

ENCLOSURE 1

NOTICE OF VIOLATION

Florida Power Corporation
Crystal River Unit 3

Docket Nos. 50-302
License Nos. DPR-72
EA 93-307

During an NRC inspection conducted on November 15-19 and December 6-10, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion V, requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.
1. Contrary to the above, on December 11, 1993, several Emergency Operating and Abnormal Operating Procedures were inadequate as evidenced by the following examples:
 - a. Emergency Operating Procedure 03, "Inadequate Subcooling Margin," did not contain appropriate guidance to mitigate small break loss of coolant accident with loss of all high pressure injection.
 - b. Emergency Operating Procedure 14, Enclosure 6, could not be performed as written because the procedure did not direct the operator to open Valve CXV-358.
 - c. AP-470, "Loss of Instrument Air," contained four incorrect cross references which directed the operator to implement cancelled Abnormal Procedures.
 - d. AP-581, "Loss of Non-Nuclear Instrumentation (NNI-X) Power," Enclosure 2, was technically incorrect, in that, instruments identified as unreliable were reliable and other instruments that were unreliable were not identified.
 - e. AP-582, "Loss of Non-Nuclear Instrumentation (NNI-Y) Power," Enclosure 2, was technically incorrect, in that, it stated that no instruments would be unreliable on a loss of NNI-Y when, in fact, many instruments would be unreliable.
 2. Contrary to the above, on December 11, 1993, the procedures for writing, verifying, and validating Crystal River Emergency Operating Procedures were inadequate as evidenced by the following examples:
 - a. AI-402A, "Writer's Guide for Emergency Operating Procedures," contained outdated accident mitigation strategy; stated that verification procedures should be

organized by critical safety functions which were no longer applicable; described the old numerical sequencing of Emergency Operating Procedures which were no longer applicable; and, contained no information regarding the content and format of Rules, Carry-over steps, or Flow Charts.

- b. AI-402C, "EOP Verification and Validation Plan," stated that the organization of the Verification Procedures was in accordance with the old critical safety functions vice the new format that presently exists.

This is a Severity Level IV violation (Supplement I).

- B. An NRC Order dated February 21, 1984, confirming licensee commitments on emergency response capability, directed Florida Power Corporation to upgrade Emergency Operating Procedures in the manner described in a Florida Power Corporation submittal identified in Section III of the Order. This submittal, dated April 15, 1983, was Florida Power Corporation's response to Generic Letter 82-33 which contained Supplement 1 to NUREG 0737, Requirements for Emergency Response Capability. In this submittal, Florida Power Corporation committed to implementing the requirements of the generic letter. Item 7.1.b of NUREG 0737, Supplement 1, required that licensees reanalyze transients and accidents and prepare Technical Guidelines. Item 7.1.c required licensees to upgrade Emergency Operating Procedures to be consistent with Technical Guidelines and an appropriate procedure Writer's Guide. Item 7.2.b required a Procedures Generation Package to be submitted which contained Plant Specific Technical Guidelines.

Contrary to the above, on December 11, 1993, a complete Emergency Operating Procedure rewrite documented to Revision 6 of the Babcock and Wilcox Generic Technical Guidelines was completed and implemented without development of current Plant Specific Technical Guidelines.

This is a Severity Level IV violation (Supplement I).

- C. 10 CFR 50, Appendix B, Criterion VI, requires, in part, that measures shall be established to control the issuance of documents, such as instructions, procedures and drawings, including changes there to, which prescribe all activities affecting quality. These measures shall assure that documents, including changes are reviewed for adequacy and approved for release.

NOD-05, "Document Control Program," provides, in part, that documents which specify or provide criteria, parameters and bases upon which completion of a quality related task is based are controlled documents. It required that "The document control program shall contain provisions which insure that ... obsolete or superseded documents are removed from use or destroyed to prevent inadvertent use."

Contrary to the above, on December 11, 1993:

1. The Deviation Document for the previous Emergency Operating Procedures written to Revision Four of the Generic Technical Guidelines was an uncontrolled and unofficial document, in that: it had not been dated, signed, or reviewed; contained no file or reference data; was typed on plain paper with no indication of the originating organization; and had been marked up with multiple pen and ink changes with no indication of the author of the changes.
2. The library copy of the Final Safety Analysis Report contained an obsolete and superseded Appendix 12C, Licensed Operator Qualification Program Description, pages 12C-iii thru 12C-20.

This is a Severity Level IV violation (Supplement I).

- D. 10 CFR 50.59 requires, in part, that the holder of a license of a utilization facility may make changes in the procedures as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the technical specifications incorporated in the license or an unreviewed safety question. The licensee shall maintain records of changes in procedures made pursuant to this section. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, on July 26, 1993, the licensee did not provide adequate safety evaluations (§ 50.59 review) for 14 of the newly implemented Emergency Operating Procedures. The bases for the determination that the changes to these procedures did not involve an unreviewed safety question was inadequate as evidenced by the following examples:

1. All 14 of the procedures had identical § 50.59 review documentation which did not include any specific details that could withstand an independent review.
2. Emergency Operating Procedures 01, 10, 11, 12, and 14 were developed by the licensee but were not addressed by the Generic Technical Guidelines. The safety evaluations stated that the new procedures were developed in "Strict accordance with approved vendor guidelines." This statement was not accurate for these procedures.
3. Emergency Operating Procedures 02 through 09, and 13 contained numerous deviations from the vendors generic guidelines which was contrary to the statement provided on the § 50.59 evaluation. The safety evaluations stated that the mitigation strategies had remained unchanged for the design basis events when, in fact, the mitigation strategies had changed. The previous Emergency

Operating Procedures utilized Critical Safety Functions which were no longer employed.

This is a Severity Level IV violation (Supplement I).

- E. Technical Specification 6.8.1 required, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.

Regulatory Guide 1.33 listed various safety-related administrative activities including Procedure Review and Approval.

AI-402C, "EOP Verification and Validation Plan," required that the originator of the procedure verification designate independent reviewers to perform enclosure 2 of the procedure (Evaluation Criteria for Procedure Verification).

Contrary to the above, on December 11, 1993, the licensee had not performed verifications and validations on 14 Emergency Operating Procedures in accordance with the procedural requirements of AI-402C as evidenced by the following examples:

1. The verification and validation summaries (Enclosure 1 and Enclosure 3 of AI-402C) for 14 Emergency Operating Procedures did not have any independent reviewer signatures and dates as required by step 4.1.2 of AI-402C.
2. Enclosure 2 of AI-402C, "Evaluation Criteria for Procedure Verification," was not performed for any of the verifications in accordance with AI-402C, as evidenced by the following:
 - a. Step 2.2.1 required that differences between the Emergency Operating Procedures and the Generic Technical Guidelines were documented and explained. A large volume of differences existed but were not documented.
 - b. VP-580, "Plant Safety Verification," was designed, written, verified, and implemented on September 3, 1993, without conforming to the quantitative acceptance criteria listed in AI-402C.
3. Emergency Operating Procedure 14, Enclosure 6, "OTSG Blowdown Lineup," was not adequately validated. Step 1.1.1 of AI-402C Enclosure 4 required that the procedure contain sufficient information to perform the specified actions. The procedure could not be performed as written because the procedure did not direct the operator to open Valve CXV-358.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Florida Power Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Atlanta, Georgia
this 10 day of February 1994

ENCLOSURE 2

LIST OF ATTENDEES
ENFORCEMENT CONFERENCE
JANUARY 18, 1994
NRC REGION II/FLORIDA POWER CORPORATION

LICENSEE ATTENDEES:

P. Beard, Senior Vice President, Nuclear Operations
G. Boldt, Vice President, Nuclear Production
P. Fleming, Senior Nuclear Licensing Engineer
G. Halon, Manager, Nuclear Plant Operations
S. Tribatch, Winston & Strawn
R. Tyrie, EOP Coordinator
K. Wilson, Manager, Nuclear Licensing
G. Williams, Corporate Counsel, Florida Power Corp.

NRC ATTENDEES:

S. Ebnetter, Regional Administrator
L. Reyes, Deputy Regional Administrator
B. Uryc, Jr., Director, Enforcement and Investigation
Coordination Staff (EICS)
C. Evans, Regional Counsel
J. Johnson, Deputy Director, Division of Reactor Project (DRP)
A. Gibson, Director, Division of Reactor Safety (DRS)
J. Arildsen, NRR/DRCH
H. Berkow, NRR
M. Sinkule, Branch Chief, DRP, Branch 2
K. Landis, Section Chief, DRP2B
L. Watson, Senior Enforcement Specialist, EICS
R. Butcher, Senior Resident Inspector, Crystal River Nuclear Plant
A. Long, Project Engineer, DRP
L. Lawyer, Chief, Operator Licensing Section, (OLS), Operations Branch, (OB),
DRS
G. Hopper, Reactor Engineer, OLS, OB, DRS
J. Bartley, Reactor Engineer, OLS, OB, DRS

ENFORCEMENT CONFERENCE

January 18, 1994

Atlanta, GA

EMERGENCY OPERATING PROCEDURE TEAM INSPECTION

INSPECTION REPORT 93-16

FLORIDA POWER CORPORATION

CRYSTAL RIVER, UNIT 3

AGENDA

INTRODUCTION	G. BOLDT
CHRONOLOGY	P. FLEMING
RESPONSE TO APPARENT VIOLATIONS	G. BOLDT
CORRECTIVE ACTIONS	G. HALNON
CLOSING REMARKS	P. BEARD

FPC PARTICIPANTS

PAT BEARD	SENIOR VICE PRESIDENT NUCLEAR OPERATIONS
GARY BOLDT	VICE PRESIDENT NUCLEAR PRODUCTION
GREG HALNON	MANAGER NUCLEAR PLANT OPERATIONS
KEN WILSON	MANAGER NUCLEAR LICENSING
PAUL FLEMING	SENIOR NUCLEAR LICENSING ENGINEER
RON TYRIE	EOP COORDINATOR

INTRODUCTION

- * EOP CONTENT IS TECHNICALLY SOUND
 - SUBSTANTIAL IMPROVEMENT OVER PREVIOUS EOPs
 - SIMULATOR VALIDATION INCLUDING SUBSTANTIAL SENIOR MANAGEMENT PARTICIPATION
 - RECENT INITIAL LICENSE AND REQUALIFICATION RESULTS
 - EOPs EFFECTIVE: NO SAFETY CONCERN
- * PREVIOUS MANAGEMENT OVERSIGHT CONCENTRATED ON END PRODUCT. SENIOR MANAGEMENT GENERALLY QUALIFIED TO SRO LEVEL.
- * ACKNOWLEDGE EOP DEVELOPMENT PROCESS AND DOCUMENTATION DEVIATIONS
 - WE ACKNOWLEDGE THE UNIQUE NATURE AND THE IMPORTANCE OF THE PROCESS AND DOCUMENTATION DEFICIENCIES AND WILL PROMPTLY CORRECT THEM.
 - NO SAFETY SIGNIFICANT IMPACT ON EOPs
- * COMPREHENSIVE CORRECTIVE ACTION PLAN ALREADY DEVELOPED/ PROVIDED TO NRC
 - PROVIDES FOCUSED MANAGEMENT OVERSIGHT AREAS ADDRESSED BY THE APPARENT VIOLATIONS
 - LESSONS LEARNED WILL BE APPLIED TO OTHER, COMPARABLE PROGRAMS

CHRONOLOGY

2/21/84

CONFIRMATORY ORDER -- NRC
ACCEPTS FPC PROCESS FOR
UPGRADING EOPs IN RESPONSE TO
GL 82-33

ORIGINAL PROCESS BASED ON
EXPECTATIONS SUBSEQUENTLY
MODIFIED BY LATER EVOLUTION OF
GTG

- ATOG
- TBD (VOLUME 3)
- GEOG (VOLUME 1)

9/85

TBD ISSUED USING VOL. 3, AS
BASELINE

4/88

IR 88-09 NOTED NEED FOR FPC TO
DOCUMENT DIFFERENCES BETWEEN
GTG AND FPC EOPs

3/89

FPC EMBARKED ON A PLAN TO
STRENGTHEN EOPs

5/89

IR 89-10 IDENTIFIED LACK OF
CONSOLIDATED PSTG BUT NO
VIOLATIONS OR DEVIATIONS

9/89

INPO ASSIST -- REVIEWED EOP
UPGRADE PROJECT

OTHER INPO EVALUATIONS
ALSO OCCURRED IN 2/89, 2/90,
6/91, AND 12/92 THAT FOCUSED
ON THE EOP PROGRAM AT CR-3

10/90

IR 90-31 NOTED "PROGRESS IN
DEVELOPMENT OF IMPORTANT [EOP]
PROGRAM FEATURES WAS GOOD." NO
VIOLATIONS OR DEVIATIONS

12/90

TBD VOLUME 1 (GEOG) ISSUED

1991

FPC HAD SUFFICIENTLY THOROUGH
PSTG; PROVIDED DEVIATION
DOCUMENT (VOL. 3, REV. 4) TO INPO

1/92

IR 91-24 CLOSED UPGRADED
CONSOLIDATED PSTG FINDING
BASED ON SATISFACTORY PROGRESS
EVEN THOUGH THE DEVIATION
DOCUMENT WAS NOT COMPLETE. NO
EOP-RELATED VIOLATIONS OF NRC
REQUIREMENTS

1992

CR-3 REDIRECTS PROGRAM BY USING
VOL. 1 OF GTG AS BASIS FOR EOP
UPGRADE

7/93

UPGRADED/VALIDATED EOPs
IMPLEMENTED

1/94

IR 93-16

RESPONSE TO APPARENT VIOLATIONS

Overview

- * FPC ACKNOWLEDGES FINDINGS ON PROCESS DEVIATIONS
 - ADMINISTRATIVE IN NATURE
 - NO SAFETY CONSEQUENCES -- EOPs WORK AS ADOPTED

- * FPC DISAGREES WITH DEVIATIONS REGARDING EOP CONTENT
 - EOPs ADEQUATELY ACHIEVE THEIR PURPOSE FROM BOTH A TECHNICAL AND HUMAN FACTORS STANDPOINT
 - EXTENSIVE SIMULATOR VALIDATION
 - APPARENTLY BASED ON TECHNICAL DIFFERENCES OF OPINION

- * NONE OF THE APPARENT VIOLATIONS ARE SAFETY SIGNIFICANT

- * CORRECTIVE ACTION PLAN
 - COMPREHENSIVE, ADDRESSES ALL IDENTIFIED ISSUES
 - HAS RECEIVED MANAGEMENT REVIEW AND APPROVAL
 - PROVIDED TO NRC
 - ARE REVIEWING OTHER PROJECTS TO ENSURE THAT ADMINISTRATIVE DEFICIENCIES ARE NOT REPEATED

EEI 302/93-16-01: FAILURE TO DEVELOP AN ADEQUATE
PLANT SPECIFIC TECHNICAL GUIDELINE
(PSTG)

- * FPC ACKNOWLEDGES THIS DEFICIENCY
- * INSUFFICIENT DOCUMENTATION FOR RECENT REVISIONS AND EARLIER REVISIONS NOT DOCUMENTED IN A CONTROLLED RECORD
- * NEVERTHELESS, EOPs ARE TECHNICALLY SOUND
 - AUTHOR OF CR-3 EOPs IS FPC'S REPRESENTATIVE ON THE B&WOG OPERATORS SUPPORT COMMITTEE THAT IS RESPONSIBLE FOR GTG DEVELOPMENT. EOPs DID USE GTG AS STARTING POINT.
 - AUTHOR AWARE OF AND ATTEMPTED TO MINIMIZE DIFFERENCES BETWEEN EOPs AND GEOG.
 - AUTHOR OBSERVED ALL OPERATOR PARTICIPATION IN SIMULATOR VALIDATION. COMMENTS WERE DOCUMENTED.
 - SIMULATOR VALIDATION CORROBORATED EFFECTIVENESS OF PROCEDURES AND, THEREBY THE INFORMAL PROCESS USED
- * FPC RECOGNIZES THE NEED FOR DOCUMENTING DEVIATIONS AS AN ELEMENT FOR CONFIDENCE IN THE EOPs AND ANY CHANGES TO THEM
- * DEVIATION DOCUMENT WILL BE COMPLETED AS PART OF CORRECTIVE ACTION PLAN

- * CORRECTIVE ACTION PLAN IN PLACE TO PREVENT RECURRENCE
- * APPARENT VIOLATION IS NOT SAFETY SIGNIFICANT

EEI 302/93-16-02: FAILURE TO TAKE ADEQUATE
CORRECTIVE ACTION ON PREVIOUSLY
IDENTIFIED PSTG DEFICIENCIES

- * FPC DOES NOT AGREE WITH THIS APPARENT VIOLATION

- * IMPLEMENTED AGGRESSIVE, EFFECTIVE CORRECTIVE ACTIONS IN RESPONSE TO PRIOR NRC AND INPO CONCERNS
 - DEVELOPMENT OF DEVIATION DOCUMENT IN 1991 (VOL. 3, REV. 4 OF THE GTG)

 - NRC REVIEW AND CLOSURE OF PRIOR CORRECTIVE ACTIONS

 - FPC ACKNOWLEDGES PRIOR ACTION INSUFFICIENT TO PRECLUDE RECURRENCE

- * APPARENT VIOLATION IS NOT SAFETY SIGNIFICANT

EEI 302/93-16-03: FAILURE TO MAINTAIN ADEQUATE
CONTROL OF DOCUMENTS, TWO
EXAMPLES

- * AGREE WITH IDENTIFIED DEFICIENCIES

- * SOME ASPECTS OF DOCUMENT CONTROL MISSING
FOR REV. 4 DEVIATION DOCUMENT -- ADEQUATE
CONTROL NOW IMPOSED AS DESCRIBED IN
CORRECTIVE ACTIONS

- * THE SUPERSEDED INFORMATION IN TRAINING
DEPARTMENT'S COPY OF FSAR WAS READILY
CORRECTED. RECURRENCE WILL BE AVOIDED BY
ADOPTION OF COMPUTERIZED VERSION OF FSAR

- * APPARENT VIOLATION IS NOT SAFETY SIGNIFICANT

EEI 302/93-01-04: FAILURE OF PROCEDURES TO PROVIDE
ADEQUATE GUIDANCE, SEVEN EXAMPLES

- * FPC DISAGREES WITH THIS APPARENT VIOLATION AS IT APPLIES TO EOPs

- * FPC REVIEW OF ALL EOP PROCEDURE ISSUES IDENTIFIED IN THE INSPECTION REPORT CONTINUES TO DEMONSTRATE EOP TECHNICAL ADEQUACY (SEE ENCLOSURE)
 - FPC ACKNOWLEDGES SOME DEFICIENCIES AND DIFFERING PROFESSIONAL OPINIONS

 - CERTAIN AP DEFICIENCIES WERE ALREADY ADDRESSED IN INTERIM GUIDANCE AND ARE NOT SAFETY SIGNIFICANT

 - OTHER DEFICIENCIES (APs) WERE IDENTIFIED BY FPC PRIOR TO THE INSPECTION AND WERE IN PROCESS OF BEING CORRECTED.

- * WE ACKNOWLEDGE PROCESS DEFICIENCIES (E.G., LACK OF DEVIATION DOCUMENT AND FAILURE TO UPDATE AI-402C). THESE DID NOT UNDERCUT EOP INTEGRITY

- * CR-3 EOPs ARE ADEQUATE AND TECHNICALLY SOUND AS DEMONSTRATED BY SIMULATOR TESTS

- * CORRECTIVE ACTION PLAN WILL MAINTAIN DOCUMENTED ASSURANCE OF EOP AND AP CONTENT

- * NONE OF THE IDENTIFIED ISSUES ARE CONSIDERED SAFETY SIGNIFICANT

EEI 302/93-16-05: FAILURE TO FOLLOW THE VERIFICATION
AND VALIDATION PROCEDURE

- * AGREE -- FPC FAILED TO FOLLOW V&V PROCEDURES

- * DESPITE LACK OF APPROPRIATE DOCUMENTATION AND ADHERENCE TO ADMINISTRATIVE INSTRUCTIONS, EOP VALIDATION PRODUCED ADEQUATE PROCEDURES
 - SITE-SPECIFIC SIMULATOR VALIDATION
 - EXTENSIVE MANAGEMENT OVERSIGHT OF END PRODUCT
 - INPO ASSISTS AND EVALUATIONS

- * OTSG BLOWDOWN LINE UP ADEQUATE (ADDRESSED IN FPC TECHNICAL EVALUATION OF EOP ADEQUACY)

- * RE-VERIFICATION AND RE-VALIDATION EFFORTS WILL CONFIRM TECHNICAL ADEQUACY OF EOPs

- * APPARENT VIOLATION IS NOT SAFETY SIGNIFICANT

EEI 302/93-16-06: FAILURE TO PERFORM ADEQUATE
SECTION 50.59 REVIEWS

- * ACKNOWLEDGE SHORTCOMINGS IN THE 50.59 EVALUATIONS FOR EXISTING EOPs. THESE WERE DONE PRIOR TO IMPLEMENTATION OF NSAC-125.
- * 50.59 PROCESS HAD ALREADY BEEN REVISED PRIOR TO THE INSPECTION. NRC REVIEWED NEW 50.59 PROCEDURE/TRAINING.
- * NEVERTHELESS:
 - EOP REVISIONS ARE CONSISTENT WITH FSAR
 - EOPs ARE TECHNICALLY ADEQUATE
 - SIMULATOR EXERCISES DEMONSTRATED THAT EOPs WORKED
 - THERE ARE NO UNREVIEWED SAFETY QUESTIONS ASSOCIATED WITH THE CR-3 EOPs
- * MORE ADEQUATE 50.59 EVALUATIONS WILL BE DEVELOPED AS PART OF CORRECTIVE ACTION PLAN.
- * APPARENT VIOLATION IS NOT SAFETY SIGNIFICANT

CORRECTIVE ACTIONS

- * COMPREHENSIVE, ADDRESSES ALL IDENTIFIED ISSUES

- * CORRECTIVE ACTION PLAN ALREADY PROVIDED TO NRC

- * EOP TASK FORCE ESTABLISHED
 - COMPRISED OF QUALIFIED PERSONNEL (MOST HOLD/HELD SRO LICENSE OR CERTIFICATION)

 - BROAD RANGE OF EXPERIENCE; INDEPENDENT

 - SUFFICIENT RESOURCES FOR VERY TIMELY CORRECTIVE ACTIONS

 - EXPERIENCED IN EOP DEVELOPMENT PROCESS

 - REPRESENTATIVES FROM SYSTEM ENGINEERING, LICENSING, QA, TRAINING, AND OPERATIONS

RESPONSIBILITIES:

- (1) RESTORE EOP SUPPORT DOCUMENTATION TO ACCEPTABLE STATUS, RE-VERIFY AND RE-VALIDATE (AS NECESSARY) ALL EOPs, AND PRODUCE NEW 50.59 EVALUATIONS FOR ALL EOPs**
- (2) REVIEW ALL EOP DEVIATIONS FROM GTG**
- (3) PROVIDE PROJECT MANAGEMENT OVERSIGHT OF PLAN IMPLEMENTATION, AND UPDATE SENIOR LEVEL MANAGEMENT ON PROGRESS**

*** WORK WITH NRC AND B&WOG TO RESOLVE GENERIC OPEN ITEMS IDENTIFIED IN INSPECTION REPORT**

- BASELINE GTG (VOL. 1, REV. 7)**
- DEVIATION THRESHOLD**
- JUSTIFICATION THRESHOLD**
- RESOLVE TECHNICAL DIFFERENCES OF OPINION**

*** REVIEW AND REVISE, AS NECESSARY, PROCEDURES GOVERNING EOP PROCESS (INCLUDING WRITERS GUIDE AND V&V PROCEDURES)**

- * REVIEW, REVISE, RE-VERIFY AND RE-VALIDATE, AS NECESSARY, ALL EOPS
 - ADDRESS TRAINING NEEDS ASSOCIATED WITH ANY RESULTING CHANGES TO PROCEDURES

- * QA WILL CONDUCT IN-PROCESS REVIEW AND VERIFICATION ACTIVITIES

- * ARE REVIEWING OTHER PROJECTS TO PREVENT RECURRENCE OF ADMINISTRATIVE DEFICIENCIES
 - SENIOR VP-LEVEL MANDATE
 - STRUCTURED ACTION PLANS

- * HAVE REVISED PROCEDURES GOVERNING PREPARATION OF 50.59 EVALUATIONS CONSISTENT WITH THE INDUSTRY GUIDANCE IN NSAC-125