



THE JOB ORDER AND CLEARANCE PERMIT WHICH AUTHORIZED THE DESIGN WORK ON THE CONTROL ROOM VENTILATION SYSTEM WERE REVIEWED. BOTH WERE FOUND TO CONTAIN VAGUE DESCRIPTIONS OF THE ACTUAL WORK TO BE PERFORMED. FURTHER INVESTIGATION REVEALED THAT THE USE OF "BLANKET" JOB ORDERS TO AUTHORIZE WORK OF A BROAD OR UNDEFINED SCOPE WAS NOT UNCOMMON.

THE PLANT MANAGER INSTRUCTIONS RELATIVE TO JOB ORDERS AND CLEARANCE PERMITS WERE REVIEWED. THESE INSTRUCTIONS WERE FOUND TO CONTAIN ADEQUATE INFORMATION ON THE PREPARATION OF JOB ORDERS AND CLEARANCE PERMITS. THE ADMINISTRATIVE CONTROLS LACKED CONTINUITY AND THESE INSTRUCTIONS WERE DEEMED TO NEED REVIEW AND REVISION.

THE FOLLOWING ACTIONS HAVE BEEN/ARE BEING TAKEN TO PREVENT RECURRENCE:

- A) ON SEPTEMBER 24, 1982, AN OPERATIONS DEPARTMENT STANDING ORDER WAS INSTITUTED WHICH PROHIBITS THE CHANGE OF MODES DURING START-UP WITH ANY REDUNDANT TECHNICAL SPECIFICATION EQUIPMENT INOPERABLE OR UNDER A CLEARANCE PERMIT WITHOUT A DOCUMENTED REVIEW AND MANAGEMENT APPROVAL.
- B) ON SEPTEMBER 29, 1982, THE PLANT MANAGER ISSUED A MEMO TO ALL PLANT DEPARTMENT HEADS AND THE CONSTRUCTION MANAGER WHICH DESCRIBED THE EVENT AND INSTITUTED ADDITIONAL REQUIREMENTS IN THE AREA OF DESIGN CHANGES WHICH BECAME EFFECTIVE IMMEDIATELY. THESE ADDITIONAL REQUIREMENTS INCLUDED; A REVIEW BY THE OPERATIONS DEPARTMENT OF ALL ACTIVE DESIGN CHANGE CLEARANCE PERMITS TO ASSURE ADEQUACY, INVOLVEMENT OF THE DESIGN CHANGE COORDINATOR ON CLEARANCE PERMIT REQUESTS AND RELEASES AND A REVIEW BY THE DESIGN CHANGE COORDINATORS OF ALL JOB ORDERS ASSOCIATED WITH DESIGN CHANGES TO ASSURE THAT THE SCOPE OF THE WORK AND RELATED TESTING REQUIREMENTS ARE WELL DEFINED.
- C) ON NOVEMBER 23, 1982, THE PLANT MANAGERS INSTRUCTION ON JOB ORDERS WAS ISSUED AFTER A COMPREHENSIVE REVIEW. THIS REVISION PROVIDES ADDITIONAL GUIDANCE AND CONTROLS FOR THE PREPARATION, PLANNING AND PERFORMANCE OF JOB ORDERS.

- D) THE PLANT MANAGERS INSTRUCTION ON CLEARANCE PERMITS IS BEING REVISED TO ADDRESS THE APPLICABLE ASPECTS OF THIS EVENT. THE ISSUANCE OF THIS INSTRUCTION HAS BEEN COMMITTED TO IN THE DONALD C. COOK PLANT'S NUCLEAR REGULATORY PERFORMANCE IMPROVEMENT PROGRAM WHICH WAS SUBMITTED TO THE NRC UNDER AEP:NRC:0625c. THE IMPLEMENTATION AND VERIFICATION OF THIS COMMITMENT WILL BE TRACKED UNDER THIS PROGRAM.