

NIAGARA MOHAWK POWER CORPORATION  
NINE MILE POINT NUCLEAR STATION  
ADMINISTRATIVE PROCEDURE

AP-2.2

REVISION 01

PROCEDURE CHANGE EVALUATIONS

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TECHNICAL SPECIFICATION REQUIRED  
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Approved By:  
K. A. Dahlberg

K.A. Dahlberg  
Plant Manager, Unit 1 5/21/91  
Date

Approved By:  
M. J. McCormick, Jr.

M.J. McCormick, Jr.  
Plant Manager, Unit 2 5/21/91  
Date

FOR INFORMATION ONLY

THIS PROCEDURE SUPERSEDES S-SUP-4

Effective Date: 6/1/91

PERIODIC REVIEW DUE DATE: June 1993

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LIST OF EFFECTIVE PAGES

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## 1.0 PURPOSE

To establish the requirements and responsibilities for review, implementation, and control of changes to procedures.

### 1.1 Applicability

This procedure applies to:

- 1.1.1 Nuclear Generator personnel reviewing, approving, and implementing immediate changes to site procedures.
- 1.1.2 Nuclear Division personnel and other external organizations requesting new procedures or changes to existing site procedures.

## 2.0 PRIMARY RESPONSIBILITIES

- 2.1 The Plant Manger approves Immediate PCEs involving technical changes to Technical Specification Required (TSR) procedures within 14 days of implementation.
- 2.2 The Supervisor Site Procedures has primary responsibility for the content and maintenance of this procedure.
- 2.3 The Responsible Procedure Owner (RPO) maintains required procedures in a usable condition including the assessment and approval of immediate changes and ensuring disposition and incorporation of future changes.
- 2.4 Licensed Senior Reactor Operators (SROs) provide interim approval for Immediate PCEs involving technical changes to Technical Specification Required (TSR) procedures.

## 3.0 PROCEDURE

### 3.1 Initiation of a Procedure Change Evaluation (PCE)

- 3.1.1 A Procedure Change Evaluation (PCE) may be initiated when a new procedure or procedure alteration is necessary or desired AND it is not practicable to use the procedure revision process.
- 3.1.2 Future and Immediate PCEs are initiated on a common form (Attachment 1) and implemented by one of the following methods:
  - a. Immediate PCE when procedure changes are considered immediately necessary to complete planned work or work in progress. Immediate Changes involve a markup of the existing procedure Master Copy.

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3.1.2 (Cont)

- b. Future PCE when requested changes, revisions, or new procedures are not immediately required. Future Changes do not involve a markup of the procedure Master Copy.

3.1.3 Immediate PCEs may be initiated when an activity must be completed AND the associated procedure:

- a. Cannot be performed safely, including ALARA concerns;  
OR
- b. Cannot or should not be performed as written; OR
- c. Is technically incorrect

3.1.4 PCE initiators shall complete Section 1 of the PCE Form (Attachment 1) and:

- a. Include the procedure number and current revision level. For requests for new procedures, enter "NEW".
- b. Include a description of change. A marked up copy may be attached as necessary.
- c. Explain the reason for the change including, as appropriate, reference to modifications or Simple Design Changes (SDC), NCTS commitments, or DERs being addressed.

3.1.5 PCE initiators shall submit:

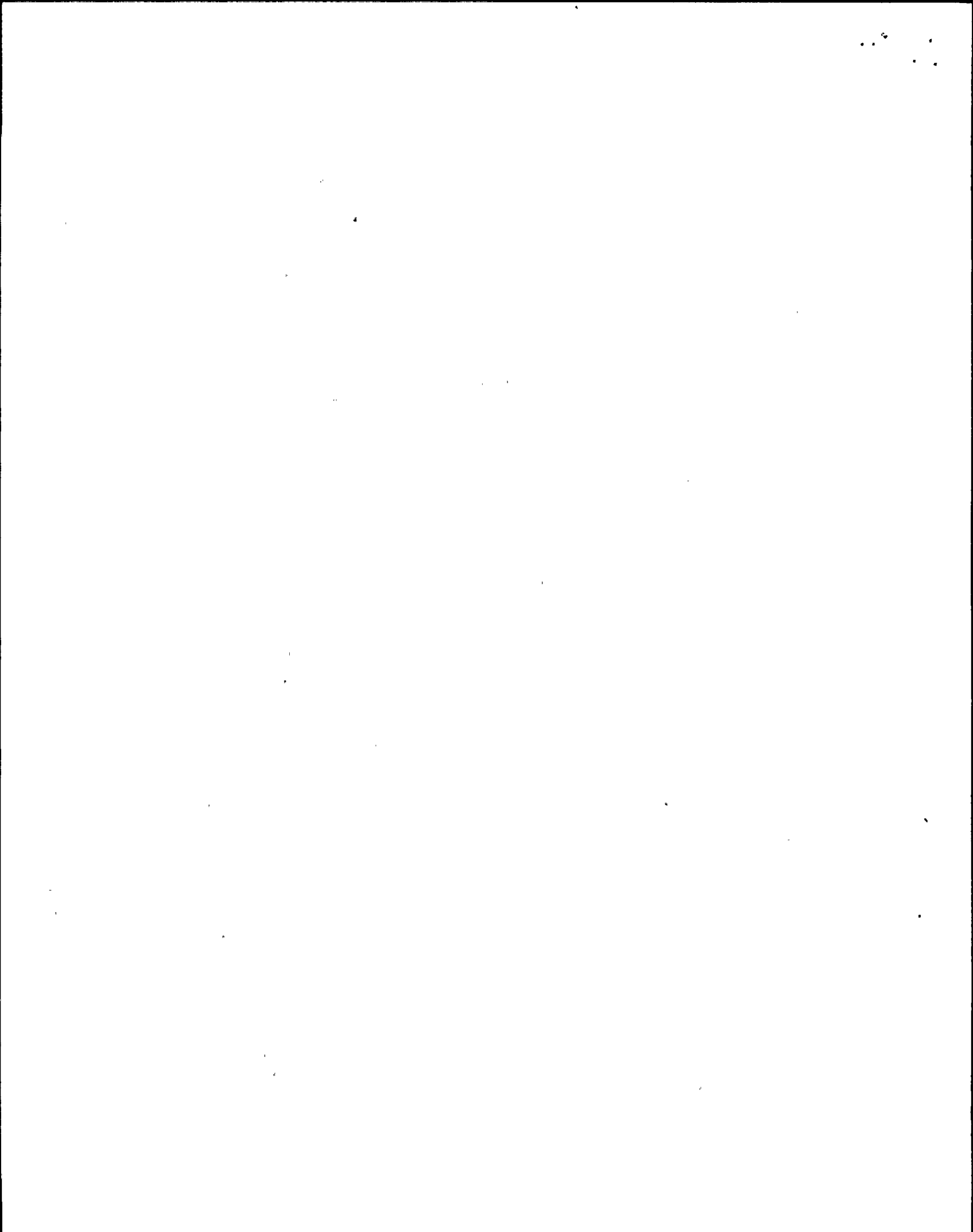
- a. Immediate PCEs to the Responsible Procedure Owner (RPO) or RPO alternate. Telecon may be used, if necessary. The RPO may assign the initiator or another individual to complete further preparation.
- b. Future PCEs to the Procedures Publication Unit (PPU). Submittal of a Future PCE does not provide permission to implement a procedure change.

NOTE: Initiators able to readily obtain a Future PCE disposition may do so before submitting to the PPU.

3.2 Preparation and RPO Assessment of Immediate PCEs

3.2.1 The following requirements apply to Immediate PCEs.

- a. Shall not involve a "change of intent" as determined using Attachment 2, Guidelines for Change of Intent.



3.2.1 (Cont)

- b. Shall only be made to approved technical procedures with a status of "effective".
- c. Shall not be made to Administrative Procedures. Administrative procedures requiring alteration shall be revised in accordance with AP-2.1, Procedure Preparation, Review, and Issue.

NOTE: Administrative procedures include Site Administrative Procedures, Section/Unit Administrative Procedures or other procedures categorized as administrative.

3.2.2 (COMM 1) Immediate PCEs should be prepared in accordance with applicable requirements of AI-1.0, Site Procedures Writer's Manual. Assistance from experienced procedure authors may be necessary.

3.2.3 The initiator shall ensure the proposed change is technically accurate. Procedure source reference documents, license documents, and drawings shall be referenced, as appropriate.

3.2.4 The initiator shall assess the full impact of the proposed changes on the entire procedure including portions already performed and incorporate each required change.

3.2.5 The initiator shall ensure procedure changes are legible and affected information indicated by a vertical "revision bar" in the margin.

3.2.6 The initiator shall identify the required duration of the change as one of the following:

- a. Permanent Change when the change is intended to be permanently included in the current revision of the procedure.
- b. One Time Only Change when the change is required only for the duration of the existing controlled working copy being used.

3.2.7 The Responsible Procedure Owner (RPO) shall:

- a. Assess the urgency of Immediate PCEs in accordance with Step 3.1.3
- b. Ensure Immediate PCEs do not constitute a "change of intent" in accordance with Attachment 2.

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- 3.2.8 The RPO assessment shall result in one of the following actions:
- a. Agree with the request by initialing and dating each revision bar and complete interim approval requirements in accordance with Section 3.3
  - b. Redirect the change to the Future PCE process for consideration at a later date
  - c. Reject the change and destroy the PCE. The RPO shall ensure any affected procedure copies are returned to their original condition, if appropriate

### 3.3 Interim Approval of Immediate PCEs

- 3.3.1 The RPO shall approve changes to Non-Technical Specification Required (NTSR) procedures. Unless the change involves a temporary alteration, no further approvals are required. See Step 3.3.2 for changes to temporary alterations.
- 3.3.2 The RPO shall approve changes to Technical Specification Required (TSR) procedures and determine the need for additional review and approval as follows.
- a. Editorial changes need only be approved by the RPO provided they are made in accordance with Attachment 3, Criteria for Editorial Changes.
  - b. Technical changes to TSR procedures shall receive interim approval before implementation by the RPO and one other member of the station management staff, one of whom holds a Senior Reactor Operators (SRO) license for the affected station. Procedures having a site impact shall be approved by an SRO from each station.
  - (COMM 2) c. Technical changes affected protected procedure steps for Logic System Functional Testing (LSFT, Unit 2 only), shall be reviewed by a member of the Technical Support Section before implementation.
  - d. Technical changes affecting protected procedure steps for ASME Section XI Inservice Testing (IST or ASME) shall be reviewed by a member of the Technical Support-IST Section before implementation.
  - e. Technical changes to Special Test Procedures shall be reviewed by the Station Technical Review Committee before implementation.

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3.3.2 (Cont)

- f. Technical changes that add or alter a temporary alteration, regardless of whether the procedure is TSR or NTSR, shall require additional technical review and performance of a Safety Review prior to implementation.
- g. Additional technical reviews may be requested as warranted.

3.3.3 When requested, personnel providing technical review of Immediate PCEs shall:

- a. Ensure the change is consistent with applicable requirements for operation of the system, structure, or component.
- b. Document approval by signing the PCE form.

3.3.4 Senior Reactor Operators (SROs) reviewing Immediate PCEs for approval shall:

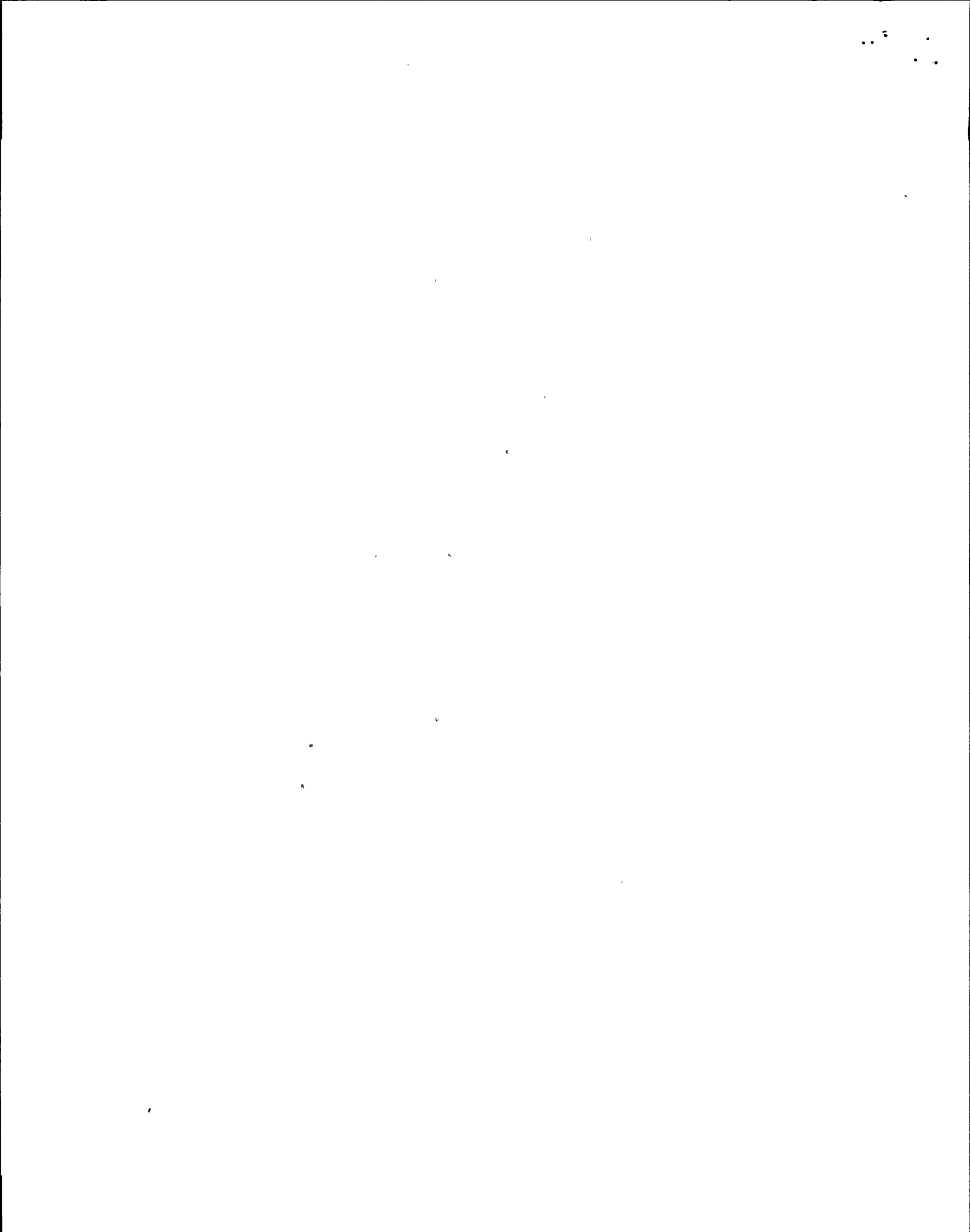
- a. Ensure the change does not constitute a change of intent or an operability concern.
- b. Be satisfied that the change is consistent with applicable requirements, such as drawings, manuals, and specifications. The SRO may request additional supporting information from the initiator, as necessary.
- c. Grant interim approval by signing the PCE Form and initialing each revision bar.

3.3.5 If time permits, the RPO may direct that a Safety Review be completed prior to implementation of an Immediate PCE. Safety Reviews are completed in accordance with AP-2.1, Procedure Preparation, Review, and Issue.

3.4 Implementation of Immediate PCEs

3.4.1 The initiator shall attach a copy of the interim approved PCE Form and a legible copy of each changed page as follows:

- a. Permanent Changes shall be made to:
  - 1. The Master Copy
  - 2. Satellite Master Copies
  - 3. The Controlled Working Copy being used
- b. One Time Only Changes shall be made to the Controlled Working Copy only.





- 3.4.2 The initiator shall deliver the original PCE and a legible copy of each affected page to the office of the Plant Manager. Delivery should be within one business day.
- 3.4.3 The author or user may implement the change upon completion of appropriate interim approval and delivery requirements.

3.5 Plant Manager Approval of Immediate PCEs

- 3.5.1 The office of the Plant Manager shall receive and record Immediate PCEs. A unique number shall be assigned to each Immediate PCE.
- 3.5.2 Immediate PCEs involving editorial changes and changes to NTSR procedures do not require Plant Manager approval and shall be forwarded directly to the PPU.
- 3.5.3 The Plant Manager shall ensure a Safety Review is prepared in accordance with AP-2.1 for each Immediate PCE involving technical change to a TSR procedure.
- a. If not already completed and attached, a copy of the PCE requiring Safety Reviews shall be routed to the RPO.
  - b. The RPO shall ensure Safety Reviews are completed and returned to the Plant Manager within 14 days. The RPO should attempt to complete Safety Reviews within 7 days.
- 3.5.4 The Plant Manger shall approve each Immediate PCE involving a technical change to a TSR procedure within 14 days. Procedures having site impact shall be approved by the Plant Manager of each unit.
- 3.5.5 The RPO shall ensure a PCE is immediately removed from use and a Deviation Event Report is initiated if:
- a. The Safety Review for an Immediate PCE indicates that a Safety Evaluation is required and the change has already been implemented
  - b. The Plant Manager disapproves an Immediate PCE after implementation has occurred
  - c. The Plant manager does not approve an Immediate PCE involving a technical change to a TSR procedure within 14 days.

3.6 Incorporation of Immediate PCEs

- 3.6.1 The Procedures Publication Unit shall receive Immediate PCEs.



3.6.2 The Procedures Publication Unit (PPU) should reissue approved Immediate PCEs within two business days of receipt. Immediate PCEs shall be reissued within 7 days of receipt.

- a. Permanent Changes shall be reissued to controlled copy holders and include all revised portions of the procedure
- b. One-Time-Only Changes shall not be reissued and shall be maintained in the procedure file

3.7 Disposition of Requests for Future PCEs  
(COMM 3)

3.7.1 The RPO shall disposition Future PCEs by one of the following methods:

- a. Accept the proposed change and document disposition. Alteration to the content of the request may be necessary and such changes should be included in the disposition.
- b. Redirect the proposed change to the Immediate PCE process provided it meets the requirements for an Immediate PCE.
- c. Inactivate the procedure.
- d. Reject the proposed change and document reason for rejection in the disposition.

3.7.2 The RPO shall return dispositioned Future PCEs to the Procedures Publication Unit. The RPOs unit should maintain a copy of dispositioned Future PCEs for reference.

3.8 Incorporation of Future PCEs  
(COMM 3)

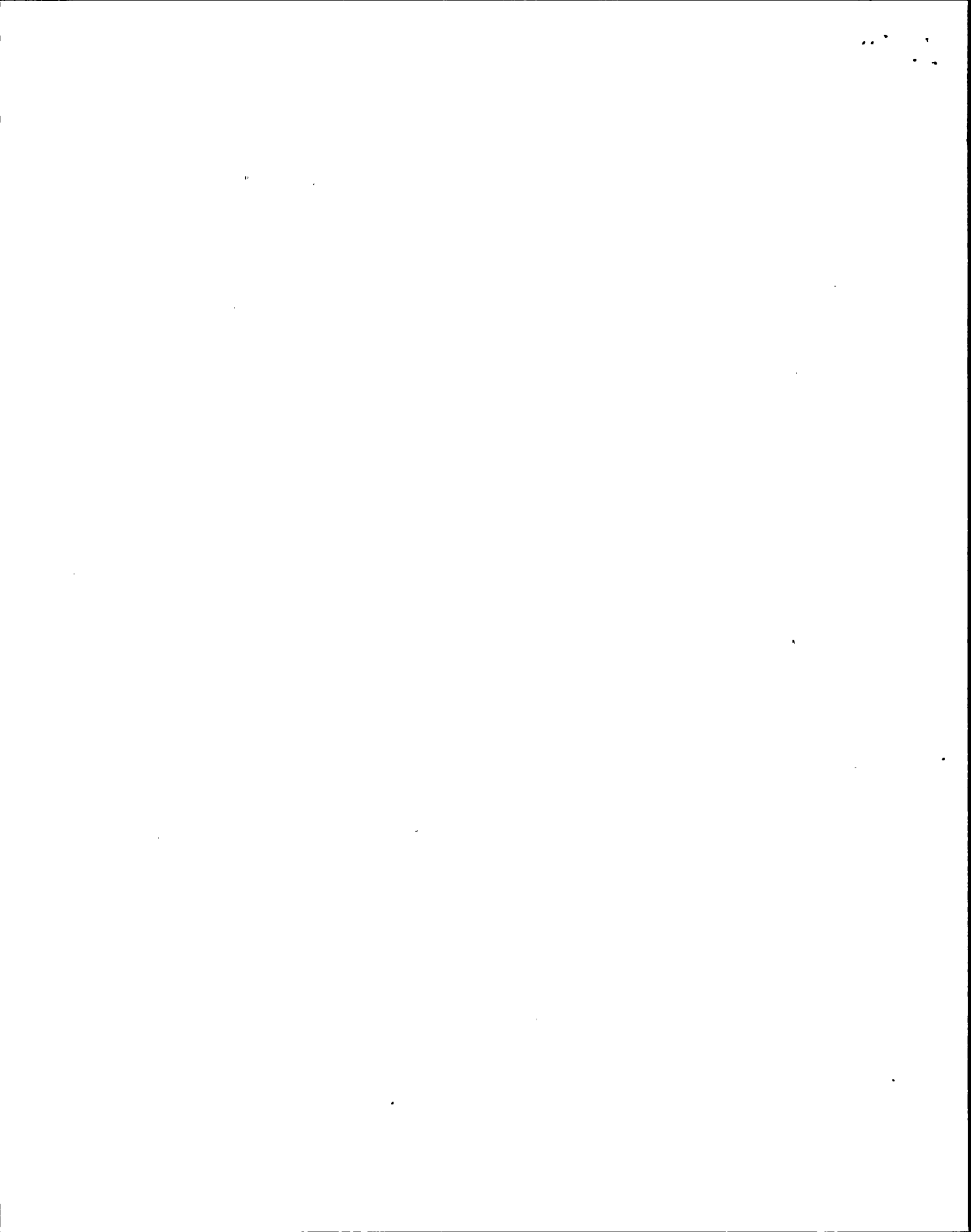
3.8.1 The RPO shall be responsible for the prioritization and incorporation of Future PCEs into subsequent revisions or Immediate PCEs.

3.8.2 Future PCEs incorporated by revisions shall be completed in accordance with AP-2.1, Procedure Preparation, Review, and Issue.

3.9 PCE Tracking and Control

3.9.1 The Procedures Publication Unit (PPU) shall maintain a system to monitor and control PCEs. The system shall include:

- a. Assignment of a unique tracking number to each PCE
- (COMM 3) b. Differentiation between Immediate and Future PCEs



3.9.1 (Cont)

c. Capability for status and performance monitoring reports including:

1. Immediate PCEs incorporated into procedures
2. Future PCEs needing disposition
3. Future PCEs needing incorporation
4. New procedure requested

3.9.2 The PPU shall control the issue and return of PCEs to initiators. A copy of PCEs initiated for Future Changes shall be returned to the initiator upon:

- a. Disposition
- b. Closeout or cancellation

3.9.3 The PPU shall provide procedure authors with copies of Future PCEs upon request.

4.0 DEFINITIONS

4.1 "Change of Intent" - A change involving technical deviation from the approved condition such that it is beyond the scope of an Immediate PCE.

4.2 Editorial Change - A procedure alteration that does not alter technical intent or does not require technical review or approval due to limited potential impact or consequences.

4.3 Future PCE - A PCE implementation method which delays the incorporation of a requested change until a future procedure revision or subsequent processing as an Immediate PCE.

4.4 Immediate PCE - A PCE implementation method that allows direct, expedited incorporation of procedure changes that are considered immediately necessary.

4.4.1 One-Time-Only Change - An Immediate PCE required for a single specific use of a procedure.

4.4.2 Permanent Change - An Immediate PCE intended to apply to all future uses of the current revision.

4.5 Procedure Change Evaluation (PCE) - The form and process to implement or suggest alterations to procedures or to suggest development of new procedures.

4.6 Procedure Intent - The purpose, method, conditions, and scope of a procedure that ensures safe and accurate completion of an activity.

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4.7 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.

4.8 Technical Change - A change to a procedure which may affect the operational status of plant systems or equipment and requires technical review before implementation.

5.0 REFERENCES AND COMMITMENTS

5.1 Licensee Documentation

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

5.1.2 Unit 2 Technical Specifications, Section 6.5, Review and Audit and Section 6.8, Procedures and Programs

5.2 Policies, Programs, and Procedures

5.2.1 NDD-PRO, Procedures and Orders

5.2.2 NIP-ECA-01, Deviation Event Report

5.2.3 AP-2.0, Procedure Use and Control

5.2.4 AP-2.1, Procedure Preparation, Review, and Issue

5.2.5 AP-10.1, Management of Station Records

5.2.6 AI-1.0, Site Procedures Writer's Manual

5.3 Commitments

<u>Sequence Number</u>	<u>Commitment Number</u>	<u>Description</u>
1	NCTS 701024-00	Instruct personnel writing Immediate Procedure Change Evaluations to follow applicable requirements of AI-1.0, Site Procedures Writer's Manual
2	NCTS 503368-01	Revision and TCNs to LSFT items will be reviewed by the Technical Staff (Unit 2 only).
3	CAR 90.3022	Improve Procedure Evaluation Process and centralize

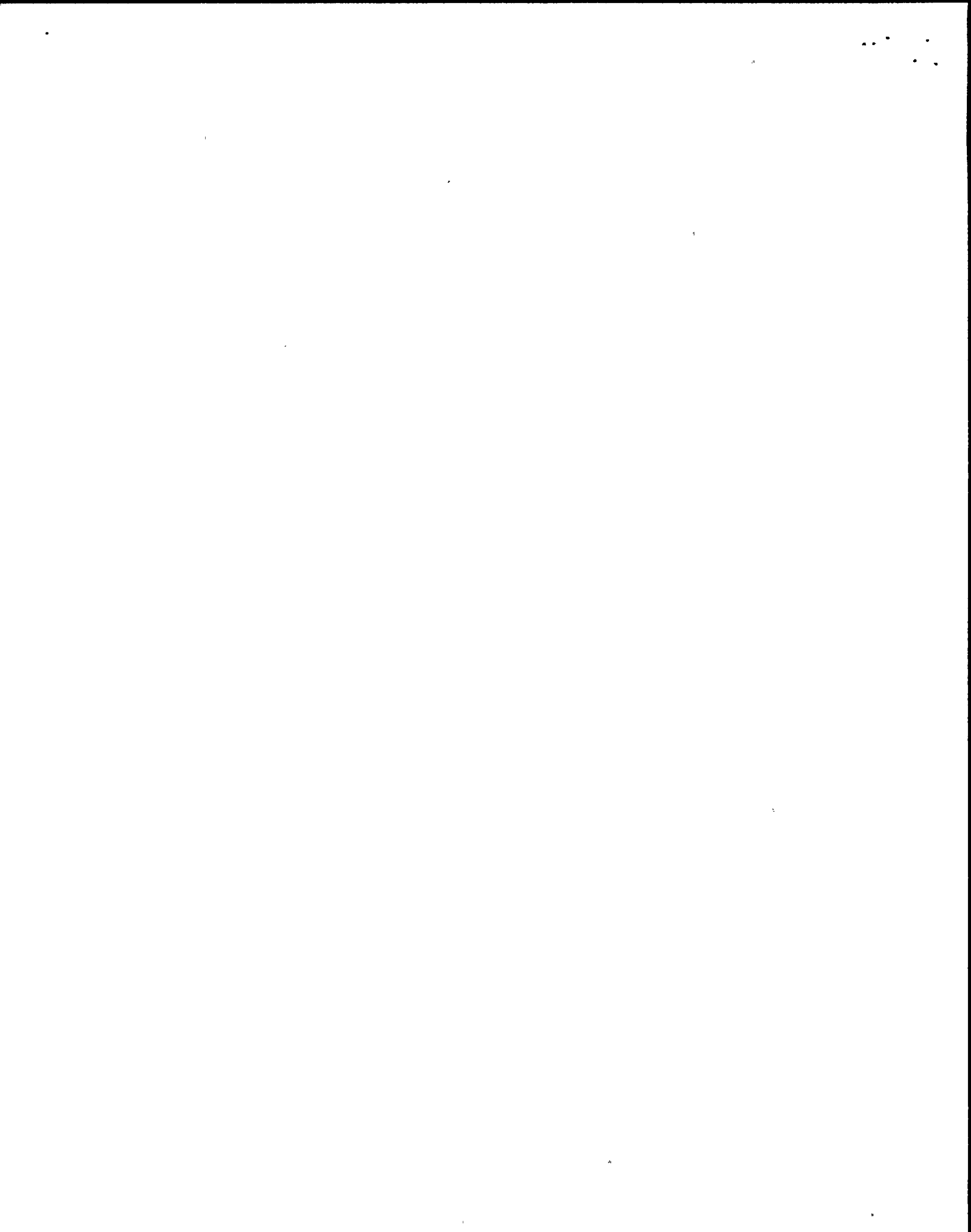




6.0 RECORD REVIEW AND DISPOSITION

The following records shall be maintained as permanent plant records in accordance with AP-10.1, Management of Station Records:

- 6.1 Final Approved Immediate PCE Forms
- 6.2 Safety Review Forms



**ATTACHMENT 1  
PROCEDURE CHANGE EVALUATION**

(AP-2.2, Form 1, Rev 03)

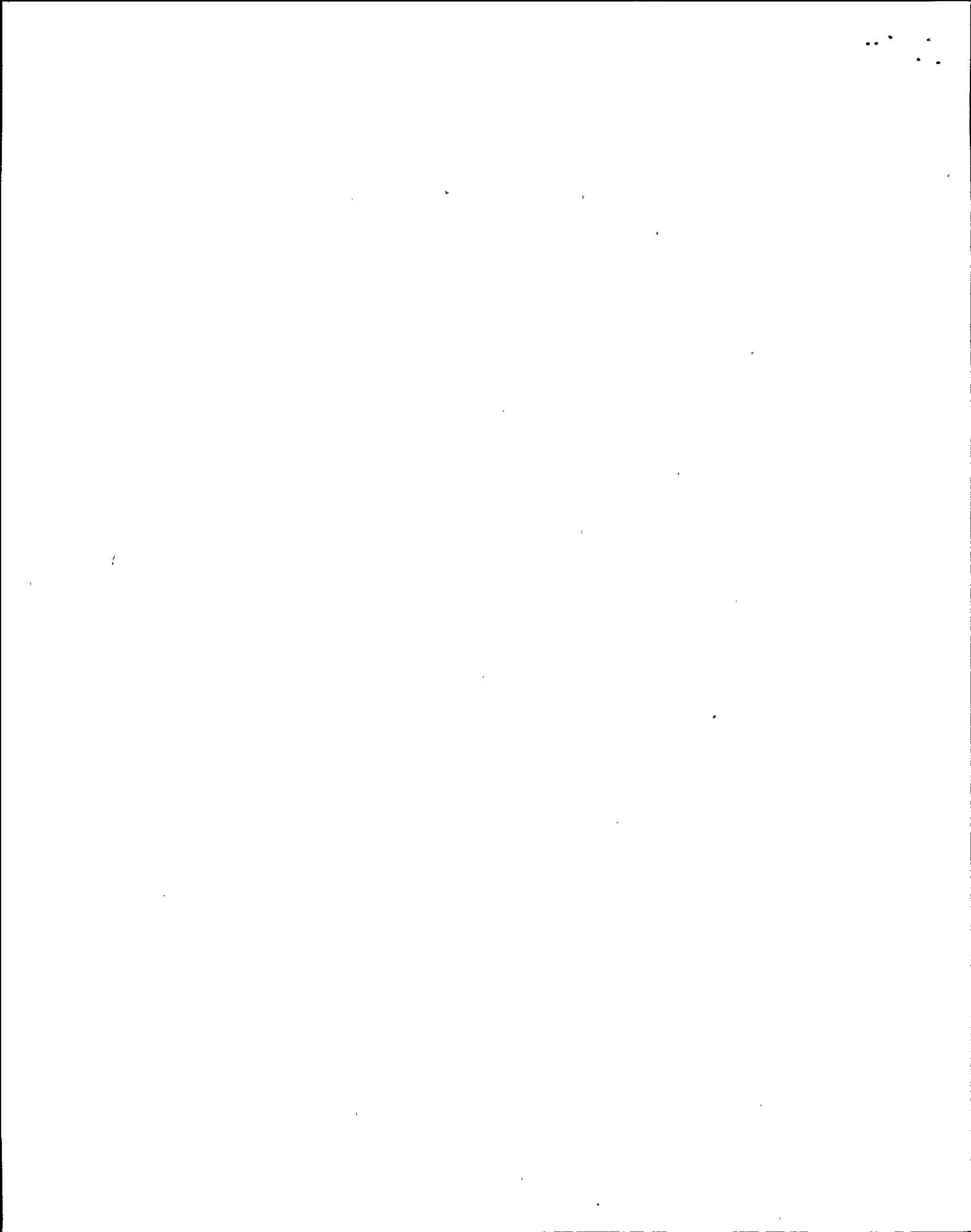
<b>NY NIAGARA MOHAWK</b>	<b>PROCEDURE CHANGE EVALUATION (PCE)</b>	PCE No. _____
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**1. Initiation**

Procedure No. _____	Rev. No. _____	Title _____
Describe Change: _____ _____ _____ _____		
Reason for Change: <input type="checkbox"/> NCTS No. _____ <input type="checkbox"/> DER No. _____ <input type="checkbox"/> Mod/SDC No. _____ <input type="checkbox"/> Other (Explain): _____ _____		

**2. Method of Change**

<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td align="center"><input type="checkbox"/> <b>Immediate Change</b></td> </tr> <tr> <td>Change Is:    <input type="checkbox"/> Permanent    <input type="checkbox"/> One Time Only</td> </tr> <tr> <td> <input type="checkbox"/> Technical Change to TSR Procedure              <input type="checkbox"/> NTSR Procedure OR Editorial Change         </td> </tr> <tr> <td>Pages Affected: _____</td> </tr> <tr> <td>Initiator (Print &amp; Initial) _____ Date _____</td> </tr> <tr> <td>RPO App'l: (Both if Site)    <input type="checkbox"/> Accept    <input type="checkbox"/> Reject    <input type="checkbox"/> Redirect to Future</td> </tr> <tr> <td>Date: _____ Date: _____</td> </tr> <tr> <td>Safety Review Req'd    <input type="checkbox"/> Yes - TSR or Temp Alteration  <input type="checkbox"/> No - NTSR or Editorial         </td> </tr> </table>	<input type="checkbox"/> <b>Immediate Change</b>	Change Is: <input type="checkbox"/> Permanent <input type="checkbox"/> One Time Only	<input type="checkbox"/> Technical Change to TSR Procedure <input type="checkbox"/> NTSR Procedure OR Editorial Change	Pages Affected: _____	Initiator (Print & Initial) _____ Date _____	RPO App'l: (Both if Site) <input type="checkbox"/> Accept <input type="checkbox"/> Reject <input type="checkbox"/> Redirect to Future	Date: _____ Date: _____	Safety Review Req'd <input type="checkbox"/> Yes - TSR or Temp Alteration <input type="checkbox"/> No - NTSR or Editorial	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td align="center"><input type="checkbox"/> <b>Future Change</b></td> </tr> <tr> <td>Initiator (Print) _____</td> </tr> <tr> <td>Mail Location _____ Phone _____ Date _____</td> </tr> <tr> <td><b>Disposition</b></td> </tr> <tr> <td>RPO Name _____ <span style="border: 1px solid black; padding: 2px;">PPU</span></td> </tr> <tr> <td>_____</td> </tr> <tr> <td>_____</td> </tr> <tr> <td>_____</td> </tr> <tr> <td>_____</td> </tr> <tr> <td> <input type="checkbox"/> Redirect to IMMEDIATE Change (To RPO)  <input type="checkbox"/> Inactivate Procedure (To PPU)  <input type="checkbox"/> Future Revision or New Procedure (To PPU)  <input type="checkbox"/> Reject (To PPU)         </td> </tr> <tr> <td>RPO Approval _____ Date _____</td> </tr> </table>	<input type="checkbox"/> <b>Future Change</b>	Initiator (Print) _____	Mail Location _____ Phone _____ Date _____	<b>Disposition</b>	RPO Name _____ <span style="border: 1px solid black; padding: 2px;">PPU</span>	_____	_____	_____	_____	<input type="checkbox"/> Redirect to IMMEDIATE Change (To RPO) <input type="checkbox"/> Inactivate Procedure (To PPU) <input type="checkbox"/> Future Revision or New Procedure (To PPU) <input type="checkbox"/> Reject (To PPU)	RPO Approval _____ Date _____
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<b>Plant Manager (Technical TSR Changes Only)</b>																				
Signature _____	Date _____																			
Signature (Site Only) _____	Date _____																			



ATTACHMENT 2  
GUIDELINES FOR "CHANGE OF INTENT"

If any of the following guidelines are "true" concerning the proposed change, then the change may represent a "change of intent".

1. Involves a change to the purpose of the procedure, except for editorial changes to the "PURPOSE" statement.
2. Removal of, alteration, or addition to the technical content of acceptance criteria except when acceptance criteria values are controlled by another organizational unit and have been technically reviewed by that unit.
3. Causes a deviation from the Technical Specifications or FSAR/USAR.
4. Results in a Limiting Condition for Operation (LCO) when no LCO was required by the original procedure.
5. Results in operation of equipment or components in a mode of operation or to perform a function which:
  - a. Is inconsistent with equipment or component design; OR
  - b. Causes uncertainty as to how the change may impact the operation of equipment.
6. Alters or deletes a protected procedure step or hold point without proper justification.
7. Results in equipment or personnel safety concerns or has the potential to introduce previously unevaluated ALARA concerns.
8. Deviates from controls established by Administrative Procedures.
9. Changes the Procedure Number or title page information.

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ATTACHMENT 3  
GUIDELINES FOR EDITORIAL CHANGES

The following guidelines should be used in determining if a proposed change constitutes an "editorial change". Editorial changes are changes that:

1. In no way alters the intent of technical information but may enhance or further define the existing information.
2. Can be ascertained to be a typing error.
3. Makes minor corrections to existing information that can be adequately and entirely supported by controlled and approved design documentation. The documentation shall be referenced on the PCE and may include, Engineering Design Changes, Specifications, or Q-Lists.
4. Makes corrections that do not alter the technical content such as:
  - a. Updating references
  - b. Substituting material symbol numbers
  - c. Correcting misspelled words
  - d. Changing minor, obvious errors in equipment numbers
  - e. Minor word changes that add to understanding but do not change the meaning
  - f. Correcting the number or title of a step, figure, attachment, or table
  - g. Correcting revision or page numbers
  - h. Updating phone numbers
5. Reflects changes in position titles without modifying existing responsibilities.

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