

JAN 18 1990

MEMORANDUM FOR: Brian W. Sheron, Director
Division of Systems Research
Office of Nuclear Regulatory Research

FROM: Thomas M. Novak, Director
Division of Safety Programs
Office for Analysis and Evaluation
of Operational Data

SUBJECT: OPERATOR ACTIONS DURING OPERATIONAL EVENTS

The enclosed study on Operator Actions During Operational Events highlights a significant issue regarding impromptu actions during recovery from an event. These actions arise because of various circumstances including: organizational attitudes about following procedures as guidance instead of verbatim compliance, lack of procedures, time available for preemptive operational actions, incorrect or inadequate procedures, or other event specific conditions. As noted during the recent steam generator tube rupture event at McGuire, this process resulted in the "in place" steam generator tube rupture emergency procedures not being implemented as expected. The recent blowdown event at Braidwood is another example where impromptu operator actions occurred during recovery from a loss of coolant event because of a lack of emergency procedures covering shutdown events.

Significant resources have been expended on developing emergency procedures and training to cope with untoward events as a result of the TMI accident. Yet, there may be situations where conflicts arise, procedures are inadequate, or no procedures exist, such as recovery from events that occur when the plants are shutdown, which require impromptu operator actions. There is no specific guidance governing operator actions under these conditions except the rather high level direction provided by 10CFR50.54, Conditions of licenses, paragraph (x) and IN 79-20, "NRC Enforcement Policy - NRC Licensed Individuals," September 1979.

As indicated in the enclosed report, there should be more specific direction about when it is appropriate to block or secure a safety system, about when safety systems should be manually actuated, about what takes priority when faced with conflicting functional demands, or about what approach to take if there are flawed or no procedures covering a situation. This prioritized guidance should be developed and incorporated into the operators' training. I believe that written guidance could be on the order of one to two pages prepared in such a manner so as to permit easy recall.

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Generic Issue 125.11.10, "Hierarchy of Impromptu Operator Actions," which addressed this issue was subsumed by Issue HF4.4, "Guidelines for Upgrading Other Procedures". Current efforts appear to be directed at developing procedures for specific situations not presently covered by the EOPs. However, development of prioritized guidance on impromptu actions would be an adjunct to this effort in the interim when no procedures exist or for those future situations where unanticipated conflicts arise. The enclosed report is for your use and information in resolving the issue of impromptu actions. We strongly support more definitive guidance being developed on expected operator responses under these ad hoc situations.

Original signed by:
Thomas M. Novak
Thomas M. Novak, Director
Division of Safety Programs, AEOD

Enclosure: As stated

cc: w/enclosure:

J. Roe, NRR
E. Rossi, NRR
W. Regan, NRR
D. Hood, NRR
D. Matthews, NRR
F. Coffman, RES
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MEMORANDUM FOR: Brian W. Sheron, Director
Division of Systems Research, RES

FROM: Thomas M. Novak, Director
Division of Safety Programs, AEOD

SUBJECT: OPERATOR ACTIONS DURING OPERATIONAL EVENTS

The enclosed study on Operator Actions During Operational Events highlights a significant issue regarding ad hoc actions during recovery from an event. These actions arise under various circumstances including: lack of procedures, time available for preemptive operational actions, incorrect or inadequate procedures, or other event specific conditions. As noted during the recent steam generator tube rupture event at McGuire, this process resulted in the in place steam generator tube rupture emergency procedures not being implemented as expected.

The recent blowdown event at Braidwood is another example where impromptu operator actions were employed. Enormous resources have been expended on developing emergency procedures and training to cope with untoward events as a result of the TMI accident. Yet, there may be situations where conflicts arise, procedures are inadequate, or no procedures exist, such as recovery from events, that occur when the plants are shutdown, which require impromptu operator action.

Generic Issue 125.II.10, "Hierarchy of Impromptu Operator Actions," which addressed this issue was subsumed by Issue HF4.4, "Guidelines for Upgrading Other Procedures." The enclosed report is for your use and information in resolving the issue of impromptu actions. We strongly support more definitive guidance being developed on expected operator responses under these ad hoc situations in the resolution of Issue HF4.4.

Thomas M. Novak, Director
Division of Safety Programs, AEOD

Enclosure: As stated

cc w/enclosure:

- J. Roe, NRR
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