07.238.91

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION

ADMINISTRATIVE PROCEDURE

AP-2.1

REVISION 01

PROCEDURE PREPARATION, REVIEW, AND ISSUE

****
TECHNICAL SPECIFICATION REQUIRED
****

Approved By: K. A. Dahlberg — Plant Manager, Unit 1 — Date: 5/20/91

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5/4/3C-2

IDENTIFICATION OF INCOMPLETE PROCEDURE SECTIONS

The following sections of this procedure contain incomplete information.

Section/Step	Page	Description
Attachment 3	28	Procedure Classification Guidelines are under development.

LIST OF EFFECTIVE PAGES

Page No.	Change No.	Page No.	Change No.	Page No.	Change No.
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1.0 PURPOSE

To establish the requirements and responsibilities for preparation, review, approval, and issue of new procedures, instructions, program manuals, and orders and revisions thereto.

1.1 Applicability

This procedure applies to:

1.1.1 Nuclear Generation personnel performing procedure review and control activities. Nuclear Security shall retain sole responsibility for conducting and coordinating procedure review and control activities for Nuclear Security procedures.

1.1.2 Contractor procedures used for conducting work on safety-related or Q-related systems. Such procedures are subject to only the review and approval requirements of this procedure.

2.0 PRIMARY RESPONSIBILITIES

2.1 The Plant Manager has overall responsibility for the implementation of the procedure program at Nine Mile Point Nuclear Station.

2.2 The Supervisor Site Procedures is responsible for the content and maintenance of this procedure.

2.3 The Responsible Procedure Owner (RPO) is responsible for maintaining assigned procedures in a usable condition including initiation of revisions and new procedures, assurance of appropriate review and approval, and control of changes.

2.4 Authors are responsible for ensuring procedures are prepared in accordance with the requirements of this procedure.

3.0 PROCEDURE

3.1 Initiation of Procedure Review and Control Activities

3.1.1 A Procedure Review and Control (PRC) Form shall be initiated for the following procedure review and control activities:

a. New procedure, full or limited revision (Section 3.2)

b. Inactivation (Section 3.3)

c. Full or partial supersedure (Section 3.4)

d. Cancellation (Section 3.5)

3.1.1 (Cont)

e. Database change only (Section 3.6)

f. Periodic Review (Section 3.7)

3.1.2 The initiator shall complete Section 1 of the PRC Form for the specific activity and shall:

a. Indicate the procedure number and title (see Section 3.2 for numbering of new procedures)

b. Identify the revision number using the revision number that the document would become if the activity is approved

c. Include a reason for the activity

3.1.3 The Responsible Procedure Owner (RPO) shall approve activity initiation.

3.2 (COMM 1) Preparing New Procedures or Revisions

3.2.1 New procedures may be initiated as desired and when new activities or controls need to be proceduralized and cannot be appropriately incorporated into existing procedures.

3.2.2 Full Revisions may be prepared when procedure alterations to existing procedures are made to the extent that it is desired or necessary to review the entire procedure. The following requirements apply to Full Revisions:

a. Preparation requirements of this section apply to the entire procedure.

b. The procedure title page shall indicate a "Full Revision" has been made. Revision bars are not required.

3.2.3 Limited Revisions may be prepared when limited alterations are required and it is not desired to review the entire procedure. The following requirements apply to Limited Revisions:

a. Preparation requirements of this section apply to only the information altered by the revision.

b. Each alteration shall be indicated by a vertical revision bar adjacent to the revised information.

c. The periodic review due date shall not be extended unless the periodic review requirements of Section 3.7 are met.

3.2.4 The RPO shall assign qualified personnel to prepare new procedures and revisions as defined below.

a. Authors shall be knowledgeable in the area to be addressed by the procedure. Other individuals may be used to assist in preparation, however, the assigned author shall retain responsibility for the preparation of the procedure.

b. Authors should be familiar with the requirements of this procedure and AI-1.0, Site Procedures Writer's Manual.

3.2.5 For new procedures and full revisions, authors shall obtain a Procedure Activity Tracking (PAT) number from the PROMIS database. Include the number on the PRC Form.

3.2.6 For new procedures or alterations to existing procedure numbers, the author shall determine the appropriate procedure number in accordance with AI-1.0, Site Procedures Writer's Manual. The author shall:

a. Determine the procedure category, type, and, if applicable, system and frequency

b. Contact the Procedures Publication Unit (PPU) for sequential unique identifier

3.2.7 (COMM 2) Procedures shall be prepared in accordance with the applicable requirements for content, format, and human factor principles described in AI-1.0 with the following exceptions:

a. The RPO may authorize <u>limited</u> exceptions to the requirements of AI-1.0 for portions of <u>individual</u> procedures when such requirements would hinder the use of a procedure due to unusual or unique presentation requirements.

b. The Section or Branch Manager may authorize general exception to the requirements of AI-1.0 for a group of procedures provided:

1. The nature, intent, environment and scope of the activities do not warrant or require standardized structure or format; OR

2. The procedure activities are performed by a limited number of appropriately trained individuals and the procedures have a documented history of repeated successful completion.

3.2.8 Authors may prepare procedures on an electronic medium. The medium used should be compatible with the PPU word processing system. Authors should adhere to the preparation guidelines established by the PPU.

3.2.9 When making revisions, authors shall use the latest approved version of a procedure including any approved changes.

3.2.10 Authors shall verify or determine the procedure classification.

a. Technical Specification Required (TSR) procedures are those procedures required by Technical Specification 6.8.1 including Appendix A to Regulatory Guide 1.33.

b. Non-Technical Specification Required (NTSR) procedures are those procedures not required by Technical Specification 6.8.1.

3.2.11 Authors shall compile and review outstanding Procedure Change Evaluations (PCE) and other internal source information associated with the procedure.

a. Immediate PCEs approved for the current revision shall be incorporated or dispositioned and noted on the PRC Form.

b. Future PCEs shall be reviewed for incorporation. If incorporated, they shall be noted on the PRC Form and copies included in the procedure package.

c. For new procedures and full revisions, other internal sources of information shall be reviewed and incorporated as applicable, including:

1. Nuclear Commitment Tracking System (NCTS) including INPO and NRC commitments

2. Deviation/Event Reports (DER) and Licensee Event Reports (LER)

3. Lessons Learned Transmittals

4. Operating and industry experience assessments

5. Self assessments

3.2.12 Authors shall ensure applicable requirements contained in upper tier documents are satisfactorily addressed or incorporated into the procedure. This shall include, as applicable:

a. Nuclear Division Directives, Interface Procedures, and Site and Section Administrative Procedures.

b. Niagara Mohawk license documents, including:

1. Updated Safety Analysis Report including the Quality Assurance Topical Report

2. Technical Specifications

3. Other formal regulatory commitments

c. Federal, state, local, and industry rules, regulations, and codes, such as:

1. Code of Federal Regulations and committed Regulatory Guides and NUREGs

2. ASME Codes, as committed

3. ANS, ANSI, and IEEE standards, as committed

3.2.13 Authors shall ensure applicable requirements contained in design documents, such as drawings and engineering specifications, are satisfactorily addressed or incorporated into the procedure.

a. Design documents used as source information shall be approved by the responsible organization and controlled in accordance with AP-10.2, Station Document Control.

b. For safety-related and quality-related procedures, applicable Quality Assurance/Quality Inspection hold or witness points shall be incorporated.

c. If deviations, exceptions, or changes are required to design documents, they shall be approved before procedure approval. Information not yet approved may be designated as "later" during the draft stages.

3.2.14 Authors shall ensure applicable information pertinent to commitments is incorporated in procedures and shall identify which portion of the procedure implements the commitments by placing annotations adjacent to the steps or sections in accordance with the AI-1.0, Site Procedures Writer's Manual.

3.2.15 Authors shall ensure applicable requirements contained in Vendor Manuals are satisfactorily addressed or incorporated into the procedure. Vendor manuals used in preparing TSR procedures shall be controlled in accordance with AP-10.2, Station Document Control.

3.2.16 If the procedure involves maintenance of Environmentally Qualified (EQ) components AND the procedure activities change the EQ condition of a component, the author shall ensure:

a. The applicable requirements contained in Environmental Qualification Required Maintenance (EQRMs) or Environmental Qualification Maintenance Program Data Sheets (EQMPDS) are satisfactorily addressed or incorporated into the procedure.

b. The applicable EQRM or EQMPDS document numbers are listed on the PRC Form.

3.2.17 If the procedure incorporates changes as a result of station modifications or Simple Design Changes (SDC), the author shall include reference to the appropriate number on the PRC Form.

3.2.18 If the procedure involves surveillance testing or preventive maintenance activities, the author shall indicate on the PRC Form. If the PM or ST activity involves a regulatory commitment for performance other than Technical Specifications, the author shall include reference to the committing document.

3.2.19 For temporary procedures, the author shall determine and include a cancellation date or event.

3.2.20 Authors shall, to the extent necessary, determine procedure user needs by:

a. Addressing the appropriate level of detail by contacting frequent users or subject matter experts. Level of detail considerations should include:

1. Task qualification, knowledge, and experience level

2. Complexity of task and relative length of the procedure

3. Industry and in-house experience indicating increase or reduction in detail

b. Conducting walkdowns of the equipment or system to ensure correctness of location, access, and actual plant configuration

3.2.21 The author shall determine the impact of the new procedure or revisions on other intradepartmental procedures.

a. Other procedures requiring full or partial supersedure shall be revised concurrently in accordance with Section 3.4. The author shall indicate the number of the affected procedure(s) in Section 2 of the PRC Form indicating full or partial supersedure.

b. Other affected procedures not involving supersedure shall be assessed for criticality and may be:

1. Revised or changed concurrently; OR

2. Addressed by a Future PCE in accordance with AP-2.2, Procedure Change Evaluations

3.2.22 Upon completion of a procedure draft, the author shall prepare a procedure package for review. The package should consist of:

a. PRC Form completed through Section 2 to reflect the appropriate information required by this Section

b. Proposed procedure

c. As applicable, documentation of exceptions to source information

d. As applicable, implementing reference documents

e. As applicable, other pertinent information which may assist reviewers, such as drawings, copies of source references or other information not readily available to reviewers.

3.3 Inactivation

3.3.1 To preclude use, the RPO may voluntarily inactivate a procedure (except as noted in Step 3.3.2) whenever necessary, including when:

a. The procedure is not immediately needed and is incorrect or potentially incorrect such that the procedure may not be performed safely or accurately

b. Routine periodic reviews are not desireable due to an extended period of time between performances

3.3.2 Procedures continuously required for station operation shall not be inactivated for any reason including missed periodic review. Continuously required procedures shall be controlled accordingly and shall include:

a. Site Administrative Procedures (APs)

b. Operating Procedures (OPs)

c. Emergency Operating Procedures (EOPs)

d. Special Operating Procedures (SOPs)

e. Alarm Response Procedures (ARPs)

f. Emergency Plan implementing procedures

g. Security Plan implementing procedures as determined by Nuclear Security

h. Other select procedures as determined by the RPO

3.3.3 The individual initiating the inactivation shall complete Section 1 of the PRC Form, obtain RPO approval, and forward the PRC Form to the Procedures Publication Unit.

3.3.4 The Procedures Publication Unit shall notify controlled copy holders of inactivations. The PPU shall verify holders of Master and Satellite Master copies have received notification.

3.3.5 Inactivated procedures shall be reactivated prior to use in accordance with the applicable requirements of Section 3.7, Periodic Review of Procedures.

3.4 Supersedure of Procedures

3.4.1 The RPO may authorize full or partial supersedure when the requirements of an existing procedure are incorporated into or implemented through other documents.

3.4.2 Alteration to a procedure number shall constitute a full supersedure. Such alterations shall be completed by revision to the procedure and only a single PRC form is required.

3.4.3 Commitments required to be retained from superseded procedures shall be transferred to the superseding procedure.

3.4.4 Supersedure shall be completed concurrent with approval of the superseding documents.

3.4.5 Authors initiating a full or partial supersedure shall complete Section 1 of the PRC Form for each superseded document and:

a. Indicate full or partial supersedure and reference the superseding document in the "Reason" block

b. Obtain RPO approval for the supersedure

3.4.6 If a procedure is to be partially superseded, the author shall make the appropriate revisions. PCEs shall not be used for partial supersedure.

a. Partial supersedure does not require additional review unless requested by the RPO.

b. The author shall close or transfer affected open Future PCEs.

c. The author shall complete Section 2 of the PRC Form and forward the form and copy of procedure to the PPU concurrent with approval routing for the superseding procedure.

d. Partial supersedure shall not reset the periodic review due date <u>unless</u> the requirements for periodic review are met.

3.4.7 If a procedure is to be fully superseded, the author shall complete Section 2 of the PRC Form and:

a. Close or transfer any open Future PCEs

b. Forward the form and a copy of the procedure to the PPU concurrent with approval routing for the superseding procedure

3.4.8 The PPU shall update the status of superseded procedures and reissue affected procedures as follows:

a. Fully superseded procedures shall be removed from active status. The PPU shall:

1. Notify controlled copy holders of supersedure and verify receipt by Master and Satellite Master copy holders

2. Ensure the number of the superseded procedure shall appear on the cover page of the superseding procedure

3.4.8.a (Cont)

3. Mark the original procedure as superseded. Forward PRC Form to Records Management for filming in accordance with AP-10.1, Management of Station Records.

b. Partially superseded procedures shall be reissued concurrent with superseding procedures. The number of the superseded procedure should appear on the cover page of the superseding procedure.

3.5 Cancellation of Procedures

3.5.1 The RPO may authorize cancellation of a procedure when the procedure requirements are no longer applicable.

3.5.2 The RPO shall ensure a review is completed to verify the procedure requirements are no longer applicable. Personnel initiating cancellation shall:

a. Complete Section 1 of the PRC Form and include a justification for the cancellation

b. Complete Section 2 of the PRC Form. Close or transfer any open Future PCEs

c. Obtain RPO approval for the cancellation

d. Forward the PRC Form to the PPU

3.5.3 The PPU shall update the status of cancelled procedures and:

a. Notify controlled copy holders to destroy existing copies and verify receipt by Master and Satellite Master copy holders

b. Mark the original procedure as cancelled. Forward PRC Form to Records Management for filming in accordance with AP-10.1, Management of Station Records.

3.5.4 Temporary Procedures that are automatically cancelled after the predetermined date established by the original PRC Form do not require new or additional PRC Form Processing.

3.6 Database Changes Only

3.6.1 The RPO may initiate PROMIS database changes when corrections or updates that impact only the database are required such as changes to RPO assignments or approval of Satellite Master copies.

NOTES: Database updates resulting from normal procedure review and control activities are included as part of activity processing and separate PRC Forms are not required.

3.6.2 The RPO may authorize database changes to advance periodic review due dates to levelize periodic reviews required to be completed each month. Periodic review due dates shall not be changed such that the requirements of Step 3.7.1 are exceeded.

3.6.3 The individual initiating database changes shall complete Section 1 of the PRC Form, obtain RPO approval, and forward to the Procedures Publication Unit.

3.6.4 Database changes shall not be used to alter the procedure classification.

3.7 Periodic Review of Procedures

3.7.1 Periodic reviews shall be performed on all procedures in accordance with the following criteria:

a. TSR Procedures shall be reviewed at least once every two years from the approval date of last revision.

b. NTSR Procedures shall be reviewed at least once every four years from the approval date of last revision.

c. Emergency Plan implementing procedures shall be reviewed at least once every 12 months.

d. Security Plan implementing procedures shall be reviewed at least once every 12 months.

3.7.2 The RPO shall ensure periodic reviews are performed by at least one reviewer qualified per AP-3.4.3, Technical Review.

3.7.3 The periodic review shall assess the technical accuracy of the procedure and determine whether alterations are necessary or desired. This shall be accomplished by performing or documenting one of the following for the entire procedure:

a. Reaccomplishment of the technical verification requirements of Section 3.9, Technical Verification; OR

b. Verifying that no changes to technical or quality assurance requirements are necessary or desired and that more than one successful step-by-step performance has been demonstrated.

3.7.4 Periodic reviews shall result in one of following procedure review and control activities:

a. A No Change Periodic Review (NCPR) may be processed if the results of the review indicate no alterations are necessary or desired.

3.7.4 (Cont)

b. Procedures that require alterations, shall be processed in accordance with the additional applicable requirements of Section 3.2.

3.7.5 NCPRs shall be approved by the RPO. No additional review is required unless requested by the RPO.

3.7.6 The PPU shall update the periodic review date and reissue the cover page for approved NCPRs. NCPRs shall not advance procedure revision level.

3.7.7 The RPO should ensure periodic reviews are completed before the periodic review due date.

3.7.8 The PPU shall maintain and track periodic review due dates.

a. Procedures that exceed the established periodic review due date shall be automatically inactivated in accordance with Section 3.3 except as noted below.

b. If a procedure continuously required for operation (reference Step 3.3.2) exceeds its periodic review due date, the PPU shall immediately notify the RPO and initiate a Deviation Event Report in accordance with NIP-ECA-01, Deviation Event Report.

3.8 (COMM 1) General Requirements for Procedure Review

3.8.1 The author shall review Section 1 and 2 of the PRC Form for completeness and accuracy before initiating the review process.

3.8.2 The author shall determine the extent of the review cycle required by Sections 3.9 through 3.14 and initiate Section 3 of the PRC Form by indicating required reviewers by organizational section or unit.

a. New procedures and full revision shall involve a review of the entire procedure.

b. Limited revisions need only involve a review of the altered information.

3.8.3 Reviews may be conducted in parallel or sequentially. When Safety Reviews or SORC review is required, such reviews shall be completed after other reviews.

3.8.4 Quality Assurance shall be included as a reviewer for the following procedure types:

a. Site Administrative Procedures (APs)

b. Emergency Operating Procedures (EOPs)

c. Special Operating Procedures (SOPs)

3.8.5 Reviewers should review the procedure and return comments by the requested review date or arrange for an extension.

3.8.6 Review comments shall be incorporated or resolved with required reviewers. Disagreements shall be escalated when appropriate.

3.8.7 If review comments result in significant changes to the procedure, the review cycle should be repeated to obtain concurrence before procedure approval.

3.8.8 Nuclear Security shall arrange and control review of procedures containing safeguards information. Personnel involved in such review shall have approved safeguards access.

3.8.9 The review and implementation of Site Administrative Procedures shall be coordinated by the Supervisor Site Procedures in accordance with Section Administrative Procedures to ensure:

a. Appropriate organizational input is obtained

b. RPO concurrence is obtained

(COMM 3, 6, & 7) c. Procedure implementation requirements, such as training, are identified

d. Site APs are distributed for review to the applicable Supervisors, General Supervisors, or Managers who shall obtain and consolidate respective unit or section comments

e. Site APs and revisions are presented to SORC in accordance with AP-3.4.1, Station Operations Review Committee. Site APs undergoing minor editorial changes using the revision process do not require SORC review.

3.9 Technical Verification

3.9.1 A technical verification shall be completed for new procedures and revisions classified as TSR. NTSR procedures may receive technical verification as determined by the RPO.

3.9.2 Site procedures for use at both Unit 1 and Unit 2 shall receive technical verification from personnel representing each unit.

3.9.3 Technical verifiers shall be qualified in accordance with AP-3.4.3, Technical Review.

a. The reviewer shall be an individual other than the author and should be from the same organizational unit for which the procedure was written.

b. A reviewer from a different organizational unit may be selected provided the reviewer has appropriate background knowledge.

3.9.4 Technical verifiers shall ensure the proposed procedure satisfactorily addresses the applicable requirements of:

a. Nuclear Division Directives, Nuclear Interface Procedures, and Site and Section Administrative Procedures

b. NMPC licensing documents including Technical Specification and USAR requirements

c. Federal, state, and industry rules, regulations, and codes

d. Design documents including specifications and drawings

e. Manufacturer or vendor requirements including vendor manuals

3.9.5 Technical verifiers shall ensure the proposed procedure contains, as applicable:

a. Accurate acceptance criteria

b. Proper interface with related structures, systems, and components.

3.9.6 Technical verifiers shall specify needed cross-disciplinary reviews in accordance with Section 3.10 in addition to any previously identified.

3.9.7 Technical verifiers may use the Procedure Verification Checklist contained in AI-1.0 checklist may be used provided the requirements of technical verification are met.

3.10 Cross-Disciplinary Reviews

3.10.1 Cross-disciplinary reviews shall be assigned whenever another organization, unit, or discipline is required to verify the accuracy of all or a portion of the procedure, including the following conditions:

a. When other organizational units have actions required by the procedure except for permission, notification, or other normally assigned duties.

b. When a procedure of another organizational unit is used for performing a portion of the activity.

c. When specifically required by another organizational unit as indicated on the PROMIS database. Database inclusion of required cross-disciplinary reviewers shall be approved by the RPO of the affected procedure.

(COMM 4) d. When the scope of review is beyond the responsibility or knowledge of the technical verifier. Authors and reviewers should use Attachment 4, Input and Review Guidelines.

3.10.2 Site procedures for use at both Unit 1 and Unit 2 shall receive required cross-disciplinary reviews from personnel representing each unit.

3.10.3 Cross-disciplinary reviewers shall be a member of the specified organizational unit and should be qualified per AP-3.4.3, Technical Review.

3.10.4 Cross-disciplinary reviewers shall review the procedure to determine if information contained is consistent or otherwise correct in regards to the applicable program, equipment, or activity for which the cross-reviewer is responsible.

3.11 Human Factors Review

3.11.1 New and full revisions to technical procedures classified as TSR should be reviewed for human factors content. The RPO or author may request reviews for other procedures as necessary.

3.11.2 Human Factors reviews should be conducted by the Site Procedures Unit and shall address procedure content for compliance with AI-1.0, Site Procedures Writer's Manaul.

3.12 Validation Review

3.12.1 Validation should be completed for new procedures and full revisions to technical procedures classified as TSR. The RPO shall determine the need for and extent of procedure validation based on:

a. The nature of activities performed. Special consideration should be given to procedures affecting safety systems and Operating Procedures.

b. The consequences of incorrect performance

c. Environment for performance

3.12.2 When performed, validation shall be completed by an individual or group that represents the procedure end user.

3.12.3 Validation may be completed by one of the following methods listed in order of preference:

a. Parallel review with an actual execution of the currently approved version of the procedure.

NOTE: Unapproved procedures shall not be used for implementation.

b. Performing walkthroughs, dry runs, mockups, benchtests, or simulation (including use of the Control Room Simulator for applicable operating procedures).

c. When validation by parallel performance or simulated performance is not practicable, validation may be completed by conducting discussions with experienced users.

3.12.4 Validation should ensure:

a. The procedure can be performed as written and does not require additional interpretation to complete the task.

b. The level of detail is adequate and addresses the qualification level of the end user.

3.13 Safety Review

3.13.1 A Safety Review shall be completed for each:

a. New and revised Technical Procedure

b. Revision to Technical Specification Required (TSR) procedures

3.13.2 The RPO shall ensure Safety Reviews are approved by qualified Safety Reviewers. Qualified Safety Reviewers shall be:

a. A qualified technical reviewer per AP-3.4.3, Technical Review, and have completed Qualified Safety Reviewer training on the requirements of 10CFR50.59; OR

b. A SORC member or alternate.

3.13.3 If changes are made to the procedure following approval of a Safety Review, the RPO shall ensure additional Safety Reviews are performed.

3.13.4 If the Safety Review indicates that a Safety Evaluation is required:

a. The RPO shall arrange for production of a Safety Evaluation by Nuclear Engineering.

b. The Safety Evaluation shall be reviewed in accordance with AP-3.4.3, Technical Review, prior to procedure approval. A record of Safety Evaluation approval shall be included on the PRC Form.

c. The Safety Evaluation and Associated procedure should be presented to SORC together in accordance with AP-3.4.1, Station Operations Review Committee.

3.13.5 If required by the Safety Review, the Supervisor Environmental Protection shall determine the need for a detailed Environmental Evaluation and, if necessary, conduct the evaluation before procedure implementation.

3.14 Station Operations Review Committee (SORC) Review

3.14.1 Procedures requiring SORC approval are as follows:

a. Site Administrative Procedures (APs). Limited revisions to APs shall be controlled by the Site Procedures Unit and may not require SORC approval.

b. Procedures requiring performance of a Safety Evaluation as required by AP-3.4.3, Technical Review

c. Procedures for testing as required by AP-6.5, Control of Testing

d. New and revised Emergency Preparedness Procedures (EPPs) and Emergency Action Procedures (EAPs)

3.14.2 Procedures that require SORC review and that have a site impact, shall be reviewed by Unit 1 and Unit 2 SORCs before approval.

3.14.3 Procedures shall be presented to SORC in accordance with AP-3.4.1, Station Operations Review Committee. A record of SORC approval shall be included on the PRC Form.

3.15 Approval of Procedures

3.15.1 Procedures classified as Technical Specification Required (TSR) shall be approved by the Plant Manager. Such procedures having a site impact shall be approved by the Plant Manager of each unit.

3.15.2 Procedures classified as Non-Technical Specification Required (NTSR) shall be approve by the appropriate Branch or Section Manager.

3.15.3 The Procedures Publication Unit (PPU) shall prepare and process procedures for approval including:

a. Preparation of original procedure for approval

b. Storage and control of electronic versions of procedures

c. Closure of incorporated PCEs. Approved Immediate PCEs shall be verified closed before procedure issue.

d. Proofing and editorial review

3.15.4 The PPU shall return the Procedure Package to the RPO or designee which shall include:

a. Original Procedure

b. PRC Form

c. Safety Review form, as applicable, and Safety Evaluation, as applicable

d. Concurrent full and partial supersedures including PRC Form, as applicable

e. Other information provided by the author

3.15.5 The RPO shall review and approve the procedure by signing the PRC Form. The RPO shall ensure:

a. Required reviews by properly qualified personnel have been accomplished

b. the procedure classification is accurate

c. The procedure meets the requirements for procedure adequacy (reference AP-2.0, Procedure Use and Control)

3.15.5 (Cont)

d. If changes have been made to the procedure based on review comments, rereview of the procedure is considered

e. Required title page approval is obtained or provided

3.15.6 The title page approver shall determine that adequate review has been completed and indicate approval by signing the title page and returning to sender. If disapproved or if changes are required, return the Procedure Package to the sender without signature.

3.15.7 Following title page approval, the RPO shall identify pre-implementation requirements.

a. Initiate or arrange for any required pre-implementation training. Completion of required training shall be coordinated with assignment of the effective date.

b. Establish an effective date. Allow at least 3 working days for procedure distribution. If implementation sooner than 3 working days is required, notify the PPU in advance to arrange for immediate distribution.

c. Ensure Immediate PCEs against the previous revision have been addressed. Immediate PCEs incorporated during this period do not necessitate reperformance of reviews.

3.15.8 (COMM 6) If a procedure or program cannot be fully implemented at the time of effective date, the RPO shall ensure a date for full program compliance is established and an explanation of exclusions is included in the "PURPOSE" section of the procedure.

3.15.9 Approved procedures shall be returned to the PPU for issue.

3.16 Issue of Procedures

3.16.1 (COMM 8) The Procedures Publication Unit (PPU) shall issue approved procedures so that they are available for use on the effective date as follows:

a. Master and Satellite Master copies of Technical Procedures

b. Controlled copies of Administrative Procedures

c. Other copies of Technical and Administrative Procedures shall be issued as soon as practicable.

3.16.2 The PPU shall ensure title pages of issued procedures are marked with the appropriate procedure copy designation.

3.16.3 The PPU shall provide a single Master Copy of each approved Technical Procedure.

a. The cover page of each Master copy shall indicate the existence of approved Satellite Master Copies.

b. Administrative Procedures do not require Master Copies.

3.16.4 The PPU shall keep the number of controlled copyholders to the minimum required for efficient station operation. The continuing requirement for retention of each holder's controlled copy status should be reviewed at least annually.

3.16.5 Records documenting required review and approval of procedures shall be controlled in accordance with AP-10.1, Management of Station Records. Upon completion of a procedure activity, the PPU shall process the following records:

a. For new procedures and revisions, a copy of the procedure

b. Original PRC Form and, as applicable, Safety Review Form

3.16.6 The PPU shall maintain a file for each effective and inactive procedure containing items applicable to the latest revision, including:

a. Photocopy of PRC Form including, as applicable, Safety Review Form

b. Approved Immediate PCEs

c. Original approved procedure

d. Original forms and other graphics

3.16.7 The PPU shall complete supplemental distribution for procedures having a PRC form that identifies the following:

(COMM 5) a. PM/ST requirements to Regulatory Compliance

b. EQRM/EQMPDS to the Environmental Qualification group

c. Modification/SDC related changes to Configuration Management group

(COMM 4) d. Logic System Functional Test related Procedure Review and Control forms to Unit 2 System Engineering

3.17 Procedure Graphics and Forms

3.17.1 Forms shall be controlled by the procedure. Revision and change control shall be the same as for procedures.

a. If a form is not intended to be copied from the procedure but is intended to be used as shown, the form should be stamped "SAMPLE".

b. If a form is intended to be copied from the procedure and used, the form should not be stamped "SAMPLE".

3.17.2 Procedures Publication shall maintain original current revisions of forms established in procedures.

3.17.3 Procedures Publication should maintain the highest possible graphic and form reproduction quality. The PPU should:

a. Upon revision of a procedure, copy original drawings, charts, graphs, forms, and other graphics and insert the copies for issue, retaining the original in the file.

b. When requested, provide original graphics to authors for revision.

3.18 Procedure Information and Index

3.18.1 The Procedures Publication Unit (PPU) shall maintain and issue procedure numbers that establish distinct unique identification for each procedure.

a. Procedure numbers shall be in accordance with the applicable format requirements of AI-1.0, Site Procedures Writer's Manual.

b. Temporary procedures shall include a "T" at the end of the procedure number.

c. Procedure numbers of superseded and cancelled procedures shall not be reassigned.

3.18.2 The PPU shall maintain a system to monitor procedure information and provide control. The system shall, as a minimum, contain the following information for each procedure:

a. Unique procedure number and title

b. Current revision level and effective date

c. Procedure Classification

3.18.2 (Cont)

d. RPO and coversheet approval authority

e. Active PCEs with indication of incorporated immediate PCEs

f. Next scheduled periodic review date

g. Reference to superseded procedures

h. System expert

i. Required reviewers

3.18.3 The PPU shall maintain a system to identify authorized copy holders. The system shall contain or identify:

a. The control number of each copy issued

b. The name of the copy holder

c. The date of issue of each revision

d. Type of copy

3.18.4 The PPU shall periodically and upon request issue reports from the PROMIS database. The PPU shall:

a. Issue an index of procedures for each RPO at least quarterly. The RPO may request or produce reports on a more frequent basis.

b. Issue a monthly report of procedures requiring periodic review during the next 120 days for each RPO. The report shall include procedures having an inactive status.

4.0 DEFINITIONS

4.1 Effective Date - The date following procedure approval when procedure requirements become effective.

4.2 Full Revision - A procedure alteration that is comprehensive in nature such that requirements and accuracy of the entire procedure are evaluated and reviewed.

4.3 Limited Revision - A procedure alteration that is limited in scope and for which only the altered portions of the procedure are evaluated and reviewed.

4.4 Periodic Review - A periodically scheduled review to verify the accuracy of technical and editorial content of procedures.

4.5 Procedure - A generic term used to represent administrative and technical procedures and program manuals.

4.6 Procedure Activity Tracking Number - A unique identifier generated by the PROMIS database used to track and status new procedure development and revisions.

4.7 Procedure Classification - A classification assigned to a procedure based on the relation of the procedure content to the requirements of Technical Specification Section 6.8. Classification is used to determine review and approval requirements.

4.7.1 Technical Specification Required - Procedures required by Technical Specifications or otherwise important to safety.

4.7.2 Non-Technical Specification Required - Procedures not required by Technical Specifications and not considered important to safety.

4.8 Procedure Type - A subset of procedure subcategory that identifies the applicable discipline and series of a procedure. The procedure type code is integrated into the procedure number.

4.9 PROMIS Data Base - A PRIME computer database used to maintain and control procedure information for controlled Nuclear Generation procedures. Includes the procedure index, revision tracking, change tracking, periodic review status, and general procedure information.

4.10 Protected Procedure Step - A step, series of steps, or an entire procedure that has been identified as implementing specific requirements. Protected references are annotated with a reference to the type of requirement in parentheses adjacent to the associated information.

4.11 Responsible Procedure Owner (RPO) - The individual primarily responsible for the content and maintenance of a procedure or type of procedure. This may be a shared responsibility for Site procedures.

4.12 Reformatted Procedure - A procedure altered significantly in structure such as through the Technical Procedure Upgrade Project.

4.13 Safety Evaluation - An evaluation designed to determine if proposed changes to facilities or procedures described in the Updated Safety Analysis Report (USAR) constitute an Unreviewed Safety Question.

4.14 Safety Review - A review performed to determine if a Safety Evaluation is required.

4.15 Temporary Procedure - A procedure that is intended to be used for a specific event or period of time and then cancelled.

5.0 REFERENCES AND COMMITMENTS

5.1 Licensee Documentation

5.1.1 Unit 1 and Unit 2 Technical Specifications, Section 6.5, Technical Review, and Section 6.8, Procedures and Programs

5.1.2 Unit 1 and Unit 2 Updated Safety Analysis Reports, Chapter 13, Administration of Operations

5.1.3 QATR-1, Quality Assurance Topical Report for Nine Mile Point Nuclear Station Operations, Section 5.0, Instructions, Procedures, and Drawings, and Section 6.0, Document Control

5.2 Standards, Regulations, and Codes

ANSI/ANS 3.2-1982, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants (as endorsed by Regulatory Guide 1.33)

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-2.0, Procedure Use and Control

5.3.4 AP-2.2, Procedure Change Evaluations

5.3.5 AP-3.4.1, Station Operations Review Committee

5.3.6 AP-3.4.3, Technical Review

5.3.7 AP-10.1, Management of Station Records

5.3.8 AP-10.2, Station Document Control

5.3.9 AI-1.0, Site Procedures Writer's Manual

5.4 Commitments

Sequence Number	Commitment Number	Description
1	NCTS 503494-02	Clarify roles and responsibilities of writers and reviewers
2	NCTS 701024-00	Direct procedure writers to follow applicable requirements of AI-1.0, Site Procedures Writer's Manual
3	NCTS 000481-00	Provide guidelines for performing routed reading training on Site APs

5.4 Commitments (Cont)

4	NCTS 503368-01	LSFT review by system engineers
5	NCTS 001078-00	Require Regulatory Compliance review of procedures that could affect PM/ST Program
6	CAR 90.3018	Develop implementation plans to ensure training requirements are reviewed for Site Administrative Procedures
7	CAR 90.3023	Develop implementation plans for Site Administrative Procedures
8	CAR 90.3024	Ensure procedures are available for use on effective date

6.0 RECORD REVIEW AND DISPOSITION

The following records are required to be retained in accordance with AP-10.1, Management of Station Records:

6.1 Each procedure and revision

6.2 Procedure Review and Control Forms

6.3 Safety Review Forms

ATTACHMENT 1
PROCEDURE REVIEW AND CONTROL FORM

(AP-2.1, Form 1, Rev 00)

NIAGARA MOHAWK	PROCEDURE REVIEW AND CONTROL FORM	PAT No.

1. Initiation

Procedure No.	Revision No.	Title	
Periodic Review Information: ☐ Not Performed or New Procedure ☐ Performed, Add'l Activity Required ☐ NCPR		Signature (If Performed)	Date
Activity: ☐ New Procedure/Full Revision ☐ Limited Revision ☐ Inactivation ☐ Supersedure ☐ Cancellation ☐ Database Change Only Reason:			
Author/Initiator (Print)	RPO Approval		Date

2. Procedure Data

Procedure Classification: ☐ Technical Specification Required (TSR) ☐ Non-Technical Specification Required (NTSR) Indicate Periodic Review Frequency (In Months) If Other Than 2 or 4 Years:	Procedure Category: ☐ Administrative ☐ Technical
List Immediate PCEs Closed and Future PCEs Incorporated or Transfered (T): PCE PCE PCE PCE PCE PCE PCE PCE PCE PCE PCE PCE ☐ Additional PCEs listed on attached	
EQR/WEQMPDS Requirement(s) Incorporated ☐ No ☐ Yes If Yes, List:	Mod/SDC Related Changes ☐ No ☐ Yes If Yes, Mod/SDC No.:
PM/ST Procedure ☐ No ☐ Yes Commitment Related ☐ No ☐ Yes, Ref No.:	LSFT Requirement(s) Incorporated (Unit 2 Only) ☐ No ☐ Yes If Yes, List:
Supersedes Procedure(s) ☐ No ☐ Yes If Yes, List: (Indicate Partial Or Full)	
Temporary Procedures Only Expiration Date or Event:	☐ Continuously Required for Operation (Cannot Inactivate)
Author Signature	Date

3. Review

	Organization	Name (Print) Unit 1	Init/Date	Name (Print) Unit 2	Init/Date
Tech. Verification ☐ N/R			/		/
Human Factors ☐ N/R			/		/
Cross-disciplinary ☐ N/R			/		/
			/		/
			/		/
QA Review ☐ N/R			/		/
Validation ☐ N/R			/		/

Safety Review ☐ N/R ☐ Attached	Safety Evaluation ☐ N/R ☐ Yes, S.E. No.:	SORC Meeting No.:	Meeting Date:

4. Approval

PPU:			
Final Editorial/Proof:	Update PROMIS:	Update Word Processing File:	Update Hardcopy File:	Distribute:
RPO Approval (Both if Site)	(Site Only)	Date	Effective Date (Allow 3 Days)

ATTACHMENT 2
SAFETY REVIEW

(AP-2.1, Form 3, Rev 00)

NIAGARA MOHAWK **SAFETY REVIEW FORM**

Procedure No.	Revision No.	Title

Does the new procedure or proposed changes to the existing procedure:

A "maybe" constitutes a yes answer.

	Yes	No	N/A
1 Involve activities described in the SAR? ☐ Yes ☐ No Documents reviewed: _____			
If YES, are the activities as described in the SAR altered?	☐	☐	☐
* Explain: _____			
2 Involve a structure, system, or component (SSC) described in or referenced by the SAR or assumed in the Accident and Transient Analysis? ☐ Yes ☐ No Documents reviewed: _____			
If YES, will:			
A The design or function be altered?	☐	☐	☐
* Explain: _____			
B The method of performing the function be altered?	☐	☐	☐
* Explain: _____			
3 Involve a test or experiment NOT described in the SAR?	☐	☐	
* Explain: _____			
4 Require a change to the Technical Specifications or Operating License?	☐	☐	
Sections reviewed: _____			
5 Affect nuclear safety (increase or decrease) in a way not previously evaluated in the SAR?	☐	☐	
* Explain: _____			

Safety Evaluation Required? ☐ Yes ← Any YES Answers; ☐ No ← All Answered NO and/or NA

	Yes	No
1 Create new or increase existing thermal effluents discharged to the environment?	☐	☐
2 Introduce new or increase usage of existing chemicals that may be discharged into the environment?	☐	☐

Contact Environmental Protection? ☐ Yes ← Any YES Answers; ☐ No ← Both NO Answers

Detailed Environmental Evaluation Required? ☐ Yes ☐ No

Supervisor Environmental Protection	Date

Approvals	Concurrence Yes	Concurrence No	Date
Qualified Safety Reviewer (Unit 1) ☐ N/A - Print/Sign	☐	☐	
Qualified Safety Reviewer (Unit 2) ☐ N/A - Print/Sign	☐	☐	

* Further explanations are attached. ☐ .....Number of attached pages: _____

ATTACHMENT 3
PROCEDURE CLASSIFICATION GUIDELINES

(LATER)

ATTACHMENT 4
PROCEDURE INPUT AND REVIEW GUIDELINES

(AP-2.1, Form 2, Rev 00)

NIAGARA MOHAWK

INPUT AND REVIEW GUIDELINES

The guidelines included below should be used to determine if input by another discipline is required. If used for assistance in determining Cross-Disciplinary Reviews, the guideline should be used in conjunction with Section 3.10. Review should be obtained by the listed organization if the procedure:

ALARA / Health Physics

a. Involves work in a radiologically controlled area, particularly contaminated areas and high radiation areas.
b. Involves work on a system, component or item containing or contaminated with radioactive materials.
c. Involves Unit 2 Valve Maintenance with potential cobalt (stellite) introduction into Reactor AND has not been evaluated by ALARA.

Chemistry

a. Potentially affects condensate, feedwater, or reactor water chemistry or chemistry instruments.
b. Involves use of chemicals not on approved chemical list or a new use for a listed chemical.
c. Produces or affects effluents or effluent monitoring.
d. Introduces liquids into floor/equipment drains.
e. Addresses the opening of a Service Water System boundary (G. L. 89 - 13)

Fire Protection

a. Disarms a Fire Protection or Detection system or component.
b. Potentially represents an increased fire loading.

Inservice Inspection/Test (ISI/IST)

a. Involves ASME Section XI component or components included in the ISI program plan.
b. Involves Appendix J Local Leak Rate Type C tests.

System Engineering

a. Involves Logic System Functional Testing.
b. Involves special or preoperational modification functional testing.
c. Involves corrective maintenance on equipment addressed by an Engineering Specification.
d. Is an operating procedure that affects system hydraulic characteristics.

Operations

a. Involves Limiting Conditions for Operation (LCO).
b. Requires Operations alignment and restoration of safety-related or Q components.
c. Specifies surveillance test related post-maintenance testing to be completed.
d. Contains an EOP protected step.

Quality Assurance QA/QI

a. Is a Site Administrative Procedure, Emergency Operating Procedure, or Special Operating Procedure.
b. Incorporates QA hold, witness, or notification points.

Reactor Engineering

a. Could affect core reactivity.
b. Affects Core Monitoring instrumentation.
c. Affects Feedwater instrumentation.

Design Engineering

a. Adds, deletes or changes the timing or sequence of Electrical, Structural or Mechanical (flow, heat) loads or characteristics.
b. Permanently or temporarily changes the plant configuration.
c. Involves movement of heavy loads (i.e. greater than 1,000 lbs.).
d. Affects environmentally or seismically qualified structures, systems or components.
e. Is a PM procedure with a maintenance interval other than that specified on Engineering Documents.
f. Is an EOP.
g. Involves maintenance on a door.

Nuclear Security

a. Title or contents could be considered Safeguards information if the procedure specifically identifies:
   1. Security measures for the physical protection of formula quantities of Special Nuclear Material.
   2. Security measures for the physical protection system and detailed location of plant equipment vital to site safety.
b. Involves Security related equipment, such as security doors and fences.

Environmental Qualification (EQ)

a. Incorporates EQ required maintenance requirements.
b. Involves maintenance or affects the condition of EQ equipment.

Emergency Preparedness

a. Provides instructions for response to Emergency Events.
b. Potentially affects the Site Emergency Plan.

Radwaste

a. Implementation increases the volume or type of radwaste.
b. Results in generation of radwaste by use of chemicals in accordance with AP-7.1.
c. Affects plant water balance.

Maintenance (Mech / Elec / I&C)

Requires Maintenance personnel to perform activities, such as performance of maintenance procedures, installation of M&TE, including vibration and flow monitors, lifting and landing of leads and connectors.