

CAROLINA POWER & LIGHT COMPANY

SHEARON HARRIS NUCLEAR POWER PLANT

PLANT OPERATING MANUAL

VOLUME 1

PART 1

“UNCONTROLLED COPY”

PROCEDURE TYPE: ADMINISTRATIVE PROCEDURE

NUMBER: AP-618

TITLE: JUSTIFICATION FOR CONTINUED OPERATION

REVISION 0

APPROVED: J. L. Willis Signature MAY 07 1987 Date
4/24/87

TITLE: J. L. WILLIS, PLANT GENERAL MANAGER

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1.0 PURPOSE

This procedure provides guidance to plant personnel who are involved in the evaluation and disposition of conditions, found to exist in the plant, which may constitute INOPERABILITY of equipment required by the Technical Specifications. This procedure ensures a consistent methodology for evaluation, disposition, management review and records retention of identified deficiencies. This procedure does not replace the requirement for formal engineering evaluations, but rather provides a consistent guideline for developing timely evaluations.

2.0 REFERENCES

1. Title 10, Code of Federal Regulations
2. Technical Specifications
3. AP-615, NRC Reporting Requirements
4. AP-616, Evaluating and Reporting of Defects and Non-Compliance in Accordance with 10CFR21
5. RMP-006, Records Storage Area
6. AP-011, Safety Reviews

3.0 RESPONSIBILITIES

1. Plant General Manager - Is responsible for ensuring that appropriate and timely actions (commensurate with the potential severity) to analyze the effect of identified deficiencies on component OPERABILITY are initiated and concluded. As chairman of the Plant Nuclear Safety Committee, he approves each such analysis.
2. Manager - Operations - Is responsible for providing specific direction to shift operations personnel concerning the OPERABILITY status of affected components.
3. Unit Managers - Are responsible for performing evaluations of deficiencies and presenting such evaluations to the PNSC for review and approval.
4. Director - Regulatory Compliance - Is responsible for ensuring retention of written evaluations after PNSC approval, and for interfacing with NRC concerning such evaluations.



4.0 DEFINITIONS/ABBREVIATIONS

1. PNSC - Plant Nuclear Safety Committee
2. ONS - Onsite Nuclear Safety
3. CNS - Corporate Nuclear Safety
4. JCO - Justification for Continued Operation is a written document providing an evaluation of a specific deficiency which concludes either OPERABILITY, OPERABILITY with specific compensatory actions, or INOPERABILITY of affected equipment.
5. CQA - Corporate Quality Assurance
6. INPO - Institute of Nuclear Power Operation
7. NRC - Nuclear Regulatory Commission

5.0 PROCEDURE

5.1 Initial Actions

1. Potential deficiencies in of safety-related components may be identified by any of the following (non-inclusive list):
 - 10CFR21 Notifications from Vendors
 - QA Non-Conformance Reports
 - Independent Audits (CQA, ONS, INPO, etc.)
 - NRC Inspections
 - NRC Inspection and Enforcement Bulletins
 - Visual observation
2. Personnel discovering such problems shall use AP-615, NRC Reporting Requirements, to document the discovery and to ensure awareness of shift operations personnel of the situation.
3. If the Operations Shift Foreman is unable to determine if affected components remain OPERABLE (as defined in Technical Specifications), he shall notify the following personnel:
 - Manager - Operations
 - Plant General Manager
4. The Plant General Manager shall determine the appropriate actions to be taken and the time allotted for such actions based on input from the unit managers. This will include a determination of whether affected components shall be immediately declared INOPERABLE or shall remain OPERABLE until an evaluation is completed.

5.1 Initial Actions (continued)

5. The Plant General Manager shall assign the JCO to the appropriate unit manager; or, he may refer the matter to Harris Plant Engineering Section (HPES) for evaluation. If HPES is to perform evaluation under their procedure, then no action under this procedure is required until Step 5.2.9.
6. The Unit Manager shall then assign qualified individuals to investigate and evaluate the deficiency.

5.2 Evaluation and Documentation for JCO

1. The identified deficiency shall be evaluated to determine the impact on the functional capabilities of the affected equipment.
2. If at any point during this evaluation it becomes evident that a Technical Specification component is not capable of performing its identified function, then the Manager - Operations and the Plant General Manager shall be informed and appropriate action taken under the Technical Specifications.
3. The evaluation shall consider:
 - Technical Specifications
 - Operating License
 - FSAR
 - ISI Requirements
 - Seismic Requirements
 - Environmental Qualification Requirements
 - Code of Federal Regulations
 - Engineering Design Codes (i.e., ASME)
 - Equipment Specifications
4. Upon completion of the evaluation, the unit manager shall be notified of the conclusions reached. He shall report these conclusions to the Plant General Manager and Manager - Operations. Shift Operations personnel shall be informed of the OPERABILITY status of the affected components.
5. A JCO shall be prepared to include the following:
 - a. Review Page (See Attachment 1).
 - b. Deficiency - should include method of discovery, persons involved, time and date, nature of deficiency, equipment impacted, Technical Specifications impacted.



5.2 Evaluation and Documentation for JCO (continued)

- c. Functional Requirements - should be a brief discussion of the design function of affected component(s) from the sources identified in 5.2.3.
 - d. Evaluation - shall be a discussion of the specific impact of the deficiency on the affected components' capability to perform its functional requirements.
 - e. Conclusions/Recommendations - shall be a definitive statement concerning continued OPERABILITY of the affected components, as well as recommended further actions.
 - f. References - shall include documents or other sources of information used to conduct the evaluation and support the conclusions.
6. The JCO shall be accompanied by a safety evaluation prepared in accordance with AP-011, Safety Reviews.
 7. The JCO shall be signed by all persons involved in its preparation, an independent technical reviewer, and by the applicable unit manager.
 8. The JCO may then be used on an interim basis pending final review by the PNSC.
 9. The JCO shall be presented to the PNSC. The PNSC shall review the JCO for approval and document the conclusion by the signature of the Chairman - PNSC (see Attachment 1).
 10. The JCO shall be sent to Regulatory Compliance for transmittal to Document Services in accordance with RMP-006, Records Storage Area.

ATTACHMENT 1

JUSTIFICATION FOR CONTINUED
OPERATION REVIEW
JCO NO. _____

System/Component:

JCO Prepared by:

(Name/Title)

Date:

(Name/Title)

Date:

(Name/Title)

Date:

Indep. Tech. Reviewer:

(Name/Title)

Date:

Unit Manager:

Date:

PNSC Review Comments/Action Items:

PNSC Review:

Approved:

Disapproved:

PNSC Chairman:

Signature

Date:

(Form AP-618-1-0)