

07-237-91

NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT NUCLEAR STATION  
ADMINISTRATIVE PROCEDURE

AP-2.0

REVISION 23

PROCEDURE USE AND CONTROL

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TECHNICAL SPECIFICATION REQUIRED  
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FOR INFORMATION ONLY

THIS PROCEDURE SUPERSEDES SGO 90-06

Effective Date: 6/1/91

PERIODIC REVIEW DUE DATE: June 1993

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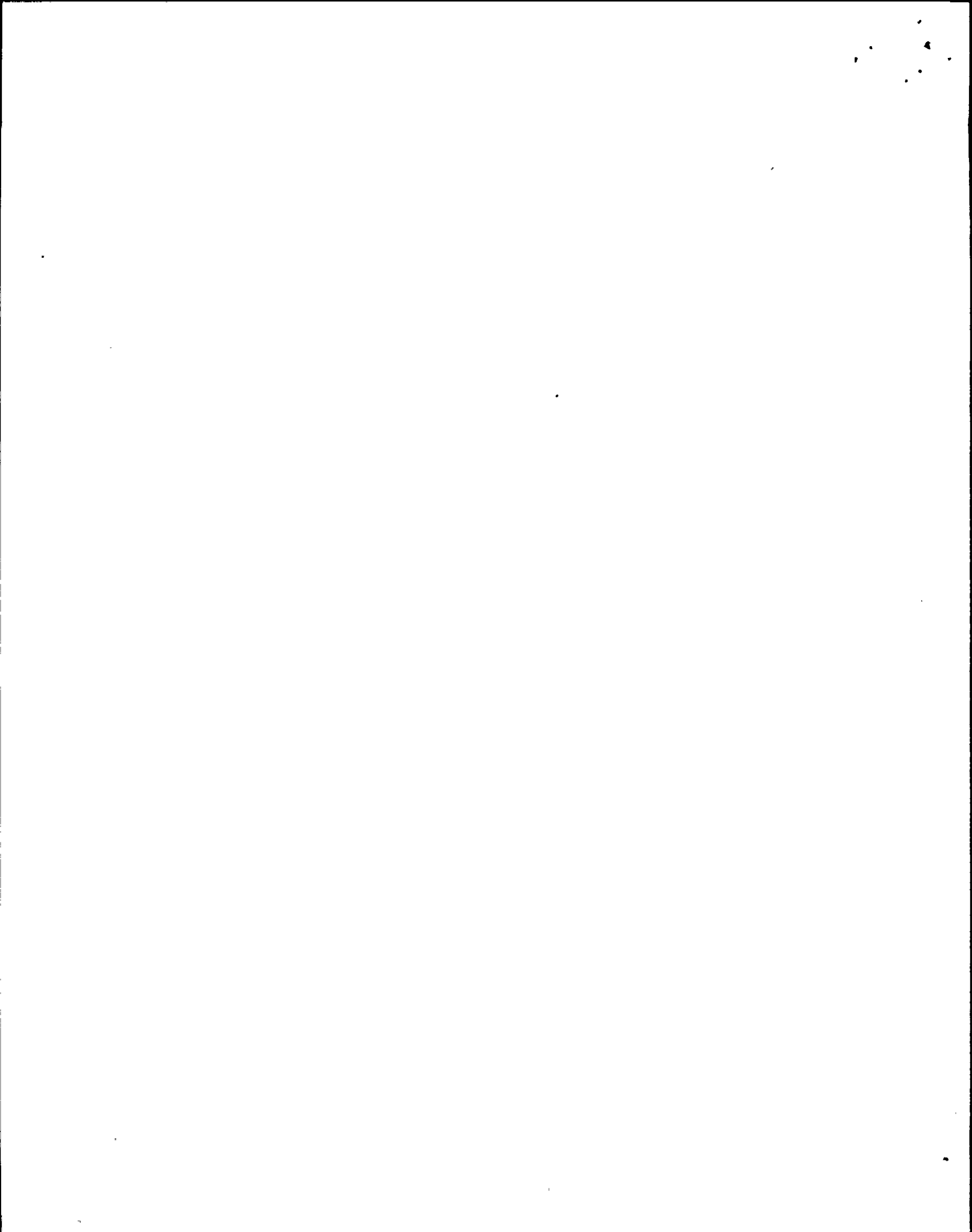
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## 1.0 PURPOSE

To establish requirements and responsibilities for the use and control of procedures, instructions, program manuals, and orders at Nine Mile Point Nuclear Station.

### 1.1 Applicability

This procedure applies to:

- 1.1.1 Nuclear Generation personnel using procedures at Nine Mile Point Nuclear Station (NMPNS)
- 1.1.2 Other organizations using procedures to conduct or administer activities at NMPNS
- 1.1.3 Contract organizations conducting or administering safety-related or Q-related activities at NMPNS which require the use of procedures

### 1.2 Exclusions

This procedure does not apply to the use and control of Section/Unit Administrative Instructions.

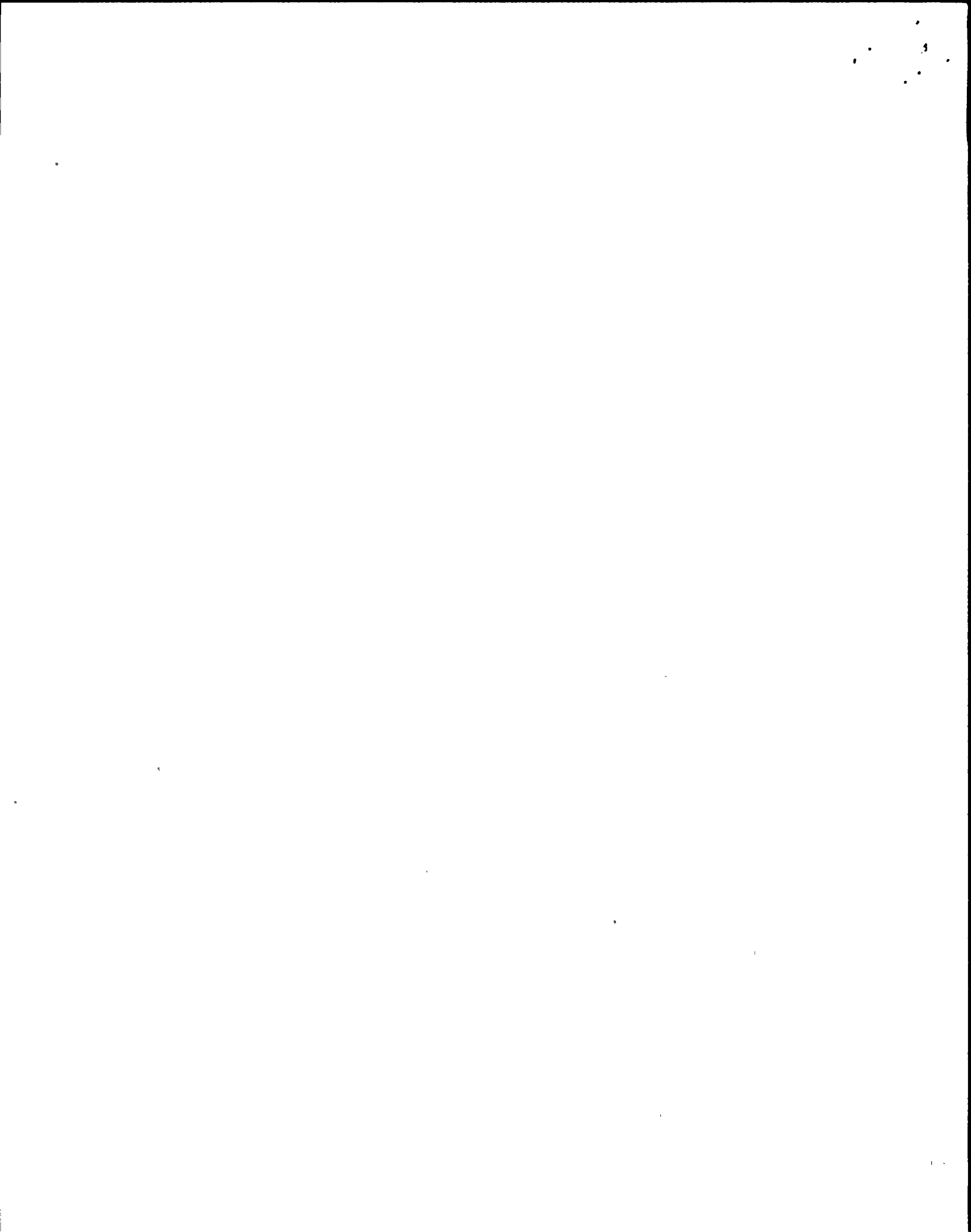
## 2.0 PRIMARY RESPONSIBILITIES

- 2.1 The Plant Manager ensures procedures are produced, approved, and used to the extent necessary to implement the requirements of the Technical Specifications Section 6.8.
- 2.2 The Supervisor of Site Procedures has primary responsibility for the content and maintenance of this procedure.
- 2.3 The Responsible Procedure Owner (RPO) ensures required procedures are maintained in a usable condition or that they are inactivated, superseded, or cancelled as appropriate.
- 2.4 Procedure users shall adhere to the requirements of this procedure including using and adhering to procedures when required, verifying procedures in use, and initiating revisions or changes when necessary.

## 3.0 PROCEDURE

### 3.1 Responsible Procedure Owner

- 3.1.1 A Responsible Procedure Owner (RPO) shall be established for each procedure or group of procedures. The RPO should be the individual having direct supervisory responsibility for the activities for which the procedure or group of procedures was prepared.



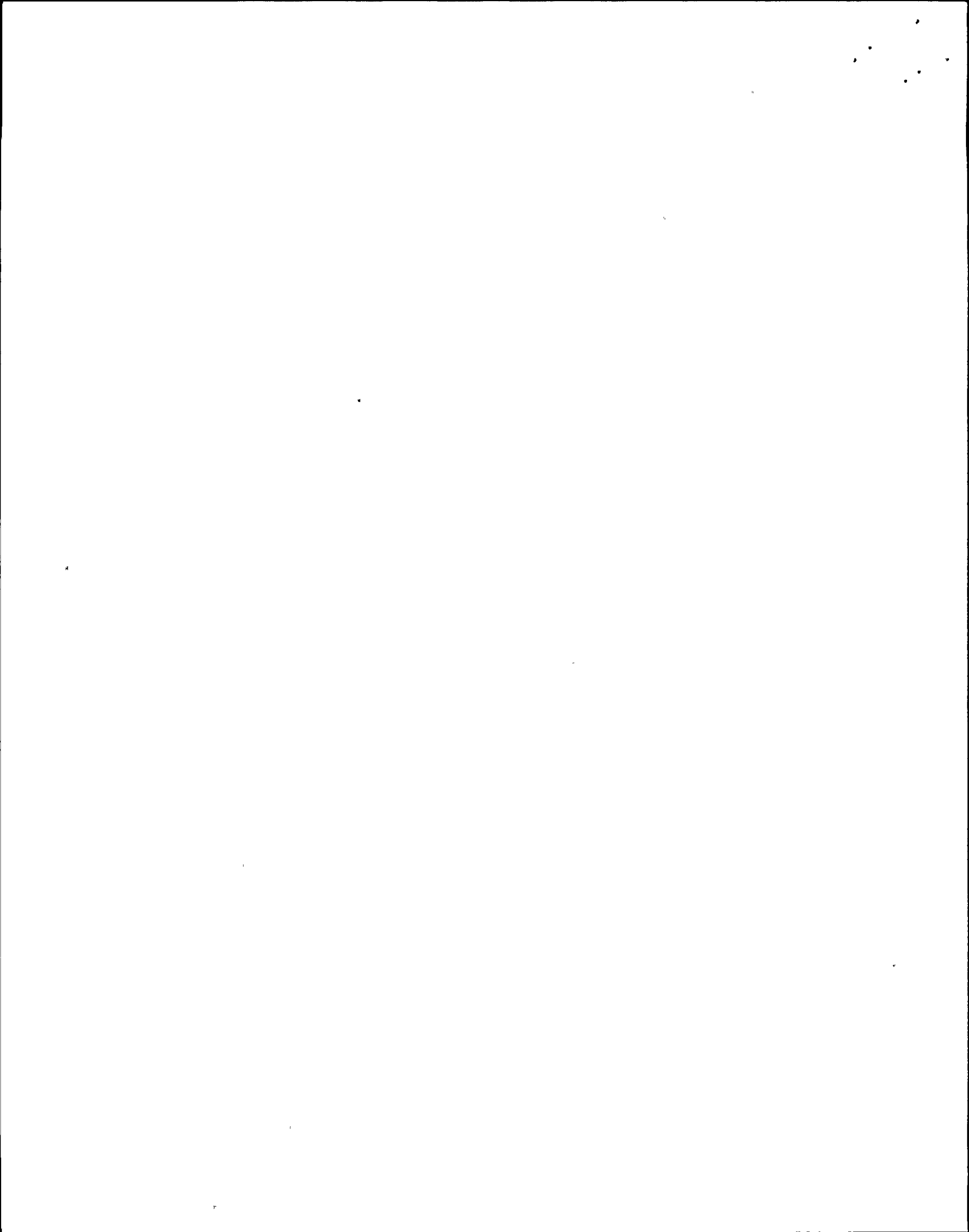


- 3.1.2 The RPO shall ensure required procedures are produced and maintained in accordance with the requirements for adequacy of procedures or inactivated, superseded, or cancelled, as appropriate.
- 3.1.3 The RPO shall maintain full responsibility for the adequacy of assigned procedures and may designate responsible alternates in writing. RPO alternates shall be:
  - a. Knowledgeable of the requirements for adequacy of procedures
  - b. An NMPC management employee reporting to the RPO. Designation of non-NMPC individuals shall be approved by the Plant Manager.
- 3.1.4 Authorized RPO alternates may act on behalf of the RPO with the exception of final procedure approval. However, in the absence of the RPO, final approval may be delegated in accordance with AP-1.1, Composition and Responsibility of the Nuclear Generation Organization.
- 3.1.5 An active list of assigned RPOs shall be maintained by the Procedures Publication Unit (PPU). Lists of alternate RPOs shall be maintained by the RPO.

3.2 Adequacy of Procedures

- 3.2.1 The Plant Manager shall require Responsible Procedure Owners to develop and implement procedures to ensure the orderly, safe, and efficient administration, operation, testing, maintenance, and modification of the station to the extent required by Technical Specifications Section 6.8.1.
 

NOTE: Guidance for the types of procedure activities required by Technical Specifications are provided in AP-2.1, Procedure Preparation, Review, and Issue.
- 3.2.2 The RPO shall ensure new procedures, revisions, and changes thereto are developed in accordance with:
  - a. AP-2.1, Procedure Preparation, Review, and Issue; OR
  - b. AP-2.2, Procedure Change Evaluations
- 3.2.3 The RPO shall maintain required procedures in a usable condition and ensure required procedures:
  - a. Are technically accurate
  - b. Ensure safe and correct performance



3.2.3 (Cont)

- c. Are available for use
- d. Are appropriately developed and approved for the type of activity to be performed
- e. Where required, furnish documentary evidence of values, conditions, and results that satisfy applicable requirements for the condition of structures, systems, and components
- f. Contain sufficient administrative controls, as applicable, to provide:
  - 1. Measures to assist work planning
  - 2. Proper notifications
  - 3. Assessment of plant impact
  - 4. Equipment configuration control
  - 5. Personnel and equipment protection
  - 6. Accountability for performance, verifications, acceptance criteria, and return to normal operation

3.3 Use of Procedures

- 3.3.1 Procedures shall be present and implemented as written for extensive or complex activities where reliance on memory is not sufficient. This shall include Technical Procedures used to perform:
  - a. Surveillance tests
  - b. Emergency Operations Procedures (EOPs)
  - c. Operations activities for plant startup, shutdown, or power changes
  - d. Activities that require independent verification
  - e. Complex, multi-step activities that require continuous procedural direction for performance
- 3.3.2 Procedures shall be implemented as written but need not be present while performing frequently repeated, routine activities including:
  - a. Administrative activities
  - b. Checking or observing equipment

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3.3.2 (Cont)

- c. Drawing samples
- d. Lubricating equipment
- e. Radiation surveying
- f. Skill-of-the-Craft tasks

3.3.3 When only a portion of a technical procedure is performed, the portions used shall include the applicable prerequisite, preliminary, and restoration actions AND the procedure steps necessary to perform the activity. Portions of procedures may be used for, but not limited to, the following situations:

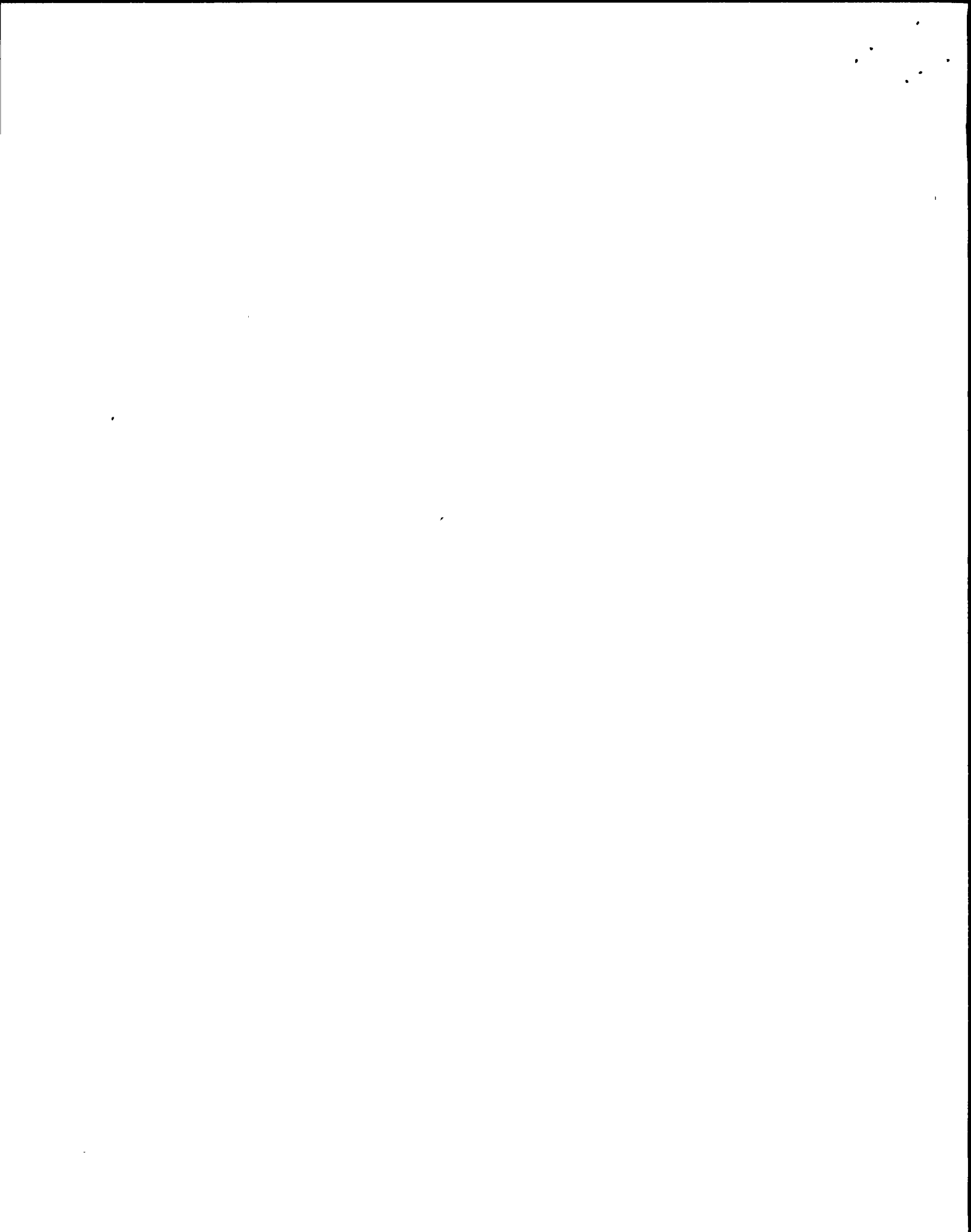
- a. To satisfy post-maintenance testing (PMT) requirements
- b. To perform partial surveillance tests as a retest
- c. To perform a specific troubleshooting activity
- d. When the procedure includes multiple surveillance activities and not all activities require performance
- e. When emergency events addressed by Site Emergency Plan implementing procedures are not actually experienced

3.3.4 When a procedure is required to be present, a controlled working copy of the procedure shall be used.

- a. If a procedure requires only data taking through observation, a controlled working copy of a data sheet alone may be used to gather required data provided the data sheet supports independent use.
- b. If an original controlled working copy becomes contaminated or otherwise unusable, users may transfer data to a "clean" controlled working copy.

3.3.5 When performing an activity involving multiple persons in separate locations being directed by a "procedure controller":

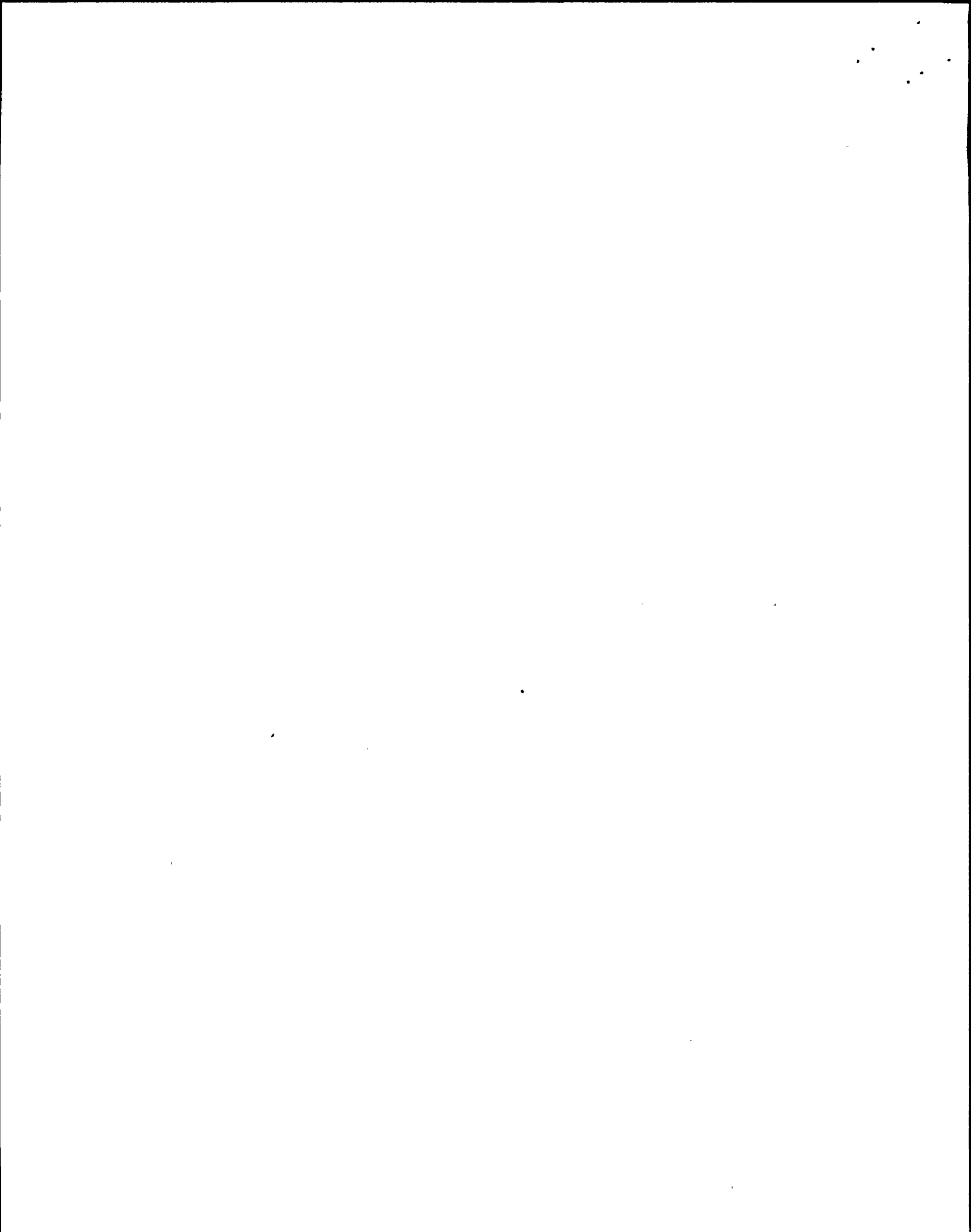
- a. The procedure controller shall possess a controlled working copy of the procedure.
- b. Remote personnel should possess a controlled working copy of the procedure.
- c. Data entry shall be made by either the procedure controller or performers into a controlled working copy.



- 3.3.6 When procedure steps include sign-offs or checklists, users shall initial or check appropriately.
- 3.3.7 Procedure data entries shall be made in black non-soluble ink. Corrections shall be made by a single-line strike out with initials and date. Erasure, scribble, use of "white out" or correction tape is not permitted.
- 3.3.8 If a procedure requires implementation of a use reference, such references shall be controlled as follows:
  - a. Other station procedures shall be controlled in accordance with this procedure.
  - b. Drawings, vendor manuals, and other documents normally controlled by Nuclear Document Control shall be controlled in accordance with AP-10.2, Station Document Control.
  - c. References not normally controlled by Nuclear Document Control shall be used as referenced in the procedure.
- 3.3.9 Forms shall be controlled by the parent procedure. Users shall verify that forms are current in accordance with the latest revision of the parent procedure including any approved changes.

#### 3.4 Adherence to Procedures

- 3.4.1 While on site, personnel shall adhere to the requirements established by Nuclear Generation Site Administrative Procedures and procedures for emergency response regardless of the individual's reporting organization.
- 3.4.2 When a procedure is required, users shall perform steps in sequence unless:
  - a. Deviation from sequence is specifically permitted by the procedure
  - b. Performing Annunciator Response Procedure steps which may be performed in any order, or not completed, as required
- 3.4.3 When a procedure cannot be performed safely, cannot or should not be performed as written, is technically incorrect, or unexpected results or conditions occur, users shall:
  - a. Stop the activity being performed unless doing so would endanger personnel or equipment





3.4.3 (Cont)

- b. Ensure systems and equipment are left in a safe condition and, as applicable, the Station Shift Supervisor is notified
- c. Notify supervision of the deficiency or condition
- d. As appropriate, initiate a procedure revision or Procedure Change Evaluation to correct the deficiency

3.4.4 In emergency situations not addressed by procedures, personnel may take action to avoid or minimize personnel injury or damage to the station.

3.4.5 When emergency actions are necessary that depart or potentially depart from Technical Specifications or license conditions, personnel shall take the following action in accordance with 10CFR50.54:

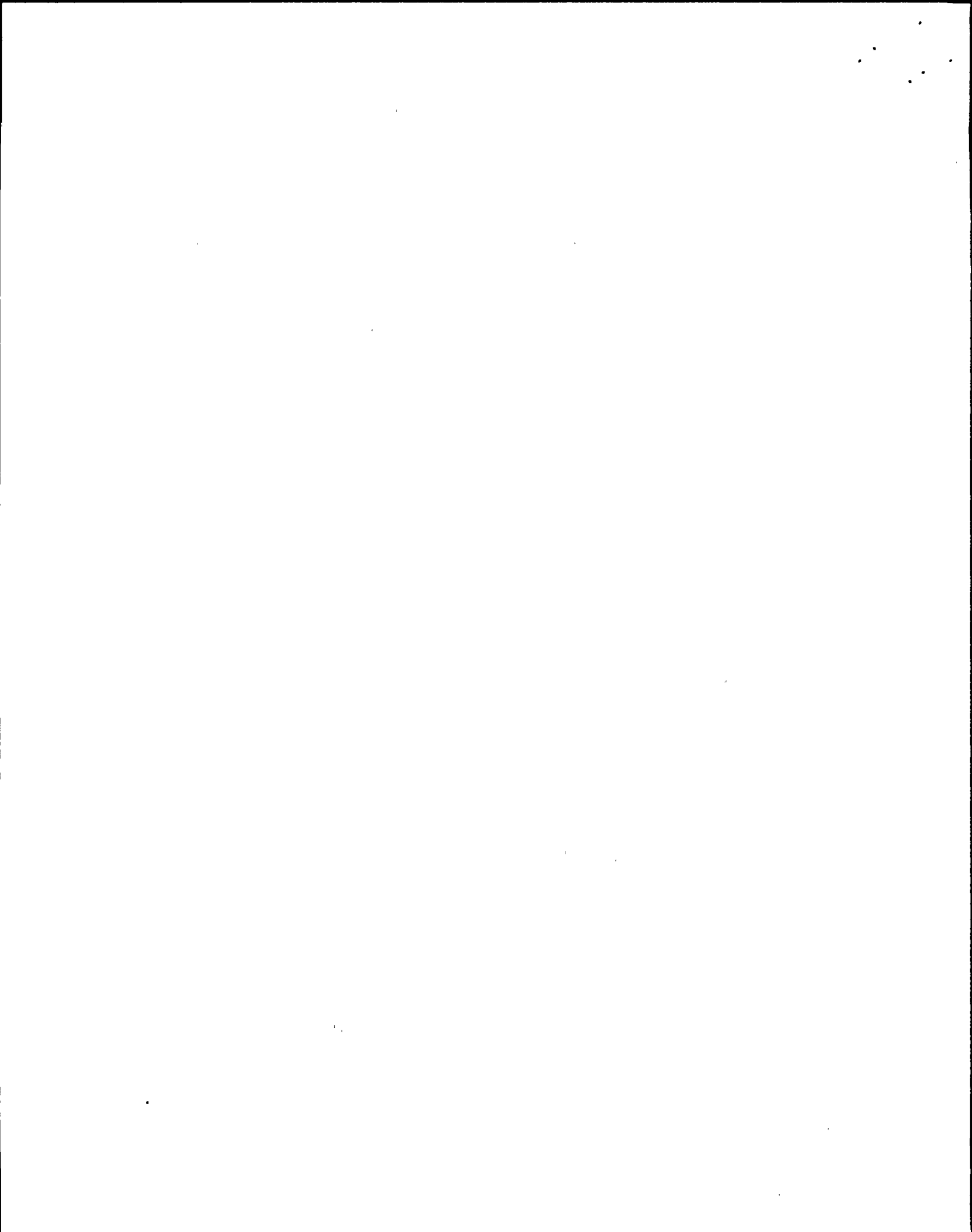
- a. Ensure actions are necessary to protect the public health and safety
- b. Obtain approval of a licensed Senior Reactor Operator
- c. If time permits, obtain SORC review and approval of the proposed actions
- d. Perform the actions as approved
- e. After performing approved actions, ensure a Deviation/Event Report (DER) is initiated in accordance with NIP-ECA-01, Deviation Event Report.

3.4.6 When failure to adhere to a procedure results in a deviation as described by NIP-ECA-01, Deviation Event Report, a DER shall be initiated to address the circumstances that prevented the procedure from being followed.

3.5 User Verification of Controlled Working Copies

3.5.1 Controlled working copies shall be made from the procedure Master or Satellite Master Copy and shall be verified as follows before use:

- a. Procedure to be used is current effective revision level
- b. Interim and final approved Immediate Procedure Change Evaluations are present



3.5.1 (Cont)

- c. Copy is stamped "Controlled Working Copy" and indicates the name of the user and the date and time accuracy needs to be reverified.
- d. Potential conflict with the periodic review due date and activity completion date is assessed.

3.5.2 During use of a controlled working copy, users shall reverify procedure accuracy at least once every 72 hours. Following each such reverification, the procedure shall be restamped and signed.

3.5.3 Procedure attachments or figures used solely for repetitive data recording are not subject to verification requirements provided they are controlled in accordance with the requirements for Satellite Master copies.

3.5.4 If a technical procedure exceeds its periodic review date or is otherwise inactivated during use, the RPO shall ensure the activity is re-evaluated and shall:

- a. Accept completed results based on a comparison with any revised or replacement documents; OR
- b. Ensure affected activities are reperformed using the revised or replacement document

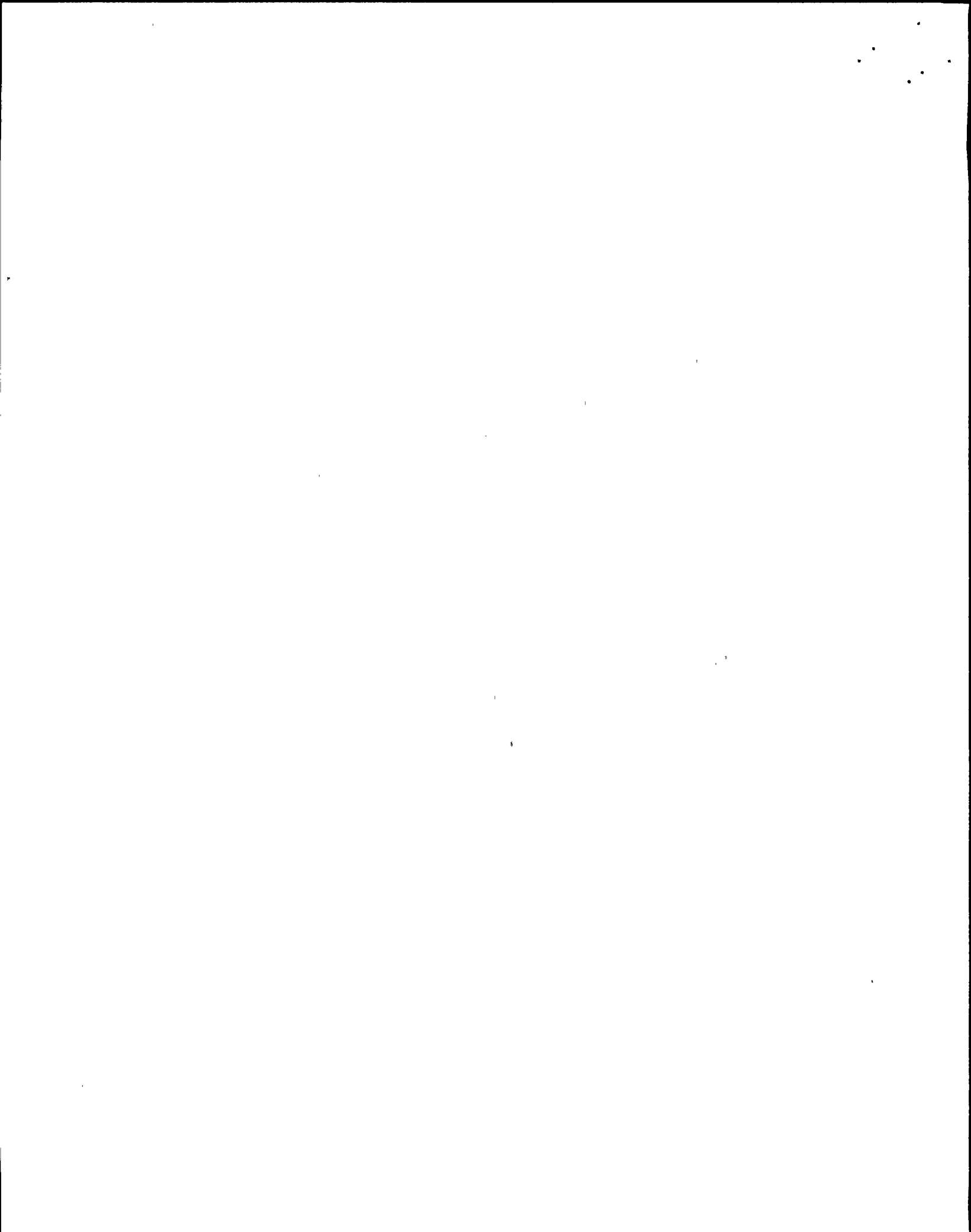
3.6 Independent Verification

3.6.1 Independent verification shall be required for:

- a. Alignment of systems and components identified in the Technical Specifications or otherwise important to safety to verify:
  - 1. The correct system or component is removed from service
  - 2. Systems or components returned to service are properly aligned before being declared operational
- b. Application and restoration of temporary alterations within a procedure

3.6.2 Personnel performing independent verification shall be:

- a. Knowledgeable of the action or condition being verified
- b. qualified to perform the action being verified.



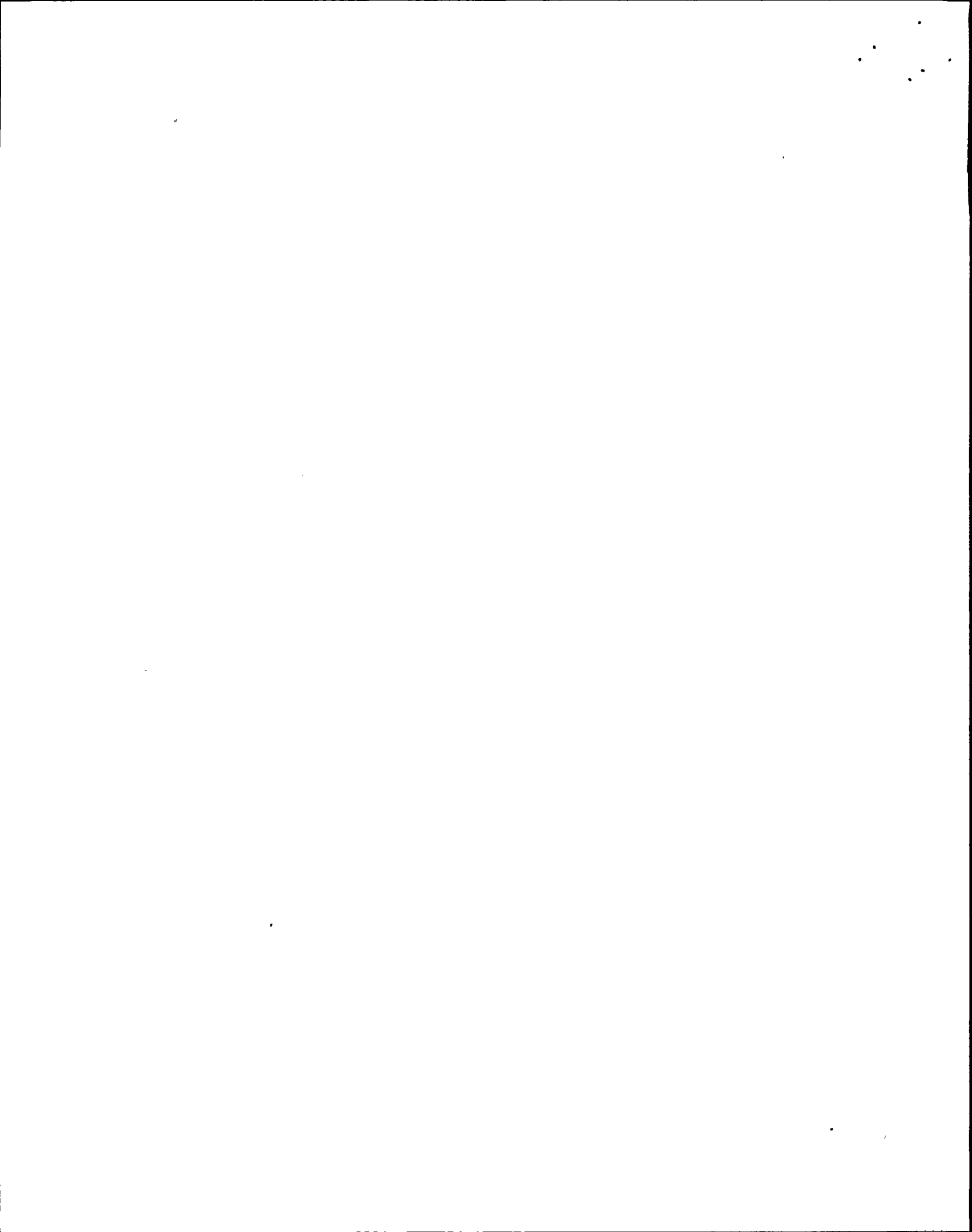
- 3.6.3 The integrity of the independent verification shall be maintained by minimizing interaction between the performer and verifier. Physical separation is not required.
- 3.6.4 Personnel performing independent verification shall verify the action or condition against the written procedure requirement.

3.7 Use of Not Applicable and Not Required

- 3.7.1 Users may use "Not Applicable" (N/A) or "Not Required" (N/R) when:
  - a. Specifically allowed by the procedure
  - b. Only a portion of the procedure is used in accordance with Step 3.3.3
  - c. Implementing Site Emergency Plan implementing procedure steps which do not apply to events experienced
  - d. The Chief Shift Operator (CSO) indicates that a markup is N/R in accordance with the NMPC Accident Prevention Rules or if the CSO directs a change to the suggested markup specified by the procedure
  - e. A procedure step directs the user to obtain a Radiation Work Permit (RWP), but one is not necessary per Radiation Protection assessment
- 3.7.2 N/A or N/R should not be used for prerequisite, acceptance criteria, return to normal, or post-use testing or alignment activities, unless the portion of the procedure for which such activities were intended is not being used. If N/A or N/R is used in such instances:
  - a. The user should notify supervision
  - b. A cognizant section supervisor shall determine the need for technical review. Approval of such actions shall be completed before procedure results are accepted.

3.8 Performer Explanatory Notes

- 3.8.1 Users may include explanatory notes within the procedure when:
  - a. Specifically allowed by the procedure
  - b. Explaining entry of N/A or N/R as allowed by Section 3.7
  - c. Providing additional information for review of results



3.8.1 (Cont)

- d. Providing additional information for the purpose of turnover
- e. Explaining unexpected results, after consulting supervision

3.8.2 Users shall initial and date explanatory notes.

3.9 Contractor Procedures

3.9.1 Contractor documents that describe activities and services performed on Site shall satisfy the intent of this procedure for the equivalent Nuclear Division documents, regardless of what documents are called for by the contractor.

3.9.2 Where such documents are to be used off site or are governed by the contractor's approved Quality Assurance program, they shall be used as required by the applicable NMPC Purchase Order.

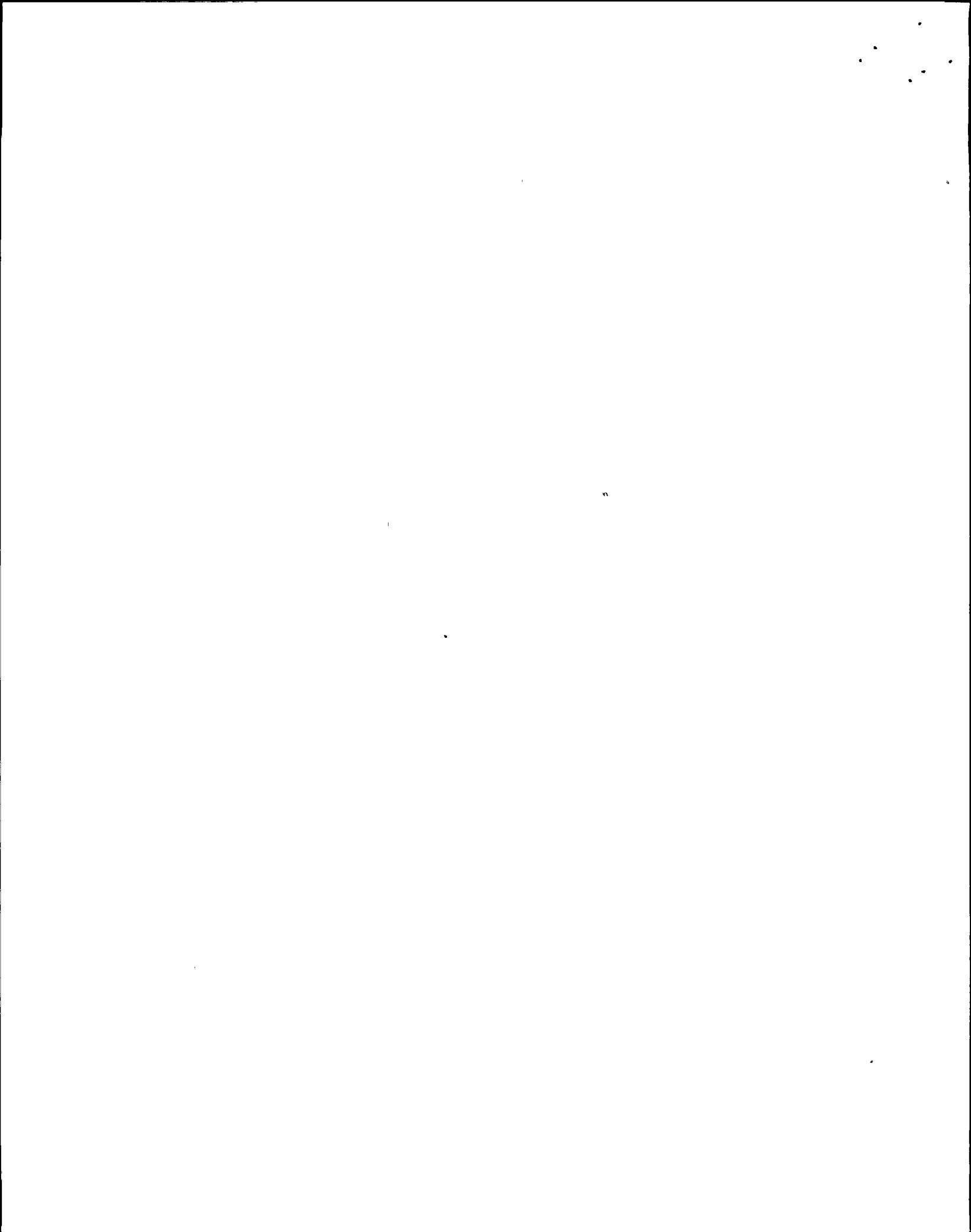
3.10 Maintenance of Procedure Copies

3.10.1 The RPO shall ensure required procedures are available for use.

- a. Master copies and Satellite Master copies of technical procedures shall be maintained in an up-to-date condition including incorporation and documentation of approved Immediate Procedure Change Evaluations.
- b. A procedure index of assigned procedures shall be maintained including hand-made updates reflecting active Immediate Procedure Change Evaluations and changes to procedure status.

3.10.2 Satellite Master copies shall be limited to the extent absolutely necessary to support efficient procedure implementation. Satellite Masters may be used as follows:

- a. A Satellite Master copy of a procedure for Site procedures when more than one Master is required to support implementation at each unit
- b. A Satellite Master copy of a procedure at remote and alternate locations where procedures are frequently used and repetitive duplication from a Master copy would not be practicable
- c. When individual pages require separation from the procedure for posting or data recording

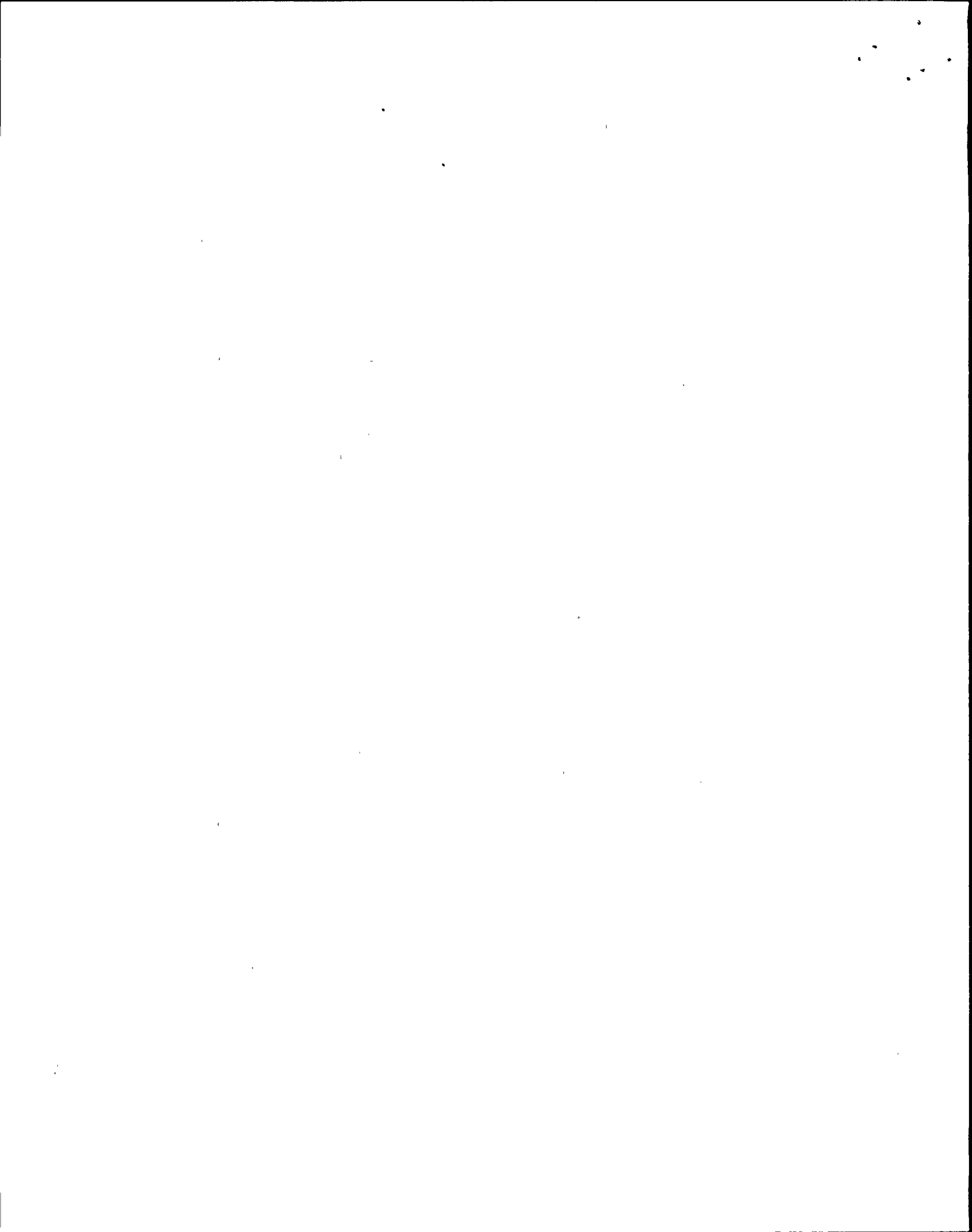




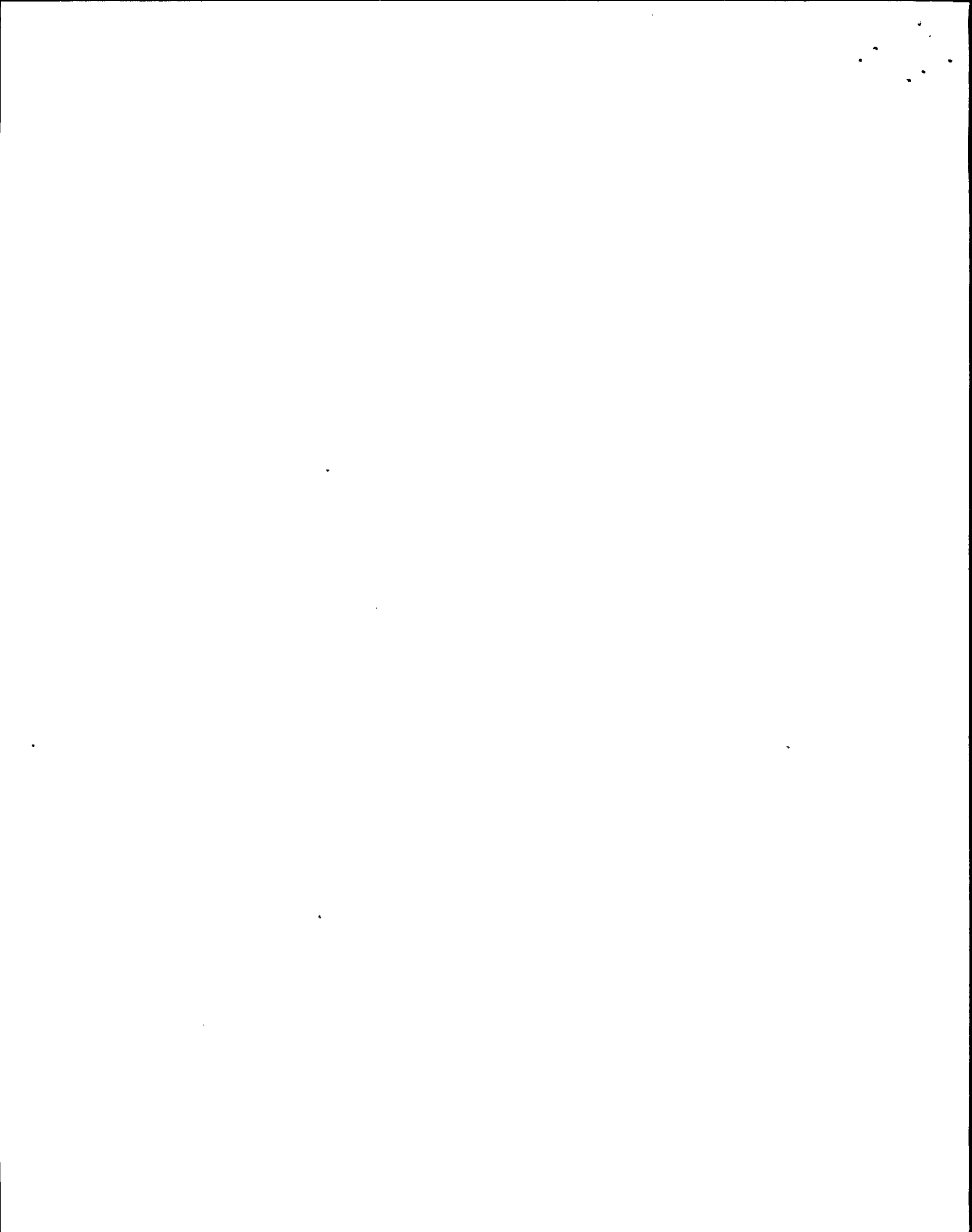
- 3.10.3 The RPO shall ensure Satellite Masters are approved and controlled as follows:
- a. Satellite Master copies of procedures shall be approved by the Plant Manager. The Supervisor Procedures Publication Unit shall be notified of such approvals by transmitting a Procedure Review and Control Form to the PPU.
  - b. Individual Satellite Master pages shall be approved by the RPO and logged on the cover page of the Master copy.
- 3.10.4 The RPO shall ensure that inactive, superseded, and cancelled procedures are not used and that such procedures are appropriately marked or removed to preclude use.
- 3.10.5 Procedure files should be periodically reviewed to verify consistency with the Procedure Index.
- 3.10.6 The Control Room area shall maintain master or controlled copies of procedures in accordance with AP-4.0, Administration of Operations.

4.0 DEFINITIONS

- 4.1 Administrative Instruction - An uncontrolled document produced at the discretion of Section/Unit supervisory personnel that provides detailed administrative guidance for conducting administrative activities, usually clerical, of an individual section or unit. Administrative Instructions are not subject to the requirements of AP-2.1 or AP-2.2 and therefore do not contain mandatory quality requirements or supplant required technical or administrative procedures.
- 4.2 Administrative Procedure - Controlled procedures which establish requirements and define responsibilities for matters of general and continuing applicability to the conduct of business. Administrative Procedures describe administrative programs, processes, and approaches for obtaining administrative objectives such as notifications, reviews, approvals.
- 4.2.1 Site Administrative Procedure - Controlled procedure that establishes requirements and responsibilities for the Nuclear Generation Department for implementing the requirements of Nuclear Division Directives. Site APs are generally applicable to more than one branch or section within Nuclear Generation.



- 4.2.2 Section Administrative Procedure - Controlled procedure that establishes requirements and responsibilities for implementation of requirements established by Site Administrative Procedures or Nuclear Division Directives that are specific to the functional area of an individual section.
- 4.2.3 Program Manual - Controlled set of individually revisable documents that contain multiple or independent requirements and criteria for a common program, such as safety or fire protection. Program Manuals are associated with and controlled by Site Administrative Procedures.
- 4.3 Order - A controlled document issued at the discretion of a Branch or Section Manager (usually Operations) or above to provide management instruction for special operations of short term applicability, special operations issued for eventual incorporation into other controlled documents, or matters of policy not normally addressed by Administrative Procedures.
- 4.4 Procedure Copies
- 4.4.1 Master Copy - A photocopy of the original approved procedure maintained current at all times and used to generate copies for performing work.
- 4.4.2 Satellite Master Copy - A photocopy of the original approved procedure maintained to reflect the Master Copy which is approved for use when required to support station operations.
- 4.4.3 Controlled Working Copy - A photocopy of the master or satellite master copy used to conduct work activities and is properly stamped and verified against the master or satellite master copy.
- 4.4.4 Controlled Copy - A photocopy of the original approved procedure that is updated after the original procedure is updated and used for reference or to conduct training.
- 4.4.5 For Information Only - A photocopy of a procedure that is used for reference only and is not updated to reflect changes or revisions.
- 4.4.6 For Training Purposes - A photocopy of an approved procedure not yet effective that is used for training personnel before implementation.
- 4.5 Procedure Index - A listing of controlled Nuclear Generation procedures from the PROMIS database which includes procedure control information.



#### 4.6

##### Procedure Status

- 4.6.1 Effective - An active procedure that implements approved requirements.
- 4.6.2 Effective - Partially Superseded - An active procedure that has had some of its requirements removed and included in another procedure.
- 4.6.3 Inactive - A procedure that has been removed from active use due to potential or actual deficiencies.
- 4.6.4 Cancelled - A procedure deleted because its requirements no longer apply.
- 4.6.5 Superseded - A procedure deleted because its requirements were incorporated into another procedure.

4.7 Skill-of-the-Craft - Activities that are within the skills normally possessed by qualified personnel, such as gasket, annunciator lamp and recorder slidewire replacement, valve packing, and troubleshooting.

4.8 Technical Procedure - A controlled, discipline specific procedure depicting specific steps to perform work activities, methods, or skills used to achieve a scientific, functional, or operational objective. Technical procedure subcategories include, but are not limited to, preventive and corrective maintenance procedures, operating procedures, calibration procedures, sampling procedures, surveillance test procedures, and special test procedures.

#### 5.0 REFERENCES AND COMMITMENTS

##### 5.1 Licensee Documentation

- 5.1.1 Unit 1 Technical Specifications, Section 6.8, Procedures
- 5.1.2 Unit 2 Technical Specifications, Section 6.8, Procedures and Programs

##### 5.2 Standards, Regulations, and Codes

- 5.2.1 ANSI/ANS 3.2, 1982, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants
- 5.2.2 10CFR50.54, Conditions of License, Subparts (x) and (y)

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5.3 Policies, Programs, and Procedures

- 5.3.1 NDD-PRO, Procedures and Orders
- 5.3.2 NIP-ECA-01, Deviation Event Report
- 5.3.3 AP-1.1, Composition and Responsibility of the Nuclear Generation Organization
- 5.3.4 AP-2.1, Procedure Preparation, Review, and Issue
- 5.3.5 AP-2.2, Procedure Change Evaluations
- 5.3.6 AP-4.0, Administration of Operations
- 5.3.7 AP-10.2, Station Document Control

5.4 Commitments

None

6.0 RECORDS REVIEW AND DISPOSITION

None

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