Calvert Cliffs Nuclear Power Plant
Administrative Procedure

FUNCTIONAL EVALUATION/OPERABILITY DETERMINATION

NO-1-106

Revision 2

Effective Date OCT 0 4 1995

Tech Spec Related X

Management Related ____

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Approved _____ 9/29/95
Superintendent - Nuclear Operations Date

RECORD OF REVISIONS AND CHANGES

Revision	Change	Summary of Revision or Change
2	0	Clarified when an Engineering Letter of Explanation would be used. Added the ability to use NO-1-106 process to exit a Technical Specification Action Statement. Deleted the requirement for the GS-NPO to "validate" the Shift Supervisor's assumptions. Incorporates Operations Management philosophy when the cause of a condition is not definitely known.

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1.0 INTRODUCTION

1.1 Purpose [B-1]

This procedure provides the process for addressing an operability issue which exists because the full qualification status of nonconforming or degraded installed structures, systems, or components (SSC) cannot be unequivocally demonstrated.

The process provides directions and guidelines for obtaining Functional Evaluations and documentation necessary for completing Operability Determinations.

1.2 Scope/Applicability

This procedure assumes that reasonable assurance exists that the nonconforming or degraded SSC is capable of performing its specified safety function(s). If reasonable assurance of operability does not exist, the Shift Supervisor shall enter the applicable Technical Specification Action Statement and/or take additional appropriate actions.

This procedure is applicable to the preparation, review, and approval of formal Functional Evaluations/Operability Determinations initiated at the request of the Shift Supervisor or Operations Management. This procedure is not a mechanism to replace more informal measures of data gathering by the Shift Supervisor (phone conversations, face to face discussions, walkdowns with engineers, Engineering formal letters of explanation, or Issue Reports) to reach a point of questioning operability. Should the Shift Supervisor or Operations Management require more convincing documented evaluations and/or calculations to resolve an operability concern, the process governed by this procedure shall be utilized.

This procedure should not be used for justification of planned activities such as Facility Change Requests or Temporary Alterations. Procedures that specifically control these processes should be used instead. [B-8]

Corrective actions are not within the scope of this procedure.

2.0 REFERENCES

2.1 Developmental References

A. Generic Letter 91-18, Operability Determination

2.2 Performance References

A. Calvert Cliffs Unit 1 & 2 Technical Specifications

B. QL-2-100, Issue Reporting and Assessment

C. RM-1-101, Regulatory Reporting

3.0 DEFINITIONS

A. **Functional Evaluation [B-6]**

The examination of the Current License Basis (CLB; including UFSAR, Technical Specifications and BGE Commitments) to establish the condition and performance requirements to be met for determining operability.

B. **Operability Determination [B-6]**

Using this procedure, the prompt determination process of Operability from a detailed examination of the deficiency whenever the ability of an SSC to perform its Specified Function is an issue. The Operability decision may be based on analysis, test, operating event experience, engineering judgment, or a combination of those factors taking into consideration equipment functional requirements.

C. **Degraded Condition**

A condition of an SSC in which there has been any loss of quality or functional capability.

D. **Letter of Explanation**

Written documentation used to support either the validity of an Operability Issue, or the assurance of Operability.

E. **Nonconforming Condition**

A deficiency or noncompliance relating to an SSC when there is a failure to meet regulatory requirements or commitments. Examples of Nonconforming Conditions include:

- Incorrect or inadequate documentation
- Deviations from prescribed processing, inspection or test procedures
- Failure to comply to applicable codes and standards
- Plant equipment that does not meet Updated Final Safety Analysis Report (UFSAR) design requirements
- Design inadequacies.

F. **Operable/Operability**

A system, subsystem, train, component, or device shall be Operable or have Operability when it is capable of performing its specified safety function(s). Implicit in this definition is the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other required auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its safety function(s) are also capable of performing their related support function(s).

3.0 DEFINITIONS (Continued)

G **Operability Issue [B-6]**

A suspected hardware, process, or program deficiency which appears to compromise the capability of the SSC to perform its specified safety function(s).

NOTE

Operability and qualification are closely related concepts. However, the fact that a system/component is not qualified does not, in all cases, render that system/component incapable of performing its specified safety function(s) as defined in the CLB, if called upon. A safety or safety support system does not have to be qualified to be operable; it shall be capable of performing its specified safety function(s) for accident prevention and/or mitigation as described in the CLB.

H **Qualification**

The assurance that a SSC conforms to all of the aspects of the CLB, which includes codes and standards and Baltimore Gas & Electric (BGE) commitments.

I **Reasonable Expectation for Operability**

Technical judgment coupled with the safety significance of the issue which indicates an SSC is capable of performing its intended specified function.

J **Specified Function(s)**

The specified function(s) of the system, subsystem, train, component, or device is the specified safety function found in the CLB for the unit(s).

K **Compensatory Actions [B-5]**

Those interim actions required to provide a reasonable assurance that the specified function is being maintained during the process from the initial identification of the issue to the final Operability Determination and/or permanent fix, including the Functional Evaluation process.

4.0 RESPONSIBILITIES

4.1 **Shift Supervisor (SS) responsibilities include the following:**

A Determining whether the condition is an Operability Issue within the scope of this procedure.

B Notifying the General Supervisor - Nuclear Plant Operations (GS-NPO) that an Operability Issue exists that may require a Functional Evaluation.

C Complying with Technical Specifications based on the Operability Determination.

D Initiating a report according to RM-1-101, Regulatory Reporting.

4.1 **Shift Supervisor (SS) responsibilities include the following:** (Continued)

E. Logging the request for a Functional Evaluation according to NO-1-204, Plant Logs.

F. Inserting approved active Operability Determinations in the Shift Supervisor's book of active Operability Determinations.

4.2 **General Supervisor - Nuclear Plant Operations (GS-NPO) responsibilities include the following:**

A. Confirming the validity of the Operability Issue.

B. Requesting a Functional Evaluation when needed from the Plant Engineering Section (PES) if one has not yet been initiated.

C. Establishing time requirements for the completion of Functional Evaluations and Operability Determinations.

D. Approving the Functional Evaluation and making the Operability Determination.

E. Notifying the Shift Supervisor of the Operability Determination results.

4.3 **The General Supervisor - Plant Engineering Section (GS-PES) is responsible for supporting the GS-NPO as requested to:**

A. Complete the Functional Evaluation form and make an Operability recommendation to the GS-NPO.

B. Ensure the Functional Evaluation is completed in a timely manner.

C. Ensure that the documentation, reviews, and approvals are adequate to support the Functional Evaluation and Operability recommendation.

D. Obtain external support as required to complete the Functional Evaluation.

E. Notifying the Director - Nuclear Regulatory Matters (DIR-NRM) of the significant Operability Issues.

F. Provide the GS-NPO updates to the initial Functional Evaluation as new/revised information becomes available which may affect the previous recommendation for Operability.

G. Maintain a log of Functional Evaluation/Operability Determinations.

H. Maintain a book of all active Operability Determinations in the Shift Supervisor's office. In this same book, maintain a status sheet of all approved Operability Determinations and requested Functional Evaluations.

4.4 **The Director - Nuclear Regulatory Matters (DIR-NRM) responsibilities include the following:**

A. Interfacing with the Nuclear Regulatory Commission (NRC), as needed, to provide a briefing of the Operability Issue.

4.5 **The Superintendent, Director, General Supervisor, or Principal Engineer of any site organization supporting the GS-NPO and GS-PES in the timely completion of Functional Evaluations and Operability Determinations is required to:**

A. Ensure that the Functional Evaluation is completed in a timely manner.

B. Ensure that the documentation, reviews, and approvals are adequate to support the Functional Evaluation performed by the site organization.

C. Provide an Operability recommendation to the GS-PES.

5.0 PROCESS

5.1 Actions Taken Upon Identification of an Operability Issue [B-4]

NOTE

Attachment 1 provides the process flow chart.

NOTE

The GS-NPO or Shift Supervisor shall be immediately notified if at any time during the evaluation process a reasonable expectation for the Operability of the affected SSC does NOT exist.

A. Immediately upon notification of a potential Operability Issue, the Shift Supervisor shall:

1. Ensure an Issue Report (IR) has been generated according to QL-2-100, Issue Reporting and Assessment and is available for review.

NOTE

In determining the validity and the assurance of Operability, the Shift Supervisor may use any or all of the following resources:

- Operating Experience,
- Current operating conditions,
- On-shift or off-shift licensed individuals,
- Verbal resolution with the IR Originator and/or the reviewing supervisor,
- Verbal or written resolution with the System Engineer, or
- Any other substantiating methods by which Operability may be assessed.

5.1 **Actions Taken Upon Identification of an Operability Issue** (Continued)

NOTE

Engineering letters of explanation, memos, or documented phone calls (as referenced in the IR) can provide adequate basis for operability calls if:

1) An SSC is Operable by virtue of an Operability Issue being invalid, or

2) The organization is fully convinced (assured) that the valid Operability Issue does not result in the SSC being inoperable, or

3) The valid Operability Issue which results in a degradation or nonconformance of an SSC, does not compromise the capability of the SSC to perform its Specified Function(s).

In these cases, the System Engineer can provide:

1) A documented opinion, based on knowledge and experience, or

2) An easy determination or access existing evaluations and/or calculations without requiring additional outside work (CE, Bechtel, BGE Design Engineering, etc.).

2. Determine the validity of a potential Operability Issue.

NOTE

The IR process should not be held up if a Letter of Explanation is required to support the basis for not being valid or the basis for an assurance of operability.

a. If the Operability Issue is invalid, document the decision on the IR, submit the IR through the normal review process, and exit this procedure.

(1) Ensure the IR reflects the phone conversation or face-to-face communication which may have been used to make the determination.

(2) If a Letter of Explanation is needed to support the determination of validity, then ensure the IR reflects the request and the responsible engineer.

b. If the Operability Issue is valid, determine if the assurance of Operability can be made.

5.1 **Actions Taken Upon Identification of an Operability Issue** (Continued)

3. Determine the assurance of Operability.

   a. If fully convinced that the Operability Issue does not result in the SSC being inoperable, based on existing conditions and information available at the time of determination, then:

      (1) Document the basis of the Operability call on the IR,

      (2) Submit the IR through the normal review process, and

      (3) Exit this procedure.

   b. If a Letter of Explanation is required by Operations to support the determination made in 5.1.A.3.a, then ensure the IR reflects the request and the responsible engineer.

   c. If the Operability Issue may result in the SSC being inoperable then attempt to establish a Reasonable Expectation of Operability.

4. Establish a Reasonable Expectation of Operability using Attachment 3, GS - NPO/Shift Supervisor Guidelines for Reasonable Expectation and Determination of Operability, as necessary.

   a. If a Reasonable Expectation of Operability does not exist, then:

      (1) Enter the applicable Technical Specification Action Statement, and/or

      (2) Take additional appropriate actions, and

      (3) Notify the GS - NPO, and

      (4) Exit this procedure, or

      (5) Perform the actions required in Section 5.1.A.4.b and then proceed with Section 5.1.A.5 as a parallel action to satisfy exiting the Technical Specification Action Statement.

   b. If a Reasonable Expectation of Operability does exist, notify the GS-NPO of the Operability Issue, the time it was identified, and the IR number.

      (1) Document the issue involved and the IR number according to NO-1-204, Plant Logs, in the Shift Supervisor's smooth log.

      (2) Take Compensatory Actions as necessary. **[B-5]**

5. Await the results of the Operability Determination unless directed to take immediate corrective action by the GS-NPO.

5.1 **Actions Taken Upon Identification of an Operability Issue** (Continued)

B. The GS-NPO (or designee) with support of the GS-PES, if required, shall:

NOTE

The time between identifying the Operability Issue and the Operability Determination is commensurate with the safety significance of the Operability Issue. Generally, the Technical Specification Action Statement time limits provide reasonable guidance (i.e., for a 7 day action statement there is normally 7 days to respond).

1. Assess the Operability Issue and determine if immediate corrective action is required.

2. Request the GS - PES perform a Functional Evaluation using Attachment 2.

3. Provide the GS - PES with the IR number and the time requirements for completing the Functional Evaluation/Operability Determination recommendation.

5.2 **Actions Taken To Complete a Functional Evaluation**

NOTE

The PES normally serves as the lead engineering organization in resolving an Operability Issue. External support may be requested from the Nuclear Engineering Department or other organizations as necessary to complete evaluations.

NED uses Attachment 2 when the Operability Issue is design related and outside of the normal function of PES. PES then uses NED's evaluation to complete Attachment 2 and make an Operability recommendation to the GS-NPO.

A. The GS-PES with assistance from other site organizations, as required, shall:

1. Notify the DIR - NRM of significant Operability Issues.

   a. The DIR - NRM shall interface with the Nuclear Regulatory Commission (NRC), as needed, to provide a briefing of the Operability Issue.

2. Determine if a previous Functional Evaluation exists which will address the current situation.

   a. The Functional Evaluation/Operability Determination Log may be consulted for this determination.

   b. If a previous Attachment 2 exists, re-evaluate the current application and process according to this procedure.

5.2 **Actions Taken To Complete a Functional Evaluation** (Continued)

3. Complete Attachment 2, within the time requirements specified by the GS-NPO.

   a. If additional time is required to complete the Operability recommendation, discuss the need for an extension with the GS-NPO.

4. Ensure that all givens/assumptions are listed in Attachment 2 and are: **[B-2]**

   a. Specified as to which assumptions must be verified during the Functional Evaluation process.

   b. Justified based on recognized engineering practices, physical constants or elementary scientific principles.

   c. Marked as "None" if no assumptions were necessary.

5. Ensure any recommended Compensatory Actions are documented and evaluated for their effect on the safest plant configuration. **[B-5]**

6. Ensure that the recommendation(s) for further evaluation on Attachment 2 is/are adequately tracked via AIT by initiating a new milestone on the existing IR reflecting the condition(s) requiring evaluation. **[B-3]**

7. Ensure that an independent review of Attachment 2 occurs prior to approval. **[B-2]**

   a. The independent reviewer shall:

      (1) Have minimal involvement in the evaluation process prior to performing the review.

      (2) Sign Attachment 2 when satisfied that the preparer's logic, facts and evaluations are correct and accurate.

      (3) Forward Attachment 2 to the GS - PES for approval.

8. If the cause of the Nonconforming or Degraded Condition cannot be determined, ensure the following points are addressed to establish reasonable assurance that the specified function will be performed: **[B-9]**

   a. Compensatory Actions as appropriate (e.g., replace/exercise components, increase the periodicity of log readings/surveillances).

   b. Credible causes ruled out and why.

5.2 **Actions Taken To Complete a Functional Evaluation** (Continued)

c. Credible causes that **cannot** be ruled out or that, at this time, require further evaluation to include:

(1) Consequences of the Nonconforming or Degraded Condition recurring.

(a) Determination that the consequences are acceptable to perform the specified function.

(2) Potential for more adverse failures resulting in inoperability that could occur due to these credible causes.

9. Ensure AIT and the database are updated. **[B-7]**

10. Hard carry the completed Attachment 2 to the GS-NPO for review and approval.

11. Provide the GS - NPO with updates to the initial Functional Evaluations as new/revised information becomes available which may affect the previous recommendation for operability.

a. Ensure these updates are processed via a memo referencing the original Functional Evaluation serial number or other unique identification.

5.3 **Processing the Functional Evaluation and Operability Recommendation**

A. Upon receiving the Functional Evaluation and Operability recommendation from the GS-PES, the GS-NPO shall:

1. Perform an Operability Determination using Attachment 3 guidelines.

2. On approval:

a. Enter the time of the Operability Determination on Attachment 2.

b. Sign Attachment 2 and forward the original to the Shift Supervisor for inclusion in the Shift Supervisor's Active Operability Determinations book.

c. Forward a copy of Attachment 2 to the GS - PES.

3. If rejected:

a. Send the original back to the GS - PES with reasons for the rejection.

b. Apply Technical Specification Action Statements as needed.

B. The GS - PES shall:

1. Ensure approved Functional Evaluations are logged.

5.3 **Processing the Functional Evaluation and Operability Recommendation** (Continued)

2. Maintain the status of all requested/in progress Functional Evaluations, all approved active/inactive Operability Determinations, and rejected Operability Recommendations.

   a. A duplicate of the status sheet shall be maintained in the Shift Supervisor's Active Functional Evaluation/Operability Determinations book.

3. Forward copies of the approved or rejected Functional Evaluations to:

   1) The Supervisor - Issues Assessment Unit for inclusion with the initiating IR.

   2) The Director - Nuclear Regulatory Matters.

   3) The assigned RE.

C. Quarterly the GS - PES shall conduct a review of:

1. The Shift Supervisor's Active Operability Determination Book to determine that only active Operability Determinations are contained.

   a. Inactive Operability Determinations shall be:

      1) Removed from the Shift Supervisor's Active Operability Determinations Book.

      2) Stamped "Inactive."

         a) The GS - PES shall sign and date the inactive Operability Determination to acknowledge the status change.

      3) Updated in the database to reflect the status change.

      4) Reported to the GS - NPO of the change in status for the affected Operability Determination.

2. Active Operability Determinations to determine that current plant conditions and new or revised information do not affect previous Functional Evaluation assumptions/bases.

   a. If active Operability Determinations are affected, then immediately notify the GS-NPO.

      1) Ensure this notification is processed via memo referencing the original Functional Evaluation serial number or other unique identification.

5.3 **Processing the Functional Evaluation and Operability Recommendation** (Continued)

3. The status of all requested/in progress Functional Evaluations and ensure the status sheets for the Log and the Shift Supervisor's book are updated accordingly.

   a. The Engineering status shall be kept current.

   b. The Shift Supervisor's status sheet shall be updated concurrently with the quarterly review. However, instructions to access the current data base shall be kept in the Shift Supervisor's book.

6.0 BASES

[B-1] INSR 91-82/82, IPAT Inspection, NRC Commitment, CT9200018.

[B-2] RCAR 9409, increased the requirements for defining assumptions made during review and added the requirement for an independent review of all evaluations.

[B-3] IR0-009-383, needed to specify the actual processing of Functional Evaluations.

[B-4] RCAR 9406, clarify threshold for implementing procedure, define characteristics of operability issue which does not require a formal Functional Evaluation or Operability Determination.

[B-5] RCAR 9406, define concept of compensatory actions.

[B-6] RCAR 94-06, define Operability Determination, Functional Evaluation and Operability Issue.

[B-7] RCAR 9406, actions for tracking evaluations, records and recoverability.

[B-8] IRO-037-255, do not use for planned activities.

[B-9] Nuclear Operations Support Letter, D. A. Holm, Recommendation for Operability dated April 7, 1995.

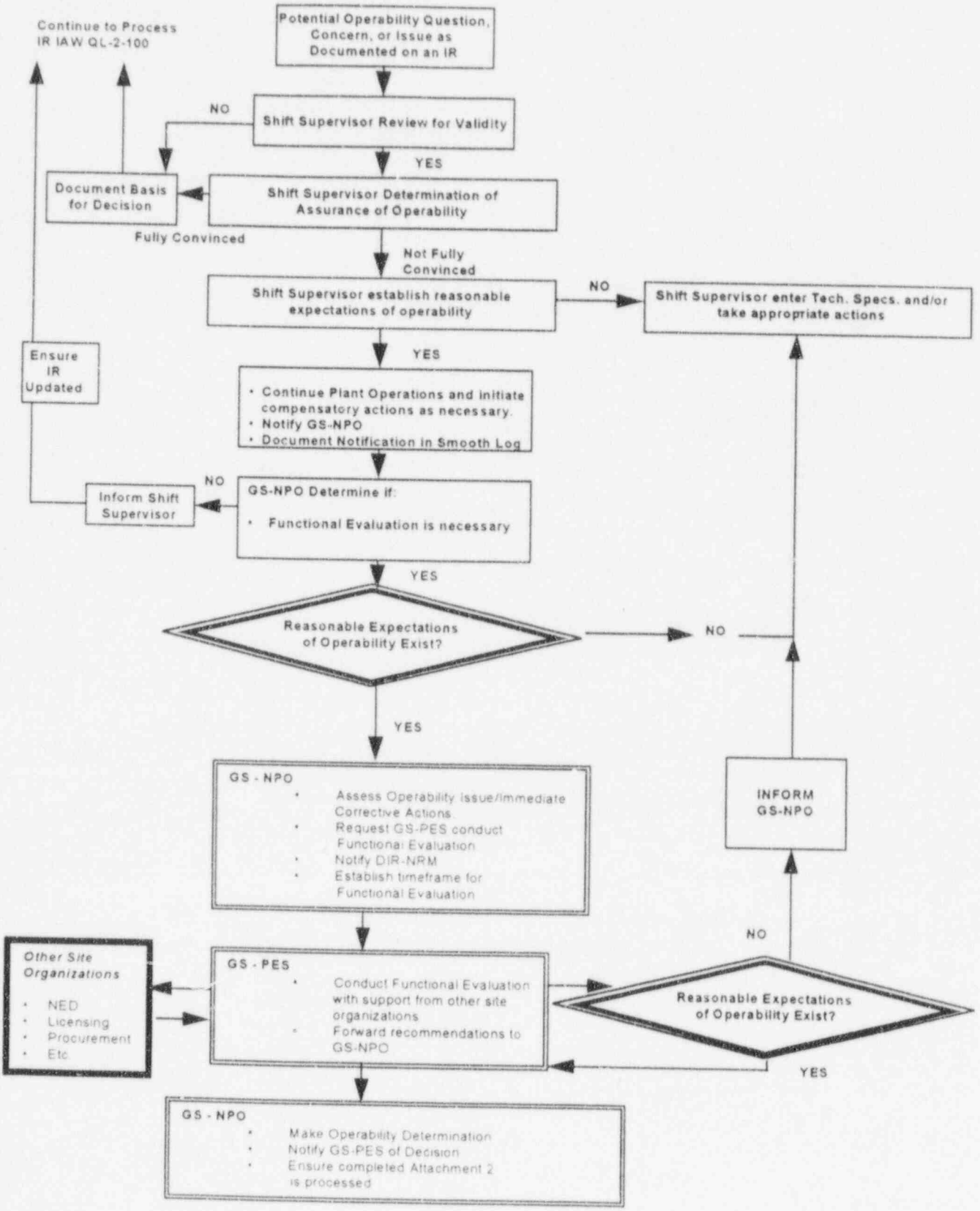
[B-10] AIT 1F199500815, RPA 95-083.

7.0 RECORDS

The following records are generated by the use of this procedure and shall be captured and controlled according to PR-3-100, Records Management.

- Completed Functional Evaluation/Operability Determinations

ATTACHMENT 1, PROCESS FLOW CHART
SHIFT SUPERVISOR REVIEW



ATTACHMENT 2, FUNCTIONAL EVALUATION (Page 1 of 3)

SERIAL NO._____ DATE/TIME INITIATED:_____/_____

UNIT:_____ ISSUE REPORT #:_____

EQUIPMENT/COMPONENT DESCRIPTION: (SYSTEM#/COMP#/UEI#/ETC.)_____

_____

_____

OPERABILITY RECOMMENDATION CHECKLIST

ANSWER YES/NO/NA TO EACH OF THE FOLLOWING:

1._____The affected structure/system/component (SSC) should be declared OPERABLE as reasonable assurance exists which indicates that the degraded/non-conforming SSC WILL PERFORM its intended safety function(s) as required.

2._____The affected structure/system/component (SSC) can remain OPERABLE as the Functional Evaluation indicates that the degraded/non-conforming condition in question is inappropriate or not applicable for the safety function(s) of the SSC and the SSC WILL PERFORM its safety function(s).

3._____The affected structure/system/component (SSC) can remain OPERABLE as there is reasonable assurance that the SSC WILL PERFORM its safety function(s), but there remains some concerns or uncertainties that further evaluation can resolve.

4._____The affected structure/system/component (SSC) should be declared INOPERABLE as reasonable assurance of the SSC functionality DOES NOT exist and the degraded/non-conforming SSC WILL NOT PERFORM its intended safety function(s) when required. Terminate the use of this attachment and immediately inform the GS - NPO or Shift Supervisor of the inoperability.

DOCUMENTATION OF OPERABILITY RECOMMENDATION

1. Description of the issue/situation:_____

_____

_____

_____

2. Impact on Nuclear safety and operation:_____

_____

_____

_____

3. Regulatory requirements/commitments:_____

_____

_____

_____

ATTACHMENT 2, FUNCTIONAL EVALUATION (Page 2 of 3)

4. Structure/System/Component (SSC) safety function(s):_____

5. Evaluation

   A. Scope of evaluation:_____

   B. Applicable events and scenarios:_____

   C. Givens/assumptions:_____

   D. Specific evaluations:_____

   E. Safest plant configuration including the effect of Compensatory Actions:_____

6. Recommendations for further evaluation:_____

7. References:_____

ATTACHMENT 2, FUNCTIONAL EVALUATION (Page 3 of 3)

8. Attachments: _____

Prepared by: _____ / _____ / _____
Signature Date Time

Reviewed by: _____ / _____ / _____
Signature Date Time

Approved by GS-PES: _____ / _____ / _____
Signature Date Time

9. Recommendation is (Check One):

ACCEPTED [____] REJECTED [____]

Equipment is (Check One):

OPERABLE [____] INOPERABLE [____]

If Recommendation is REJECTED, provide reasons below: _____

GS-NPO (or designee): _____ / _____ / _____
Signature Date Time

Original To: Control Room's Active Functional Evaluation/Operability Determination Book

cc: Supervisor - Issue Assessment Unit
Director - Nuclear Regulatory Matters
General Supervisor - Plant Engineering Section

ATTACHMENT 3, GS-NPO/SHIFT SUPERVISOR GUIDELINES FOR REASONABLE EXPECTATION AND DETERMINATION OF OPERABILITY (Page 1 of 2)

Philosophy Discussion

An Operability Determination is realistically conducted in phases. These phases, in assessing an Operability Issue are; i) validity, ii) assurance of operability, and iii) reasonable expectation of operability.

The assessment of validity encompasses the initiator's and reviewing supervisor's thought processes (surrounding an apparent Nonconforming/Degraded Condition), the documented Issue Report (IR), and the Shift Supervisor's determination that the subject of the IR is an Operability Issue.

Assurance of operability is the confidence level, characterized by the Shift Supervisor's experience and knowledge and based on existing conditions and information available at the time, that the valid Operability Issue does not result in the SSC being inoperable.

The establishment of a reasonable expectation for Operability is the process of coupling the safety significance of the valid Operability Issue with sound technical judgment to support the capability of the SSC to perform its intended specified function.

NOTE

The measure of "reasonable" should be a function of the safety significance of the issue.

NOTE

NRC Generic Letter 91-18 (REF A) may be consulted for additional guidance while conducting an Operability Determination.

1. When reasonable technical judgment indicates that the SSC affected by the issue is capable of performing its intended safety function(s) when required, the equipment should be declared operable.

   A. If there is reasonable assurance that the SSC is capable of performing its specified safety function(s), and that the determination process will support this expectation, but there are some remaining concerns or uncertainties, the SSC can remain Operable until further evaluation can resolve the concerns.

   B. If the Functional Evaluation indicates that it can be shown that the conformance/Qualification in question is irrelevant to the safety function(s) of the SSC, the SSC should remain operable.

   C. An SSC covered by Technical Specification may only be considered Operable when it is capable of performing its specified function. If Operability of the SSC is dependent on a support system, the support system must also be capable of performing its function. If conditions are such that SSC Operability is not dependent on a support system, the support system need not be Operable(e.g. Switchgear air conditioning may not be required to be Operable during periods of low ambient temperature). No additional action outside of restoring the capability of the support system is needed.

ATTACHMENT 3, GS-NPO/SHIFT SUPERVISOR GUIDELINES FOR REASONABLE EXPECTATION AND DETERMINATION OF OPERABILITY (Page 2 of 2)

2. When reasonable technical judgment indicates that the SSC affected by the issue is not capable of performing its specified safety function(s) when required, the SSC should be declared inoperable.

   A. For inoperable SSC's not covered by the Technical Specifications, reactor operation may continue if the safety function(s) can be accomplished by other designated SSC that is qualified, or if limited administrative controls can be used to ensure the safety function(s) is met.