

Calvert Cliffs Nuclear Power Plant
Administrative Procedure

Industry Operating Experience Information Processing

NS-1-300

Revision 0

Effective Date 9/1/93

USER
CONTROLLED
SEP 01 93

Tech Spec Related

Management Related X

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Approved LR Dandy, 8-11-93
(Manager - Nuclear Safety & Planning) Date

RECORD OF REVISIONS AND CHANGES

REVISION	CHANGE	SUMMARY OF REVISION OR CHANGES
0	0	<p>Initial Issue; incorporates IOER Unit Procedures IOER-01, IOER-02, IOER-03, sections of CCI-146 and CCI-122 to support the initial issue of NS-1-100.</p> <p>Updated Bases References [B-1] through [B-11] from INPO 85-001 to INPO 90-15.</p> <p>Deleted IOER-01 Basis Number [B-14]. Biennial Reviews are performed per PR-1-100; a separate Biennial Review Form does not need to be included in this procedure.</p>

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1.0 INTRODUCTION**1.1 Purpose**

The purpose of this instruction is to describe the process for managing nuclear industry operating experience (IOE) information to improve plant operational safety.

1.2 Scope/Applicability

- A. This instruction describes the IOE information to be evaluated, the evaluation methodology, and the means to ensure IOE information is incorporated as appropriate.
- B. The Industry Operating Experience Review (IOER) shall:
 - 1. Screen and evaluate nuclear IOE information.
 - 2. Perform the necessary research, or recommend additional investigation, to evaluate the applicability of these events to Calvert Cliffs Nuclear Power Plant (CCNPP).
- C. The results of the IOE information Applicability Review shall be forwarded to appropriate CCNPP personnel.
- D. This instruction is applicable to all IOER personnel and other Operating Experience Review (OER) Section personnel who may be assigned Applicability Reviews of IOE information.

2.0 REFERENCES**2.1 Developmental References**

- A. INPO 90-015, Performance Objectives and Criteria for Operating and Near-term Operating License Plants, August 1990
- B. NRC Generic Letter 83-28 commitment
- C. CCNPP LER 90-22
- D. QL-2-100, Issue Reporting and Assessment
- E. 10 CFR 50, Appendix B, Section XVI, Corrective Action
- F. INPO 89-015, Significant Event Evaluation and Information Network (SEE-IN) Program Description, December 1989
- G. INPO 91-005, NUCLEAR NETWORK Users Manual, August 1991, Third Edition

2.2 Performance References

- A. QL-3-102, Program Deficiency Reporting
- B. CCI-122, Control of Technical Manuals and Other Vendor Technical Information
- C. NS-1-100, Use of Operating Experience and the Nuclear Hotline
- D. CCI-154, Calvert Cliffs Response to NRC Correspondence
- E. QL-2-100, Issue Reporting and Assessment
- F. PR-3-100, Records Management
- G. INPO 89-005, Guidelines for the Use of Operating Experience, November 1990

3.0 DEFINITIONS**A. Condition [Adverse to Quality]**

An event, failure, malfunction, deficiency, deviation, nonconformance, defective material and/or equipment, error, trend, etc. (refer to QL-2-100, Issue Reporting and Assessment and 10 CFR 50, Appendix B, Section XVI).

B. Significant Item:

- Any type Condition which, if repeated at the initial location or elsewhere in the plant in any operating or accident mode, could by itself or in combination with any subsequent equipment failures or human errors cause a significant increase in the chances for serious damage to people or the plant.
- Methods or procedures used to implement a Technical Specification requirement do not adequately do so and there is an associated significant increase in the chances for serious damage to people or the plant.
- 3. Any type Condition which, on recurrence, may be indicative of a significant increase in the chances for serious injury to people or damage to the plant.

C. Safety Concern

A Significant Item which could compromise plant safety and requires corrective action. Notification of senior management is required per QL-2-100, Issue Reporting and Assessment. An affirmative "yes" reply to any of the below questions identifies the issue as potentially significant.

Does this IOE item:

- affect the ability of the operator to assess or control the Nuclear Safety Status of the plant? [B-14]
- change the Nuclear Safety Response of the plant to normal evolution, anticipated operational occurrences or design basis accidents? [B-14]

3.0 Definitions (Continued)

- affect the qualification or operational characteristics of installed components classified as Safety-Related in the Q-List? [B-14]
- increase the potential for the release of radioactive material to the environment?
- significantly increase the potential for a plant trip?

D. Significant Event Evaluation and Information Network (SEE-IN)

A program managed by INPO to screen nuclear power plant events occurring worldwide and to disseminate (usually via NUCLEAR NETWORK) important IOE information:

1. Topic IS
 - Significant Operating Experience Report (SOER)
 - Significant Event Report (SER)
 - Significant Event Notification (SEN)
 - Significant by Others (SO) Report
2. Topic OR: Operations and Maintenance Reminder
3. Topic OE: Operating Plant Experience

E. Nuclear Network

An INPO electronic information system to disseminate information to member utilities. (Refer to INPO 91-005, NUCLEAR NETWORK Users Manual.)

F. IOER Screening

A preliminary review of IOE information, to select those events having a potential impact on the safety or reliability of CCNPP or to close IOE information which is either not applicable (NA) or of no concern (NC).

1. Significance
 - a. Nuclear Safety--Condition which directly affects the confinement and/or control of radioactive material within the established boundaries (i.e., operating outside of the design basis).
 - b. Personnel Safety--Condition which directly affects the safety of personnel (i.e., operating with faulty equipment could directly lead to personnel injury or fatality).
 - c. Significant--Condition could affect Nuclear Safety or deals directly with a threat to Personnel Safety. [B-14]

3.0 Definitions (Continued)

- d. **Possible--Condition** which may challenge or affect Nuclear Safety, or threaten Personnel Safety, or affect our ability to operate the plant as designed. [B-14]
- e. **Reliability--Condition** which challenges or affects plant Reliability. [B-14]
- f. **Not Significant--Condition** does not affect Nuclear Safety, Personnel Safety, Reliability, or the ability to operate. [B-14]

2. Applicability Category

- a. **Applicable--Condition** as described is associated with specific equipment, systems or programs at CCNPP.
- b. **Possible--Condition** as described may be associated with specific equipment, systems or programs, OR similar equipment, systems or programs at CCNPP.
- c. **Not Applicable--Condition** as described is *not* associated with specific equipment, systems or programs, OR similar equipment, systems or programs at CCNPP.

G. IOER Evaluation

The review of an IOE condition to assess the impact on CCNPP activities and to document results. All deficiencies are documented per QL-2-100, Issue Reporting and Assessment.

H. Effectiveness Review Program

Primarily applies to SOERs, SERs and recurring industry events. All industry, NRC and vendor information is reviewed by IOER should be used to determine effectiveness. The program is results driven -- to prevent events, minimize repetitive errors and stop recurring events. The program does not address details of administration or procedural adherence.

I. Effectiveness Review Report

A report issued to document program strengths or areas where improvement is needed to maximize the lessons learned from industry events. Results are assessed by management and appropriately involved in implementation of corrective actions.

J. "Industry Briefs"

Calvert Cliffs Nuclear Power Plant newsletter describing recent nuclear IOE information to keep plant staff informed.

4.0 RESPONSIBILITIES [B-1]**4.1 Supervisor-Operating Experience Review (S-OER)**

- A. Oversees the review of operating experience from nuclear power plants.
- B. Ensures IOER Effectiveness Review Reports and Applicability Reports are performed periodically.

4.2 Work Leader-Industry Operating Experience Review (WL-IOER)

- A. Supervises the review of operating experience from nuclear power plants.
- B. Ensures IOER information is provided in a concise and useable format to the line organizations and the Nuclear Training Unit.
- C. Designates an IOER staff member to be the NUCLEAR NETWORK Coordinator.
- D. Ensures CCNPP operating experience is used in the evaluation of IOE.
- E. Ensures that auditable SEE-IN evaluation files are maintained.
- F. Reviews IOER applicability determinations.
- G. Approves issue reports and IOER evaluations.
- H. Assesses the adequacy of CCNPP staff responses to IOE generated issue reports.
- I. Provides activity status reports to management showing status of IOER issues.
- J. Screens IOE information to determine whether further evaluation is necessary.
- K. Prepares a monthly status report.
- L. Assesses the effectiveness of plant responses to prevent recurring events.
- M. Releases the "Industry Briefs" newsletter for distribution.

4.3 Industry Operating Experience Review (IOER) Staff

- A. Evaluates industry operating experience.
- B. Determines applicability of conditions having the potential to affect CCNPP, concisely reports problems, evaluates solutions and verifies problem corrective actions. [B-14]
- C. Reviews the effectiveness of corrective actions resulting from IOER issue reports.

4.0 RESPONSIBILITIES [B-1] (Continued)**4.4 NUCLEAR NETWORK Coordinator [B-2]**

- A. A member of the IOER staff responsible for distributing NUCLEAR NETWORK information to those individuals who need or can benefit from it. [B-10, -11]
- B. Serves as a liaison between CCNPP and INPO's NUCLEAR NETWORK Manager.
- C. Publishes the "Industry Briefs" newsletter at least monthly.

5.0 PROCESS**5.1 Industry Operating Experience (IOE) Information Administration**

- A. Industry Operating Experience (IOE) Information Sources
 - 1. The NUCLEAR NETWORK database information is retrieved at least twice per week and routed to appropriate CCNPP personnel. [B-10, -11]
 - 2. The "Industry - Operating Experience Review Work Group Database" shall contain information pertaining to an Applicability Review, including the original document and any actions taken by IOER personnel.
 - 3. Other Industry Information, such as Vendor or Part 21 Notifications, shall also be processed per CCI-122, Control of Technical Manuals and Other Vendor Technical Information. [B-15]
- B. Industry Operating Experience (IOE) Information shall be categorized as follows:
 - 1. Category 1 INPO Information [B-7], [B-16]
 - Significant Operating Experience Reports (SOERs)
 - Significant Event Reports (SERs)
 - Significant by Others (SOs)

5.1 Industry Operating Experience (IOE) Information Administration (Continued)

2. Category 2 Information [B-7]
 - a. INPO: [B-16]
 - Significant Event Notifications (SENs)
 - Operations & Maintenance Reminders (ORs)
 - b. NRC:
 - Information Notices (INFON)
 - Administrative Letters (AL)
 - c. Combustion Engineering (CE) Information Bulletins

NOTE

Nuclear Regulatory Matters is responsible for processing and coordinating written responses to all NRC Bulletins, Generic Letters and other NRC information.

3. Others as deemed appropriate, by WL-IOER, for example:
 - 10 CFR 21 Reports
 - Vendor Information (e.g., CE Technical Notices, Fairbanks-Morse, Westinghouse, Foxboro, Rosemount and General Electric technical information or newsletters)
 - Selected Network Topics: Hotline (HL) & Operating Experience (OE) information
 - Miscellaneous information [NRC Office of Analysis and Evaluation of Operational Data (AEOD), Generic Letters (GL), Nuclear Management and Resources Council (NUMARC), Electric Power Research Institute (EPRI), Edison Electric Institute (EEI), other utilities, License Event Reports, (LERs) etc.]

5.2 Industry Operating Experience (IOE) Information Processing

- A. Category 1 Information
 1. Category 1 IOE information is routed to appropriate supervisory personnel for their information using Attachment 1, IOE Information Routing/AITS Entry. [B-9]
 2. Category 1 IOE information requires a written evaluation per Section 5.4, IOER Evaluation. A summary classification of Potential Applicability and Significance is recorded on Attachment 1. Screening for Applicability and Significance per Attachment 2, IOE Information Screening/Database Entry is not required. [B-6], [B-16]

5.2 Industry Operating Experience (IOE) Information Processing (Continued)

- B. Category 2 Information
1. Category 2 IOE information is routed, as deemed appropriate by the IOER screening process, using Attachment 1, IOE Information Routing/AITS Entry. [B-9]
 2. As a result of Section 5.3, IOER Screening, Category 2 IOE information may require a written evaluation. [B-6]
- C. Information determined by the WL-IOER as low probability, not applicable or of no concern, shall not be screened. [B-16]
- D. If at any point during the process a significant safety issue is identified, an Issue Report shall be submitted and the Plant Operations and Safety Review Committee (POSRC) informed. [B-16]
- E. For SOERs, a Project Manager will be assigned by the Plant General Manager to complete the SOER recommendations [B-6]

5.3 Industry Operating Experience Review (IOER) Screening**NOTE**

INPO Emergency Hotline (HL) and Significant Event Notifications (SENs) are exempt from this requirement when incomplete information prohibits an accurate screening. [B-13]

- A. Category 2 IOE information should be screened within 3 workdays of receipt.
- B. The "IOER Database" should be used to determine significance and/or applicability of repetitive IOE information.
- C. Attachment 2, IOE Information Screening/Database Entry, may be used to determine the significance and applicability of Category 2 IOE information. [B-13]. [B-16]
1. The information should be routed immediately if the WL-IOER determines it is of a time-sensitive nature, or has the potential for a significant safety or personnel hazard.
 2. The Shift Supervisor shall be promptly notified per QL-2-100, Issue Reporting and Assessment if a condition requiring initiation of a Limiting Condition for Operation (LCO) or requiring a report to the NRC (e.g., 10 CFR 50 or 10 CFR 21) is identified or suspected.

5.3 Industry Operating Experience Review (IOER) Screening (Continued)**NOTE**

While determining applicability, presume the information is applicable, until proven otherwise. For example, if the information concerns the RCS in a BWR, interpret this as concerning both the RCS and the secondary steam/feedwater systems.

- D. All "NO" responses (in PART I of Attachment 2, IOE Information Screening/Database Entry) shall be classified as "Not Significant", and "CLOSED", without further screening.
- E. All "YES" responses (in PART II of Attachment 2, IOE Information Screening/Database Entry) shall be classified as "Not Applicable", and "CLOSED".
- F. Other responses (on Attachment 2, IOE Information Screening/Database Entry) signifies the IOE information as Conditionally Applicable or of Consequence and a written evaluation will be considered.
- G. The WL-IOER signature on Attachment 1 identifies the IOER Evaluator to review Attachments 1 & 2 and to perform the Applicability Review (if necessary).
- H. The IOER Evaluator's signature on Attachment 1 indicates acknowledgement of the assignment. [B-8]

5.4 Industry Operating Experience Review (IOER) Evaluation**A. General****NOTE**

Category 1 Evaluations shall be documented via Attachment 3, Applicability Review. Category 2 Evaluations may be evaluated via Attachment 3, Applicability Review or via Attachment 5, Closeout Form.

- 1. Evaluation reports shall be assigned one of the following priorities:
 - a. IMMEDIATE : "Red" SOERs only
The typewritten Applicability Review shall be completed within 30 days after receipt of the IOE information.
 - b. PROMPT : All other Category 1 IOE information
The typewritten Applicability Review shall be completed within 60 days after receipt of the IOE information.
 - c. ROUTINE: Category 2 and "Other"
The evaluation should be completed and issued within 90 days after receipt of the IOE information.

5.4 Industry Operating Experience Review (IOER) Evaluation (Continued)

2. The IOER Evaluator shall research and conduct interviews to perform a thorough, complete and accurate evaluation report.
3. The IOER evaluation process may require an in-depth study of site design, equipment, procedures, programs and information systems. The following guidelines for performing an evaluation describe the typical actions necessary for a complete evaluation.
 - a. Review previous IOER evaluation reports of similar operating experiences (see the document references), the INPO Keyword Index and the "IOER NOAH Database."
 - b. Review previous investigations of similar in-house experience using the Issue Report, "Nuggets" and Trends databases.
 - c. Review NPRDS, Alpha-Numeric Listing, NUCLEIS, CCETS, Approved Vendor List, IOERVEND FOCUS report, and the Technical Library Listings for any hardware related information.
 - d. Review site design, equipment, procedures, programs and information (using the UFSAR, Technical Specifications, System Descriptions, etc.).
 - e. Discuss with cognizant units (which are the same or similar to those discussed in the IOE information) the design, equipment, systems and programs, as they relate to the event.
4. Faulty or inadequate vendor technical information shall be forwarded to the appropriate system engineer. [B-12]
5. The IOER Evaluator shall specifically address each recommendation made in the document being reviewed. For those recommendations being reviewed which the evaluator disagrees with, the evaluation shall clearly identify the difference between the recommendation and the IOER position.
6. The IOER Evaluator shall forward the evaluation to the WL-IOER for review and approval.

B. Records

1. The IOE information file shall include the following forms, as applicable:
 - a. Attachment 1, IOE Information Routing/AITS Entry
 - b. Attachment 3, Applicability Review
 - c. Attachment 4, Update Record
 - d. Attachment 5, Closeout Form

5.4 Industry Operating Experience Review (IOER) Evaluation (Continued)

2. The evaluation should be formatted per Attachment 3, Applicability Review or Attachment 5, Closeout Form.
- C. Review and Approval [B-3]
1. The report shall be reviewed by the WL-IOER (or designee).
 2. The WL-IOER shall sign Attachment 3, Applicability Review, indicating his approval.
 3. If the Applicability Review references an Issue Report and recommendations; the affected organization assigns a responsible individual via the normal IR/AITS processing through the cognizant GS. [B-5]
 4. The IOER Evaluator shall complete an Attachment 6, IOER Database Input/Update Form and forward to the IOER Clerk for data entry.
 5. The evaluation shall be distributed to the appropriate cognizant unit(s) for review.
 6. The IOER Evaluator shall answer all technical review comments.
 7. The IOER Evaluator shall incorporate the resolutions into the IOER evaluation as revisions to the IOE information file.
- E. Corrective Action Implementation
1. Once accepted, the cognizant section will status the IOE Information via the normal AITS entry and updating. [B-3]
- F. Tracking [B-3]
1. WL-IOER tracks and reports the status of Issue Reports generated from IOER applicability reviews after an AITS entry (IR) is generated.
 2. The IOER Evaluator will monitor the progress of long term actions and document status changes using Attachment 4, Update Record.
 3. When the deficiency is reported as having been corrected, the evaluator shall verify the adequacy of the approved corrective action, nominally within thirty days.
 - a. Sufficient investigations, inspections, and assessment should be performed to verify the corrective actions will prevent the problem at CCNPP.
 - b. The method of verification shall be documented using Attachment 5, Closeout Form, citing the actions taken and substantive evidence reviewed (or included/attached).

5.4 Industry Operating Experience Review (IOER) Evaluation (Continued)

- c. Once verified, the issue shall be "Closed" on AITS and the IOER Database updated by submitting an Attachment 6, IOER Database Input/Update Form.

G. SOER Review

1. "Selected" SOER recommendations, as listed in INPO Report 91-007, shall be reviewed annually.
2. Each recommendation shall be reviewed on or before the anniversary of closeout verification and tracked on AITS.

H. Revision

A revision to an approved IOER evaluation shall be prepared, reviewed and approved in the same manner as the original.

5.5 IOER Monthly Report

- A. The report should inform management of significant issues, backlog on issues pending resolution and SOER status and progress.
- B. The report shall be provided to the:
 - Supervisor-Operating Experience Review
 - POSRC Chairman [B-5]

5.6 IOER Effectiveness Review**A. Review Requirements**

1. An independent effectiveness review of implemented IOER applicability reviews shall be conducted once per year. [B-4]
2. The review shall assess whether the IOE program is attaining its objective of identifying and recommending improvements in plant activities.
 - a. The review should not focus on the details of the IOE program administration, but on the end results of the program.
 - b. The review should be conducted using the guidelines of INPO 89-005, Guidelines for the Use of Operating Experience.
 - c. The IOER Effectiveness Review Program primarily applies to SOERs, SERs, and recurring industry events. All industry, NRC and vendor information reviewed by the IOER should be used to determine effectiveness. The program is results driven -- to prevent events, minimize repetitive errors and stop recurring events. The program does not address details of administration or procedural adherence.

5.6 IOER Effectiveness Review (Continued)

3. The results of this review shall be forwarded to the Vice President, Nuclear Energy Division. [B-4]
4. This review should be conducted by personnel with suitable technical and plant knowledge, and are not directly involved in IOER. (Consideration should be given to supplementing the review team with personnel from Quality Assurance, the Independent Safety Evaluation Unit (ISEU), or contractors/personnel from other nuclear utilities.)

B. Effectiveness Review Report Requirements

1. The IOER Effectiveness Review Program will report on the adequacy of the following key aspects of industry operating experience reviews:
 - Distribution of Operating Experience to appropriate personnel (a sample size of at least 5% of all Nuclear Network events will be used for a given time-frame).
 - Technical reviews of Significant Operating Experience (a sample size of at least 10% of all SOERs, SENs, SERs and SOs, determined to be applicable and assigned for technical reviews, shall be reviewed for thoroughness).
 - Implementation of action items resulting from reviewing operating experience (25% of the assignments are reviewed for completion by observation and/or interviews).
 - Discussion of the usefulness (based upon in-house events) of IOER corrective actions to prevent events, improve plant safety and enhance reliability.
2. Attachment 7, IOER Effectiveness Review Checklist, provides typical questions for interviews and observations.
3. The Effectiveness Review Evaluator will maintain a detailed record of activities, research and observations. This record will be used to improve future corrective actions and reviews.

5.7 IOER Resolution of Plant Operating Experience Assessment Committee (POEAC) Outstanding Items (OIs) and SOER Action Items

- A. Following the dissolution of POEAC, IOER will resolve the remaining open POEAC-Action Item Tracking System (PC-AITS) action items and document their resolution.
1. A log (Post-POEAC Minutes) will be maintained to document the receipt of closure/extension request items for the remaining open PC-AITS action items.
 - a. The log shall identify (as a minimum) the POEAC action item designation, the author of the closure/extension request item and the related item (NRC concern, INPO concern, vendor concern, etc.).
 - b. The resolution (Action) by IOER shall be described.
 - c. The closure response shall be made an attachment to the log entry and the attachment will be serialized.
 - d. The PC-AITS action item shall be updated to reflect the resolution by IOER. The resolution will be forwarded to the PC-AITS action item responsible individual.
 2. A monthly summary of the log will be forwarded to the WL-IOER.
- B. The status of the remaining open PC-AITS action items will be provided to the Managers in a monthly report.

5.8 "Industry Briefs" Newsletter

- A. Recent operating experience information from both the nuclear industry and CCNPP should be included in the newsletter in order to keep plant staff informed.
- B. Submittals for the newsletter should be provided at least monthly and approved by the WL-IOER.

6.0 BASES

- B-1 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plants, section OE.1.C
Responsibilities and authority of each management, supervisor, and professional position involved in the program are clearly defined and understood.
- B-2 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plants, section OE.1.D.
Interfaces with in-house and industry supporting groups are clearly defined and understood.
- B-3 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.1.F.
Action items resulting from operating experience review receive appropriate approval and are tracked to completion.
- B-4 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.1.G.
An effectiveness evaluation is performed periodically to apprise management of how well the operating experience program is functioning and attaining desired results.
- B-5 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.1.H.
Management is appropriately involved in operating experience review activities to ensure adherence to station policies and procedures and to identify and correct problems.
- B-6 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.3.A.
A comprehensive evaluation is performed on applicable, significant industry operating experience, and appropriate corrective action is completed in a timely manner.
- B-7 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.3.B.
Sources of significant industry operating experience information reviewed for applicability.
- B-8 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.3.C.
Appropriate checks are performed to verify that industry operating experience information is being properly classified for applicability.

6.0 BASES (continued)

- B-9 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.3.D.

Applicable significant industry operating experience information is distributed to appropriate personnel and departments in a timely manner.

- B-10 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant, section OE.3.E.

Distribution of conflicting or extraneous industry operating experience information to operators and other personnel is minimized.

- B-11 INPO 90-015 (formerly INPO 85-001), Performance Objectives and Criteria for Operating and Near-term Operating License Plant section OE.3.F.

Other applicable industry operating experience information from the sources such as the following is disseminated to operators, maintenance, or other personnel for review and training purposes.

- B-12 BG & E Letter dated July 17, 1987 providing additional information for NRC Generic Letter 83-28, Item 2.2.2 "Vendor Interface".

- B-13 LER 90-22

Operating experience review of documents will require a documented record of what action, even if none, is taken by cognizant organizations.

- B-14 December 1991 IPAT Inspection, i.a.w. TS 6.5.1.7. (NRC Commitment CO9200029.)

- B-15 CCI-122, Control of Technical Manuals and other Vendor Technical Information (to be superseded by EN-1-100).

- B-16 QA Surveillance (Recommendation 4.2) S-92-62 of November 24, 1992.

7.0 RECORDS

The following records are generated by this procedure:

- IOE Information Routing/AITS Entry (Lifetime Records)
- IOE Information Screening/Database Entry Form (Non-permanent)
- IOER Applicability Reviews (Lifetime Records)
- Update Record (Lifetime Records)
- IOER Evaluation Closeouts (Lifetime Records)
- IOER Effectiveness Review Reports (retain most recent)

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7.0 RECORDS (Continued)

- IOER Monthly Reports (Non-permanent, retained for 1 year)
- *"Industry Briefs"* Newsletter (Non-permanent, electronic media is sufficient)
- Post-POEAC Minutes (Lifetime Records)

Records are maintained according to PR-3-100, Records Management

8.0 ATTACHMENTS

Attachment 1, IOE Information Routing/AITS Entry

Attachment 2, IOE Information Screening/Database Entry

Attachment 3, Applicability Review

Attachment 4, Update Record

Attachment 5, Closeout Form

Attachment 6, IOER Database Input/Update Form

Attachment 7, IOER Effectiveness Review Checklist

ATTACHMENT 1, IOE INFORMATION ROUTING/AITS ENTRY

<u>TO:</u> _____	<u>DATE:</u> ____/____/____
_____	_____
_____	_____
_____	_____
_____	_____
<u>TITLE:</u> _____	

<u>SOURCE:</u> INPO / NRC / CE / WEST / GE / Other _____	<u>DATED:</u> ____/____/____
<u>SOER #</u> _____ <u>AL/GL/NRCB/INFON #</u> _____	<u>CEIB/CETN</u> _____
<u>SER/SEN #</u> _____ <u>O&MR/SO #</u> _____	<u>Network OE</u> _____
<u>Applicability:</u> A / CA / NA	<u>Effect:</u> S / C / NC
	<u>Potential:</u> H / M / L / None
<input type="checkbox"/> For Information Only (over)	<input type="checkbox"/> Review Requested (over)
	<input type="checkbox"/> Type-written Response
<u>KEYWORDS:</u> _____	

<u>RELATED DOCUMENTS:</u> _____	

<u>COMMENTS:</u> _____	

<u>EVALUATION PRIORITY</u>	<u>CATEGORY:</u> 1/2/OTHER
<input type="checkbox"/> IMMEDIATE Report Completed and issued Within 30 Days	<u>REPORT DUE DATE</u> ____/____/____
<input type="checkbox"/> PROMPT Report issued Within 60 Days (Other IS)	<u>RI:</u> _____
<input type="checkbox"/> ROUTINE Report issued Within 90 Days	<u>AITS#:</u> _____
<input type="checkbox"/> N/A No Evaluation Required	
_____ / _____	_____ / _____
WL-IOER	Date
	Evaluator
	Date

ATTACHMENT 2, IOE INFORMATION SCREENING/DATABASE ENTRY

<u>YES</u>	<u>POSS</u>	<u>NO</u>	<u>SIGNIFICANCE</u>	(Summarize on Attachment 1) PART 1																					
[]	[]	[]	Directly affects the confinement and/or control of radioactive material within the established boundaries (i.e., operating outside of the design basis).																						
[]	[]	[]	Directly affects the safety of personnel (i.e., operating with faulty equipment that could directly lead to personnel injury or fatality).																						
[]	[]	[]	Directly affects the ability to operate the plant as designed.																						
[]	[]	[]	Important "lessons learned" or safety benefits could result from evaluation of the reported condition (describe below).																						
[]	[]	[]	The condition description is incomplete/inadequate (see below).																						
<u>NO</u>	<u>POSS</u>	<u>YES</u>	<u>APPLICABILITY</u>	(Summarize on Attachment 1) PART 2																					
[]	[]	[]	The reported condition identifies an event specific to BWR systems only.																						
[]	[]	[]	The component failure is vendor specific, is not used at CCNPP.																						
[]	[]	[]	The system described in the report is not a system utilized at CCNPP.																						
[]	[]	[]	The environmental conditions described are plant specific.																						
<p>Identify (with a "X") the consequences of the event:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><input type="checkbox"/> None</td> <td style="width: 33%;"><input type="checkbox"/> Equipment damage</td> <td style="width: 33%;"><input type="checkbox"/> Trip UE/Alert</td> </tr> <tr> <td><input type="checkbox"/> Equipment swap</td> <td><input type="checkbox"/> Increased radiation</td> <td><input type="checkbox"/> Longer outage</td> </tr> <tr> <td><input type="checkbox"/> "Operating Limits" exceeded</td> <td><input type="checkbox"/> Bad publicity</td> <td><input type="checkbox"/> NRC notification</td> </tr> <tr> <td><input type="checkbox"/> Personnel injuries</td> <td><input type="checkbox"/> Reduced output</td> <td><input type="checkbox"/> Citation/Violation</td> </tr> <tr> <td><input type="checkbox"/> PCIs/Hot Particles</td> <td><input type="checkbox"/> Other _____</td> <td></td> </tr> </table>					<input type="checkbox"/> None	<input type="checkbox"/> Equipment damage	<input type="checkbox"/> Trip UE/Alert	<input type="checkbox"/> Equipment swap	<input type="checkbox"/> Increased radiation	<input type="checkbox"/> Longer outage	<input type="checkbox"/> "Operating Limits" exceeded	<input type="checkbox"/> Bad publicity	<input type="checkbox"/> NRC notification	<input type="checkbox"/> Personnel injuries	<input type="checkbox"/> Reduced output	<input type="checkbox"/> Citation/Violation	<input type="checkbox"/> PCIs/Hot Particles	<input type="checkbox"/> Other _____							
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<input type="checkbox"/> PCIs/Hot Particles	<input type="checkbox"/> Other _____																								
<p>Identify (with a "X") the causes/factors of the event, and circle the root cause:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"><input type="checkbox"/> Procedural error</td> <td style="width: 33%;"><input type="checkbox"/> Tagging</td> <td style="width: 33%;"><input type="checkbox"/> Human error</td> </tr> <tr> <td><input type="checkbox"/> Equipment failure</td> <td><input type="checkbox"/> Wrong unit/train</td> <td><input type="checkbox"/> Calculation</td> </tr> <tr> <td><input type="checkbox"/> Inattention to detail</td> <td><input type="checkbox"/> Safety concern</td> <td><input type="checkbox"/> Miscommunication</td> </tr> <tr> <td><input type="checkbox"/> Mispositioning</td> <td><input type="checkbox"/> Work practices</td> <td><input type="checkbox"/> Labeling</td> </tr> <tr> <td><input type="checkbox"/> Documentation</td> <td><input type="checkbox"/> Environment</td> <td><input type="checkbox"/> Managerial</td> </tr> <tr> <td><input type="checkbox"/> Organizational</td> <td><input type="checkbox"/> RWA (Right Intent, Wrong Action)</td> <td><input type="checkbox"/> Training</td> </tr> <tr> <td><input type="checkbox"/> Poor turnover</td> <td><input type="checkbox"/> Design</td> <td><input type="checkbox"/> Other _____</td> </tr> </table>					<input type="checkbox"/> Procedural error	<input type="checkbox"/> Tagging	<input type="checkbox"/> Human error	<input type="checkbox"/> Equipment failure	<input type="checkbox"/> Wrong unit/train	<input type="checkbox"/> Calculation	<input type="checkbox"/> Inattention to detail	<input type="checkbox"/> Safety concern	<input type="checkbox"/> Miscommunication	<input type="checkbox"/> Mispositioning	<input type="checkbox"/> Work practices	<input type="checkbox"/> Labeling	<input type="checkbox"/> Documentation	<input type="checkbox"/> Environment	<input type="checkbox"/> Managerial	<input type="checkbox"/> Organizational	<input type="checkbox"/> RWA (Right Intent, Wrong Action)	<input type="checkbox"/> Training	<input type="checkbox"/> Poor turnover	<input type="checkbox"/> Design	<input type="checkbox"/> Other _____
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<input type="checkbox"/> Poor turnover	<input type="checkbox"/> Design	<input type="checkbox"/> Other _____																							
<p>SUMMARY: Further evaluation is / is not required. _____</p> <p>_____</p> <p>_____</p> <p>_____</p>																									
<p>CLOSEOUT: _____</p> <p>_____</p>																									
<p>REFERENCE: _____</p> <p>_____</p>																									

ATTACHMENT 3, APPLICABILITY REVIEW

APPLICABILITY REVIEW

DATE: _____ Of _____

Industry - Operating Experience Review

TO: Expert VIA: WL-IOER
FROM: IOER Evaluator
TITLE:

SUMMARY: IOER has reviewed _____, determined this affects your area of responsibility and is / is not applicable to Calvert Cliffs. Please review this report for accuracy. Your input is requested by ____/____/____ to ensure an accurate industry event database is maintained.

DISCUSSION:

IRs WRITTEN:

RECOMMENDATIONS:

REFERENCES:

INTERVIEWS:

cc: File
S-OER

ATTACHMENT 4, UPDATE RECORD

Evaluation Report _____ (AITS # _____) Date: ____/____/____

This recommendation is OPEN / CLOSED / REOPENED / CHANGED / VERIFIED based upon information from a PHONE-CON / LETTER / DISCUSSION with _____ of _____ on ____/____/____ and is ATTACHED / SUMMARIZED as:

Necessary actions as a result are: _____

Responsible Individual/Unit: _____ Notified By: _____ On: ____/____/____

cc: Responsible Individual/Supervisor
Original to IOER Routing, then IOER Files.

ATTACHMENT 5, CLOSEOUT FORM

IOER EVALUATION : _____ AITS # : _____	
SUBJECT: _____	
ISSUE: _____ _____ _____ _____ _____ _____	
<u>DATE</u>	<u>STATUS/COMMENTS</u> _____ _____ _____ _____ _____
<u>DATE</u>	<u>VERIFICATION</u> _____ _____ _____ _____
AITs Verified:	_____ IOER Evaluator (Signature) _____ Date
WL-IOER Approval:	_____ Date
IOER Databases Updated:	_____ Clerk-IOER (Signature) _____ Date

ATTACHMENT 7, IOER EFFECTIVENESS REVIEW CHECKLIST

The following topic questions should be considered when completing the IOER Effectiveness Review Report:

- Are the program functions adequately staffed by experienced technical personnel?
- Is pertinent industry operating experience information being provided to affected personnel in a timely manner?
- Are plant personnel being made aware of industry operating experiences through continuing classroom and simulator training?
- Has the information been incorporated into initial training material to ensure new personnel are familiar with lesson learned from operating experience?
- Has the information been presented in a manner that makes "real" the experiences of others to the trainees, including careful descriptions of the events at specific plants, with plant names, dates, and circumstances?
- Is the distribution of extraneous and conflicting information being adequately controlled?
- Is the applicability of industry events to the plant being determined adequately?
- Are adequate priorities being established on which events are addressed first?
- Is the status readily available for an event report in the review and implementation process?
- Are thorough technical evaluations being performed on applicable industry events?
- Do recommendations resulting from the evaluations seem adequate to resolve the subject concerns?
- Are corrective actions developed and implemented in a timely manner following receipt of an industry operating experience report?
- Have the corrective actions been effective in solving the problem for cases in which results can be measured?
- Is management being updated on the status of the operating review process?
- Do corrective actions remain in effect until no longer applicable?
- Are in-house events used to monitor effectiveness of industry operating experience?
- Are in-house events compared to improvements planned for plant safety and reliability?
- Are in-house events compared to ineffective corrective actions from industry events?