

# OPERATIONS DEPARTMENT INSTRUCTION

N2-ODI-5.10  
Rev. 0  
(TCN-1)

EOE

ONGOING EVALUATION PROGRAM



APPROVALS:

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**FOR INFORMATION ONLY**

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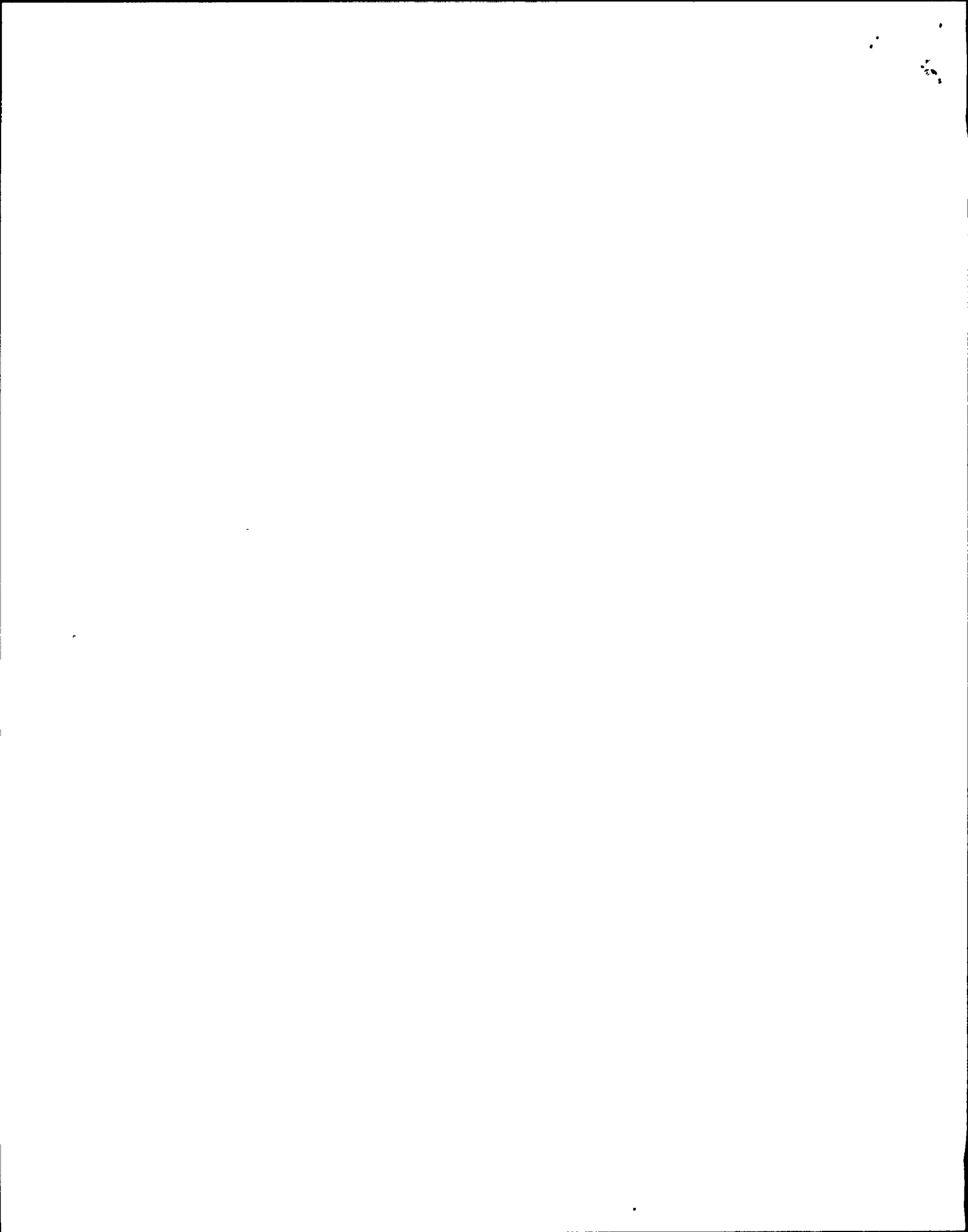
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EOP ONGOING EVALUATION PROGRAM

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EOP ONGOING EVALUATION PROGRAM

1.0 PURPOSE

This instruction describes the Ongoing Evaluation Program for the NMP2 Emergency Operating Procedures and the associated support procedures.

2.0 SCOPE

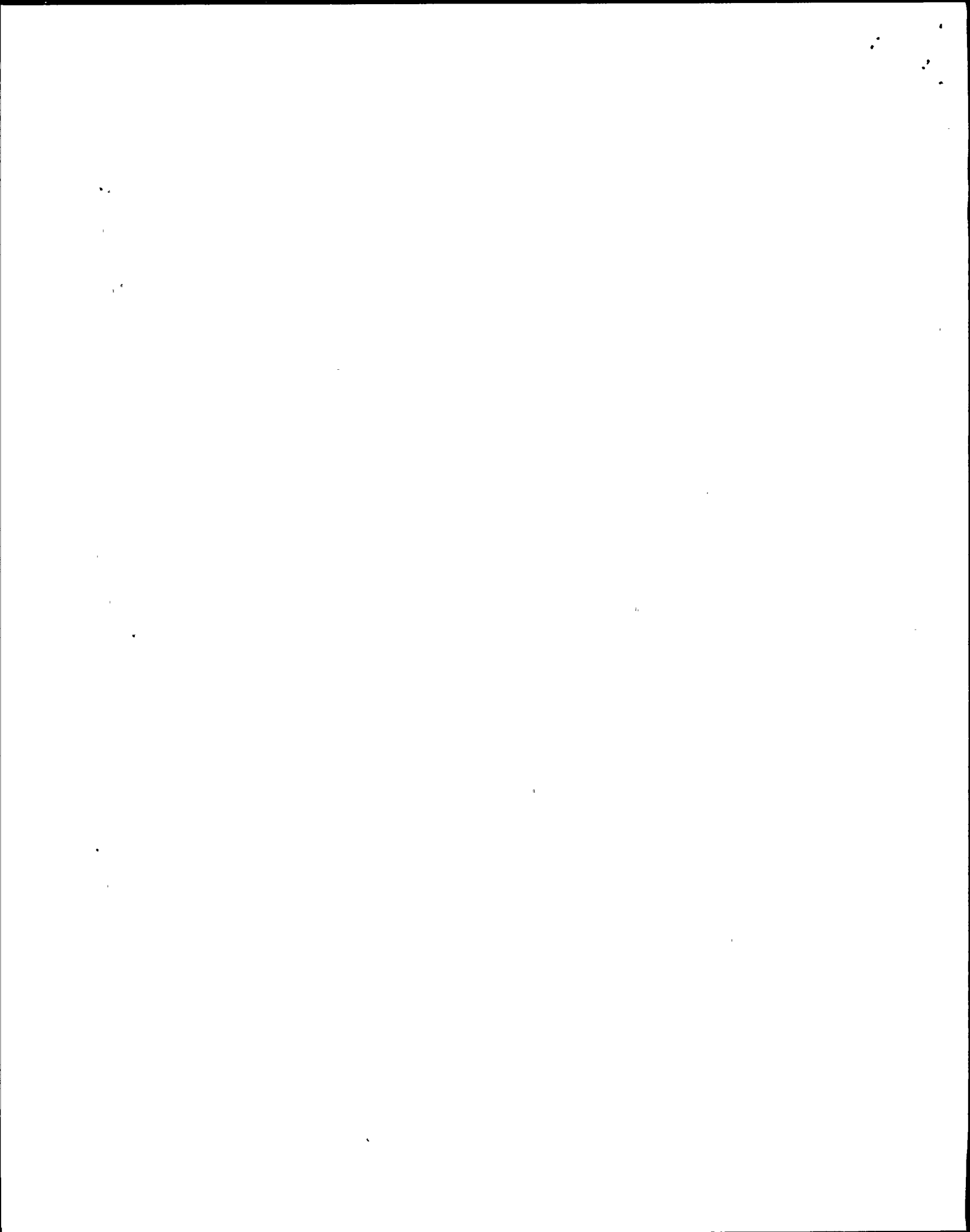
The Emergency Operating Procedures and the associated support procedures direct the Operators actions during potentially degraded plant conditions. It is important that they are well-written, easy to use, and are properly updated and maintained.

2.1 This instruction provides guidance for the ongoing evaluation of the NMP2 Emergency Operating Procedures and the associated support procedures. This includes:

- Evaluating the technical adequacy of the EOPs in light of operational experience and use, Operator training, exercise of the EOPs in the simulator and Control Room/plant walk-throughs.
- Evaluating the EOPs for organization, format, style and content, as a result of the experience gained in the use of the EOPs.
- Evaluation of staffing and staff qualifications relevant to using the EOPs.

2.2 Maintenance of EOPs

- a. EOPs are maintained by an ongoing evaluation program as required by NUREGs 0899, 1358, and Technical Specifications Sections 6, Administrative Controls. This section describes the process whereby the technical adequacy, organization, format, style, and content of the EOPs and associated support procedures can be evaluated. This evaluation is done on a continual basis through operational experience and use, training, simulator exercises, and Control Room walk-throughs. This procedure also provides for continued evaluation of staffing and staffing levels relevant to using EOPs.



b. Procedural controls will be in place to ensure that EOPs or their associated calculations are not adversely affected as a result of plant modifications, design drawing changes, and other reference document changes. NMP2 Engineering will control the EOP calculations as well as the PSTGs (PR-8207). Engineering will develop a "Plant Specific Input Parameters List" and will assure that the EOP calculations and the PSTGs are revised whenever any plant specific parameters are changed. These plant specific parameters may be affected by the following:

1. Licensing change notices (NEL-030)
2. Technical Specification changes (NT-130.A)
3. Plant Modifications (ND-100/ND-100.E)
4. Temporary Modification (AP-6.1)
5. Procedure changes (AP-2.0)
6. Spare Parts Equivalency Evaluation (NEL-038)
7. Nonmodification EDC (NEL-050)
8. Vendor Manual changes (ND-170)
9. Any NMP2 Calculation Revision

c. Operators, trainers, and other station personnel are encouraged to identify problems, possible solutions, and suggest improvements to EOPs, their support procedures and their implementation methods.

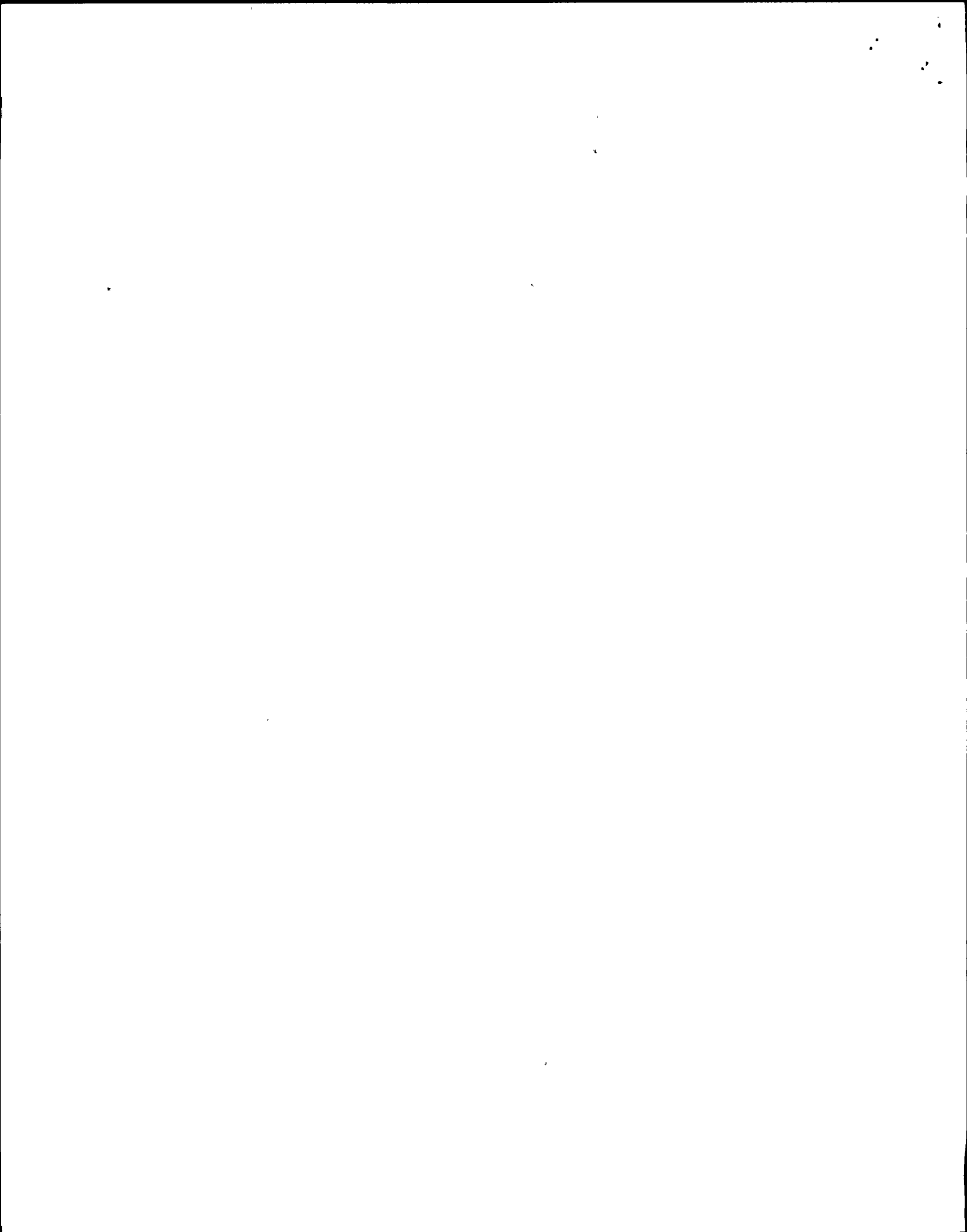
d. EOPs are evaluated and maintained through the following procedures and programs:

AP-2.0, "Productions and Control of Procedures" describes the generation, approval, publication, distribution, and control of procedures issued by the Nuclear Generation Department or signed by the Plant Manager. EOPs are required to be periodically reviewed every two years as a minimum. These reviews are required to include the QA Department, the ALARA Department, cross disciplinary and intradisciplinary reviews.

S-SUP-4, "Procedure Evaluation Request," provides a method for the procedure user to request corrections, changes, or improvements to existing procedures. It is a formalized method to identify concerns or recommendations regarding procedures to station management.

S-SUP-2, "Problem Report Program" provides a mechanism for identification, documentation, and resolution of problems associated with NMP1 and 2. This program may include, but is not limited to drawing or publication errors, missing or inadequate documentation, and inaccurate or unworkable procedures.

N2-EOP-5, "Production and Control of NMP2 EOP Revisions" establishes requirements governing the generation and control of revisions to NMP2 EOPs. Included within N2-EOP-5 is the EOP Writers Guide, Validation, and Verification Programs.





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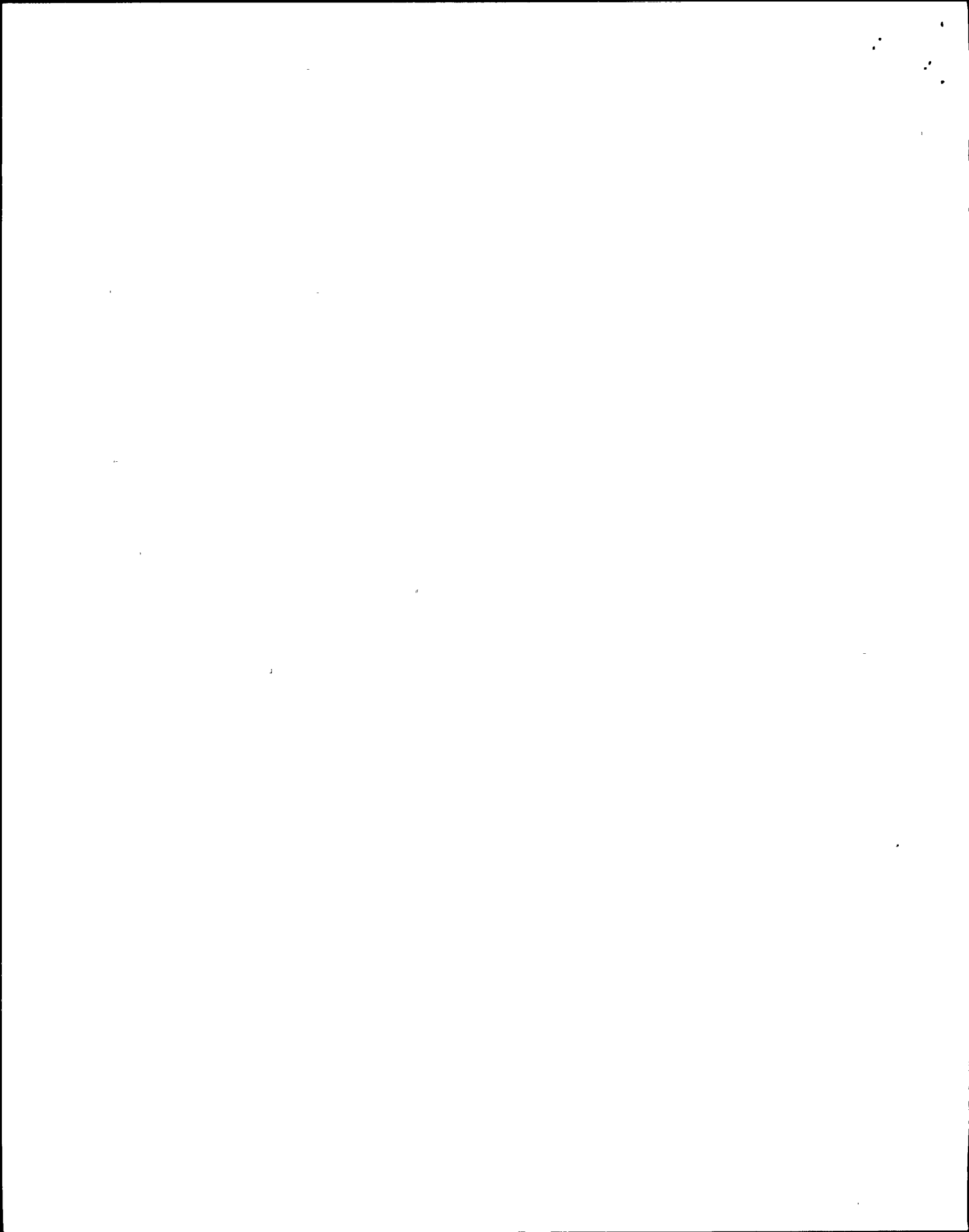
N2-PM-M4, "Monthly Audit of EOP Support" is utilized to ensure that equipment required to support EOPs is maintained in a ready status.

N2-ODI-5.10, "EOP Ongoing Evaluation Program" provides a mechanism for tracking and dispositioning EOP concerns identified through:

1. Training
2. Inplant Walk-throughs
3. Control Room Walk-throughs
4. Any other method through which attention or concern is raised concerning NMP2 EOPs

3.0 REFERENCES

- 3.1 NUREG-0899, Guidelines for the Preparation of Emergency Operating Procedures
- 3.2 N2-EOP-5, "Production and Control of NMP2 Emergency Operating Procedure Revisions"
- 3.3 N2-PM-M4, "Monthly Audit of EOP Support Equipment"
- 3.4 S-SUP-4, "Procedure Evaluation Request"
- 3.5 S-SUP-2, "Problem Report Program"
- 3.6 NMP2 Procedures Generation Package May 1984
- 3.7 NUREG-1358, "Lessons Learned from the Special Inspection Program for Emergency Operating Procedures", March-October 1988.
- 3.8 Problem Report 8207 EOP Procedural Controls
- 3.9 In 86-64, "Deficiencies in Upgrade Programs for Plant Emergency Procedures", August 14, 1986
- 3.10 In 86-64, Supplement 1, "Deficiencies in Upgrade Programs for Plant Emergency Procedures", April 20, 1987
- 3.11 NUREG/CR 5228, "Techniques for Preparing Flowchart-Format Emergency Operating Procedures", Vol 1 and 2, January 1989



4.0 RESPONSIBILITIES

4.1 Originator

- a. Completes the appropriate information of the EOP Evaluation Request (Figure 2).
- b. Provides adequate information regarding the problem or suggestion.
- c. If possible, provides a recommended solution to the problem.
- d. Forwards the Open Item to his/her Supervisor.

4.2 Originator's Supervisor

- a. Ensures the EOP Evaluation Request (Figure 2) is filled out completely and correctly.
- b. Ensures the Originator has provide adequate information regarding the problem or suggestion.
- c. Forwards the Open Item to the Operations Manager.

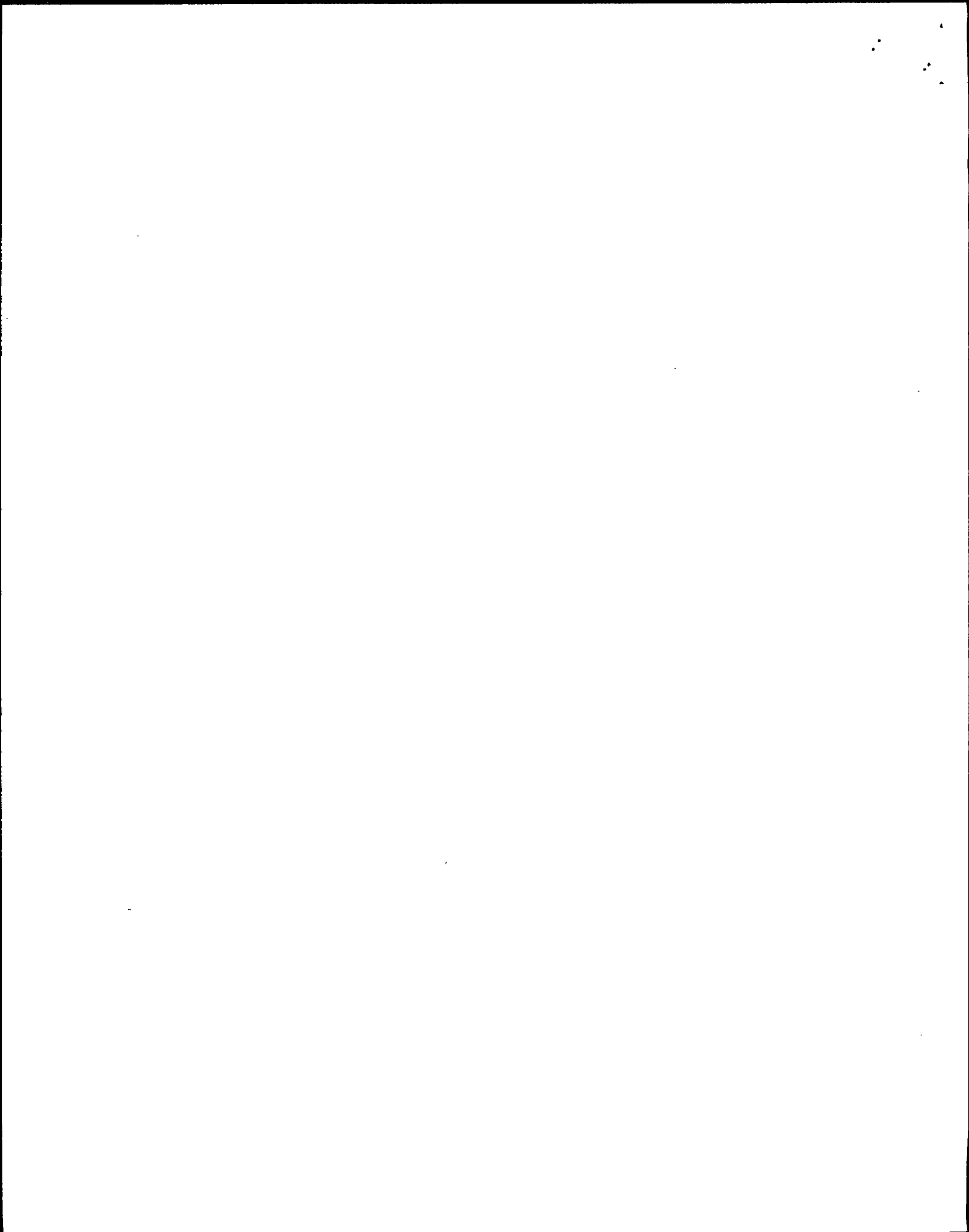
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4.3 Operations Manager

- a. Maintains overall responsibility for the program.
- b. Assigns the priority level and due date (if applicable for Open Items).
- c. Reviews all Open Items before forwarding to the EOP Coordinator for disposition.
- d. Approves all dispositions/resolutions before closeout.
- e. Assigns the responsibility of "EOP Coordinator".

4.4 EOP Coordinator

- a. Assigns an Open Item number and enters the item into the Open Items Book.
- b. Maintains the Open Items Book and Closed Items Book.
- c. When receiving a new Open Item, checks the Open Items Book and Closed Items Book for possible duplicates.
- d. If possible, resolves the Open Item and forwards it to the Operations Superintendent for approval.
- e. Coordinates the disposition of the Open Item with the "Responsible Department", if needed.



4.4 (Cont'd)

- f. Approves all dispositions/resolutions before closeout.
- g. Initiates the necessary action to implement the resolution of the Open Item.
- h. Determines if the change requires verification and/or validation.
- i. Forwards appropriate information to Training for updating the EOP training material.
- j. Forwards a copy of the resolved Open Item to the Originator.
- k. Enters the resolved item into the Closed Items Book when complete.

4.5 Operations Staff

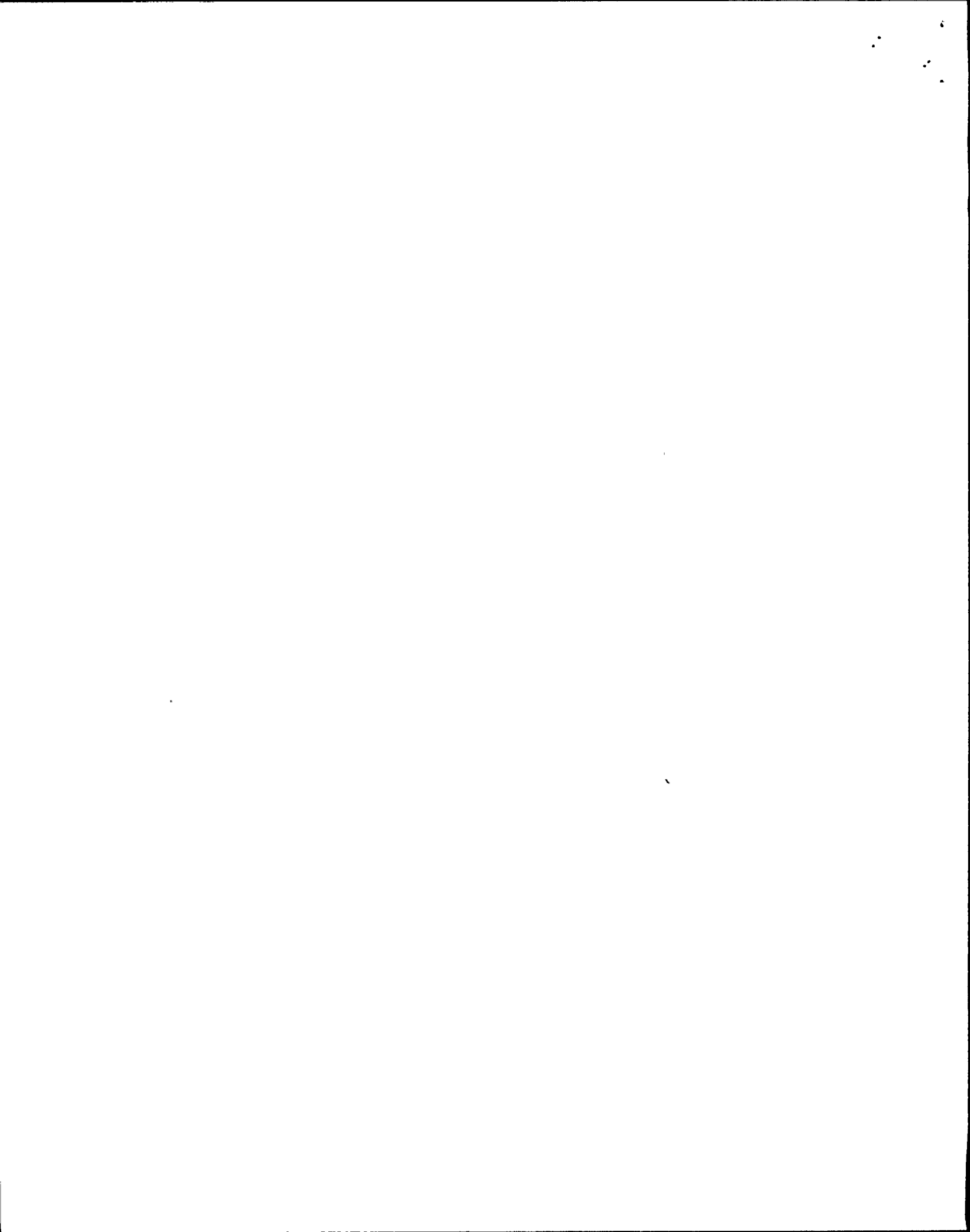
- a. Provide feedback to the EOP Coordinator, via the EOP Ongoing Evaluation Program, concerning the usability, technician accuracy, operational correctness and written correctness of the EOPs.
- b. Provide feedback to the EOP Coordinator, via the EOP Ongoing Evaluation Program, concerning needed improvements to EOPs noted while using the EOPs during plant operations and walk-through and simulator training.

5.0 PROCEDURE

Operators, trainers and other station personnel are encouraged to identify potential problems, possible solutions and suggest improvements to EOPs and their support procedures. An Open Items Book has been established to track user concerns. It provides a mechanism for identifying, evaluating and resolving questions or problems concerning EOPs.

5.1 Initiation

- a. The individual identifying the problem, potential problem or any concern or suggestion regarding EOPs should complete the appropriate information on the EOP Evaluation Request (Figure 2).
- b. The Originator should provide as much information as possible to aid in resolving the problem or suggestion. If possible, the Originator should provide a marked up copy of the appropriate procedure or other appropriate references.
- c. If possible, the Originator should provide a recommended solution to the problem.



5.1 (Cont'd)

- d. The Originator should include their name, shift (if applicable) and phone number in the event there are any questions regarding the problem or suggestion.
- e. The Originator will then forward the EOP Evaluation Request (Figure 2) to their Supervisor.

5.2 Review

- a. The Originator's supervisor should review the EOP Evaluation Request (Figure 2) for completeness and correctness.
- b. If concurring, the Supervisor will sign and date the EOP Evaluation Request (Figure 2) and then forward the EOP Evaluation Request to the Operations Manager or General Supervisor. If dissenting, the supervisor should disapprove the request and return.
- c. The Operations Manager or General Supervisor will review the EOP Evaluation Request (Figure 2) and assign a priority and due date. (if applicable) based on the criteria of Section 7.0.
- d. The Operations Manager or General Supervisor will sign and date the EOP Evaluation Request (Figure 2) concurring with problem or suggestion and then forward the EOP Evaluation Request to the EOP Coordinator for resolution. If dissenting the Operations Manager or General Supervisor should disapprove and return.

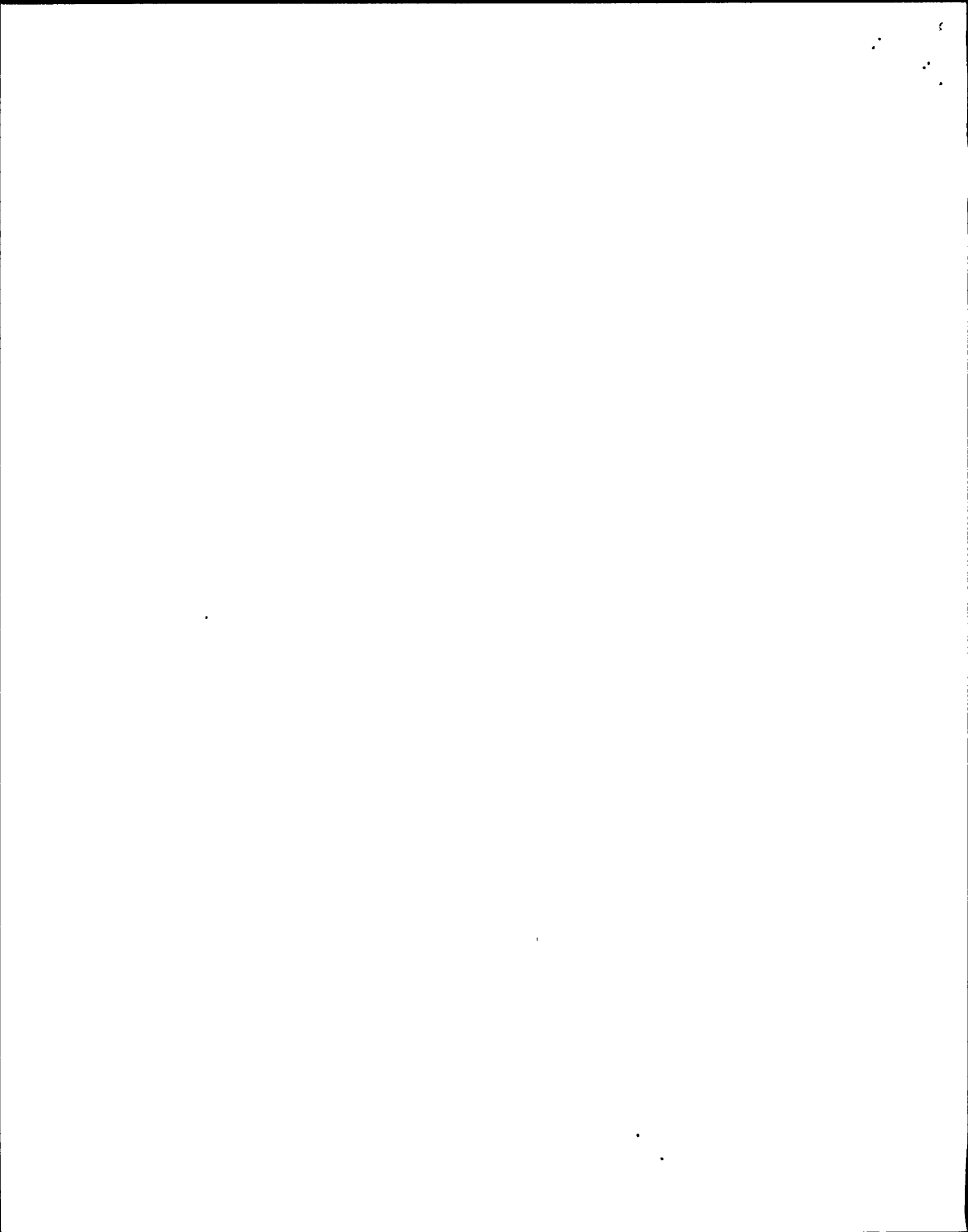
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5.3 Tracking and Resolution

- a. The EOP Coordinator should first review the Open Items and Closed Items Book for possible duplication of the new Open Item. If a duplicate exists, the EOP Coordinator should indicate on the EOP Evaluation Request that the item is a duplicate including the number of the duplicate. The EOP Coordinator should then forward a copy to the Operations Manager and the Originator.
- b. If no duplicate exists, the EOP Coordinator should assign the next sequential Open Item number to the EOP Evaluation Request (Figure 2) and enter the item number into the Open Items Book.
- c. If possible, the EOP Coordinator should resolve the Open Item and then forward it to the Operations Manager for approval.
- d. If the EOP Coordinator cannot resolve the Open Item then he should solicit the assistance of the appropriate organization in resolving the item.

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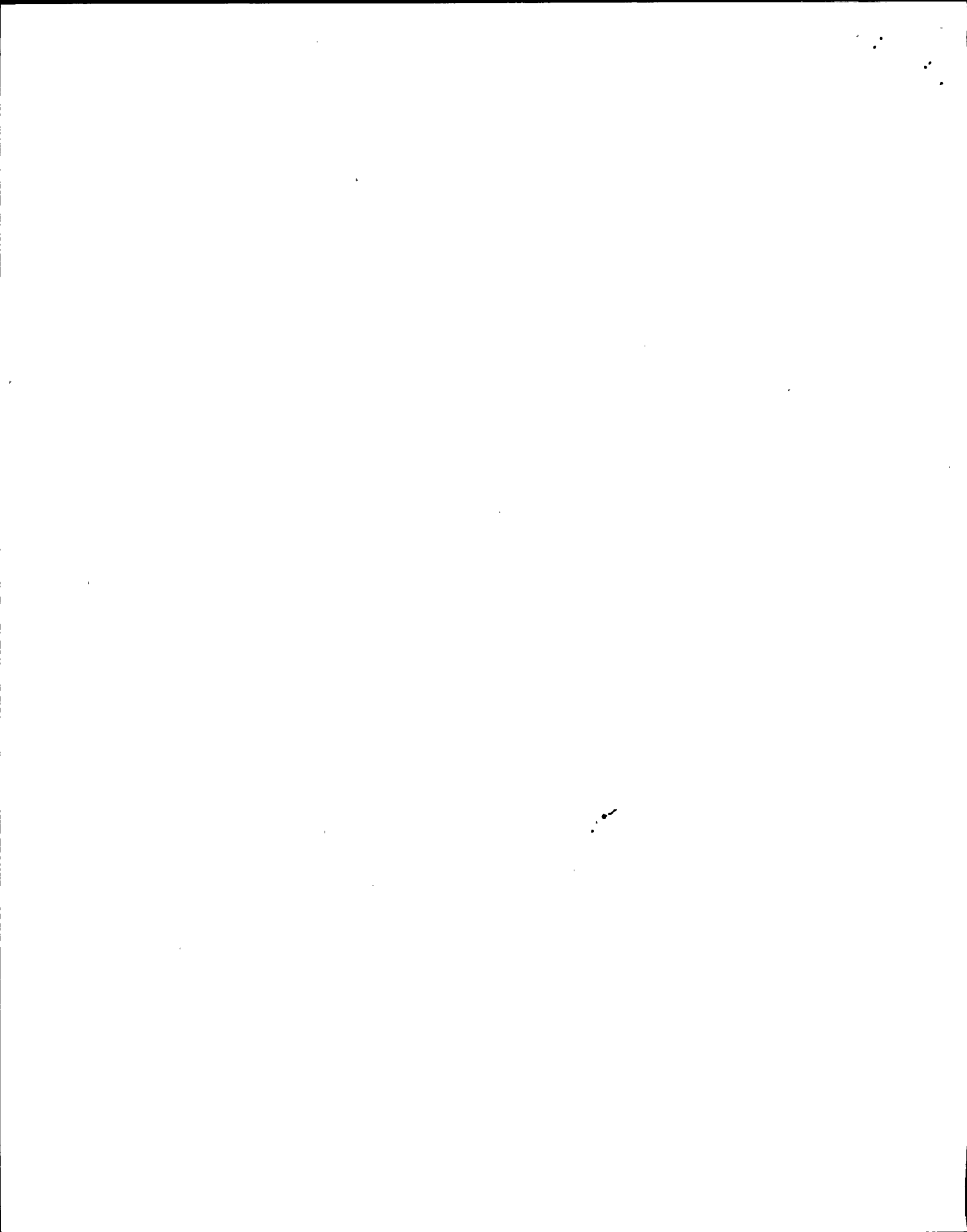


5.3 (Cont'd)

- e. If the Open Item is to be sent to another organization for resolution, the EOP Evaluation Request (Figure 2) and the Open Items Index should be annotated appropriately. A copy of the Open Item will be maintained in the Open Items Book while the original is forwarded for resolution.
- f. If another organization has the Open Item for resolution, the EOP Coordinator should take appropriate follow-up actions to ensure the timely completion of the item.
- g. Once the Open Item has been resolved, the EOP Coordinator will review and approve the resolution. If the Open Item has not been satisfactorily resolved, it should be returned to the responsible individual or department with an explanation and, if possible, a proposed resolution.

5.6 Approval and Closeout

- a. The EOP Coordinator reviews and approves the disposition of the Open Item and then forwards it to the Operations Manager for TCN-1 approval.
- b. The Operations Manager or General Supervisor reviews and approves the disposition of the Open Item and then returns it to the EOP Coordinator for implementation and closeout.
- c. The EOP Coordinator implements the appropriate changes and determines if further verification or validation is required in accordance with the criteria of N2-EOP-5. (Depending on priorities, required changes may be accumulated until a revision is justified.)
- d. The EOP Coordinator forwards a copy of the appropriate EOP changes to the Training Manager for updating the EOP training material.
- e. The EOP Coordinator forwards a copy of the resolved Open Item to the Originator.
- f. The EOP Coordinator closes out the resolved Open Item once the required changes have been implemented. The Closed Item is placed in numerical order in the Closed Items Book and the Open Item Index in the Open Items Book shall be annotated appropriately. As an option Closed Items may be maintained within a file but must be readily identified and available. Filing by procedure number is permissible.



## 6.0 ITEMS INITIATED VIA S-SUP-4

To avoid duplication of effort and paperwork, this instruction is intended to supplement S-SUP-4 for EOP concerns submitted via the S-SUP-4 Procedure. EOP related S-SUP-4 PEF forms will be maintained in the Open Items Book instead of the Procedure Evaluation Request Log.

6.1 When an EOP related concern or suggestion is received via an S-SUP-4 PEF it will be treated as though it were submitted on an EOP Evaluation Request (Figure 2).

6.2 The EOP Coordinator will transcribe the appropriate information from the S-SUP-4 PEF to a new EOP Evaluation Request (Figure 2). The S-SUP-4 PEF will be attached to the EOP Evaluation Request (Figure 2) and the EOP Coordinator will assign the next sequential Open Item number to the EOP Evaluation Request. The item will then be entered into the Open Items Book for disposition.

6.3 For expediency it is not necessary that the Originator's Supervisor approve the EOP Evaluation Request (Figure 2). However, a copy of both the S-SUP-4 PEF and the EOP Evaluation Request should be forwarded to the Originator and their supervisor with an explanation stating that the S-SUP-4 PEF is being tracked via the EOP Ongoing Evaluation program of ODI-5.10.

6.4 The EOP Evaluation Request (Figure 2) with the attached S-SUP-4 PEF will then be forwarded to the Operations Manager or General Supervisor for review and approval. The Operations Manager or General Supervisor will assign a priority and due date (if applicable) in accordance with the criteria of Section 7.0. The priority assigned by the Operations Manager or General Supervisor to the Open Item will supersede that assigned to the S-SUP-4 PEF.

6.5 The Open Item is then processed in accordance with Section 5.0.

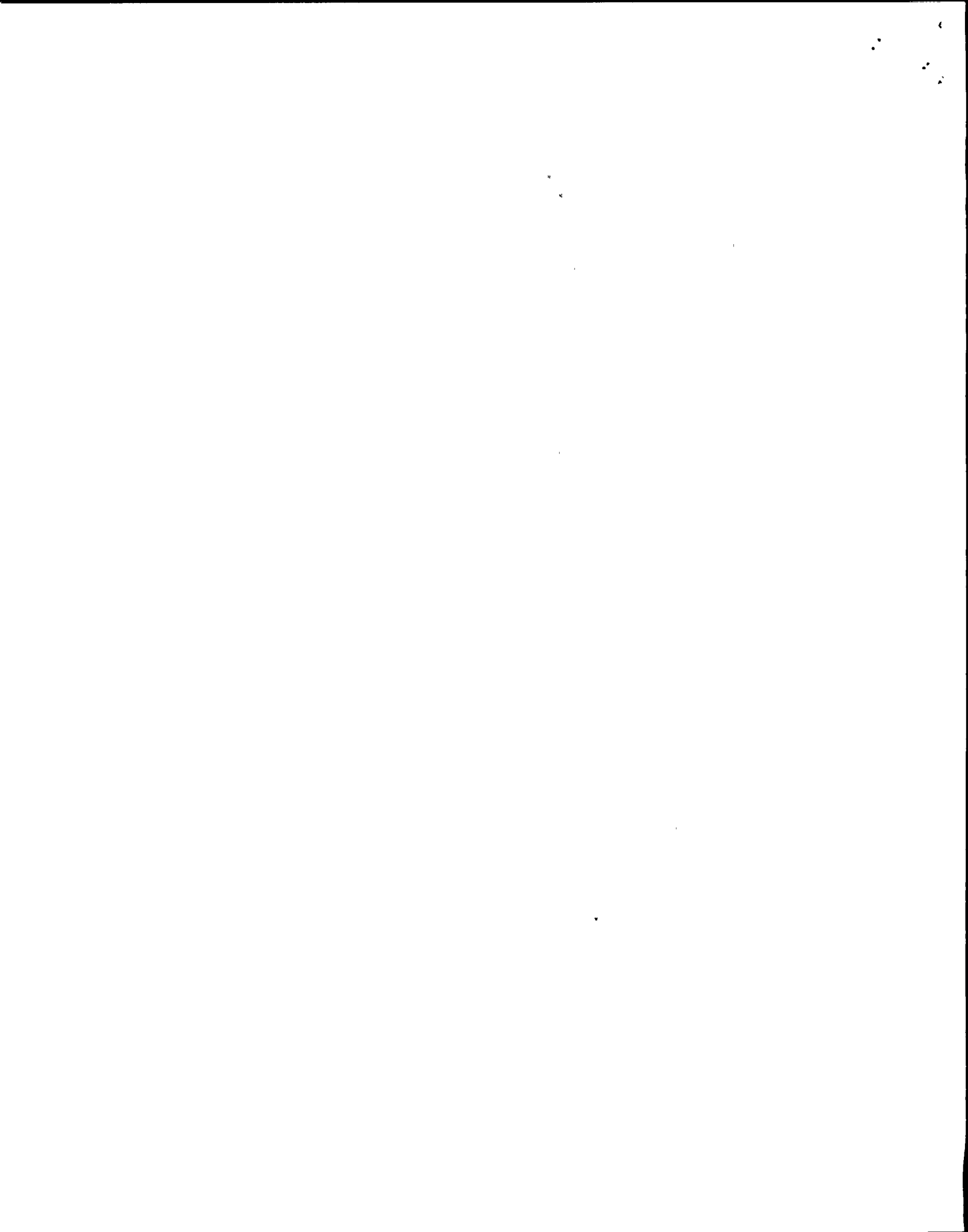
## 7.0 OPEN ITEM PRIORITY

The urgency to which an item must be evaluated and resolved will be dependent upon its potential impact on the EOPs or their implementation. The Integrated Priority System (Station General Order 88-7) may be used as an alternate system.

### 7.1 Priority 1

Items which have the potential to adversely effect the EOPs, support procedures or the effect implementation of the procedures. These items should receive increased emphasis on evaluation and disposition. Items within this category may include but are not limited to the following:

- a. NRC, INPO, BWROG or other agency concerns,



7.1 (Cont'd)

- b. Plant modifications which effects physical plant configuration,
- c. Design value or reference document changes which adversely effects an EOP calculation or variable such that current procedures are not conservative, or do not meet the intent of the BWR0G EPG.

7.2 Priority 2

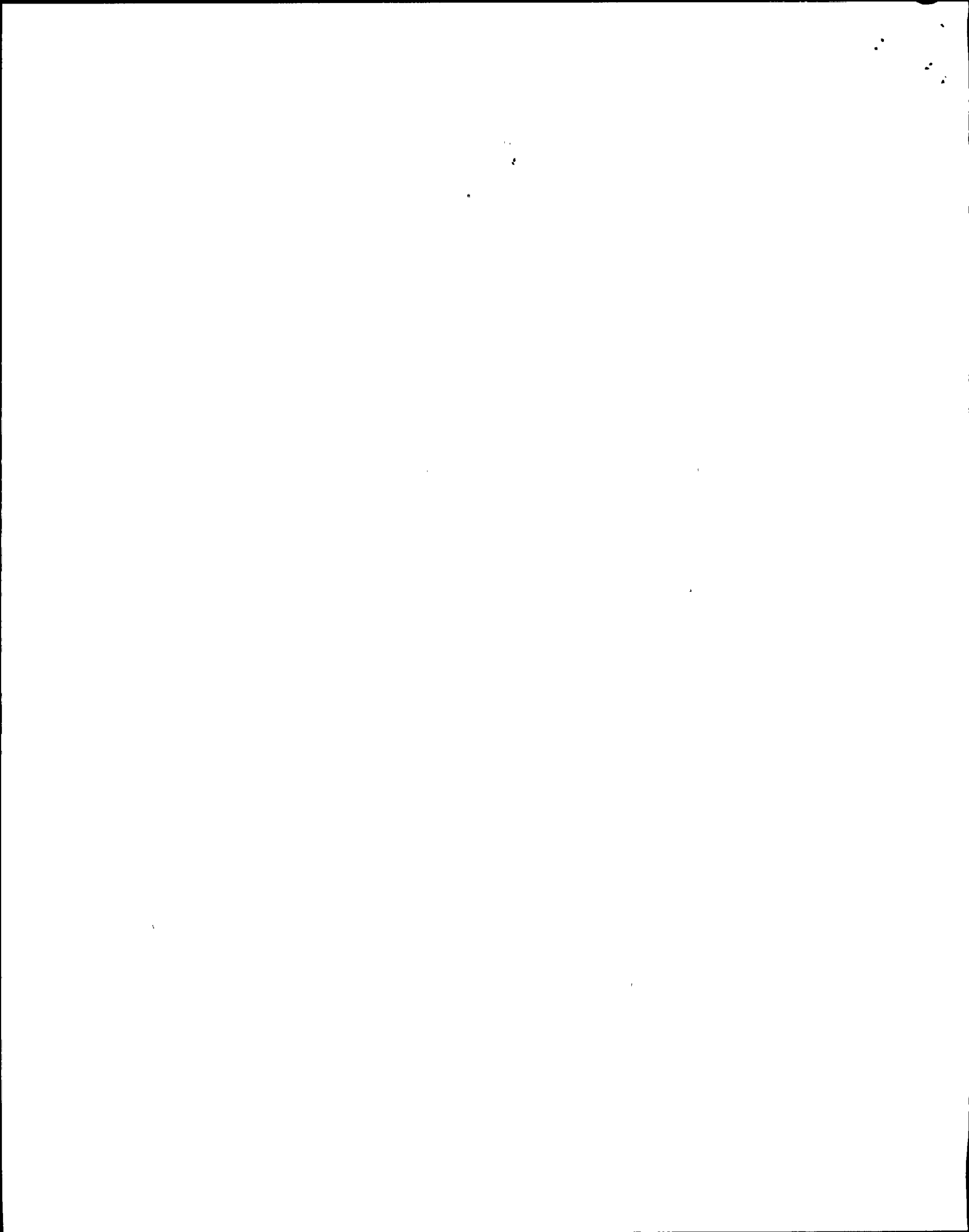
Items which do not adversely effect the EOPs, support procedures or effective implementation of the procedures. Items within this category may include but are not limited to the following:

- a. Questions from training regarding step basis,
- b. Simulator deficiencies,
- c. Suggestions for alternate methods of performing a particular evolution which may be more effective, and
- d. Suggestions concerning format.

8.0 OPEN ITEM DISPOSITION

In order to adequately address each concern, question or suggestion contained in the Open Items Book, one or more of the following actions may be employed:

- a. Reviewing the basis for a particular step or procedure section
- b. Engineering evaluation
- c. Review of various EOP support documents or references
- d. Walkdown of plant systems and/or procedures
- e. Review of regulatory documents
- f. Procedure revision (N2-EOP-5)
- g. PSTG, Writer's Guide or EOP revision including required verification and validation (N2-EOP-5)
- h. Staging inplant equipment
- i. Conducting simulator or classroom training
- j. Plant modifications



9.0 OPEN ITEMS BOOK

The Open Items Book contains the EOP Evaluation Request (Figure 2) forms which have not been resolved. The items are entered into the Open Items Book for tracking, evaluation, disposition, accountability and auditability purposes. An index sheet is provided in the front of the book to indicate the status of each Open Item.

The Open Items Book shall contain either a copy or the original of each unresolved item. No Open Item should be removed from the Open Items Book without a copy being present.

10.0 CLOSED ITEMS BOOK

The Closed Items Book contains the EOP Evaluation Request (Figure 2) forms which have been resolved and closed out. The items are entered into the Closed Items Book for accountability and auditability purposes. The Open Items Index in the Open Items Book indicates which items have been closed out and entered into the Closed Items Book.

The Closed Items Book shall contain either a copy or the original of each closed out item. No Closed Item should be removed from the Closed Item Book without a copy being present.

11.0 REVIEW OF STAGED INPLANT EQUIPMENT

N2-PM-M4 is performed monthly by Operations to audit equipment which is staged inplant to support EOPs. It is utilized to ensure that equipment required to support performance of the EOPs is maintained in a ready to use status.

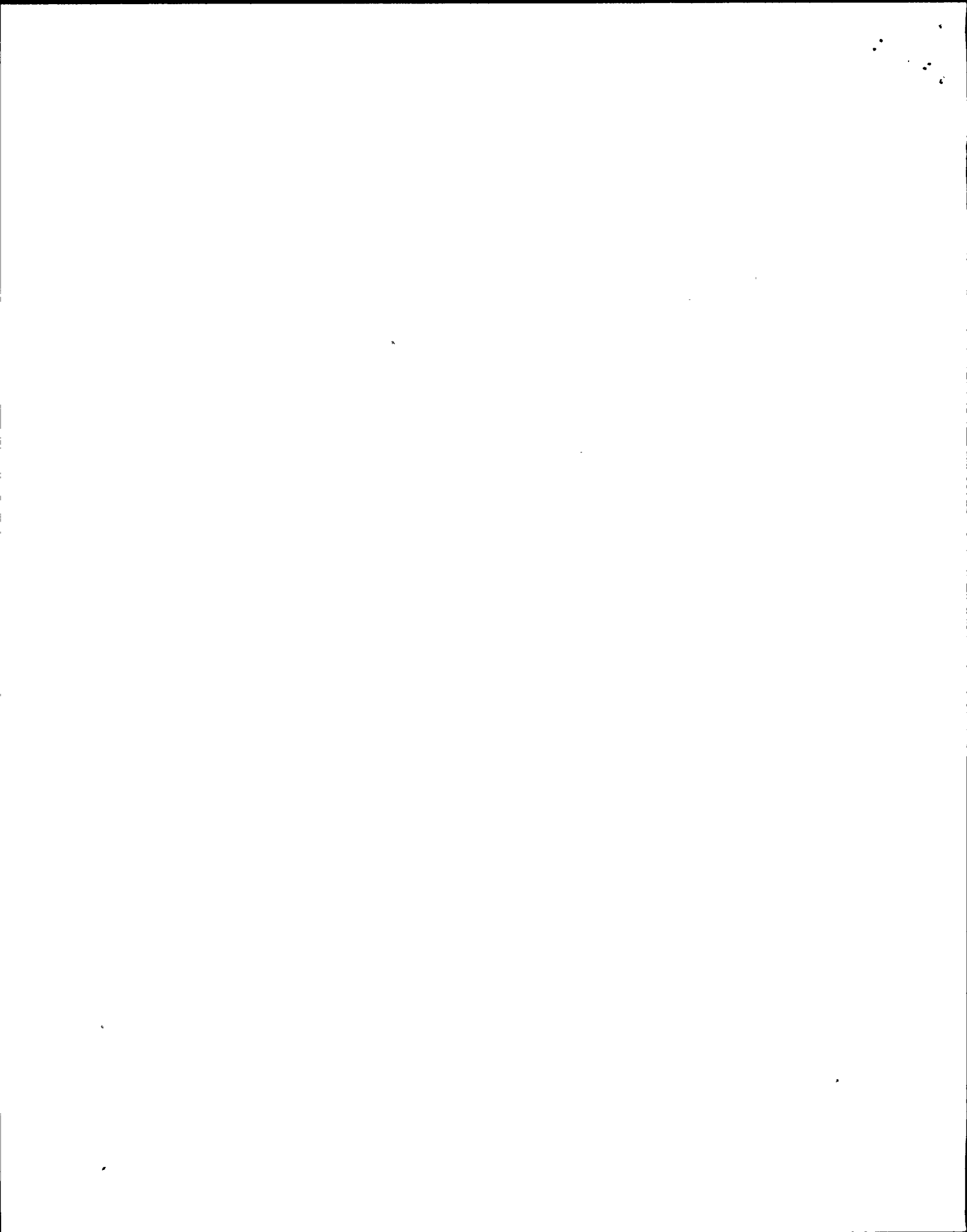





FIGURE 1

OPEN ITEMS INDEX

Item No.	Description	Procedure Number	Date Identified	Priority/ Due Date	Sent to for Resolution/Date	Date Resolved	Date Implemented	Date Closed Out



FIGURE 2

 <b>NIAGARA MOHAWK</b>	<h2 style="margin: 0;">EOP EVALUATION REQUEST</h2>	Item # _____			
Unit <input type="checkbox"/> 1 <input type="checkbox"/> 2    Procedure Number    Revision    Section    Step No.    Page No.    Priority <input type="checkbox"/> 1 <input type="checkbox"/> 2 Due Date _____					
Discovered During: <input type="checkbox"/> Control Room Use <input type="checkbox"/> Periodic Review <input type="checkbox"/> Control Room W/T <input type="checkbox"/> Training <input type="checkbox"/> Simulator <input type="checkbox"/> Other _____					
Discrepancy / Suggested Change:					
Recommended Solution:					
Originator (print & sign)	Shift	Date	Phone	Originator's Supervisor Approval	Date
Operations Manager / General Supervisor Approval				Date	Responsible Department
Disposition / Comments:					
Disposition by:		Date	EOP Coordinator Approval		Date
				Operations Manager / General Supervisor Approval	
Type of Change Required:				Change Implemented by:	
				Date	
Copy to Training		Date	Item Closed - EOP Coordinator		
<input type="checkbox"/> N/A					

