) Managing the work schedule and work load of the site OE Coordinators.

[7] Fleet Core Team develops the initial IER Level 1 fleet response template.

[8] Fleet IER Sponsor oversees the Fleet's IER Response.

[9] General Manager Fleet Operation and Support - has overall responsibility for the Operating Experience (OE) Program.

[10] General Managers – Plant Operations (GMPO)

(a) Taking steps to continually improve the site's culture of, and ability to, learn from Operating Experience.

(b) Addressing any OE issues that escalate to their level for action or resolution.

(c) Approving INPO OE releases.

(d) Approves not releasing an OE when a RCE has been performed. Concurrence is not required for not posting Security OE with INPO.

[11] Manager, Corrective Action/Assessment (CA&A)

(a) Review external OE releases prior to their approval.

4.0[11]

(b) Dotted-line management support of the site OE coordinators for administrative purposes such as fitness-for-duty, behavioral observation, vacation scheduling, logistical needs, etc.

(c) Ensures the CRG manages the sharing of OE through the timely initiation of actions to support such.

(d) Assigning a corrective action to the site OE coordinator(s) for closure review of site condition reports initiated as a result of incoming operating experience (i.e., OE screened by the OE Coordinators).

[12] Manager, (Site) Security submits security OE to the Nuclear Energy Institute (NEI).

[13] Managers

(a) Identifying by name the required Points of Contact (POCs) for their department.

(b) Ensuring the POCs support the timely review of OE.

(c) Communicating and reinforcing departmental expectations for when the use of OE information is expected. Typical examples of when OE is expected to be used are, but not limited to:

1. When designing changes to the plant or equipment.
2. Planning jobs or work.
3. Writing procedures.
4. During Cause Analysis to help identify any failure modes or mechanisms that may have been overlooked, or to identify additional actions to strengthen the response.
5. During pre-job briefs to accentuate the importance of, or to clarify behaviors important to, the job being briefed.

(d) Ensure Effective use of OE within their department.

(e) Ensure that lessons-learned from their area, typically arrived at through cause analysis efforts or post-job critiques, are shared with the fleet and the industry as appropriate.

(f) Assigning resources to ensure timely, effective review of operating experience for which they are the assigned Sponsor.

4.0[13]

(g) Assigning technical support for the drafting of OE releases to the industry.

(h) For assigned IERs, the Responsible Manager:

1. Prepares the IER response
2. Obtains IER Review Board/CARB Review / Acceptance / Approval
3. Defines any required Corrective Actions
4. Enters Corrective Actions into PCRS
5. Ensures the IER 1 or 2 is communicated to INPO

[14] Operating Experience Points of Contact (POCs) - Responsible for:

(a) Acting as the focal point for Operating Experience in their assigned area. This includes working with the Site OE Coordinator to ensure Department personnel are trained in the use of OE tools such as:

- Operating Experience database
- INPO Website
- OE Website

(b) Receiving FYI distribution from OE screening:

- Review and acknowledge the weekly distribution of OE (B1 FYI OE) in one or more of the following ways:
  - Review each item and, if no action is required, perform a “weekly acknowledgement”
  - Comment on any one or more OE in the Weekly Distribution
  - Elevating any one or more OE items
- Determining the most effective method of sharing the information within the department. Examples include:
  - Forwarding to others
  - Discussing in routine meetings

(c) Getting appropriate information into daily briefs.

4.0[14]

(d) Providing feedback to the OE group on:

- Departmental items or trends that should be shared with the other Entergy sites or with the rest of the industry.
- Departmental needs or improvements that may increase the effectiveness of the OE program.

(e) Identify OE success stories in their area that demonstrate the effective use of OE information.

(f) Informing the OE Group of Exemplary uses of OE.

[15] Site Vice Presidents – Operations

(a) Ensuring organizational responsibilities and resources support maintaining and improving the Site OE program and culture.

(b) With the General Manager Plant Operations, communicate to the organization that a IER Level 1 or 2 document has been issued.

[16] Site (OE) Operating Experience Coordinator(s) - Site OE coordinators report to the Manager-OE&CA, but are “dotted-line” reports to the site CA&A Manager for administrative purposes. The typical duties of the OE coordinator are:

(a) Prepare, review and publish a daily OE Event Summary for use throughout the organization to keep OE visible routinely.

(b) Coordinate periodic effectiveness review of IER Level 1/SOER responses on the INPO Annual IER/SOER List.

(c) Input IER Level 1 (SOER) information to the IER Level 1 (SOER) database.

(d) Conduct POC training.

(e) Review Site CRs and make recommendations to CRG for sharing with the Entergy fleet or the industry.

(f) Disposition/screen daily incoming OE items for potential impact and for the appropriate POC to further evaluate.

(g) Determine relevant OE to be distributed to station personnel.

(h) Input information into the OE screening database.

4.0[16]

(i) Establishing and maintaining a list of OE Points of Contact (POCs) required at all sites.

(j) Finalize the OE based on technical input from Subject Matter Experts (SMEs) and obtains reviews and approval for release as OE to the industry.

(k) Input information for site OEs into the INPO web site.

(l) Conduct field observations/coaching.

(m) Support for preparing OE for pre-job briefings, outage activities and as requested by site personnel.

(n) Participate in site OE assessments to periodically monitor OE program performance and effectiveness.

(o) Conduct OE searches as requested by plant staff for Root Cause Analysis/Apparent Causes.

(p) Train site personnel on the use of OE search tools.

(q) Act as INPO OE Coordinator.

(r) Act as INPO Nuclear Network Coordinator.

(s) Initiate OE Written Reviews, coordinate action assignments, and review responses.

(t) Evaluate the impact of OE items to station operation.

(u) Initiate site CRs for the following types of documents:

a) All IER Level 1 and 2 Documents

b) Part 21's where the site is named.

c) Other OE items where the site is named or where it may be known to be applicable.

(v) Perform closure review of site condition reports initiated as a result of incoming operating experience (i.e., OE screened by the OE Coordinators).

4.0[16]

(w) Assist in the validation of IER Level 1 (SOER) responses and IER Level 1 (SOER) effectiveness reviews and in preparing required information to INPO, as needed.

(x) Participate in the Reactivity Management Oversight Group (RMOG)

[17] Site Personnel

(a) Review and respond to OE if assigned as the OE SME for a particular issue or area using the guidance provided by the OE Group.

(b) Utilize OE information to increase plant safety and reliability in routine and emergent situations such as:

a) Pre-job briefings.

b) Preparation for a non-routine major plant evolution.

c) Planning for a refueling outage.

d) Initial and continuing training.

e) Conduct of an Infrequently Performed Test or Evolution (IPTE).

f) Equipment reliability concern.

g) Self-assessment and evaluation activities.

h) Determining the impact to the station of assigned OE Written reviews as assigned.

[18] (SOER) IER Level 1 Sponsor - The individual, typically a Manager or Director, assigned overall ownership for implementation of the (SOER) IER Level 1 for either a site or the fleet. The Manager or Director that is initially assigned the condition report by the CRG is considered the SOER Sponsor. SOER Sponsors are also assigned for existing INPO Annual IER/SOER List IER Level 1s. The (SOER) IER Level 1 Sponsor is responsible for the following:

(a) Ensuring that appropriate reviews are performed and approvals are obtained for initial (SOER) IER Level 1 responses, and for updated SOER response information that is prepared for INPO E&A visits, (SOER) IER Level 1 updates, or Effectiveness Reviews. The approved information should be provided to the site OE Coordinator for incorporation in the (SOER) IER Level 1 Database.

4.0[18]

(b) Ensuring the (SOER) IER Level 1 recommendations are effectively implemented and initiation of actions are required to address deficiencies or non-compliances.

(c) Presentation of the (SOER) IER Level 1 response to the (SOER) IER Review Board for review and concurrence.

[19] IER Level 2 Sponsor - The individual, typically a Manager, assigned overall ownership for implementation of the (SOER) IER Level 2 for either a site or the fleet. The IER Level 2 Sponsor is designated through assignment of the condition report by the CRG.

[20] (SOER) IER Response Lead – An individual who is assigned for an SOER/IER Level 1 by the (SOER) IER Level 1 sponsor (and who otherwise may be designated for IER levels 2, 3 and 4) to coordinate and prepare the overall SOER response to address the recommendations. The (SOER) IER Level 1 Response Lead facilitates the response effort with the recommendation owners and other station or fleet personnel as applicable by conducting meetings or teleconferences and prepares the (SOER) IER Level 1 response for the (SOER) IER Level 1 Sponsor to present to the (SOER) IER Review Board.

[21] (SOER) IER Level 1 Recommendation Owner – The individual assigned by the SOER Sponsor and SOER Response Lead to have ownership of a specific (SOER) IER Level 1 recommendation. The (SOER) IER Level 1 Recommendation Owner is responsible for participating in the initial team meeting and providing individual recommendation responses to the (SOER) IER Level 1 response lead to prepare the (SOER) IER Level 1 response. The Recommendation Owner is also responsible for preparing SOER recommendation effectiveness reviews as required and for ensuring (SOER) IER Level 1 recommendations remain in effect.

[22] (SOER) IER Review Board – A mechanism for site or fleet senior management to approve (SOER) IER responses to determine if the station or fleet has satisfactorily responded to the (SOER) IER and effectively addressed the recommendations. This may be the Onsite Corrective Action Review Board (CARB), Station Challenge Meeting, or equivalent site management group as deemed appropriate by senior management. This board shall act as a challenge board and act as an oral challenge board when appropriate to ensure the effectiveness of (SOERs) IERs. A IER Review Board quorum shall include a Senior Site Leader (chair) and 2 Senior Managers. The Chair may set additional quorum requirements based on the subject matter of the IER.

4.0

[23] Superintendents and Supervisors:

(a) Knowing how to use sources of OE information useful for planning evolutions or work in their respective areas. These sources typically include:

a) INPO's OE Database, Plant Event Database, and various OE Reports and Digests.

b) Nuclear Network Forums specific to their area.

c) PCRS search tools.

d) Entergy OE database

(b) Performing the duties of the POC as appointed by their manager.

5.0 DETAILS

5.1 PRECAUTIONS AND LIMITATIONS

[1] Security OE is not covered by this procedure. See the Manager, Security for details.

[2] Senior Site Leadership is either the Site Vice President or General Manager Plant Operations

[3] Senior Executive Leadership are the Senior Vice Presidents.

[4] A Senior Manager is a Manager reporting to either the General Manager Plant Operations, the Engineering Director or the Nuclear Safety Assurance Director.

[5] Where Senior Site Leadership is required to meet the intent of SOER 10-2, and is unavailable; if the absence is not an extended one (e.g., month), the responsibility should not be delegated. The intent of SOER 10-2 is that senior managers have often not been engaged or relied too heavily on process, not giving their focus to the significant events.

5.2 GENERAL

[1] The OE Program provides the process for assessing OE from industry sources for potential impact to the continued safe and reliable operation of Entergy nuclear units. When conditions are identified as having an impact, Condition Reports are generated to provide for evaluations and corrective action plans.

(a) If at any time during the screening or evaluation process, an "adverse condition" as defined in EN-LI-102 or equivalent station corrective action procedures is identified, then a Condition Report shall be initiated for all Entergy units affected and/or Nuclear Headquarters.

(b) Documents that are typically screened and tracked by the OE Group are the following:

- INPO Event Report (IER) Documents
- INPO download of industry OE (typically the INPO Plant Events Database)
- NRC Information Notices
- NRC Licensee Event Reports
- NRC Regulatory Issues Summaries (RIS)
- Vendor notices as appropriate received by OE personnel
- 10 CFR Part 21 Reports

In addition to the above listed documents, the OE Group also screens other documents for impact. These documents include:

- NRC Download
- Other Nuclear Network information
- Applicable NSSS owners group reports
- Internal OE, as described in section 5.2[3]
- Reactivity Management Events
- OSHA information notices and updates
- Site INPO Assist Visit Reports or Learnings

5.2

[2] Screening and Dissemination

(a) Incoming OE items are screened by a team of nominally five OE coordinators for impact on Entergy plants. The screening has one of three possible outcomes (see Attachments 9.1 and 9.3 for all screening and evaluation codes and sub-codes):

- Screened as code "A" - "Evaluation Required" – This is for documents that indicate the presence of an Entergy "adverse condition", "potential adverse condition" or require formal evaluations for a proper impact assessment. The sub-code assigned per Attachment 9.1 determines the course of action.

- Screened as code "B" - "Useful for Site Awareness" – This is for documents that may have no impact (or may have only a small probability of impact) but are considered of informational value to selected plant staff. The associated document should be sent to the appropriate departmental OE POC for review.

- Screened as code "C" - "Not Applicable"

(b) Documents received by the OE coordinators relating to industry OE are screened for potential impact. This is accomplished by OE Coordinators screening the documents and then by a means of an inter-site conference call;

- Documents received that are identified as copyrighted or proprietary may be added to the OE database in compliance with the corporate policy on Copyright, Trademark, and Patent Infringement.

(c) The criteria used by Entergy personnel to determine potential impact in the screening process includes the following:

- Similar equipment or components are used at the station (or in the warehouse), although not necessarily in the same application.

- Similar design exists, if design was determined to be a main contributor to the issue.

- Current Organizational and or Programmatic practices that could increase the chances of a similar problem.

- Similar conditions, such as aquatic life, sea grass, severe weather, or extreme temperatures, could be present.

5.2[2](c)

- A similar event has already been experienced.
- Similar management expectations, personnel behaviors, processes, or programs have been observed in the station.
- Reactivity Management Events.
- Equipment and Plant Reliability Events.

(d) The OE Coordinators who perform the OE Screening are responsible for how OE is distributed to the organization. The screening of incoming OE documents is performed using the codes found in Attachment 9.1. Screening codes are recorded for all screened documents, including those screened as “not applicable,” for tracking purposes.

(e) OE that is screened by the OE Coordinators on the inter-site conference call is then reviewed at the CRG. The Site CA&A Manager can shift this schedule to accommodate CRG. This review is to determine if any OE requires additional site reviews (i.e., screened on the call as code “B”, but should be code “A”.)

(f) IER Level 1 and 2 Documents are screened as A1 and require a condition report. The A1 is normally issued (with a disposition of 5 working days) to each site OE coordinator to issue the condition report.

(g) In general, the following should apply for IER levels 3s and 4s:

i. An A2 (OE Written Review) is issued to all sites to review the IER. The A2 (OE Written Review) is issued to the Site Responsible Managers.

5.2[2](g)

ii. If the screening determines a fleet response can be provided, a single A2 (OE Written Review) is issued to the Fleet Sponsor.

iii. If the screening determines the IER is obviously not applicable to a site (or sites) (i.e., BWR/PWR only) the OE Written Report should document the non applicability. An OE should not be automatically dispositioned as not applicable just because of differences in plant design or equipment type. There may be lessons learned even when the design or equipment is not the same.

iv. Attachment 9.4 or a similar format should be used to document the review unless the IER Level 3/Level 4 is not applicable.

v. Where A2 assignments are made, a fleet subject matter expert (site or fleet) may also be issued an assignment to ensure consistent individual site responses.

(h) Other INPO documents are screened as A2 (OE Written Review) unless there are reasons to issue a fleet or site condition report. In such instances, the document is screened as A1.

i. NRC Part 21s

1. When a 10 CFR 21 report is obtained from any source, the OE organization should be provided a copy as soon as practical to allow for coordination of site and fleet reviews.

2. If the 10 CFR 21 report identifies the report is applicable to Entergy, or is applicable to an Entergy site, or is applicable by virtue of a site having the same equipment or condition described in the report, a site condition report is written as soon as practical. The OE organization will assign an action in the OE database to that site's OE Coordinator to track the initiation of the condition report. The action will be due within 5 days of CRG's screening the report. Anyone may write the condition report.

5.2[2](h)

3. For sites not identified in the 10 CFR 21 report an A2 OE Written Review should be performed and tracked in the OE database. Each site not identified in the 10 CFR 21 report performs the evaluation. This evaluation should be completed within 60 days of assignment.

4. Updates to 10 CFR 21 reports may not require a new condition report or new OE Evaluation assignment if the nature of the update is bounded by previous condition report or OE Evaluation.

ii. NRC Information Notices

1. If the Information Notice is applicable to a site, a site Condition Report is written.

2. If the Information Notice may be applicable to a site, an OE Written Review should be written and an A2 is taken.

3. If the Information Notice is obviously not applicable, an OE Written Review should be written and an A2 is assigned to a member of the screening team to document disposition.

iii. Regulatory Information Summaries

1. An A2 OE Action Item is assigned to the OE Coordinator overseeing HQN assignments who will then issue an action to HQN Licensing to review the RIS and determine what additional review actions need to be assigned, at what sites. The OE evaluation template may be used for RISs but is not required, depending on the nature of the RIS. HQN Licensing will review closure of the actions and close out the RIS Written Review when all actions are complete.

iv. Other

1. Operating Experience for Switchyard and Grid issues are screened as A2 to the Switchyard/Grid POC. POC action is to share the OE redacted by INPO with the interfacing Switchyard/Grid owners (reference INPO 09-008).

2. Operating Experience for Aging Management is screened as A2 to the Aging Management POC.

5.2[2](h)

3. Operating Experience for Gas Intrusion issues is screened as A2 to the System Engineering POC (reference NEI 09-10.)

4. Operating Experience for circuit breakers is screened as A2 or B1 to the Breaker POC (reference SOER 98-02 Rec 2.b)

v. For other documents as deemed necessary by the Fleet Manager OE & CA, or the Screening Call, an OE Written Report or a PCRS Work Task (W/T) is assigned, either to the sites or to Nuclear Headquarters if review is warranted.

[3] Sharing Internal OE

(a) Entergy nuclear stations may use similar equipment, materials, and processes. Because of this, special attention must be given to sharing OE with the other Entergy stations, as well as incorporating their lessons learned. To accomplish this, each site's CA&A Manager, Condition Review Group (CRG) and/or OE coordinator should consider the daily condition reports to determine if the other Entergy sites would benefit from the information. The OE coordinator(s) should include the selected CRs in the OE screening. CRG or CARB may identify internal OE for sharing. This is described in Section 5.2[4](m).

(b) OE considered for sharing includes condition reports written for events or conditions listed in Attachment 9.5 of EN-OE-100 and events for which a comprehensive root cause investigation was performed, and the lessons learned would be beneficial for Entergy to know about.

(c) The OE Coordinator or any site or Nuclear Headquarters Manager or above may determine if an event that occurred at his or her station warrants an OE Red Flag release. The OE Coordinator ensures that the event is placed on the next Screening Call.

1. As determined on the Screening Call or by the Manager OE&CA, either an OE Written Review or multiple site specific CRs, should be initiated to determine/ document the vulnerability of the individual site to the Red Flag OE. This OE Written Review should have a due date of no greater than two (2) weeks.

2. Entergy stations should review the Red Flag OE documents for impact and as necessary initiate corrective actions or site or headquarters Condition Report(s) to review the issue for impact. The Red Flag OE should be distributed immediately upon disposition by the Screening call. The OE should be issued with the title "Red Flag OE".

3. Responses to Red Flag OE are presented to CARB for review.

5.2

[4] Evaluation and Analysis

NOTE

Unless separate site-specific Condition Reports are initiated for every Entergy nuclear site (or Nuclear Headquarters CR), an OE Written Review may also be needed for the remaining sites to determine impact.

(a) If a document is determined to have an impact and requires an evaluation, then it is classified as code "A" - "Evaluation Required". The document requires the initiation of a site-specific condition report, a Nuclear Headquarters condition report, or an OE Written Review depending on the assigned sub-code. The priority sub-codes and suggested due dates for OE documents that require an evaluation are determined in accordance with Attachment 9.1. To ensure a timely determination of plant impact, OE Written Reviews should be assigned due dates not to exceed 90 days.

- The individual performing the OE Written Review evaluation should perform it with the perspective that "this event can happen here."

(b) OE Written Reviews should be reviewed by the Manager-OE&CA or designee prior to closure. Review of OE Written Reviews closures should include differences in the site's response, as compared to other sites, to ensure fleet consistency and completeness. Technical, causal, and organizational & programmatic (O&P) issues should be considered.

(c) OE evaluations concerning site equipment that may require inclusion into technical manuals should be processed in accordance with appropriate station procedures.

(d) Evaluation of the OE should look at the similarities that could apply to the station or fleet verses differences that may lead to inaction. Responses to OE (INPO) Documents should be reviewed or discussed as a fleet to ensure fleet learning and consistency of responses.

(e) The OE evaluation should be performance based and not just a review to determine if the procedures or processes are in place to address the issue. If a procedure contains requirements that are credited as a barrier, but users are unaware that the barrier exists, then the barrier is not robust.

(f) Some Industry OE, such as NRC generic communications, INPO OE documents, and NSSS Technical Bulletins identify generic issues that are supported by several examples of industry events. The evaluation need not evaluate each specific identified event but should ensure that the generic issue is fully addressed.

5.2[4]

(g) If specific industry Operating Experience documents are referenced as part of INPO's analysis contained in the OE document, ensure these documents are reviewed for applicability. If specific Operating Experience is referenced in the OE document that have been previously evaluated, ensure the previous evaluations are reviewed to validate the original response (including conclusions and corrective actions).

(h) If the response to any industry Operating Experience document takes credit for analysis or evaluation performed in response to a previous industry Operating Experience document, then the assumptions and conclusions for that previous evaluation should be validated.

(i) The following actions should be considered when evaluating OE. Use Attachment 9.4, OE Evaluation Template (or the template in the OE database). The numbers below correspond to the Template. If the OE obviously does not apply to the station performing the review Attachment 9.4 does not need to be used (i.e., PWR station review of a BWR issue, a search of the equipment database identifies that the component is not installed in the plant, etc.) However, the response should clearly state why a detailed OE review is not required and why the OE is not applicable:

NOTE:
The OE Coordinator should interface with affected station departments to obtain input relating to the issues and recommended actions. The individual or organization assigned ownership of the response is responsible for documenting the results from other affected groups in the OE evaluation.

I. <u>Vulnerability</u> This includes a summary of what the OE document is concerned about. Include both the specific issue, and the generic issues, as an event at one type of plant design may have generic implications affecting all plant designs. This summary should be in the context of the OE document, with no mention of the plant doing the review.

Minimize cutting & pasting from the OE document under review. Your own words are preferred in order to demonstrate internalization and understanding of the OE.

II. <u>Susceptibility</u> This should include a discussion of the plant being reviewed. Is the plant/fleet susceptible to the concern(s) expressed in the document? The answer could be 'Yes' but is managed effectively based on the discussion in the "Barriers" section.

5.2[4](i)

If the answer is "No", state the reason the OE is not applicable. (I.e., The plant/fleet does not have the same system, or even a similar system, or concern? The specific technical issue, as well as any "generic implications" should be reviewed. Address IER Level 2 and 3 "Lessons Learned" and "Questions to Consider" here.

If in the "Susceptibility" analysis, an issue of non-conformance or condition adverse to quality is identified, a CR shall be initiated and the Operability/Reportability review shall be performed. In the CR Description, identify that review of this OE precipitated the CR. The "Susceptibility" review should be based on programmatic or system/component design Considerations and not based on past performance of the system/component.

III. Barriers

- If the "Susceptibility" answer is "Yes", and a CR in not written, "Barriers" should be effectively managing the "Vulnerability". Describe these "Barriers". As needed, look at plant CRs or other data to validate that existing "Barriers" manage the" Vulnerability". As needed, validate that procedures include the appropriate Barrier(s).

- If the "Susceptibility" answer is "No", this section may be N/A given the response provided in the "Susceptibility" Section.

If in the "Barrier" analysis, an issue of non-conformance or condition adverse to quality is identified, a CR shall be initiated and the Operability/Reportability review shall be performed. In the CR Description, identify that review of this OE precipitated the CR.

The "Barrier" review should focus on:

a) What barriers are currently in place?
b) What barriers need to be strengthened?
c) What new barriers need to be put in place? (This most likely should result in a Site or HQN CR)

IV. Actions

Identify any action that results from the evaluation. These are typically enhancement actions or additional evaluation actions. If any of the actions address an issue of non-conformance or condition adverse to quality is identified, a CR shall be initiated and the Operability/Reportability review shall be performed. In the CR Description, identify that review of this OE precipitated the CR.

5.2[4]

(j) IER Level 2 and 3 documents also normally contain Prevent Events "Lessons Learned" or "Questions to Consider". These provide good insight regarding the failed barriers involved in the event and also should be individually addressed in the susceptibility section of the evaluation.

(k) Unless otherwise specified, all INPO OE document evaluations (CR or OE Written Review) should normally be completed within 90 days.

(l) For adverse conditions identified in the OE review and evaluation process a condition report is initiated. Enhancements to processes may be tracked by other processes

(m) CRG or CARB identifies CRs or Causal Evaluations to be shared in accordance with EN-LI-102 Attachment 9.5, Entergy Fleet Learning Review Process. If CRs or Evaluations are to be shared CRG or CARB issues a CA to the site OE Coordinator under the subject CR. The CRG or CARB may identify the CR or Evaluation for "Immediate Sharing" for "Site Sharing" or for "Fleet Learning". This may be done by CRG during CR classification/assignment or by CARB during approval/review of s or ACEs. The following applies:

1. CRs that require immediate review by the fleet are identified as "Immediate Sharing" and are normally identified by CRG during CR classification/assignment. The CR is added to the Screening Call and dispositioned as either Code "A" - Written Review Required or Code "B" – "Useful for Site Awareness" per the guidance of this procedure. This sharing is done prior to the cause evaluation being performed.

2. CRs that need to be shared after the cause evaluation has been completed may be either:

   a) Sent to the OE Coordinator for addition to the Screening Call. These Evaluations are classified as Site Sharing. A Site Sharing is issued for review because the Evaluation contains issues, causes or contributors that should be considered by the reviewing site.

5.2[4](m)(2)

b) Sent to the OE Coordinator for addition to the Screening Call as a Fleet Learning (see Attachment 9.1). These Evaluations require CRG to identify a Responsible Manager and a Subject Matter Expert. If the Fleet Learning is identified by CARB, CARB identifies the Responsible Manager / Subject Matter Expert. The identified Responsible Manager may determine vulnerability and, if applicable, issue applicable condition reports and assign CAs to applicable sites for vulnerability determination; and issuance of applicable condition reports. Site responses are reviewed by the reviewing site's CRG or CARB. The review should be completed with 120 days. Attachment 9.4 (or the template in the OE database) should be used to document the OE evaluation.

1) The OE Coordinators will process condition reports identified in this manner as Code "A" - "Evaluation Required A2". An HQN Learning Organization Condition Report (LO-CR) will be initiated for each Fleet Learning. A Learning Organization Corrective Action (LO-CA) is assigned to the Responsible Manager to perform the review.

2) The Responsible Manager determines if individual site LO-CAs are required or if he/she will respond without issuing LO-CAs to the sites. Site responses are approved by the site's CARB. If a single LO-CA is used to respond, the Responsible Manager's site CRG / CARB approves the entire response.

3) If site reviews are required, the Responsible Manager assigns Learning Organization Corrective Actions (LO-CA) to his/her counterparts at the other sites as follows:

- Site reviews due within 90 days of the assignment. These Fleet Reviews are issued as LO-CAs under the same LO-CR.

- The LO-CA assigned to the Responsible Manager is typically due within 120 days of the LO-CA assignment. The RM should consider this if and when actions are issued for individual site reviews.

4) The Responsible Manager should perform a review to ensure that the OE evaluation

5.2[4](m)(2)

5) Is reviewed by each applicable location's CRG or CARB.

6) The Responsible Manager ensures that the closure review conducted considers the aggregate impact to the fleet. The aggregate review is approved by the Responsible Manager's CARB. If aggregate impact is identified, the Responsible Manager ensures a HQ CR is issued to address the aggregate impact.

[5] New IER Level 1 Documents

(a) Expectations

- IER Level 1s contain recommendations that INPO expects will be implemented in a timely manner by the industry.

  INPO expects plants to implement the recommendations specified in IER Level 1 documents as follows:

  - Corrective actions are to be defined within 90 days of the date of the IER.

  - INPO is to be informed of corrective action implementation plans within 150 days of the issue date of the IER.

    INPO will review implementation plans and will conduct a detailed review of the actions taken on IER Level 1 documents. The detailed review will normally occur during evaluations and peer reviews, however, other methods may be used.

    To facilitate discussion of key industry operating experience during meetings, training, and pre-job briefings, IER Level 1documents may contain a Prevent Events section. This section consists of a brief description and a set of provocative questions that are intended to help workers and managers prevent similar problems. The intent of the Prevent Events section is to improve the effectiveness of work preparation by enhancing personnel knowledge of operating experience through discussions.

5.2[5](a)

- The Senior Site Leadership shall communicate to their respective organizations that the IER Level 1 as been issued. The communication shall include key elements of the SOER (IER) , a team has been assembled to respond, that the team shall be given the support necessary to complete the response and any expectations they have for responding to and implementing the IER. Senior Site Leadership shall ensure that this communication is cascaded down the organization.

(b) New IER Level 1 Response – Initial Actions

1. Upon receipt of the new IER Level 1, the OE Organization will place the IER on the OE Fleet screening call and ensure site CRs are written for the new IER Level 1 response. A Headquarters CR may also be initiated by the OE Organization in addition to the site CRs. The Headquarters CR tracks the fleet response and any fleet actions; the site CRs tracks the individual site responses and any site actions. Closure of the fleet CR should consider if overall fleet actions are appropriate and consistent.

2. CA&A (Headquarters and Site) should initiate CAs to track the actions required to respond to the new IER Level 1 in accordance with the schedule in Attachment 9.9.

3. The Vice President Nuclear Support (or GM Nuclear Operations Support) and the Fleet Manager OE&CA will determine the new IER Level 1 Fleet Sponsor. The Senior Executive Leadership will concur on the selection of the IER Level 1 Fleet Sponsor. Unless otherwise identified in the initiating HQN CR, New IER Level 1 responses are drafted under the oversight and coordination of the Fleet Sponsor.

4. The Fleet Sponsor works with the Site Vice Presidents to identify the Site IER Level 1 Sponsors. This should typically be individuals in the same position at each site.

5. The Fleet and Site Sponsors identify the IER Recommendation Owners. This should typically be individuals in the same position at each site.

(c) New IER Level 1 Response – Fleet Core Team

1. The Fleet Sponsor and Site Sponsors identify a Fleet Core Team that includes the Fleet Sponsor and some (but not necessarily all) of the Site Sponsors and some (but not necessarily all) of the Recommendation Owners. The Fleet Core Team may also include other individuals as deemed required.

5.2[5](c)

2. The Fleet Core Team performs due diligence. This includes:

   a) Creating a preliminary briefing sheet for distribution to executive and site leadership summarizing the issues, ownership of the issues, assignees and due dates.

   b) Establishing milestones and deliverables for the IER that meet the requirements of this procedure.

   c) Determining any required immediate actions to mitigate deleterious effects that could result based on the initial review of the IER.

   d) Performing a gap analysis and evaluation of each site's condition against the IER recommendations.

   e) Performing an evaluation of the identified gaps and performing a line-by-line review against the new IER recommendations and identifying corrective actions to close the gaps.

   f) Ensuring there is no Training impact.

3. The Fleet Core Team should use the recommendation response format identified in Attachment 9.6, Sheet 4, when completing the evaluation.

4. The Fleet Sponsor should periodically meet with the Executive Leadership for concurrence on direction of the responses.

5. The Site Sponsors should meet on a regular basis with thier Sr. Site Leadership to provide the direction of the responses.

6. The Fleet Core Team develops a formal response template to the new IER Level 1 recommendations and ensures each recommendation is specifically addressed. This includes:

   a) Ensuring the documentation "stands alone" and is clear enough to identify that the review was completed satisfactorily.

   b) Ensuring that any additional documentation is attached or easily retrievable. Easily retrievable means that there is a clear documented path provided for the reviewer to follow in order to obtain the data.

   c) Verifying that all required actions have CAs to track implementation.

5.2[5](c)(6)

d) Verifying that all Regulatory and Non-regulatory commitments are documented per EN-LI-110, Commitment Management Program and all Commitments and Obligations are documented per EN-AD-101, Procedure Process.

e) Verifying that all elements of each IER recommendation have been addressed.

f) IER Level 1 corrective actions shall be defined within 90 days of the date of the IER Level 1 document. The corrective actions should be reviewed by the Executive Leadership and the Site Vice Presidents.

g) The Responsible Manager ensures that Corrective Actions are tracking revisions to applicable procedures, training and other station activities.

(d) New IER Level 1 Response – Site reviews

1. As determined by the Fleet Core Team, additional IER Level 1 team meetings or teleconferences should be conducted during the response and evaluation cycle in order to ensure satisfactory progress and timely completion of the IER Level 1 responses.

2. Within twenty-one (21) days of the new IER Level 1 issue date, the Fleet Core Team should initiate the appropriate CAs to the new IER Level 1 Recommendation Owners to evaluate the new IER Level 1 recommendations to determine any Site impacts and to determine if the recommendations are satisfactorily addressed or if corrective actions are warranted.

3. The Fleet IER Level 1 Sponsor should be coordinating consistency of site responses with the Site IER Level 1 Sponsors or IER Level 1 Response Leads. This includes, where applicable, identifying and / or changing fleet processes or procedures that implement the IER Level 1.

(e) New IER Level 1 Response – Final Response Package

1. The Site IER Level 1 Sponsor should prepare an overall IER Level 1 Executive Summary utilizing the Attachment 9.6, IER Level 1 Response Template, Sheet 3.

2. The Fleet Core Team reviews, verifies and ensures that each site's responses are consistent and resolves any identified inconsistencies.

5.2[5](e)

3. The Fleet Sponsor in conjunction with the Site Vice Presidents resolves any differences in the responses.

4. The Site IER Level 1 Sponsor should perform a final review and approve the IER Level 1 response 73 days from the date of issuance of the IER. Site CA&A (and Headquarters CA&A, if there is also a fleet response) should initiate a CA for this review once CRG has assigned the CR tracking the IER Level 1. Extensions to this CA should be approved by the station GMPO or applicable Fleet Director. IER approvals are documented on Attachment 9.6, Sheet 1.

5. The Site IER Level 1 Sponsor should present the IER Level 1 response (with the IER Level 1 Team Lead and IER Level 1 Recommendation Owners as appropriate) to the IER Review Board within 75 days from the date of issuance. The Site Vice President or GMPO must be present at the SOER Board. The Board should review the comprehensiveness, sustainability, and executability of IER.

6. CA&A should initiate a CA to the IER Level 1 Sponsor for this review once CRG has assigned the CR tracking the IER Level 1. Extensions to this CA should be approved by the Site Vice President or GMPO (or applicable Fleet Director.)

7. INPO expects corrective actions be defined within 90 days of receipt of an IER Level document. A CA is assigned to the Fleet Sponsor to track this.

8. INPO is to be informed of corrective action implementation plans within 150 days of the date of an IER Level 1 document. A CA should be assigned to the Fleet IER Sponsor to track this. The Fleet Sponsor based on feedback from the Executive Leadership should determine if the there will be a fleet (or site) transmittal of the corrective action implementation plans to INPO. If the sites will be transmitting the corrective action plans to INPO, the Fleet Sponsor shall issue CAs to the Site IER Sponsors to perform this within 150 days of the date of the IER response. If a site response is prepared it is sent to INPO by the Site Vice President or the Site IER Level 1 Sponsor. If a fleet response is prepared it is sent to INPO by the Nuclear Ops Support Vice President or the Fleet IER Level 1 Sponsor.

9. Responses to all IER Level 1 corrective actions shall be approved by a Senior Manager.

5.2[5]

(f) IER Level 1 Response – Procedure Changes

1. Prior to closure of the fleet/site CR tracking the IER Level 1, the IER Level 1 Sponsor should ensure a LO-CA (enhancements) or CA (required change to meet IER intent or adverse condition) is initiated to track any procedure or plant changes that have not been implemented. IER Level 1 commitments that credit procedure actions or requirements should be annotated or flagged as commitments in accordance with EN-AD-101 and site procedure writer's guides.

(g) IER Level 1 Response – Initial Effectiveness Review

When the initial CAs are issued for the IER Level 1, a LO CA should be issued to each site Level 1 IER Recommendation Owner to perform an effectiveness review (using Attachment 9.7) for the IER Level 1 implementation one year after the schedule CARB/IER Review Board approval of the IER Level 1 but not more than 2 years after the IER Level 1 document is issued.

The Effectiveness Review should verify that the intended or expected results were achieved and required actions are in place after implementation of any corrective actions. The review (using Attachment 9.7) should confirm that new problems or unintended consequences were not introduced by implementation of the actions.

1. The Effectiveness reviews shall be reviewed by the CARB/IER Review Board. The Site Vice president or GMPO must be present at the IER Board review.

2. CARB/ IER Review Board review should include a review of the comprehensiveness, sustainability, and executability of the actions associated with the IER.

3. INPO revisions or addendums to IER Level 1s should follow the same process as the initial IER Level 1 evaluation and response. Approvals are documented on Attachment 9.6, Sheet 1. For IER Level 1 revisions, INPO "recommends" judgment based on the content of the IER Level 1 revision. IF there are no changes to the IER Level 1 recommendations, then the IER Level 1 revision gets screened by the OE Coordinators as no action required, with the appropriate remarks added to the OE Database. This decision is made with input from the IER Fleet Sponsor.

5.2[5]

(h) IER Level 1 (SOER) Status

Each site OE Coordinator should maintain an IER/SOER database which provides information related to IER Level 1 (SOER) site responses, effectiveness reviews performed, and each IER Level 1 (SOER) recommendation on the INPO Annual IER/SOER List. The OE coordinators are custodians of the database, but the respective sponsors and Recommendation Owners assigned are responsible for the accuracy of the database information.

The Fleet IER Sponsor, the Site IER Sponsor and the Site IER Recommendation Owners retain their responsibilities for the IER Level 1 responses after the IER has been approved. When these individuals change position, they shall ensure appropriate transfer of IER Level 1 responsibilities.

[6] Follow up IER Level 1 (SOER) Recommendation Effectiveness Reviews

a. IER Level 1 (SOER) Effectiveness Reviews are the responsibility of the individual site whether the SOER response was completed by a fleet response or by individual site.

b. The site OE Coordinators should schedule a periodic effectiveness review of the “INPO Annual IER/SOER List” Recommendation Responses. IER Level 1s (SOERs) on the “INPO Annual IER/SOER List” should be reviewed at least once every two (2) years. This review should be documented in PCRS using a Learning Organization (LO) to document the review. While effectiveness reviews are performed on a periodic basis, it is expected that the SOER Recommendation Owner ensure that IER Level 1 (SOER) Recommendations remain implemented.

c. Effectiveness Reviews may also be initiated based on receipt of an updated Annual IER (SOER) List from INPO, or station issues prior to an INPO E&A or due to plant changes.

d. Effectiveness reviews for IER Level 1 (SOER)’s should be assigned to the IER Level 1 (SOER) Recommendation Owner and the effectiveness review prepared utilizing Attachment 9.7 and include and document the following:

1. Station OE Coordinators and IER Level 1 (SOER) Recommendation Owners should conduct a periodic analysis and reviews of the Stations CA&A Quarterly Trend report to evaluate emerging trends or issues relative to IER Level 1s (SOER’s). The results should be documented in PCRS as either an LO or a CR.

5.2[6](d)

2. Review IER Level 1 (SOER) actions implemented since last SOER data base update. Check if a station's Condition Reports have been written relative to the SOER recommendations.

3. Any repeat findings from internal Entergy audits or assessments relative to IER Level 1 (SOER) recommendations.

4. Ensure that IER Level 1 (SOER) recommendation commitments that credit procedure actions or requirements are flagged as commitments in accordance with EN-AD-101 and applicable site procedure writer's guides. If the procedural action or requirement is not flagged as a commitment, process a procedure update or revision request in accordance with EN-AD-101 or applicable site procedure to add the procedural commitment.

5. The IER Level 1 (SOER) Recommendation Owner then reviews the IER Level 1 (SOER) Effectiveness Review.

e. The IER Level 1 (SOER) Sponsor should then review and approve the completed effectiveness review.

f. The site OE Coordinator should maintain an IER Level 1 and SOER effectiveness review status and tracking log and should ensure that effectiveness reviews are performed and added to the IER Level 1 (SOER) Database when completed.

g. The attribute of a continual and effective IER Level 1 (SOER) response is demonstrated by:

1. Station events related to the IER Level 1s (SOER's) have been reduced – no or few events trending to zero.

2. IER Level 1 (SOER) lessons learned are included where appropriate in both initial and continuing Training programs.

3. IER Level 1 (SOER) Lessons learned, as appropriate, are included in Root Cause Analysis and higher level ACE evaluations.

4. IER Level 1 (SOER) Recommendation Owners conduct regular and independent evaluations on the IER Level 1 (SOER) responses (FME, RP, etc.) using WTs in PCRS.

h. All completed IER Level 1 (SOER) Recommendation Effectiveness Reviews will be presented to a senior leadership review board (CARB, or IER Review Board other as determined by site management). The Site Vice President or GMPO must be present at the IER (SOER) Board review.

5.2[6]

i. The deliverable from an effectiveness review should be an updated or validated IER Level 1 (SOER) Recommendation Disposition and an IER Level 1 (SOER) Recommendation Effectiveness Review.

j. Prior to closing the LO-CA for any IER Recommendation Effective review, another LO-CA shall be issued by the OE Coordinator to track the next Effectiveness Review.

k. The next Effectiveness Review should normally be performed at least 6 months prior to the next E&A. IERs (SOERs) that require effectiveness reviews should include:

1. IERs (SOERs) that are on the annual INPO Annual IER/SOER List

2. IERs (SOERs) that were graded as “Unsatisfactory” during the previous INPO E&A

3. IERs (SOERs) that were graded as “Awaiting Implementation” during the previous INPO E&A.

[7] IER Level 1 (SOER) Recommendation Response Updates

(a) IER Level 1 (SOER) Recommendation Response Updates are the responsibility of the site IER Level 1 (SOER) Recommendation Owner whether the SOER response was completed by a fleet response or by individual site.

(b) This update should be documented in PCRS using a Learning Organization (LO) to document the review utilizing Attachment 9.6, Sheets 2, 3 and 4. It is expected that the IER Level 1 (SOER) Recommendation Owner ensures that IER Level 1 (SOER) Recommendations remain up to date and implemented.

(c) IER Level 1 (SOER) Response Updates should follow the same approval process as a new IER Level 1 (SOER) with the exception that the requirement for an IER (SOER) Review Board is determined by the Site IER Level 1 (SOER) Sponsor.

5.2

[8] IER Level 2

(a) Plants are expected to review lessons learned provided in IER Level 2 documents and develop corrective actions applicable to the plant.

INPO will conduct a review of actions taken by the plant on Level 2 documents.

- Corrective actions are to be defined within 120 days of the issue date of the IER. Upon issuing the CR CA&A issues a CA to the IER Level 2 Owner to track this. IER Board Approval review should be performed prior to completing the action to define Corrective Actions.

- INPO is to be informed of corrective action implementation plans within 150 days of the issue date of the IER. Upon issuing the CR CA&A issues a CA to the IER Level 2 Owner to track this.

  Corrective actions completed by the plant at which an event occurred are followed up by INPO during the next plant evaluation or peer review. Furthermore, if a plant is observed to be experiencing performance problems in an area covered by an IER Level 2, the utility's response to the IER Level 2 will be reviewed by INPO.

- The Senior Site Leadership should communicate to their respective organizations that an IER Level 2 Document has been issued. This includes communicating, the key elements, any expectations they have for responding and implementing the IER.

- Senior Site Leadership's involvement in the selection of the leader responsible for developing the response (i.e., the Site Level 2 Sponsor) is by means of the CRG assignment of the CR for the IER Level 2.

(b) The response to IER Level 2 documents should include a detailed review of the Lessons Learned section using Attachment 9.4.

(c) In addition to the requirements of Section 5.2[4], the following apply. A timeline is provided in Attachment 9.9:

a) An action is issued to Site Training to evaluate for training impact.

5.2[8]

b) An action is issued to a Fleet Owner for a fleet roll-up review of the IER Level 2. The fleet roll-up review should be an iterative process during the development of the individual site responses. The Fleet Owner should consider fleet calls, meetings, video conferencing or other means to ensure common site responses are developed using a common approach.

c) An action is issued to the site IER Level 2 Document owner to ensure Senior Site Leadership communicates that an IER Level 2 Document has been issued. The communication shall include key elements of the IER.

d) Attachment 9.10, IER Impact Review is provided for use in prompting the reviewer through the review process. This Form is not required to be attached to the response.

e) If a site response is prepared it is sent to INPO by the Site Vice President or the Site IER Level 2 Sponsor. If a fleet response is prepared it is sent to INPO by the Nuclear Ops Support Vice President or the Fleet IER Level 2 Sponsor.

f) The OE Coordinator should issue an HQNLO CA tracking item to the IER Level 2 owner to perform an effectiveness review within 2 years after the date of the IER Level 2 Document.

g) The Effectiveness Review should verify that the intended or expected results were achieved and required actions are in place after implementation of any corrective actions. The review should confirm that new problems or unintended consequences were not introduced by implementation of the actions. Attachment 9.8 should be used.

h) For IER Level 2s that are similar to a previous IER (SOER) Level 1 Document, ensure the initial assumptions of the IER (SOER) Level 1 Document are validated for the new event identified. If a deficiency is identified with the original IER (SOER) Level 1 assumptions or response, initiate a CR per EN-LI-102 to address the issues.

(d) Responses

a) Site responses to IER Level 2 Documents are presented to the IER Review Board/CARB for review.

5.2[8](d)

b) The IER Review Board/CARB Review should include a review of the comprehensiveness, sustainability, and executability of the actions associated with the IER. The Site Vice President or GMPO must be present at the IER Review Board/CARB.

c) The IER Level 2 Sponsor ensures that Corrective Actions are tracking revisions to applicable procedures, training and other station activities.

d) Responses to IER Level 2 documents should be approved by a Sr. Manager. This is documented in PCRS.

(e) For IER Level 2s that are obviously not applicable to a site (i.e., a BWR review of an IER on Steam Generators), the following minimum actions are required;

1. The IER Level 2 Sponsor in conjunction with the Senior Site Leadership should determine if communication to the organization is required. If communication is not required, it should be documented in a CA.

2. The Responsible Manager and Fleet Owner should be in contact with each other to ensure consistent responses across the fleet.

3. The determination that the IER is not applicable, with fleet sponsor concurrence, should be approved by CARB/IER Review Board and documented in a CA.

4. The required response to INPO at 150 Days should be provided stating that the IER is not applicable. The reason should also be provided

5. The training review, a detailed response and an effectiveness review are not required.

[9] IER Level 3

(a) Plants are expected to review this document and consider developing immediate corrective actions applicable to the plant. (Level 3 documents may be succeeded by a Level 1, 2, or 4 IER)

(b) INPO will conduct a review of the plant process for disposition of IER Level 3 documents.

(c) The response to IER Level 3 documents should include a detailed review of the Lessons Learned section, using Attachment 9.4 or the template in the OE database.

5.2[9]

(d) In addition to the requirements of Section 5.2[4], the following apply. The timeline is provided in Attachment 9.9:

a) An A2 OE Written Report will be initiated for each IER Level 3. CRG should review the list of overdue A2 OE Written Responses for IER Level 3s (nominally once a month) to ensure that IER Level 3s are being responded to in a timely manner.

b) The Site Responsible Manager (or the Fleet Responsible Manager for fleet responses) should identify if any of these IERs requires CARB approval, using the criteria in SOER 10-2; (i.e, "ensure that other important operating experience documents (Level 3 and 4) are reviewed …for applicability and that, when appropriate, applicable actions are forwarded to senior leadership for approval.) The decision to have CARB review or not, should be documented in the OE Written Response. If a CARB/IER Review Board review is performed it should be documented in the OE Written Response.

c) An A2 OE Written Response is issued to a Fleet Owner to document holding a call, video conference or meeting with his/her fleet counterparts to discuss the IER Level 3 Document. The fleet call should discuss the general approach to be taken and any issues to consider in the response. The call should normally be held soon after the IER is issued by INPO so as to provide input into the IER response.

d) Attachment 9.10, IER Impact Review is provided for use in prompting the reviewer through the review process. This Form is not required to be attached to the response.

e) For IER Level 3s that are similar to a previous IER (SOER) Level 1, ensure the initial assumptions of the IER Level 1(SOER) or 2 are validated for the new event identified. If a deficiency is identified with the original IER Level 1 (SOER) or 2 assumptions or response, initiate a CR per EN-LI-102 to address the issues.

(e) Responses

a) All responses to IER Level 3 documents should be approved by a Sr. Manager. This is documented in the A2 OE Written Response.

b) If a CARB/IER Review Board review is required quorum requirements shall be met.

5.2[9](e)

c) If a CARB/IER Review Board Review is performed it should include a review of the comprehensiveness, sustainability, and executability of the actions associated with the IER.

d) The Responsible Manager ensures that Learning Organization Corrective Actions (LO-CAs) are tracking revisions to applicable procedures, training and other station activities.

(f) For IER Level 3s that are determined to not be applicable to a site (i.e., a BWR review of an IER on Steam Generators), the following minimum actions are required;

1. The Responsible Manager and Fleet Sponsor should be in contact with each other to ensure consistent responses across the fleet.

2. A detailed response is not required.

(g) When all the Site actions have been completed, the OE Coordinator issues an A2 for the Fleet Manager OE&CA closure review.

[10] IER Level 4

(a) Plants are expected to consider corrective actions provided in this document and develop applicable corrective actions.

(b) INPO will conduct a review of the plant process for disposition of IER Level 4 documents.

(c) An A2 OE Written Report will be initiated for each IER Level 4. CRG should review the list of overdue A2 OE Written Responses for IER Level 4s (nominally once a month) to ensure that IER Level 4s are being responded to in a timely manner.

(d) In addition to the requirements of Section 5.2[4], the following apply. The timeline is provided in Attachment 9.9:

5.2[10](d)

a) The Site Responsible Manager (or the Fleet Responsible Manager for fleet responses) should identify if any of these IERs requires CARB approval, using the criteria in SOER 10-2; (i.e, "ensure that other important operating experience documents (Level 3 and 4) are reviewed …for applicability and that, when appropriate, applicable actions are forwarded to senior leadership for approval.) The decision to have CARB review or not, should be documented in the OE Written Response. If a CARB/IER Review Board review is performed it should be documented in the OE Written Response.

b) Attachment 9.10, IER Impact Review is provided for use in prompting the reviewer through the review process. This Form is not required to be attached to the response.

c) For IER Level 4s that are similar to a previous IER (SOER) Level 1, 2 or 3, ensure the initial assumptions of the IER Level 1(SOER), 2 or 3 are validated for the new event identified. If a deficiency is identified with the original IER Level 1 (SOER), Level 2 or Level 3 assumptions or response, initiate a CR per EN-LI-102 to address the issues.

(e) Responses

a) All responses to IER Level 4 documents should be approved by a Sr. Manager. This is documented in the A2 OE Written Response.

b) If a CARB/IER Review Board review is required, quorum requirements shall be met.

c) If CARB/IER Review Board is required it should include a review of the comprehensiveness, sustainability, and executability of the actions associated with the IER.

d) The Responsible Manager ensures that Learning Organization Corrective Actions (LO-CAs) are tracking revisions to applicable procedures, training and other station activities.

(f) OE closure review is performed by the Fleet Manager OE&CA when the OE Action Item is closed.

5.2

[11] 10 CFR Part 21 Reports

(a) 10 CFR Part 21 reports received by an Entergy nuclear plant require the initiation of a site-specific or Nuclear Headquarters condition report upon receipt, when the Part 21 report is directly applicable to a particular Entergy plant. OE written reviews should be generated to determine the impact for the remaining Entergy units if impact at the other sites is still in question.

(b) Any other generic document or report that is generated under the auspices of 10 CFR Part 21, and is obtained by an Entergy nuclear plant (NRC download, sister-unit receipt, etc.), require the initiation of an OE Written Review Document after screening. An OE written review is considered the preferred course of action if site impact cannot be determined relatively quick and accurately. If necessary, the OE written review evaluator may assign a CA for Part 21 Applicability Review to the responsible Manager. The CA response should detail the Part 21's material history relating to its procurement, issue to plant personnel, and whether or not the material remains in inventory (including support documentation).

(c) If the 10 CFR Part 21 being addressed is confirmed to apply to a component installed in a system at the Site, impacts plant equipment, is available for issue in the warehouse and/or requires action by site personnel, then the OE written review is closed, and a site-specific CR is then required to document the plant impact.

(d) If a sub assignment review is required for a Part 21 the OE Written Reviews should be assigned a 30 day due date, with the impact review completed by the OE coordinators within approximately 60 days. Any extension requests must be approved by the Manager, OE&CA or designee.

5.2

[12] Self-Assessments

(a) Each Entergy site performs self-assessments on a routine basis, generally at two-year intervals, to determine if station personnel are using OE information effectively. These self-assessments may be broken into several more targeted assessments versus an assessment which evaluates the entire program. The entire program should be evaluated on a two (2) year basis. A team selected per the guidance of EN-LI-104, “Assessment Process” should perform the review using the guidance found in the procedure.

(b) Assessments should include:

1. A review (sampling) of higher tier 'B' condition reports for missed OE opportunities (failure to learn from previous OE).

2. A sample review of SOER Recommendations on the INPO Annual IER/SOER List and those not on the INPO Annual IER/SOER List. This should include a review of whether the implementation is complete.

(c) Ineffective IER Level 1 (SOER) Recommendations identified during periodic reviews, self-assessments, INPO Evaluations or by other means, should be documented in a CR.

[13] Release OE to the Industry

(a) Each Entergy nuclear site is required to submit event information to the “INPO Plant Events OPEX Reports” forum in the Nuclear Network. This forum is intended for industry personnel to describe operating events, recurring problems, and corrective actions taken in response to plant events.

The Condition Review Group (CRG) or Corrective Action Review Board (CARB) (defined in EN-LI-102) normally recommends which internal events are submitted to INPO.

Entergy shall report any defects of Delta Protection Mururoa Enclosed Suits in a timely manner to the United States nuclear industry through our operating experience process as required by Reference 2.0[14].

OE reports should be made for event information that would prove beneficial to personnel at other stations. Guidance for what types of events should be reported is contained in Attachment 9.2.

5.2[13]

NOTE

The objective of reporting OE is to inform and provide useful information to the industry in a timely manner, with a goal for reporting within 50 days of event occurrence.

(b) If a periodic review indicates a site has a significant number of OE above 50 days such that the station is in the worst quartile of industry performance, corrective actions should be implemented via the CAP program.

(c) The Manager, CA&A should initiate CAs when CRG or CARB determines an OE report is required:

- An action to the OE Coordinator to coordinate release of OE for the event.

(d) The group responsible for the associated condition report disposition should provide the initial draft of the OE with the assistance of the OE Coordinator. The draft release is reviewed by the Manager, OE&CA, site CA&A Manager and Director NSA (and Director, Engineering if applicable). The OE coordinator shall lastly obtain final approval from the GMPO or designee.

(e) Once approved, the site OE Coordinator submits the OE to the Nuclear Network forum. If it is expected that the cause determination will not be competed within 50 days a preliminary OE may be issued. If a preliminary OE is issued, the Manager CA&A should ensure another CA to track issuance of the final OE is generated. An example of an exception to the 50 day goal is for follow-up OEs on fuel failures where it usually takes longer than three (3) months from the point of the discovery of a fuel failure to when the fuel inspection is done during an outage.

Updates to initial release information, such as facts revealed from completed root cause investigations, should be provided to the OE Coordinator as the information becomes available.

(f) Final OE Reports receive the same review as preliminary OE Reports.

(g) All Root Causes relating to plant events should be submitted to INPO. The GMPO should approve not reporting an OE relating to a Root Cause to INPO.

5.2

(h) Security or plant access information should not be communicated to the industry using Nuclear Network OE reports. The Security Department will submit this OE using the NEI system. This includes events or issues involving; Weapons/ammunition, Personnel/vehicle barriers, Alarms/detection, Compensatory measures, Firing range, Access authorization/control, Miscellaneous security equipment, Security Training and Fitness for Duty.

[14] OE into Work Activities

(a) Requirements for OE in work packages should be in accordance with EN-WM-105.

(b) The OE Coordinator should provide relevant OE information for the work activities as requested.

(c) Supervisors responsible for emergent work issues are responsible for obtaining applicable OE for resulting work packages. The OE Coordinator(s) should be contacted if training on OE tools is desired.

[15] OE Outage Handbook

OE coordinators put together Outage Handbooks to address issues related to OE including such items as significant outage evolutions, reactivity control, and maintenance of shutdown cooling and fire protection systems. The outage handbooks will be a compilation of operating experience from the site, the fleet and the industry.

6.0 INTERFACES

[1] EN-AD-101, Procedure Process

[2] EN-FAP-LI-003, CARB Process

[3] EN-LI-102, Corrective Action Process

[4] EN-LI-104, Self Assessment and Benchmark Process

[5] EN-LI-110, Commitment Management Program

[6] EN-LI-118, Root Cause Analysis Process

[7] EN-LI-119, Apparent Cause Evaluation (ACE) Process

[8] EN-WM-105, Work Management Process

7.0 RECORDS

None.

8.0 SITE SPECIFIC COMMMMITMENTS

8.1 OBLIGATIONS AND COMMITMENTS IMPLEMENTED OVERALL

[1] SOER 10-2, Engaged, Thinking Organizations

8.2 SECTION SPECIFIC OBLIGATIONS AND COMMITMENTS

Step	Document	Commitment
ALL	ANSI N45.2.11	2.2.Sent.2(14) (P34631)
5.2[13]	CNRO-2004-0081 dated 12/17/04	(GG-P35475) (WF3-P26788)
5.2[2]	INPO 09-008	N/A
5.2[2]	NEI 09-10	N/A
5.2[2]	SOER 98-02 Rec 2.b	N/A

8.3 SITE SPECIFIC COMMITMENTS

Step	Site	Document	Document or Reference
2.0[7]	ANO	Commitment	P10487
5.2.[4](c)	ANO	Commitment	P8060
5.0	WF3	Commitment	P15300
5.0	WF3	Commitment	P15301
5.2[1](b), 5.2[8] & 5.2[9]	WF3	Commitment	P15303
5.2.1b	WF3	Commitment	P15298
5.2[13]	WF3	Commitment	P26788
ALL	WF3	Commitment	P2273
ALL	ENS Sites	Commitment	P34631
ALL	GGNS	UFSAR_Commitment	18.1.12. Response Para 2 - P-22975
ALL	GGNS	UFSAR_Commitment	18.1.7, P-22951
ALL	All	NUREG-0737_I.C.5	W3, GGNS, RB & ANO -P23723 & P23729
			IP2 – EN-OE-100 replaces SAO-420, NUREG-0737_Commitment (Letter #81-37, dated 2/26/81, John D. O'Tool to Darrell G. Eisenhut (Item I.C.5)

			JAF - NMM procedure Section – EN-OE-100 (R0) replaces AP-03.14 (R2) **VY – EN-**OE-100 replaced AP0028, refer to NRC letter dated 12/15/81.
ALL	IP2	NRC Inspection 50-247/93-10	OE-100, Rev. 0 Section 5.2 replaces SAO 420, Rev. 14, Section 4.1.1
ALL	IP3	Commitment	COM-80-02129
ALL	IP3	Commitment	COM-80-02178
ALL	IP3	Commitment	COM-83-02673
ALL	IP2	Commitment	NL-85-A11-C01
ALL	IP2	Commitment	NL-81-A37-C04
ALL	IP2	Commitment	NL-85-A37-C01
5.2[2](e)	IP2/IP3	Entergy to NRC letter NL-10-022, dated March 9, 2010	Reply to NOV EA-09-296
ALL	PLP	Generic Letter 90-03: Relaxation of Staff Position in Generic Letter 83-28, Item 2.2, PART 2, Vendor Interface for Safety- Related Components	Palisades CMT912000834
5.2[2](e)	PNP	Entergy to NRC letter dated March 4, 2010	Reply to NOV EA-10-3

9.0 ATTACHMENTS

9.1 OE Screening and Priority Codes

9.2 OE Release Guidance

9.3 OE Prioritization Guidance Matrix

9.4 OE Evaluation Template

9.5 Internal Fleet OE

9.6 IER Level 1 (SOER) Response Template

9.7 IER Level 1 (SOER) Effectiveness Review Template

9.8 IER Level 2 Effectiveness Review Template

9.9 Typical IER Review Cycle

9.10 IER Impact Review

ATTACHMENT 9.1 **OE SCREENING AND PRIORITY CODES**

Sheet 1 of 1

The following codes are used to identify the screening classification of specific OE documents as they are entered into the OE database. Attachment 9.3, OE Prioritization Guidance Matrix, may be used to assist in identifying the correct screening priority.

A. Evaluation Required.

1. Priority 1: Adverse Condition. This priority is assigned to a document that has a potential plant impact with a high probability of occurrence and a high potential for adverse consequences.

   Evaluation documents in this category require the initiation of site-specific or Nuclear Headquarters condition reports, in accordance with EN-LI-102 or equivalent station corrective action procedure.

2. Priority 2: Potential Impact. This priority is assigned to documents that have potential plant impact, but an evaluation is required to determine if an adverse condition exists. Evaluations in this category require the initiation of an OE written review. To ensure a timely determination of plant impact, OE written reviews should be assigned due dates not to exceed 90 days. Items that are determined to be potentially significant or sensitive can be fast tracked (i.e., Red Flagged OE) and require responses to the OE written review in a time frame that is determined by the significance of the issue identified. A “Red Flagged” OE item is responded to in less than two (2) weeks. Extensions past the 90 day due date require the approval of the Manager-OE&CA. If an OE written review determines that the OE document (in question) represents an adverse condition for the site, then a Priority 1 evaluation is initiated, and the OE written review is closed - referencing the resulting condition report.

B. Useful for Site Awareness.

1. Typically sent to OE POC
2. Saved into OE Just-in-Time folder.

C. Not Applicable.

1. Contains No Information that Requires Action (includes updates, retractions, and repeat reports with no useful info).
2. No Cause Identified.
3. Different Reactor Type, Manufacturer, or Plant Specific Issue. (Includes instances of components or processes “not used” or “not found” at referenced plant).
4. Previously Evaluated or Covered by Another Document.

ATTACHMENT 9.2 **OE RELEASE GUIDANCE**

Sheet 1 of 2

From INPO 10-006, events considered for sharing OE messages include:

- Important to nuclear, public, and personnel safety, including events of direct consequence or with high potential of consequence under slightly different circumstances
  - Events that could lead to serious degradation of operating safety margin.
  - Events that affect reactivity management, core reactivity, core cooling, ~~or~~ decay heat removal, or spent fuel pool cooling
  - Significant personnel injuries or life-threatening situations.
  - Critical component failures
  - Consequential human errors
  - Fission product barrier breaches
  - Radiological events such as the following:
    - events that result in unplanned or unauthorized exposure greater than 50 millirem total effective dose equivalent or greater than 1 percent of any other regulatory limit
    - near misses or violations of high radiation or locked high radiation area controls
    - contamination found in a clean plant system
    - radioactive material outside of the protected area
    - noncompliance with radioactive material shipping requirements
    - equipment deficiencies that could cause inaccurate radioactivity measurements
    - insufficient control of high risk work such as diving, radiography, or handling of highly radioactive components that contributes to actual or potential unplanned dose, over exposure, or contamination events

- Important to generation capability

,

  - Transients, including reactor scrams, main turbine trips, main generator trips feedwater control malfunctions, and other similar problems
  - Equipment malfunctions or human errors.
  - Major equipment damage.
  - Frequent or extended outages
  - Chemistry events or transients requiring operation at reduced power or shutdown

- Important to operating plant construction or modification quality
  - Events that could adversely affect construction or modification quality
  - Events that could seriously affect the project construction schedule, including rework
  - Material deficiencies that may be widespread among projects
  - Deficiencies that may adversely impact system or component operability, resulting from weaknesses in the modification process

- Events with important generic implications (for example, training and accreditation, materials initiative, testing, and emergency planning)
  - Deficiencies in areas such as design, analysis, testing, or procedures.
  - Component failures.
  - Fraudulent or counterfeit construction materials or parts
  - Events involving discovery of information significantly different from what was assumed to be an industry norm.
  - Unique solutions to known industry operational and construction problems that could benefit other utilities
  - Transients that required extraordinary actions to terminate even though actual consequences were minor.

ATTACHMENT 9.2 **OE RELEASE GUIDANCE**

Sheet 2 of 2

- Events for which a comprehensive root cause investigation was performed, and for which the lessons learned would be beneficial to the industry to know had the event occurred at another station; root cause reports should be submitted separately from the operating experience reports

- Actual classified emergencies
  - Deficiencies in areas such as emergency plan implementation, facility activation, and risk-significant activities
  - Unique solutions to problems with the implementation of the station emergency plan
  - events required to be reported in IER Level 1 recommendations, such as:
    - SOER 03-2, *Managing Core Design Changes*, Recommendation 1.b

      Notify the industry through Nuclear Network of adverse reactor core or fuel performance events. Include evidence of fuel leakage (including minor leaks), core performance prediction shortfalls, malfunctions of core components or rod control systems, or deficiencies found in the core design process. This notification should occur as soon as practical, consistent with SEE-IN program reporting guidelines. The reporting criteria should be conservative in that events are reported even if causal analysis is incomplete or if the significance of an event initially appears minimal.

    - SOER 99-1 Addendum, *Loss of Grid – Addendum*, Recommendation 8

      Identify and report equipment problems and vulnerabilities associated with plant switchyards through the operating experience program, to enable nuclear plants to better understand the problems occurring with switchyard equipment.

    - SOER 07-2, *Intake Cooling Water Blockage*, Recommendation 1b

      Ensure that lesson learned that had adverse impact on intake structures, systems and components are shared with the industry. Examples of issues needing to be reported as OE are 1) Potential blockage of intake cooling water, for example accumulations of aquatic life (algae, seaweed and other grasses, mussels, jelly fish, shrimp and fish), frazil ice, depositions of sand and silt 2) Potential blockage or fouling of safety-related cooling systems when materials that were smaller than the intake screen mesh size enter plant systems. For example, crude oil ingress increased the potential to foul heat exchangers.

Security-related events should be reported to the Nuclear Energy Institute (NEI) using a Security Operating Experience Report. These events should not be reported to INPO.

ATTACHMENT 9.3 **PRIORITIZATION GUIDANCE MATRIX GUIDE**

Sheet 1 of 1

This is an optional guide for use in screening OE

OPERATING EXPERIENCE SIGNIFICANCE		OE RELEVANCE				
		Events concerning: Failure or Significant Degradation or Process Failure rendering a System Inoperable or Unavailable; Significant Personnel Safety Issues	Events concerning: Failure or Significant Degradation or Process Failure with System remaining Operable & Available	Events concerning: Component Degraded or Non-Significant Component or Process failures	Events concerning: Hoist, M&TE, Shop Work, Enhancement Modifications, Pre-outage, Industrial Safety Issues	Events concerning: Buildings & Support Systems, Grounds, Tools Site Betterment
EVENT RESULTING IN:	**Multiplier**	**10**	**8**	**6**	**5**	**4**
• Technical Specification AOT/LCO Entry • Regulatory Non-compliance • Maintenance rule risk significant system function affected	10	100	80	60	50	40
• Risk to or loss of generation (Turbine Trip or SCRAM) • Significant: ▪ Personnel Safety Concern (OSHA Reportable) ▪ Control Room Deficiency ▪ Security Deficiency • Control Room Annunciator • Key System Health Issue • Fire Impairment	9	90	72	54	45	36
• ALARA or Equip Safety Concern • Regulatory Compliance Threat • Plant Duty Manager Required Action • Personnel Safety Concern (OSHA Recordable)	8	80	64	48	40	32
• Operator Burden • Operator workaround • Out Of Spec Reading • Ops Concern	7	70	56	42	35	28
• All other maintenance rule systems • Non-significant Control Room Deficiency	6	60	48	36	30	24
• Balance of Plant Systems	5	50	40	30	25	20
• Minor Security issue • Minor Safety or ALARA issue	4	40	32	24	20	16
• Building & Structures & Support Systems	3	30	24	18	15	12
• Grounds • Tools • All other	2	20	16	12	10	8

PRI*	
1	**Red (100-90)** = A1 or A2
2	**Yellow (89-70)** = A2
3	**White (69- and Lower)** = B1 FYI only

The Following Items Always Require An A1 Or A2 Response:
- INPO IER Documents
- NRC Part 21

*priority color refers to boxes above.

ATTACHMENT 9.4 **OE EVALUATION TEMPLATE**

Sheet 1 of 1

(See Procedure for description of each Section)

OE written review or Document Number & CA:	Assigned Owner Department / Responsible Individual:
Document No. & Title:	
During the evaluation, if site specific vulnerabilities are identified, consult EN-LI-102 and initiate a Condition Report, if applicable, for corrective actions	

I. ***Vulnerability*** *This includes a summary of what the OE document is concerned about. Include both the specific issue, and the generic issues, as an event at one type of plant design may have generic implications affecting all plant designs. This summary should be in the context of the OE document, with no mention of the plant doing the review. Minimize cutting & pasting from the OE document under review. Your own words are preferred in order to demonstrate internalization and understanding of the OE.*

II. ***Susceptibility*** *This should include a discussion of the plant being reviewed.*
☐*Yes or* ☐*No; Is the plant/fleet susceptible to the concern(s) expressed in the document?*
The answer could be 'Yes' but is managed effectively based on the discussion in the "Barriers" section.

If the answer is "No", state the reason the OE is not applicable. (I.e., The plant/fleet does not have the same system, or even a similar system, or concern? The specific technical issue, as well as any "generic implications" should be reviewed. Address IER Level 2 and 3 "Lessons Learned" and "Questions to Consider" here. If in the "Susceptibility" analysis, an issue of non-conformance or condition adverse to quality is identified, a CR shall be initiated and the ***Operability/Reportability*** *review shall be performed. In the CR Description, identify that review of this OE precipitated the CR. The "Susceptibility" review should be based on programmatic or system/component design Considerations and not based on past performance of the system/component.*

III. ***Barriers***

- *If the "Susceptibility" answer is "Yes", and a CR in not written, "Barriers" should be effectively managing the "Vulnerability". Describe these "Barriers". As needed, look at plant CRs or other data to validate that existing "Barriers" manage the" Vulnerability". As needed, validate that procedures include the appropriate Barrier(s).*
- *If the "Susceptibility" answer is "No", this section may be N/A given the response provided in the "Susceptibility" Section.*

If in the "Barrier" analysis, an issue of non-conformance or condition adverse to quality is identified, a CR shall be initiated and the Operability/Reportability review shall be performed. In the CR Description, identify that review of this OE precipitated the CR.

The "Barrier" analysis should focus on:

a) What barriers are currently in place?
b) What barriers need to be strengthened?
c) What new barriers need to be put in place? (This most likely should result in a Site or HQN CR)

IV. ***Actions***
Identify any action that results from the evaluation. These are typically enhancement actions or additional evaluation actions. If any of the actions address an issue of non-conformance or condition adverse to quality is identified, a CR shall be initiated and the Operability/Reportability review shall be performed. In the CR Description, identify that review of this OE precipitated the CR.

OE Written Review Evaluator (Approval documented in PCRS)_____

Manager Review (INPO OE Documents ONLY - Review documented in PCRS) _____

CRG or CARB Review Required for Fleet Learnings / CARB or IER Review Board Required for IER Level 2 and for those IER Level 3 and 4 Documents determined by the Responsible Manager to require CARB review.

Review documented in PCRS; Identify CA No._____

Approvals may be documented in PCRS. / This form is not used for IER Level 1 Documents.

ATTACHMENT 9.5 **INTERNAL FLEET OEs**

Sheet 1 of 1

The following should initiate a fleet OE to be considered for sharing (reference EN-OM-128):

Equipment Problems / Plant Events:

1. Unscheduled shutdown
2. Entry into the emergency plan
3. Serious personnel injury or personal illness that requires transportation by ambulance to the hospital
4. A personnel injury that will likely result in a recordable injury
5. Fire Brigade mobilized in response to actual fire
6. Any event that will likely cause news media interest or coverage
7. Notification of any off-site agency
8. Unplanned LCO that requires a unit shutdown within the next 72 hours
9. Unplanned power reduction greater than 25 MWe
10. Any event or equipment malfunction that could threaten plant reliability or availability (loss of greater than 25 MWe) within the next 72 hours
11. Unplanned entry into Emergency Operating Procedures
12. Significant security threats or incidents
13. Any unanticipated spill or other radioactive material incident that results in contamination of an area greater than 500 square feet or unanticipated radiological conditions that require posting an airborne area (other than due to noble gases)
14. Any event that results in an unmonitored release of radioactive material
15. Any event that results in unplanned internal exposure that could result in dose assignment
16. Any event that results in an unplanned individual radiation exposure (TEDE) > 100mrem
17. Any uncontrolled radioactive material discovered outside the
18. Discovery of personnel or material inadvertently released from an Entergy site with detectable radioactivity
19. Violation of any safety limit
20. Reactivity event (Level 1, 2 or 3 as defined in EN-OP-103)
21. Mobilization of the HAZMAT response team to actual spill on-site
22. Unplanned ESF actuation

Process Issues:

1. Each Area for Improvement from INPO Evaluations or WANO Peer Reviews.
2. All NRC Substantive Cross-Cutting Issues
3. All NRC violations characterized as greater than Green
4. All LERs issued.
5. Significant Events, typically Category A CRs, as deemed appropriate by the individual site CRG or CARB. Not all Category A CRs are expected to be shared using this process, however, those with particularly significant consequences should be shared.
6. Other issues as chosen by site or headquarters CRG or CARB

ATTACHMENT 9.6 **IER LEVEL 1 (SOER) RESPONSE TEMPLATE**

Sheet 1 of 4

INITIAL IER Level 1 (SOER) RESPONSE

STATION RESPONSE TO

IER Level 1 (SOER) No. _____

TITLE _____

Tracked by CR No._____

Prepared by:

Site IER Level 1 (SOER) Sponsor_____

Site IER Level 1 (SOER) Response Leader_____

(Team Members Names – Departments)

Name	Department

IER Level 1 (SOER) Team Lead:_____/_____
Print/Signature Date

IER Level 1 (SOER) Board Approval Date: _____

Site IER Level 1 (SOER) Sponsor: _____/_____
Print/Signature Date

UPDATED IER Level 1 (SOER) RESPONSE

STATION RESPONSE TO

IER Level 1 (SOER) No. _____

TITLE _____

Tracked by CR/ OE Written Review No._____

Prepared by:

IER Level 1 (SOER) Sponsor_____

IER Level 1 (SOER) Response Leader_____

Applies to the Following Recommendations:

Rec.:_____ Rec. Owner (Name/Dept): _____

Rec.:_____ Rec. Owner (Name/Dept): _____

Rec.:_____ Rec. Owner (Name/Dept): _____

Rec.:_____ Rec. Owner (Name/Dept): _____

IER Level 1 (SOER) Board Approval Date: _____

IER Level 1 (SOER) Sponsor: _____/_____

Print/Signature Date

ATTACHMENT 9.6 **IER LEVEL 1 (SOER) RESPONSE TEMPLATE**

Sheet 3 of 4

Executive Summary for Entire IER Level 1 (SOER)

Provide to management an overall summary of the conclusion of the SOER in regards to the station meeting the intent of the SOER recommendations. Provide a summary of any new actions necessary to meet the requirements for each recommendation.

ATTACHMENT 9.6 **IER LEVEL 1 (SOER) RESPONSE TEMPLATE**

Sheet 4 of 4

Evaluation of IER (Level 1(SOER) Recommendation

Complete for each recommendation the results of the teams review for each recommendation. Provide existing defenses to avoid occurrence and identify corrective actions necessary to implement the intent of the recommendation.

IER (Level 1(SOER) No. **CR No.**

Title: **Recommendation #**

1. Text of IER (Level 1(SOER) Recommendation:

2. Implementation Status (Check one)

☐ **Fully Implemented** – All corrective actions are in place to address the areas (s) for improvement identified in the recommendation)

☐ **Implementation in Progress** – The station is in the process of identifying and/or implementation corrective actions to address the areas (s) for improvement identified in the recommendation.

☐ **Not Applicable** – the area(s) for improvement identified in the recommendation is not applicable to the station.

3. IER (Level 1(SOER) Recommendation Disposition

(Summarize station processes, training, procedures, or the corrective action (s) the station has taken or is in the process of implementing to address the area(s) for improvement identified in the recommendation. Any new corrective actions required are identified here.)

4. References

(Identify appropriate plant reference documents such as procedures, lesson plans, etc., by document number that implement the station response to the recommendation)

5. Corrective Actions:

List each action required to meet the intent of the SOER. Each corrective action initiated will include reference to the recommendation and include enough detail to address the intent of the action

6. Contact (SOER Recommendation Owner)

(Specify the individual, title, phone number, e-mail address, and department who can be contacted to discuss the station response to the recommendation)

ATTACHMENT 9.7 **IER LEVEL 1 (SOER) EFFECTIVENESS REVIEW TEMPLATE**

Sheet 1 of 1

IER Level 1 No.	Recommendation No.	
Prepared by:	Date	Tracking Document:

The purpose of this effectiveness review is to assess whether the implementation of this recommendation prevented recurrence of the issue identified in the IER Level 1 (SOER). Please complete this form to document the effectiveness review. *Ensure the SOER recommendation evaluation guidelines and special considerations are reviewed and evaluated when determining if the defenses or actions are still in place. INPO may have implemented a new guideline or revised an existing one.*

1. Are the defenses or actions taken to satisfy or implement this Recommendation still in place? (For IER Level 1 *(SOER). identify all supporting documents, procedures, lesson plans, etc. that may support the review as applicable*)

   ☐Yes ☐No ☐N/A

   Explain:

2. Does a review of station performance (*CRs, RCE 's, ACE's)* determine that defenses or actions taken in Item 1 above are effective and that no performance issues exist?*, Key words to aid in performing searches can be found at the end of the* IER Level 1 *(SOER*) ☐Yes ☐ No ☐N/A

   Explain how you know defenses or actions taken are effective? Include a copy of the PCRS search or other documentation review(s).

3. Does a review of station performance (*QA Audits, Station NRC Inspection Reports, performance indicators, self-assessments, trend reports, etc. as applicable.*) determine that defenses or actions taken in Item 1 above are effective? ☐Yes ☐No ☐N/A

   Explain how you know defenses or actions taken are effective? Include a copy of the self-evaluation, assessment, or other effectiveness review (s) performed.

4. For IER Level 1 (SOER) documents, are the procedure changes made in response to the Recommendations still active in procedures and are the IER Level 1 (SOER) commitments still flagged in the procedure? Is the intent of the recommendation still implemented in the procedure? (N/A if no procedures were changed.)

   ☐Yes ☐No ☐N/A

   Explain:

5. Does a review of the recommendations INPO SOER Evaluation Guideline indicate no additional actions are needed to effectively implement the SOER recommendation? ☐Yes ☐No ☐N/A

   Explain:

6. Describe any actions that the station has taken as a result of this effectiveness review. (*Identify any Condition Report(s) that was initiated as a result of this action or any* IER Level *1 (SOER) Recommendation commitment that credits a procedure action or requirement that is flagged as an IER Level 1 (SOER) commitment*)

   In summary the corrective actions are considered:
   ☐Effective - No further Actions required.
   ☐Indeterminate - Reschedule effectiveness review. New due date_____
   - The corrective actions are effective if all the questions are answered Yes or N/A
   - The corrective actions are ineffective if any question is answered No
   - A new Corrective Action is needed if any question is answered "No."

Review: IER Level 1(SOER) Recommendation/ IER (SER/SER Owner) (Print/Sign/Date)(N/A if prepared by Rec. Owner):

_____

Review and Approval – IER Level 1 (SOER) Sponsor/(IER) SEN or SER Owner's Manager (Print/Sign/Date):

_____

IER Level 1 (SOER) *Board Approval* ☐Yes ☐No:_____

Approvals may be documented in PCRS; SOER Board Approval is required for IER Level 1 (SOER) Effectiveness Reviews

ATTACHMENT 9.8 **IER LEVEL 2 EFFECTIVENESS REVIEW TEMPLATE**

Sheet 1 of 1

IER Level 2 No.	Recommendation No.	
Prepared by:	Date	Tracking Document:
The purpose of this effectiveness review is to assess whether the implementation of this recommendation prevented recurrence of the issue identified in the IER Level 2 (SEN & SER). Please complete this form to document the effectiveness review.		

1. Are the defenses or actions taken to satisfy or implement this IER still in place? i*dentify all supporting documents, procedures, lesson plans, etc. that may support the review as applicable*)

   ☐Yes ☐No ☐N/A

   Explain:

2. Does a review of station performance (*CRs, RCE's, ACE's)* determine that defenses or actions taken in Item 1 above are effective and that no performance issues exist?*,* ☐Yes ☐No ☐N/A

   Explain how you know defenses or actions taken are effective? Include a copy of the PCRS search or other documentation review(s).

3. Does a review of station performance (*QA Audits, Station NRC Inspection Reports, performance indicators, self-assessments, trend reports, etc. as applicable.*) determine that defenses or actions taken in Item 1 above are effective? ☐Yes ☐No ☐N/A

   Explain how you know defenses or actions taken are effective? Include a copy of the self-evaluation, assessment, or other effectiveness review (s) performed.

4. Is the intent of the recommendation still implemented in any procedure changes that were made as a result of this IER? (N/A if no procedures were changed.)

   ☐Yes ☐No ☐N/A

   Explain:

5. Describe any actions that the station has taken as a result of this effectiveness review. (*Identify any Condition Report(s) that were initiated.*

   In summary the corrective actions are considered:
   ☐Effective - No further Actions required.
   ☐Indeterminate - Reschedule effectiveness review. New due date_____
   - The corrective actions are effective if all the questions are answered Yes or N/A
   - The corrective actions are ineffective if any question is answered No
   - An new Corrective Action is needed if any question is answered "No."

Review: IER Level 2 (SER/SER Owner) (Print/Sign/Date)

_____

Review and Approval – IER Level 2 (SER/SER) Owner's Manager (Print/Sign/Date):

_____

CARB/IER Review Board Approval ☐Yes ☐No:_____

Approvals may be documented in PCRS

ATTACHMENT 9.9 **TYPICAL NEW IER REVIEW CYCLE**

Sheet 1 of 2

IER Level 1			
Action Owner	**Actions**	**Time[4]**	**CA Assigned to:**
Fleet OE&CA Manager together with VP Nuclear Support or GM Nuclear Support	Assign Fleet IER Level 1 Sponsor	5 days	
OE Coordinator	• Screens IER Level 1 • Issues HQN CR • Issues Site CR	10 days	
Fleet IER Level 1 Sponsor & Site VPs	Assigns Site IER Level 1 Sponsors	14 days	[1] Fleet IER Level 1 Sponsor
Fleet IER Level 1 Sponsor	• Defines Fleet Core Team	21 days	[1] Fleet IER Level 1 Sponsor
Site Level 1 IER Sponsors	• Identifies IER Recommendation Owners	21 days	[1] Site IER Level 1 Sponsor
Sr. Site Leadership	• Sr. Site Leadership to communicate the IER to their respective organizations	30 days	[1] Site IER Level 1 Sponsor
Fleet Core Team	• Develop IER Level 1 Fleet Recommendation Plan (i.e., GAP Analysis) • Preliminary Definition of Corrective Actions • Complete Attachment 9.6 (Fleet Template) • Identify Vulnerabilities • Recommend actions and assign owners	42 days	
Fleet IER Level 1 Sponsor & Site Level 1 IER Sponsors	• Coordinates Responses		
Site IER Level 1 Rec Owners	• Evaluate the new IER Level 1 recommendations to determine Site impacts • Determine if the recommendations are satisfactorily addressed or if additional corrective actions are warranted.	56 days	
Site IER Level 1 Lead	Compiles Site responses (prepared IER Level 1 Report)	66 days	
Site IER Level 1 Sponsor	Site IER Sponsor Approval to present to Board	73 days	
OE Coordinator	Issues CA for Effectiveness review	75 days	OE Coordinator
Site IER Level 1 Board	IER Level 1 Board Approval	80 days	[2] Site IER Level 1 Sponsor
Fleet Core Team	**Review Final Site approved IEL Level 1 Responses to ensure consistency**	**87 days**	[1] Fleet IER Level 1 Sponsor
Sr. Executives	Sr. Executives to concur on final IER level 1 responses	87 days	[1] Fleet IER Level 1 Sponsor
Site IER Level 1 Board	**Defines Corrective Actions**	**90 days**	[1] Fleet IER Level 1 Sponsor
Site IER Level 1 Sponsor/Site VP	**Transmits Corrective Actions to INPO**	**150 Days**	[1] Fleet IER Level 1 Sponsor
Site IER Level 1 Rec Owner	Issue actions from IER Level 1 Recommendation Plan	150 Days	
Individuals assigned IER Level 1 Actions	Completes Actions		[2] Senior Manager for approval
Site OE Coordinator	Update IER Level 1 Database		
Site IER Level 1 Owner	IER Level 1 Initial Effectiveness Review (with CARB approval)	2 Years	[2] Site IER Level 1 Sponsors (LO-CA)

[1] Assigned by CA&A when IER Level 1 Fleet Sponsor is identified
[2] Assigned by Fleet Sponsor when IER Level 1 Site Sponsor is identified
[3] Assigned when Owner is identified
[4] Time from issue date of IER

ATTACHMENT 9.9 **TYPICAL NEW IER REVIEW CYCLE**

Sheet 2 of 2

IER Level 2			
Action Owner	**Actions**	**Time[4]**	**CA Assigned to:**
Responsible Manager	Prepare IER Level 2 response	75 days	Responsible Manager
Sr. Site Leadership	Sr. Site Leadership to communicate the IER to their respective organizations	30 days	Site IER Level 2 Sponsor
OE Coordinator	Issues CA for Effectiveness review	75 days	OE Coordinator
Fleet IER Level 2 Owner	Review Response to ensure consistency across the fleet	90 days	Fleet IER Level 2 Owners
Site Training Manager	Determine training requirements	90 days	Site Training Manager
Responsible Manager	Obtain IER Review Board/CARB Review	100 Days	Responsible Manager
Responsible Manager	Define Corrective Actions	120 Days	Responsible Manager
Responsible Manager	Enter Corrective Actions into PCRS and communicate to INPO	145 Days	Responsible Manager

IER Level 3			
Action Owner	**Actions**	**Time[4]**	**CA Assigned to:**
Fleet IER Level 3 Owner	Hold fleet call to discuss approach to response to ensure consistency across the fleet	30 days	OE Action – Fleet IER Level 3 Owner
Responsible Manager	Prepare IER level 3 response	90 days	Responsible Manager
Responsible Manager	Obtain IER Review Board/CARB Review (if required)	120 Days	Responsible Manager

IER Level 4			
Action Owner	**Actions**	**Time[4]**	**CA Assigned to:**
Responsible Manager	Prepare IER level 4 response	90 days	Responsible Manager
Responsible Manager	Obtain IER Review Board/CARB Review (if required)	120 Days	Responsible Manager

[4] Time from issue date of IER

ATTACHMENT 9.10 **IER IMPACT REVIEW**

Sheet 1 of 6

This Impact Screening is intended to prompt the reviewer when performing his/her review of INPO IERs. This is a non quality document and need not be attached to the IER review. Any Question that has a "Yes" for Potential Impact should be further evaluated to ensure there is no impact or a condition report should be written.

CR No._____ **INPO IER No.:** _____ **Rev. No.:** _____

DESIGN ENGINEERING DISCIPLINES	Potential Impact	
Civil / Structural Design Engineering • Does the proposed activity involve any civil / structural (including seismic) design changes, activities or affect coatings? OR Does the proposed activity involve any piping engineering design changes or activities?	☐ YES	☐ NO
Electrical Design Engineering • Does the proposed activity involve any station or switchyard electrical design or settings changes or activities?	☐ YES	☐ NO
Instrumentation and Controls Design Engineering • Does the proposed activity involve any I&C design or settings changes or activities?	☐ YES	☐ NO
Mechanical Design Engineering • Does the proposed activity add/remove/replace insulation, aluminum or other metallic/non-metallic sources of debris in the reactor/containment building or involve any mechanical design changes or activities?	☐ YES	☐ NO
PSA Engineering • Does the proposed activity impact or involve changes to plant evaluations or probabilistic safety assessments?	☐ YES	☐ NO
Nuclear Analysis • Does the proposed activity impact or involve changes to plant evaluations, Technical Specifications, Technical Requirements Manual, or require a full 50.59 Evaluation?	☐ YES	☐ NO

ATTACHMENT 9.10 **IER IMPACT REVIEW**

Sheet 2 of 6

DESIGN ENGINEERING PROGRAMS	Potential Impact	
ASME Section III Specifications • Does the proposed activity add, delete, or modify information required by ASME Section III to be contained in a design specification?	☐ YES	☐ NO
Cable and Raceway Program • Does the proposed activity involve any changes to cable trays, raceways or the associated documentation?	☐ YES	☐ NO
Electronic Databases (EDB) • Does the proposed activity involve any changes to electronic databases?	☐ YES	☐ NO
EQ Program (10CFR50.49, NUREG 0588, Reg Guide 1.89) • Does the proposed activity involve any new or existing EQ components?	☐ YES	☐ NO
Hydrogen Control Program (10 CFR 50.44) (*if applicable*) • Does the proposed activity impact equipment or materials related to hydrogen control?	☐ YES	☐ NO
Human Factors Program • Does the proposed activity involve control panel design including layout and labeling, visual displays, operator aids, auditory signals or environment in the control room, cable spreading room, and other control panel locations?	☐ YES	☐ NO
Margin Management • Does the proposed activity impact or involve any change to design, licensing or operations margins?	☐ YES	☐ NO
Reg. Guide 1.97 / PAM (Post Accident Monitoring) • Does the proposed activity involve Reg. Guide 1.97 (Post Accident Monitoring) Indications?	☐ YES	☐ NO

MAINTENANCE	Potential Impact	
Electrical Maintenance • Does the proposed activity require an Electrical Maintenance review to identify affected procedures, required actions and required training?	☐ YES	☐ NO
I&C Maintenance • Does the proposed activity require an I&C Maintenance review to identify affected procedures, required actions and required training?	☐ YES	☐ NO
Mechanical Maintenance • Does the proposed activity require a Mechanical Maintenance review to identify affected procedures, required actions and required training?	☐ YES	☐ NO

NUCLEAR ENGINEERING	Potential Impact	
Nuclear Fuel Design • Does the proposed activity impact or involve the design, performance or storage of nuclear fuel?	☐ YES	☐ NO
Reactivity Management Program • Does the proposed activity impact or involve the reactor system, reactor controls, reactor chemistry, related systems, potential core and spent fuel damage, spent fuel, reactor coolant pressure boundary or reactor system procedures?	☐ YES	☐ NO

ATTACHMENT 9.10 **IER IMPACT REVIEW**

SHEET 3 OF 6

PROCESS OR PROGRAM IMPACT SCREENING CHECKLIST	Potential Impact	
Computer Support and Software • Does the proposed activity impact or involve changes to plant computer software or firmware or impact Software Quality Assurance (SQA)?	☐ YES	☐ NO
Chemistry and Environmental Impact • Does the proposed activity impact or involve any changes to plant chemistry requirements, operations or procedures, or any changes to the environment?	☐ YES	☐ NO
Radiation Protection (RP) Program Impact • Does the proposed activity impact or involve any changes to the RP program?	☐ YES	☐ NO
Operations • Does the proposed activity impact or involve changes to Operations procedures, training or operator actions?	☐ YES	☐ NO
Planning, Scheduling and Outage (PS&O) • Does the proposed activity require a PS&O review to identify required design and installation information?	☐ YES	☐ NO
MP&C (Inventory) • Does the proposed activity impact or involve any addition or removal of equipment from the inventory? • Does the proposed activity impact or involve any Procurement of Quality or Augmented Quality material from non-qualified suppliers**?**	☐ YES	☐ NO
Procurement Engineering • Does the activity impact or involve any procurement activities?	☐ YES	☐ NO

PROGRAMS AND COMPONENTS	Potential Impact	
ASME Containment In-service Inspection (IWE / IWL) Program • Does the proposed activity impact or involve the containment pressure boundary or associated moisture barriers or a support for the containment pressure boundary? This includes “software only” changes that do not physically change the hardware such as re-rating of pressures or temperatures to include changes to documented information on these items or additional documented information for these items. • Does the proposed activity limit access to containment surfaces for inspection? • Involve disassembly of a bolted connection which forms a portion of the containment boundary?	☐ YES	☐ NO
ASME Appendix J (Primary Containment Leak Rate Testing) Program • Does the proposed activity impact or involve any changes to primary containment leak rate testing?	☐ YES	☐ NO

ATTACHMENT 9.10 **IER IMPACT REVIEW**

SHEET 4 OF 6

PROGRAMS AND COMPONENTS (CONTINUED)	Potential Impact	
ASME In-service Inspection (ISI) Program • Does the proposed activity add, delete, or modify an ASME Section XI pressure boundary item or a support for an ASME Section XI pressure boundary item? This includes "software only" changes that do not physically change the hardware like such as re-rating of pressures or temperatures. (ASME Section XI items include ASME Class 1, 2, 3, or B31.1 treated as ISI Class 2 or 3 (T2 and T3) components, parts, or appurtenances such as pipe or pressure vessel walls, valve bodies and pump casings.	☐ YES	☐ NO
ASME Section XI Repair / Replacement Program • Does the proposed activity involve any mechanical component within the ASME XI program / boundaries? Does the proposed activity add, delete, or modify an ASME Section XI pressure boundary item or a support for an ASME Section XI pressure boundary item? (ASME Section XI items include ASME Class 1, 2, 3, MC, and CC, as well as B31.1 treated as ISI Class 2 or 3 (T2 and T3) components, parts, or appurtenances such as pipe or pressure vessel walls, valve bodies and pump casings).	☐ YES	☐ NO
ASME In-service Testing Program • Does the proposed activity impact or involve any item (safety related or non safety related) that may affect the performance or testing of a safety related pump or valve? • Does the proposed activity impact the function or functional classification of any pump or valve as stated in the IST program documents?	☐ YES	☐ NO
Air Operated Valve (AOV) Program • Does the proposed activity impact or involve the design, operation or testing of AOVs?	☐ YES	☐ NO
Buried Piping and Tanks (BP&T) Program • Does the proposed activity impact or involve any changes to piping, coatings, or cathodic protection of Buried Piping & Components?	☐ YES	☐ NO
Boric Acid Corrosion (BAC) Program • Does the proposed activity impact or involve any increase in the likelihood of boric acid formation or corrosion?	☐ YES	☐ NO
Check Valve Program • Does the proposed activity impact or involve the design, operation or testing of check valves?	☐ YES	☐ NO
Control Room Habitability Program • Does the proposed activity impact or involve changes that affect the temperature or radiological environmental conditions in the Main Control Room?	☐ YES	☐ NO
Electrical Circuit Breaker, Relay and Electrical Equipment Testing • Does the proposed activity impact or involve changes to the functional testing of circuit breaker, relay or electrical equipment?	☐ YES	☐ NO

ATTACHMENT 9.10 **IER IMPACT REVIEW**

SHEET 5 OF 6

PROGRAMS AND COMPONENTS (CONTINUED)	Potential Impact	
Flow Accelerated Corrosion (FAC) Program • Does the proposed activity involve any changes (e.g.: configuration, velocity, flow rate, pressure, temperature, material, weld location, etc.) to piping systems included in the FAC Program.?	☐ YES	☐ NO
Heat Exchanger Program • Does the proposed activity impact or involve the design, operation or testing of a component in the heat exchanger program?	☐ YES	☐ NO
Predictive Maintenance Program • Does the proposed activity impact or involve any aspect of the storage, use and testing of lubricants? • Does the proposed activity involve thermography? • Does the proposed activity involve vibration monitoring?	☐ YES	☐ NO
Microbiological Induced Corrosion (MIC) Program Impact • Does the proposed activity involve piping containing untreated or stagnant water or open to the atmosphere?	☐ YES	☐ NO
Motor Operated Valve (MOV) Program • Does the proposed activity impact or involve the design, operation or testing of MOVs?	☐ YES	☐ NO
Plant Thermal Performance Program • Does the proposed activity impact or involve plant thermal performance?	☐ YES	☐ NO
Preventive Maintenance Program • Does the proposed activity impact or involve periodic testing or performance of SSCs? or • Does the proposed activity add, modify or delete any Environmental Qualification (EQ) maintenance requirement or replacement frequency to ensure the component(s) maintains its qualification status?	☐ YES	☐ NO
PT Curves • Does the proposed activity add, delete, or modify the basis (as contained in each sites reactor vessel surveillance material testing program) for the Pressure / Temperature Limit Curves (fluence, pressure, temperature, reactor materials)?	☐ YES	☐ NO
Relief Valve Program • Does the proposed activity impact or involve the design, operation and testing of relief valves, safety valves, vacuum breaker valves or rupture disc?	☐ YES	☐ NO
RPV Internals Program • Does the proposed activity impact or involve any change to the reactor internals? This includes “software only” changes that do not physically change the hardware such as re-rating of pressures or temperatures. • Does the proposed activity impact or involve or related documentation to include neutron fluence or neutron fluence calculations? • Does the proposed activity impact or involve or changes to core flow characteristics or core flow characteristics?	☐ YES	☐ NO

ATTACHMENT 9.10 **IER IMPACT REVIEW**

SHEET 6 OF 6

PROGRAMS AND COMPONENTS (CONTINUED)	Potential Impact	
Welding Program • Does the proposed activity impact or involve a special process, such as welding, brazing or soldering?	☐ YES	☐ NO
Safety Program • Does the proposed impact or activity involve personnel or industrial safety?	☐ YES	☐ NO
System Engineering • Does the proposed activity impact or involve any changes to system configuration, function or performance, etc., for Maintenance Rule or other system? • Does the proposed activity impact or involve any changes to system procedures, maintenance or operation, etc.?	☐ YES	☐ NO
Training Program • Does the proposed activity involve existing training requirements or create the need for new training?	☐ YES	☐ NO
Simulator Impact • Does the proposed activity impact or involve changes to the Simulator?	☐ YES	☐ NO
Fire Protection Program • Does the proposed activity result in a change to the Fire Protection Program (including 10CFR50 Appendix R) where the impact is more than negligible?	☐ YES	☐ NO