

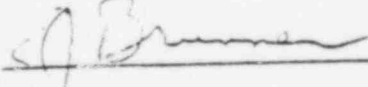
TITLE: IE REVIEW AND EVALUATION OF LICENSEE CONFORMANCE WITH TMI ACTION  
PLAN REQUIREMENTS

ACTION PLAN ITEM NO: I.C.6

TITLE: Verify Correct Performances of Operating Activities

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

UTILITY - Baltimore Gas and Electric Company  
FACILITY - Calvert Cliffs Nuclear Power Plant  
UNIT NO. - 1 and 2  
BUCKET NO. - 50-317, 50-318

Signature: , Acting Director, Division of Resident  
and Project Inspection, R I

Date:

PARENT REGION CONTACT: L. Briggs, 488-1237

8111270122 811103  
PDR ADOCK 05000317  
P PDR

I.C.6     Verify Correct Performance of Operating Activities

Position

Item I.C.6 of the U.S. Nuclear Regulatory Commission Task Action Plan (NUREG-0660) and Recommendation 5 of NUREG-0585 propose requiring that licensees' procedures be reviewed and revised, as necessary, to assure that an effective system of verifying the correct performance of operating activities is provided. An acceptable program for verification of operating activities is described below.

The American Nuclear Society has prepared a draft revision to ANSI Standard N13.7-1972 (ANS 3.2) "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." A second proposed revision to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," which is to be issued for public comment in the near future, will endorse the latest draft revision to ANS 3.2 subject to the following supplemental provisions:

- (1) Applicability of the guidance of Section ~~5.2.5~~ should be extended to cover surveillance testing in addition to maintenance.
- (2) In lieu of any designated senior reactor operator (SRO), the authority to release systems and equipment for maintenance or surveillance testing or return-to-service may be delegated to an on-shift SRO, provided provisions are made to ensure that the shift supervisor is kept fully informed of system status.
- (3) Except in cases of significant radiation exposure, a second qualified person should verify correct implementation of equipment control measures such as tagging of equipment.
- (4) Equipment control procedures should include assurance that control-room operators are informed of changes in equipment status and the effects of such changes.
- (5) For the return-to-service of equipment important to safety, a second qualified operator should verify proper systems alignment unless functional testing can be performed without compromising plant safety, and can prove that all equipment, valves, and switches involved in the activity are correctly aligned.

NOTE: A licensed operator possessing knowledge of the systems involved and the relationship of the systems to plant safety would be a "qualified" person. The staff is investigating the level of qualification necessary for other operators to perform these functions.

For plants that have or will have automatic system status monitoring as discussed in Task Action Plan item I.D.3, NUREG-0660, the extent of human verification of operations and maintenance activities will be reduced. However, the need for such verification will not be eliminated in all instances.