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AUTH.NAME AUTHOR AFFILIATION
VAN BRUNT,E.E. Arizona Public Service Co.
RECIP.NAME RECIPIENT AFFILIATION
TEDESCO,R.L. Assistant Director for Licensing

SUBJECT: Forwards responses to FSAR Chapter 13 draft 13 draft SER open items discussed in 810915 meeting.Revision 1 draft training program encl.

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ARIZONA PUBLIC SERVICE COMPANY
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September 30, 1981
ANPP-19031-JMA-KE J

Mr. R. L. Tedesco
Assistant Director for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
File: 81-056-026; G.1.10

Dear Mr. Tedesco:

Please find attached responses to FSAR Charter 13 draft SER open items discussed in the meeting held with APS and NRC on September 15, 1981, in Phoenix, Arizona.

If you have any questions in these matters, please contact me.

Very truly yours,

E. E. Van Brunt

E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

EEVBJr/KEJ/ma

Attachment

cc: J. Kerrigan (w/a)
P. Hourihan (w/a)
A. C. Gehr (w/a)
G. Zwetzig (w/a)

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1/1

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Vice President Nuclear Projects of Arizona Public Service Company, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.

Edwin E. Van Brunt

Edwin E. Van Brunt, Jr.

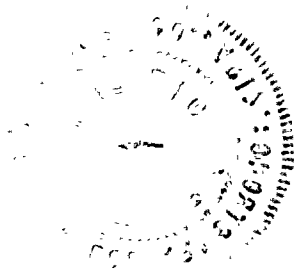
Sworn to before me this 2ND day of October, 1981.

Connie Lou Armstrong

Notary Public

My Commission expires:

June 24, 1983



CHAPTER 13
SER Open Item

1. The APS organization does not meet the guidelines of Ref. 13-2, Section 13.1.1 with respect to having a corporate officer responsible for nuclear activities, without having ancillary responsibilities that might detract from his attention to nuclear safety matters.

1. This items will be responded to during a meeting between APS and NRC managements.

CHAPTER 13
SER Open Item

2. The APS organization does not meet the guidelines of Ref. 13-3 with respect to providing integration of all necessary functional responsibilities under a single functional head.

2. The Vice President of Electric Operations (VP-EO) is responsible for all APS power plants, including PVNGS, and the transmission and distribution system including its construction and operation. To help carry out these responsibilities, the VP-EO has established six diverse departments. Four of these departments provide technical support for PVNGS (refer to FSAR Section 13.1.1.1.3). Figure 13.1-3 depicts the Electric Operations Organization.

The VP-EO has an exceptional background and understanding of the nuclear industry. The incumbent has over 23 years of nuclear experience ranging from Reactor Engineering and Nuclear Power Plant Management to VP-EO. In addition, he has assisted in the preparation of ANSI standards and was a charter member on the INPO Board of Directors.

The managers providing technical support to PVNGS who report to the VP-EO are experienced, trained and well-qualified individuals who stand alone in their functional areas of responsibility.

The Manager of Nuclear Operations for APS reports directly to the VP-EO and is responsible for the safe, reliable and efficient operation of PVNGS. Plant procedures have been developed which define the PVNGS organizational and position responsibilities as well as other operational functions. Departments at PVNGS are provided the management resources necessary to most effectively carry out their responsibilities. For example, a Material Management Information System and Station Information Management System which are second to none in the industry are being provided at PVNGS. These management systems will respond to the nuclear plant's unique material, information and scheduling requirements. Just as the control room in a power plant is the focal point for Operations, PVNGS will have a focal point for maintenance and information management.

The Manager of Nuclear Operations at PVNGS is not the same as a Plant Manager at a single reactor site. He is responsible for the entire site. This position would normally be in the Corporate Office, but because of the site location and size he is located onsite. In addition to being degreed, the incumbent has held a position at another multi-unit site.

The Operations Superintendant at PVNGS who reports to the Manager of Nuclear Operations has an Operations Supervisor for each of the units at Palo Verde reporting to him. Each of these supervisors hold Senior Reactor Operator's Licenses. The PVNGS organization has over 1500 years of nuclear experience.

Resources and management strengths such as those mentioned above contribute to our goal of excellence of operations at PVNGS.

At Corporate headquarters, situated in the same area as the VP-EO is the Nuclear Operations Support Department (NOSD). This department is responsible for providing expertise in the areas of Nuclear Licensing, Nuclear Plant Operations, Corporate Health Physics and Emergency Planning. With an increasing staff, the NOSD presently has over 50 years of nuclear experience. The NOSD staff also provides the corporate coordination for all engineering support as needed by PVNGS.

The Managers of System Electric Operations and Administrative Services also have engineering expertise available to support PVNGS operations.

The VP-EO also has competent nuclear-related engineering expertise available to him in the Nuclear Projects Management Department. In addition to being responsible for the construction of Palo Verde, the Nuclear Projects Department offers proficient nuclear engineering assistance to Palo Verde Operations. Two Nuclear Managers direct the engineering activities and are available to provide support to Nuclear Operations in the areas of Electrical Engineering, Instrumentation and Controls, Licensing, Mechanical Engineering, Civil Engineering, and Nuclear Engineering. The Nuclear Quality Assurance Department is also available to provide additional expertise and support to the PVNGS Operations Quality Assurance Department.

Finally, the VP-EO also has available to him nuclear expertise and independent safety assessment in the Safety Audit Committee (SAC). This committee is made up of highly qualified individuals from within as well as outside the company. This committee can be activated at any time to undertake or oversee any project as assigned by the VP-EO and to review it specifically for 10 CFR 50.59 compliance.

The VP-EO is the only corporate officer on 24-hour notification. He is kept continuously aware of developments that need his attention. In the event additional people are needed on extremely short notice, he has the authority and the manpower resources to act without encountering delays due to organizational restrictions.

Our dedication and commitment to building and operating PVNGS to the highest standards achievable is reflected in the strength of the incumbents within our organization. We believe that the management of APS and specifically management associated with PVNGS is the finest in the industry, and we are committed to maintaining that high standard of excellence throughout our operations.

CHAPTER 13
SER Open Item

3. The applicant should commit to staffing the STA/ISEG organization such that, in addition to other requirements, the membership (a minimum of five members) at all times has an average level of nuclear power plant experience of at least three years or all members meet the qualification requirements for ISEG members stated in the Standard Review Plan (Ref. 13-2, Section 13.4).

3. PVNGS commits to staffing the ISEG portion of the STA/ISEG organization with five members who will have at all times an average level of nuclear power plant experience of at least three years.

CHAPTER 13
SER Open Item

4. Since the Standard Review Plan (Ref. 13-2, Section 13.4) and NUREG 0737 (Ref. 13-4) require that the ISEG report "... off-site to a high level corporate official who holds a high-level, technically oriented position that is not in the management chain for power production," the applicant should revise his proposed point of reporting for the STA/ISEG organization to conform with these requirements.

4. The ISEG is an integral part of the station technical support (onsite) organization. The group functions according to ISEG programs and related procedures. However, for independence in safety related areas or for concerns related to nuclear safety, the ISEG has an established communication line to the Vice President of Electric Operations and may exercise this channel at any time such a concern arises.

CHAPTER 13
SER Open Item

6. The applicant should identify the operations training the incumbent for the position of Operations Superintendent will receive prior to Unit 1 fuel load which will provide the general background necessary for directing the safe operation of the facility and directing operations in accordance with regulatory requirements.

6. The following is a list of training that the incumbent for the position of Operations Superintendent will receive prior to Unit 1 fuel load:

   a. Plant Systems training includes classroom instruction on systems, tracing systems in the plant and identifying specific equipment locations. This includes the Nuclear Steam Supply Systems and the Balance of Plant Systems.

   b. Simulator Training Course with a duration of four weeks.

   c. Training in mitigating core damage.

   d. Supervisory training.

   e. Technical specification training.

CHAPTER 13
SER Open Item

7. The applicant has not committed to conduct the training for non-fire brigade personnel in accordance with the guidance stated in the Standard Review Plan (Ref. 13-2, Section 13.2.2).

7. PVNGS commits to conduct the training for non-fire brigade personnel in accordance with the guidance stated in the Standard Review Plan (Section 13.2.2, Revision 0, July, 1981). This will be incorporated into the plant training program by January 1, 1982.

CHAPTER 13
SER Open Item

8. The applicant will submit by December 1, 1981, a description of the current STA training program and a demonstration of conformance with the November 9, 1979, letter from D. B. Vassallo (NRC) to All Pending Construction Permit Applicants plus the additional information listed in the Ref. 13-8 response to Item I.A.1.1.

8. Attachment 1 is a draft description of the current STA training program.

This program is based on the INPO Document "Nuclear Power Plant Shift Technical Adivsor Recommendations for Position Description, Qualifications, Education and Training", GPG-01, Ref. 1, April 28, 1981.

CHAPTER 13
SER Open Item

9. The applicant should clarify his commitment as to which individuals will receive training in mitigating core damage and justify any exceptions to the guidance provided in NUREG 0737, Item II.B.4.

9. Training in mitigating core damage will be given to STA's and operating personnel from the Manager of Nuclear Operations through the operations chain to and including the licensed operators. The training will include that described in the PVNGS Lessons Learned Implementation Report, Item II.B.4.

CHAPTER 13
SER Open Item

10. The applicant should provide the information requested by Item 18 of the letter from R. L. Tedesco (NRC) to E. E. Van Brunt (APS) dated July 28, 1981.

CHAPTER 13
SER Open Item Response

10. Attachment 2 is a draft charter of the Plant Review Board for review.

CHAPTER 13
SER Open Item

11. The applicant should describe the circumstances under which the Plant Manager may delegate authority for approval of start-up test procedures and the job titles or qualifications of the individuals who might receive such authority.

CHAPTER 13
SER Open Item Response

11. Authority for approval of safety related start-up administrative control procedures will stay with the Manager of Nuclear Operations. The authority for approval of other start-up procedures has been given to the Start-Up Manager.

CHAPTER 13
SER Open Item

12. The applicant should confirm his understanding that changes to start-up test procedures for post-fuel loading tests will be made in accordance with the facility Technical Specifications.

12. Changes to all procedures, including start-up test procedures for post-fuel loading tests, will be made in accordance with the facility Technical Specifications after issuance of the operating license.

CHAPTER 13
SER Open Item

13. Regarding TMI Action Plan Item I.A.1.3(1), the applicant should propose quantitative limits on allowable overtime and define the "key personnel" who would be subject to these limits, and the individual authorized to approve deviations from the proposed limits. (Note: If the applicant takes exception to any of the guidelines presented in NUREG 0737, each exception should be fully justified.)

CHAPTER 13
SER Open Item Response

13. The maximum work hours of personnel performing a safety related function will be no more than 12 hours of continuous duty exclusive of travel time with at least 12 hours between work periods, no more than 72 hours in any 7-day period, and no more than 14 consecutive days of work without at least 2 consecutive days off. Only the Manager of Nuclear Operations shall have authority to waive these limits. The personnel effected by this requirement will be senior reactor operators, reactor operators, radiation protection technicians, auxiliary operators, I & C technicians and key maintenance personnel.

CHAPTER 13
SER Open Item

14. Regarding TMI Action Plan Item I.C.5, the applicant should provide a copy of the procedure governing the Feedback of Operating Experience to the Plant Staff for our review.

CHAPTER 13
SER Open Item Response

14. See Attachment 3 for an abstract of the procedure. This abstract follows INPO Guidelines "Performance Objectives and Criteria for Plant Evaluation", June, 1981, for providing feedback of operating experience.

CHAPTER 13
SER Open Item

15. Regarding TMI Action Plan Item I.C.6, the applicant should make available to the reviewer copies of the actual facility procedures established to verify correct performance of operating activities.

CHAPTER 13
SER Open Item Response

15. The following is a summary of the applicable procedures and a status or schedule for completion:

A. 40AC-0ZZ03, Station Tagging and Clearance, controls the release of equipment and systems for maintenance. This procedure is issued and contained in the Station Manual.

B. 40AC-9ZZ02, Conduct of Shift Operations, prescribes the use of logs for recording various plant conditions and describes the verification of plant status accomplished during the shift turnover process. This procedure will be issued for inclusion in the Station Manual by June 1, 1982.

C. 73AC-0ZZ02, Jumper and By-Pass Control, and 73AC-0ZZ03, Control of Temporary Setpoints, will be issued November 1, 1981.

D. 40AC-1ZZ07, Locked Valve and Breaker Control, will be issued for inclusion in the Station Manual by June 1, 1982.

E. 40AC-1ZZ06, Key Control, will be issued for inclusion in the Station Manual by June 1, 1982.

ATTACHMENT 1

DETAILED COURSE DESCRIPTION OF SHIFT TECHNICAL ADVISOR SIMULATOR COURSE

Personnel shall normally be in a classroom for 4 hours and in the Simulator for 4 hours in a routine training day.

1. Lecture Topics

    1.1 Reactor Startup Procedures
    1.2 Plant Startup Procedures
    1.3 BOP Satartup Procedures
    1.4 Power Operations Procedures
    1.5 Station Procedures
    1.6 Admin. Controls
    1.7 Plant Startup Procedures
    1.8 Reactor Trip Procedures
    1.9 Load Follow
    1.10 X_e Oscillation
    1.11 Abnormal Operations
    1.12 Technical Specifications, limiting Conditions for Operation
    1.13 Plant Transient and Accident Training
        1.13.1 Safety Functions
        1.13.2 Reactor Trip, Turbine Trip
        1.13.3 Loss of AC Power
        1.13.4 Natural Circulation
        1.13.5 Excess Feed Flow
        1.13.6 Excess Steam Flow
        1.13.7 Loss of Feed Flow
        1.13.8 Partial LOFA
        1.13.9 S/G Tube Rupture
        1.13.10 Letdown Line Rupture
        1.13.11 CEA Withdrawal
        1.13.12 CEA Drop
        1.13.13 Heat Transfer
        1.13.14 LOCA
            1.13.14.1 Operators Rate in Safety
            1.13.14.2 Mitigation of Core Damage

2. Simulator Operations

    2.1 Reactor Startups
    2.2 Plant Startups
        2.2.1 Critical to Minimum Load
        2.2.2 Minimum Load to Full Power
    2.3 Plant Shutdowns to Hot Standby
    2.4 Recovery From Plant Trip at 100% Power

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DETAILED COURSE DESCRIPTION OF
SHIFT TECHNICAL ADVISOR SIMULATOR COURSE (Cont'd)

2.5 Reactor Startup with Malfunctions
2.6 Plant Startup with Malfunctions
2.7 Plant Maneuvers with Malfunctions

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ATTACHMENT 2

PALO VERDE NUCLEAR GENERATING STATION MANUAL	PROCEDURE NO. 70AC-0ZZ06	
PLANT REVIEW BOARD	REVISION 1	Page 1 of 8

DRAFT

PREPARED BY: _____ DATE _____

REVIEWS REQUIRED: NUCLEAR SAFETY YES NO QUALITY SECTION YES NO

NUCLEAR SAFETY ANALYSIS REQUIRED: YES NO

TECHNICAL REVIEWER _____ DATE _____

QUALITY SECTION _____ DATE _____

DEPARTMENT HEAD _____ DATE _____

PLANT REVIEW BOARD CONCURRENCE - - - - - - - - - - - - - DATE _____

APPROVED BY: _____ DATE _____

DN-0199A/0027A DATE EFFECTIVE _____

TABLE OF CONTENTS

DRAFT

1.0 PURPOSE

This procedure establishes the PVNGS Plant Review Board (PRB) and provides a charter for its operation, including:

1) The function of the PRB
2) The PRB organization
3) The PRB meeting frequency
4) The PRB responsibilities
5) The PRB authority

2.0 REFERENCES

2.1 Implementing References

2.1.1 Review and Approval of Station Procedures, 70AC-0ZZ02

2.1.2 Nuclear Safety Evaluations, 70AC-0ZZ05

2.2 Developmental References

2.2.1 FSAR 16.6.5, "PVNGS Technical Specifications, Administrative Controls, Technical Review and Control"

2.2.2 FSAR 1.8, "Conformance to NRC Regulatory Guides"

2.2.3 FSAR 14.2.2.7 "Startup Test Program Plant Review Board"

2.2.4 ANSI-N18.7-1976, section 4.4 "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants".

2.2.5 FSAR 13.4, Review and Audit

3.0 DEFINITIONS AND ABBREVIATIONS

3.1 Plant Review Board (PRB) - A committee, consisting of management and supervisory level personnel in the Power Production - PVNGS organization, which functions to provide an overview of Power Production - PVNGS activities important to nuclear safety.

3.2 Unreviewed Safety Question - An item being reviewed shall be deemed to involve an unreviewed safety question if:

1) The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the PVNGS Final Safety Analysis Report may be increased; or

2) A possibility for an accident or malfunction of a different type than any evaluated previously in the PVNGS Fianl Safety Analysis Report may be created; or

3) The margin of safety as defined in the basis for any PVNGS Technical Specification is reduced.

3.3 Nuclear Safety Review - The overall review process required for:

1) New documents involving nuclear safety related activities;

2) Documents involving a change to a nuclear safety related procedure;

3) Documents involving a nuclear safety related test or experiment not described in the FSAR;

4) Documents involving a change in the Technical Specifications;

5) Documents involving proposed changes or modifications to plant systems or equipment that effect nuclear safety.

DRAFT

3.4 Nuclear Safety Determination - An evaluation performed to determine if an item being reviewed involves an unreviewed safety question.

3.5 Nuclear Safety Related - Those activities, equipment, systems or structures, as discussed in section 3 of the FSAR, that are necessary to ensure (1) the integrity of reactor coolant pressure boundary, (2) the capability to shutdown the reactor and maintain it in a safe condition, or (3) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the guideline exposures of 10CFR Part 100, "Reactor Site Criteria".

4.0 RESPONSIBILITIES

4.1 The PRB shall review all procedures or changes thereto as determined to affect nuclear safety or which are programs or administrative controls.

4.2 The PRB shall review proposed tests and experiments that affect nuclear safety.

4.3 The PRB shall review proposed changes to the Technical Specifications and operating licenses.

4.4 The PRB shall review proposed changes or modifications to plant systems or equipment that affect nuclear safety.

4.5 The PRB shall perform investigations of violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President of Electric Operation via the Manager of Nuclear Operations and to the Chairman of the Safety Audit Committee.

DRAFT

4.6 The PRB shall review events requiring 24 hour written notification to the Nuclear Regulatory Commission.

4.7 The PRB shall review facility operations to detect potential nuclear safety hazards. This should include periodic review of the following types of operating records:

1) Operating Logs
2) Surveillance Test Records
3) System and Plant Startup Records
4) Jumper, Bypass, and Tag Logs
5) Maintenance Records
6) Operator Training Records

4.8 The PRB shall review corrective actions taken to resolve inadequacies documented in NRC Inspection Reports, Bulletins, Circulars, and Information Notices.

4.9 The PRB shall review PVNGS Quality Assurance Department and Safety Audit Committee audit reports and responses thereto.

4.10 The PRB shall review actions taken to closeout Non-Conformance Reports (NCRs) which are determined by the Quality Assurance Department to affect nuclear safety.

4.11 The PRB is responsible for the review of results from special reviews, investigations or analyses and reports thereon as requested by the Manager of Nuclear Operations or the Chairman of the Safety Audit Committee.

4.12 The PRB is responsible for performing a periodic review of the Plant Security Plan and implementing procedures and shall submit recommended changes to the Chairman of the Plant Review Board.

4.13 The PRB is responsible for performing a periodic review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Plant Review Board.

4.14 The PRB is responsible for performing a periodic review of the Fire Protection Plan and implementing procedures and shall submit recommended changes to the Chairman of the Plant Review Board.

DRAFT

4.15 The PRB Chairman is responsible for assuring that required reviews and corrective action for problems reviewed by the committee are completed.

4.16 The PRB shall review the results of startup tests per FSAR Section 14.2.2.7.

5.0 INSTRUCTIONS

5.1 The personnel holding the following positions shall be the members of the PRB:

Manager of Nuclear Operations — Chairman
Engineering & Technical Services Manager
Operations Superintendent
Maintenance Superintendent
Operations Quality Assurance Manager
Startup Manager
Administrative Services Manager
Training Manager
Radiation Protection Supervisor
Security Manager

Qualified alternates will be designated in writing by the Manager of Nuclear Operations.

5.2 A quorum of the PRB shall consist of the Chairman and four members, including alternates. No more than two alternates shall participate as voting members in PRB activities at any one time.

5.3 The PRB shall meet at least once per calendar month and as convened by the PRB Chairman.

5.4 An agenda of items to be discussed at PRB meetings should be prepared prior to a scheduled meeting by the PRB secretary. The agenda will be distributed to members with copies of documents to be reviewed. Items to be placed on the agenda should be given to the PRB secretary.

5.5 Minutes of PRB meetings, that record PRB actions taken, action items arising out of board deliberations, and major topics discussed, shall be prepared and distributed by the PRB secretary. They shall include written reports generated by the PRB. Any member's dissent on matters involving nuclear safety evaluations or other matters involving nuclear safety shall be recorded. Copies of minutes shall be forwarded to the Chairman of the APS Safety Audit Committee, and to Vice President of Electric Operations.

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5.6 The PRB shall review minutes of previous PRB meetings and Safety Audit Committee meeting minutes.

5.7 The PRB shall function to advise the Manager of Nuclear Operations (and Department Heads when necessary) on matters related to nuclear safety. To perform this function the PRB shall:

a) Recommend to the Manager of Nuclear Operations (or appropriate Department Heads on Nuclear Safety Related implementing procedures) written approval or disapproval of items considered under 4.1 through 4.4 above by a majority vote.

b) Render determinations in writing with regard to whether or not each item considered under 4.1 through 4.5 above involves an unreviewed safety question.

c) Provide written notification within 24 hours to the Vice President Electric Operations and the Chairman of the Safety Audit Committee of disagreement between the PRB and the Manager of Nuclear Operations; however, the Manager of Nuclear Operations shall have responsibility for resolution of such disagreements.

The PRB shall also provide an overview of administrative controls to assure the existence of proper station interfaces and consistency with station policy.

5.8 The PRB review of programs and procedures shall be documented on Appendix B to procedure 70AC-0ZZ02.

5.9 Station Manual procedure 70AC-0ZZ05, Nuclear Safety Evaluations, governs review of certain activities (other than procedure review and approval) for nuclear safety aspects. The PRB reviews documentation of activities described in steps 4.2 through 4.5 of this procedure and renders determinations as to whether or not an unreviewed safety question exists in accordance with 70AC-0ZZ05. Where a Nuclear Safety Determination is required, the PRB reviews the determination and recommends its approval to the PRB Chairman. Such evaluations will be made by majority vote of those present at the meeting.

5.10 The PRB shall perform periodic reviews of certain procedures in accordance with section 5.8 of procedure 70AC-0ZZ02.

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ATTACHMENT 3

ABSTRACT

Nuclear Operating Experience Evaluation Program

PURPOSE

To ensure that PVNGS and industry-wide operating experience are evaluated and appropriate actions are taken to improve personnel awareness and equipment reliability.

PROGRAM DESCRIPTION

The following is a list of criteria which will be used to develop and implement a program that will identify and evaluate significant PVNGS and industry-wide operating experiences. Operating experiences include failure, technical specification violations, unsafe conditions, unusual occurrences, and other conditions of importance to safe operation.

A. The program will ensure that operating experiences and corrective actions are reviewed and approved by experienced technical personnel.

B. The program will include provisions to routinely evaluate the effectiveness of the program and consider improvements.

C. The program implementation will determine the relative importance of PVNGS events and industry experiences. This determination will be used to ensure the following:

1. The results of evaluations are disseminated to management, operations, training, maintenance, engineering, and other personnel, as appropriate, in a timely manner.

2. Personnel do not routinely receive a large volume of operating experience data which might obscure the lessons to be learned from the more significant events.

D. The program will ensure that information provided to operations and other personnel does not conflict or contradict other information they receive from this program or training programs.

E. The program for the review of PVNGS events will include the following elements:

1. A means of event identification and classification for controlling review and evaluation
2. A means of providing prompt notification to other utilities of significant events with generic implications
3. Rigorous investigation to determine root cause, significance, and generic implications
4. Review of investigation results and corrective action by appropriate plant management personnel
5. A second review should be performed by a multi-disciplined group independent of plant management
6. A method for recommending, implementing, and tracking corrective actions to ensure completion

F. The program for industry operating experience review will include the following elements:

1. A means of classifying events to determine applicability
2. A method for recommending, implementing, and tracking corrective actions to ensure completion.
3. A periodic independent evaluation to verify that pertinent information is properly classified by the group reviewing industry experience. This evaluation also requires that a system be in effect for documenting the disposition of operating experience information received and resultant actions taken.
4. A comprehensive program will include review of the following:
   - NRC letters, bulletins, circulars, etc.
   - Vendor and Architect-Engineer reports
   - INPO/NSAC, Significant Operating Experience Reports and Significant Event Reports
   - INPO Operations and Maintenance Reminders
   - NOTEPAD Information
   - NPRDS Input