IE REVIEW AND EVALUATION OF LICENSEE IMPLEMENTATION OF TMI ACTION PLAN REQUIREMENTS

Action Item No: 1.C.5

Procedures For Feedback Of Operating Experience to Plant Staff

U. S. Nuclear Regulatory Commission Office of Inspection and Enforcement

Utility: BALTIMORE GAS AND ELECTRIC COMPANY Facility: CALVERT CLIFFS NUCLEAR POWER PLANT Unit No.: UNITS 1 and 2
Docket No.: 50-317 and 50-318

4. 2537 Jan

Signature:	of Regident and	d Project Inspecti	, Director	, Division
Date:	6/17	181		
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POSITION

Task Action Plan 1.C.5, Procedures for Feedback of Operating Experience to Plant Staff requires each licensee to prepare procedures to assure that operating information pertinent to plant safety originating both within and outside the utility organization is continually supplied to operators and other personnel and is incorporated into training and retraining programs. These procedures shall:

- Clearly identify organizational responsibilities for review of operating experience, the feedback of pertinent information to operators and other personnel and the incorporation of such information into training and retraining programs;
- (2) Identify the administrative and technical review steps necessary in translating recommendations by the operating experience assessment group into plant actions (e.g., changes to procedures; operating orders);
- (3) Identify the recipients of various categories of information from operating experience (e.g., supervisory personnel, STAs, operators, maintenance personnel, H. P. technicians) or otherwise provide means through which such information can be readily related to the job functions of the recipients.
- (4) Provide means to assure that affected personnel become aware of and understand information of sufficient importance that should not wait for emphasis through routine training and retraining programs;
- (5) Assure that plant personnel do not routinely receive extraneous and unimportant information on operating experience in such volume that it would obscure priority information or otherwise detract from overall job performance and proficiency;
- (6) Provide suitable checks to assure that conflicting or contradictory information is not conveyed to operators and other personnel until resolution is reached; and;
- (7) Provide periodic internal audit to assure that the feedback program functions effectively at all levels.

Each utility shall carry out an operating experience assessment function that will "involve utility personnel having collective competence in all areas important to plant safety.

Those involved in the assessment of operating experience will review information from a variety of sources. These include operating information from the licensee's own plant(s), publications such as IE Bulletins, Circulars and Notices, and pertinent NRC or industrial assessments of operating experience. In some cases, information may be of sufficient importance that it must be dealt with promptly (through instructions, changes to operating and emergency procedures, issuance of special changes to operating and emergency procedures,

issuance of special precautions, etc.) and must be handled in such a manner to assure that operations management personnel would be directly involved in the process. In many other cases, however, important information will become available which should be brought to the attention of operators and other personnel for their general information to assure continued safe plant operation. Since the total volume of information handled by the assessment group may be large, it is important that assurance by provided that high-priority matters are dealt with promptly and that discrimination is used in the feedback of other information so that personnel are not deluged with unimportant and extraneous information to the detriment of their overall proficiency. It is important, also, that technical reviews be conducted to preclude premature dissemination of conflicting or contradictory information.

In the "Calvert Cliffs Nuclear Power Plant Unit Nos. 1 and 2, Docket Nos. 50-317 and 50-318 Response to NUREG-0737" licensee letter dated December 15, 1980, the licensee committed to implementation of procedures complying with this guidance by January 1, 1981. The licensee has created a standing committee, the Plant Operating Experience Assessment Committee, to implement a regular review of the operating experience of Calvert Cliffs and plants of similar design. The licensee's procedure implementing NUREG-0660, Item 1.C.5 has been reviewed by the NRC and is in substantial agreement with the guidance with no major deviations.

Based on this review, we find the licensee's procedures for feedback of operating experience to the plant staff, to be acceptable.