

Calvert Cliffs Nuclear Power Plant
Administrative Procedure

ISSUE REPORTING AND ASSESSMENT

QL-2-100

Revision 3

Effective Date

FEB 28 1995

USER
CONTROLLED

MAR 08 1995

Tech Spec Related

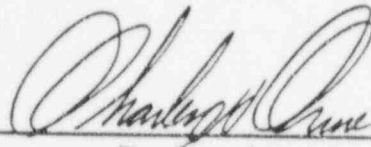
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Management Related

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Approved


Plant General Manager

1 2/27/95

Date

RECORD OF REVISIONS AND CHANGES

| Revision | Change | Summary of Revision or Change |
|----------|--------|---|
| 2 | 0 | <p>Procedure was extensively revised. Major changes include;</p> <ol style="list-style-type: none"> 1. Addition of the Single Issue Resolution Sponsor concept including requirements to fully resolve an issue before it is considered closed; 2. Clarified requirements for the IRRG to make assignments to the responsible GS, Manager - Direct Report or Staff member as approved by the Department Manager; 3. Changes to reflect differences in the two IR forms in use; 4. Strengthened requirements for clearing MODE restraints and clarified responsibilities; 5. Added requirements to document changes in priority for Pri. 'A' MO's; 6. Added requirement to document use of CCI-315 Operability Determinations as related documents in the Action Item Tracking System; 7. Added requirement to send resolution documentation to IAU for closure of issues, and 8. Added guidance for what constitutes acceptable closure documentation. <p>In addition, minor changes were incorporated to clarify the role of the IRRG, clarify the IR initiation process, clarified requirements for documenting drawing problems, provided reference to QL-2-101 for determining RCA requirements, and numerous minor changes resulting from user-defined action items.</p> |
| 2 | 1 | <p>Changes incorporated include RPA from R.D. Branch to support new Rover Maintenance Concept per MN-1-101, clarified Section 5.5 regarding AT/AIS closure, change references to AIT and AIS to AT/AIS, RPA to incorporate SA-1-102 requirements, RPA to change reference from CCI-174 to PM-1-102, and changed reference to CCI-315 to NO-1-106.</p> |

2 2

Change2 incorporated based on RPA from J.E. Gilbert to revise MO priorities in Section 5.7, and to add definition for Operations Workaround.

3 0

Formally incorporate and make permanent those changes identified in Rev. 2, Changes 1 and 2.

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| 3 | 0 | 26 | 0 | 49 | 0 |
| 4 | 0 | 27 | 0 | 50 | 0 |
| 5 | 0 | 28 | 0 | 51 | 0 |
| 6 | 0 | 29 | 0 | 52 | 0 |
| 7 | 0 | 30 | 0 | 53 | 0 |
| 8 | 0 | 31 | 0 | 54 | 0 |
| 9 | 0 | 32 | 0 | 55 | 0 |
| 10 | 0 | 33 | 0 | | |
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| 12 | 0 | 35 | 0 | | |
| 13 | 0 | 36 | 0 | | |
| 14 | 0 | 37 | 0 | | |
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1.0 INTRODUCTION

1.1 Purpose

This procedure provides requirements for initiating, reviewing, and processing of Issue Reports (IRs) and for resolution of Issues. [B-1]

1.2 Scope/Applicability

- A. This procedure controls initiation, review, and processing of IRs; the methods of controlling hardware and equipment deficiencies; and the process for resolving Issues. This procedure is applicable to all deficiencies and non-conformance's required to be documented on an IR.

NOTE

Forms associated with this procedure are representative of the forms used by the Issues Assessment Unit (IAU) and may be revised to incorporate improvements without revising this procedure, provided the revision does not violate the intent of the procedure.

- B. This procedure is applicable to work performed at Calvert Cliffs Nuclear Power Plant (CCNPP) with the following exceptions:
1. Fossil Energy Division, when working on the Main Turbine/Generators or Steam Generator Feed Pump (SGFP) Turbines inside the fenced boundaries around this equipment. (Work outside the fenced boundaries (the fence) shall be performed according to CCNPP procedures.)
 - a. FED personnel shall, however, initiate an Issue Report (IR), according to QL-2-100, Issue Reporting and Assessment, under any of the following circumstances:
 - (1) For problems discovered by FED personnel during maintenance of the Main Turbine/Generator or SGFP Turbine, that are considered to be a result of activities performed by CCNPP personnel.
 - (2) When, during Turbine work, FED personnel discover a problem requiring resolution by CCNPP personnel.
 - (3) When a condition identified by a Project Non-conformance Report (PNCR) will NOT be resolved prior to returning the equipment to service.
- C. In the case of off-site organizations working in support of CCNPP, CCNPP sponsors shall establish responsibility regarding submission of IRs in accordance with this procedure.
- D. A complete overview of the IR process is depicted in Attachment 1, Issue Report Process Flow Overview.

2.0 REFERENCES

2.1 Developmental

- A. QL-2, Corrective Actions Program
- B. MN-1, Maintenance Program Directive
- C. PR-1-100, Preparation and Control of Calvert Cliffs Administrative Procedures
- D. Administrative Procedures Writer's Manual
- E. TI-16, Simulator Maintenance/Modification Requests
- F. Generic Letter 91-18, Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Non-conforming Conditions on Operability

2.2 Performance

- A. CCI-118, Nuclear Operations Section Initiated Reporting Requirements
- B. PM-1-102, Processing and Control of Procurement Related Deficiencies
- C. CCI-707, Drawing and Technical Data Base ~~Change~~ Control
- D. MN 1-101, Control of Maintenance Activities
- E. PR-3-100, Records Management
- F. QL-3-102, Program Deficiency Reporting
- G. NS-2-101, Conduct of the Plant Operations and Safety Review Committee (POSRC)/Procedure Review Committee (PRC)/Qualified Reviewer (QR)
- H. QL-2-102, Activity Tracking
- I. QL-2-101, Event Investigation and Root Cause Analysis
- J. MN-1-200, Maintenance Order Planning
- K. SA-1-102, Fire Protection/Appendix R Compensatory Actions

3.0 DEFINITIONS

A. Accept-As-Is

A disposition permitted for a non-conforming item when it can be established that the item will function satisfactorily for its intended use. The item will continue to meet all design and engineering functional requirements including performance, maintainability, fit, and safety. (Requires Responsible Design Organization (RDO) evaluation.)

B. Action Organization

The organization responsible for resolving an Issue documented by an IR.

3.0 DEFINITIONS (Continued)

C. Classification

A determination of which Issues meet the criteria of a Program Deficiency Report (PDR). Those Issues meeting PDR criteria will be processed in accordance with QL-3-102. All other Issues will be processed by IAU using this procedure.

D. Closure Document

A completed record of action taken to resolve an Issue. Examples of Closure Documents include completed Maintenance Orders (MO), approved Requests for Procedure Activity (RPA), and approved Requests for Drawing Changes (RDC).

E. Condition Adverse to Quality (CAQ)

An actual or suspected hardware, process, or program deficiency or nonconformance.

F. Corrective Action

Action taken to halt, stabilize, or correct an adverse condition and its effect.

G. Corrective Maintenance

Repair and restoration of plant equipment that has failed or is malfunctioning and is not performing its intended function.

H. Corrected-on-the-Spot (COTS)

Minor, immediate corrective action taken by qualified personnel, pre-approved by the immediate work supervisor, authorized by designated personnel, and documented on an IR. Implicit within this definition are Rover Maintenance Activities as defined in MN-1-101.

I. Date of Discovery (As applied to 10 CFR 21)

The date the Issues Assessment Unit identifies an Issue as being potentially reportable.

J. Deficiency

A condition that results in a loss or change in function or characteristic.

K. Hardware

A system, support equipment, component, part or material.

L. Initiator

The individual who initiates an IR as a result of identifying an Issue.

3.0 DEFINITIONS (Continued)

M. Issue

An actual or suspected Condition Adverse to Quality or a Significant Condition Adverse to Quality for which an IR should be initiated.

N. Issue Report (IR)

The form used to document a Condition Adverse to Quality and provide a method for notifying affected groups and initiating corrective action.

O. Issue Report Review Group (IRRG)

A multi-disciplined group that meets periodically to review and screen selected IRs. IRRG members and alternates are designated by the S-IAU and appointed by the Plant General Manager - CCNPP.

P. Issue Resolution Sponsor

The Issue Resolution Sponsor is that individual who owns the business function which can best resolve the issue identified in the IR. The Supervisor - IAU, with concurrence of the Issue Report Review Group (IRRG), makes this determination and will assign the General Supervisor (or higher), Manager - Direct Report, or person authorized by a Department Manager, to act as Issue Resolution Sponsor for the target organization. IAU will maintain a list of individuals so designated by the Department Managers.

Q. Maintenance Order

A document used to perform and record maintenance corrective action activities on plant equipment or components, to ensure specific work controls are identified and that maintenance work history is maintained. Maintenance orders are considered as resolution documents.

R. Mode Restraining Issue Report

An Issue Report documenting an Issue that prevents transitioning to a higher (or lower) plant operating mode.

S. Nonconformance

A condition in which one or more standards or requirements are not met.

T. Operator Workaround

An equipment condition or deficiency which causes an operator to deviate from the normal means of accomplishing a function or task, and which may pose a significant challenge to the safe and reliable operation of the plant under abnormal operating conditions.

U. Process

A series of actions, changes, or functions that achieve an end result. For example, Maintenance and Corrective Action

3.0 DEFINITIONS (Continued)

V. Program Deficiency Report (PDR)

A document initiated by the Quality Audits Unit (QAU) to track and resolve Significant Conditions Adverse to Quality (SCAQ's).

W. Reject

Disposition of an item that is unsuitable for use and is either disposed of or returned to the supplier.

X. Repair

The process of restoring a non-conforming or deficient item to a condition such that the capability of the item to function reliably and safely is unimpaired.

Y. Resolution Document

Correspondence signed and dated by the appropriate level Action Organization Supervisor, identifying action taken to resolve an Issue. A resolution document shall provide all information necessary to close an IR and provide a listing of any closure documents generated during resolution of the Issue.

Z. Reviewing Supervisor

The Initiator's immediate work group supervisor, a knowledgeable supervisor in the initiator's chain of command, a supervisor knowledgeable in the area of the Issue, or an individual within the work group pre-authorized by the work group supervisor to perform the Reviewing Supervisor function of the IR process.

AA. Rework

Repetitive maintenance or modification activities resulting from unsatisfactory repairs or modifications.

BB. Significant Condition Adverse to Quality

An actual hardware, process, or program deficiency or nonconformance which, if left uncorrected, could have a serious effect on nuclear safety. A condition more serious in nature than a CAQ. The determination of a condition being either a CAQ or a SCAQ is purely a judgment call.

CC. Simulator Issue Report (SIR)

A form used to report simulator deficiencies.

4.0 RESPONSIBILITIES

4.1 Plant General Manager

The Plant General Manager is responsible for the following:

- A. Overall responsibility for the Issue Reporting and Assessment Program.
- B. Appointing the IRRG chairman, members, and alternates.

4.2 Supervisor - Issues Assessment Unit (IAU)

The Supervisor - IAU is responsible for supervising the Issues Assessment Unit and for designating Unit personnel to serve as Chairman-IRRG.

4.3 Issues Assessment Unit

The Issues Assessment Unit is responsible for the following:

- A. Implementing the Issues Assessment Program by reviewing, screening, classifying, and processing IRs.
- B. Transmitting IRs to appropriate Action Organizations for initiation of corrective action.
- C. Maintaining a list of persons designated to act as Issue Resolution Sponsors by their respective Department Managers.
- D. Compiling and transmitting a complete issue resolution documentation package (from original issue report to resolution documents) and forwarding to Plant History within 30 days of receipt of the resolution documents.

4.4 Chairman - Issue Report Review Group (IRRG)

The Chairman of the IRRG is recommended by the S-IAU and appointed by the Plant General Manager and is responsible for convening/facilitating meetings of the IRRG to review, discuss, and provide input into the screening of Issue Reports.

4.5 OMC/Shift Supervisor/Control Room Supervisor

The Operations Maintenance Coordinator (OMC)/Shift Supervisor/Control Room Supervisor is responsible for the following:

- A. Reviewing IRs that document hardware problems.
- B. Assigning Work Accomplishment Priority.
- C. Initiating MOs for correcting hardware deficiencies.
- D. Reviewing applicable IRs for Operability and Reportability concerns.
- E. Accurately completing Part C of the IR form as applicable.

4.6 Issue Report Review Group

The Issue Report Review Group (IRRG) members and alternates are responsible for attending IRRG meetings when requested by the Chairman - IRRG and providing expertise in their discipline for screening, classifying, and recommending disposition of IRs.

4.7 Reviewing Supervisors

Reviewing Supervisors are responsible for the following:

- A. Reviewing IRs promptly following initiation of the IR.
- B. Verifying accuracy of information in Part A of the IR.
- C. Completing Part B of the IR.
- D. Taking the IR to the Shift Supervisor if there is an operability, reportability, or immediate safety concern.
- E. Ensuring IRs are received by IAU for processing within three working days of being initiated.

4.8 Quality Audits Unit

The Quality Audits Unit is responsible for the following:

- A. Independent determination of PDRs from IRs in addition to those that are determined by the IRRG.
- B. Verifying resolution of PDRs according to QL-3-102, Program Deficiency Reporting.

4.9 Issue Resolution Sponsor

Issues Assessment, with concurrence of the Issue Report Review Group (IRRG), will determine the line organization which owns the business function that can best resolve the issue. The General Supervisor (or higher), Manager - Direct Report, or person authorized by a Department Manager responsible for this organization will be designated as the Issue Resolution Sponsor, and shall be responsible for initiating and verifying completion of all actions necessary to fully resolve the issue described on the IR. Full resolution means that all actions (including all physical work) needed to correct the programmatic aspects of the issue and prevent its recurrence are complete. Closure of Action Items to other processes is not permitted.

- A. The IR Sponsor is responsible for, as a minimum:
 - 1. Evaluation of the issue.
 - 2. Determination of cause (when applicable to the issue at hand).

4.9 Issue Resolution Sponsor (Continued)

3. Determination of corrective actions (both immediate corrective actions and additional long-term actions taken to prevent recurrence) as appropriate.
4. Ensuring generic implications are considered.
5. Soliciting assistance from other organizations when such action is needed for full resolution of the issue and opening appropriate user-defined action items.
6. Verifying all required actions are completed to fully resolve the issue in a timely manner, developing the Resolution Document, and forwarding this document to Issues Assessment Unit per this procedure.

If after evaluation of the issue by the targeted IR Sponsor, the target determines that he/she is not the appropriate owner of the business function best suited to correcting the issue, the target may reject (or reassign) the milestone according to Section 5.5.A.2 and recommend that the IR be reassigned to a more appropriate sponsor to correct the problem. It is the responsibility of the initial target to communicate with the new target and obtain concurrence with the proposed transfer of responsibilities. If concurrence is not obtained, the issue will be escalated for resolution.

In some cases more than one milestone may be issued e.g., for MODE Restraints or reportability concerns, but only one sponsor will be assigned.

4.10 Supervisors of Action Organizations

Supervisors of Action Organizations are responsible for the following:

- A. Evaluating IRs assigned to them by IAU. Reviewing IAU recommended actions and determining and implementing corrective actions as appropriate with a priority determined by the significance of the Issue.
- B. Resolving Issues according to existing CCNPP Corrective/Investigative/Notification Programs.
- C. Tracking and maintaining status of assigned actions to completion.

4.11 All Personnel

All personnel at CCNPP are responsible for identifying and promptly documenting deficiencies and non-conformance's on IRs. Personnel who serve as sponsors for off-site organizations, are responsible to determine when this procedure is required to be implemented and ensure implementation is effected within the required time constraints.

5.0 PROCESS

5.1 Issue Report Initiation

- A. An Issue is characterized by one of the following two types of deficiencies. The key factor is that a deficient condition exists or is highly probable.
 1. **Actual:** Existing in fact or reality. For example, a broken component or a personnel error.

5.1 Issue Report Initiation (Continued)

2. Suspected: Thought to be true or probable. For example, an unidentified fastener installed in an application that requires specific marking to identify mechanical properties.

EXAMPLES:

Examples of what should not be considered Issues include:

- **Recommendations.** Recommendations provide ideas to improve processes, programs, or material conditions beyond an already acceptable and satisfactory status. Recommendations shall be processed within their own administrative programs such as the Facility Change Request Program, Requests for FCRs, MCRs, Procedure Activity (RPA), and Surveillance Reports.
- **Plant Betterment.** Improvements, good ideas, or better ways of doing business are not Issues. Just as with a recommendation, no deficient condition exists. These types of improvements should be captured by normal administrative processes, e.g., FCRs, MCRs, ALARA suggestions or Quality Circle recommendations.
- **Simulator Issue Report (SIR) Items.** Issues concerning simulator hardware or its dynamic response shall be reported using a Simulator Issue Report (SIR) according to Training Instruction TI-16, Simulator Maintenance/Modification Requests. The SIR should be forwarded to the Simulator Instructor or Supervisor Simulator Support.

-
- B. Issues shall be promptly identified and provide clear and lucid documentation of the issue.
 - C. IRs should be limited to describing a single Issue. A single IR shall not be used to document deficiencies or non-conformance's on both units (with the exception of generic concerns), multiple systems, or unrelated deficiencies within a system or process.
 - D. The individual identifying the issue shall become the initiator of the iR. The initiator shall immediately notify the work group supervisor if, in the initiator's opinion, an immediate personnel or equipment safety concern, or an operability or reportability concern exists. For off-site organizations, the CCNPP sponsor shall ensure IRs are initiated as required by this procedure. [B-4] [B-5]

NOTE

Each preprinted IR Form contains a unique IR number which is also captured in the pre-printed bar code. No change to the IR number shown on the IR Form is permitted.

5.1 Issue Report Initiation (Continued)

1. The Initiator shall complete PART A of the IR, (Attachment 2 and 2A) by performing the following:

NOTE

There are currently two versions of the issue report form in use. These are shown as Attachment 2 and 2A. PART A of these forms is identical.

- a. Obtain sufficient information to substantiate validity of the Issue. [B-4] [B-5] [B-6]
- b. IRs shall be submitted for all cases where a conflict exists between drawings or between a drawing and the structure, system, or component as it exists in the field. If the IR documents a minor drawing deficiency, a marked-up drawing shall accompany the IR. The need for larger, more global, changes does not require a marked-up drawing be attached.
- c. For hardware or equipment Issues, complete and attach a BGE Deficiency Tag to deficient installed plant equipment according to instructions contained in Section 5.2, Tagging Deficient Hardware or Equipment.
- d. Using permanent black or dark blue ink, per PR-2-100, Document and Drawing Control, complete Part A of the IR according to instructions on the reverse side of the IR and as follows: [B-4] [B-5] [B-6]

NOTE

Each line on the IR form does not have to be completed if information requested will not contribute to identification, review, or resolution of the Issue.

- (1) Line 1. Is the Issue an Immediate Personnel or Equipment Safety Concern? [B-4] [B-5] [B-6]

If any of the following problems could occur, circle YES and immediately notify the Initiator's supervisor:

- (a) Personnel injury or an unexpected radiation or hazardous material exposure.
- (b) Fire, flood, or hazardous material spill.
- (c) Safety or Radiological violation.
- (d) Damage to plant equipment.
- (e) Failure of life support system or safety equipment.

5.1 Issue Report Initiation (Continued)

- (f) Security rule violation. Contact the Security Supervisor at Ext. 4024.

(2) Line 2. Is the Issue an Operability Concern? [B-4] [B-5] [B-6]

If the problem or concern could affect Plant/Process Equipment; Power Generating Equipment and associated Auxiliaries; Tech Spec Equipment or Tech Spec-Related Support Equipment; Appendix R Fire Safety Shutdown Equipment as described in the Interactive Cable Analysis (ICA), and if any of the following conditions exist, circle YES:

- (a) Exhibits excessive vibration, noise, leakage, smoke, etc.
- (b) Does not operate as expected.
- (c) May not be capable of performing its intended safety function.
- (d) Does not or could not meet operational or functional requirements.

(3) Line 3. Is the Issue a Reportability Concern? [B-4] [B-5] [B-6]

If the problem or concern meets the following guidelines, circle YES and immediately notify the Initiator's supervisor (if more detail is required, refer to CCI-118, Nuclear Operations Section Initiated Reporting Requirements, and Technical Specifications):

- (a) Could cause errors in the information displayed to Operators by process instrumentation, plant computer, etc., which could adversely impact safe plant operation.
- (b) Mistakenly modifies a system, or makes it operate improperly.
- (c) Makes or modifies a pathway for radioactive gas or liquid to escape from the plant.
- (d) Needs to be reported to BGE Management or to the NRC (refer to CCI-118, Nuclear Operations Section Initiated Reporting Requirements, and Technical Specifications).
- (e) An automatic trip should have occurred but did not (for power plant or associated safety systems only).

5.1 Issue Report Initiation (Continued)

- (f) May cause an unplanned shutdown of a system or unit or an unplanned reduction in power generation.
- (g) A plant communications system needed in a plant emergency is not working.
- (h) A system which is made to protect people or equipment is not working properly and if it fails, may cause a serious injury or unit shutdown.
- (i) Likely to cause media interest.

If lines 1, 2, or 3 are circled YES, immediately contact the Initiator's Supervisor who shall take action on Part B per paragraph 5.3, Reviewing Supervisor's Action. (Contact the Shift Supervisor if the Initiator's supervisor is not available.) [B-4]

If a Technical Specification violation has occurred or is imminent, contact the Shift Supervisor, then the Initiator's supervisor for action on Part B.

- (4) Line 4. Describe the Issue. [B-5]

Describe the problem or concern in sufficient detail so it can be easily understood. Do not use terms or acronyms unique to specific crafts or disciplines, or that are not in common use at CCNPP.

- (5) Line 5. Enter Date and Time the problem or concern was discovered.

- (6) Line 6. Activity in Progress when Discovered.

Indicate the activity in progress when the problem or concern was discovered. For example, during Post Maintenance Testing, a Surveillance Test Procedure, or an evolution, test, or inspection. Indicate the system or component status; that is, running, shutdown, pressure, or temperature.

5.1 Issue Report Initiation (Continued)

- (7) Line 7. Was the problem or concern Corrected-On-The-Spot?

Personnel are encouraged to immediately correct minor problems and document their actions on the IR.

- (8) Line 8. Immediate Actions Taken.

List immediate actions performed by the Initiator to halt, stabilize, or correct the problem. If the problem was Corrected-On-The-Spot, indicate corrective action taken.

- (9) Line 9. Apparent Cause.

Indicate probable cause of the Issue. Examples include: inadequate controls, inadequate documentation, deficient workmanship, faulty design, nonadherence to procedures, personnel error, etc.

- (10) Line 10. Effect of Issue.

Describe how the problem or concern is affecting or could affect other plant systems, components, or administrative processes.

- (11) Line 11. Extent of Issue. [B-5]

Describe the known or suspected boundary of the problem or concern. For example, could affect all STPs or may affect all MOVs in the system.

Indicate if the problem or concern could have generic implications; that is, it could have an effect on additional components for which the problem or concern has not yet been identified.

Include the number or type of components affected. Be as specific as possible because information provided may be used to determine the root cause of the problem or concern, the urgency of the problem or concern, and actions taken to prevent recurrence.

- (12) Line 12. Is this a Recurring Issue? [B-5]

Circle YES if, to the Initiator's knowledge, this problem or concern or a similar Issue is repetitive or has occurred more frequently than previously observed or experienced. Give details in the Recommendations section.

5.1 Issue Report Initiation (Continued)

(13) Line 13. Recommendations.

Recommend actions or ideas that will address, mitigate, or resolve the Issue. Recommendations may include the action process, e.g., an MO, PDR, or LER, or the Disposition category (for hardware deficiencies): Rework, Reject, Repair, or Accept-As-Is.

NOTE

Lines 14 thru 20 are applicable to Hardware or Equipment Issues only.

(14) Line 14. Hardware or Equipment Noun Name.

Provide the noun name of the components, sub-system, etc., involved.

(15) Line 15. Unit.

| | | | |
|---------------------------|---|---|------------|
| Indicate the Unit number: | 0 | = | Both Units |
| | 1 | = | Unit 1 |
| | 2 | = | Unit 2 |

(16) Line 16. System.

Enter the system number or letter designation.

(17) Line 17. Hardware or Equipment Number.

Enter the identification number indicated on the hardware or equipment.

Location: Describe where equipment is located. Use building, elevation, floor, compass direction, room number, grid, or column number in the area.

(18) Line 18. Tags Placed?

NOTE

Refer to section 5.2 for additional guidance on tagging deficient equipment.

Indicate if BGE Deficiency Tags or Control Panel Deficiency Tags were placed.

- (a) Print the IR number on the Control Room Deficiency tags.

5.1 Issue Report Initiation (Continued)

- (b) Describe the tag types, that is, BGE Deficiency Tag or Control Panel Deficiency Tag, and how many were placed.
 - (c) Indicate Tag locations.
- (19) Line 19. If NO (Tags) Explain.
- Whenever practical, deficient or non-conforming hardware or equipment shall be tagged. If a Deficiency Tag is not placed on the hardware or equipment, place the tag in an appropriate location. For example, on the entry way near the component or outside of the equipment or personnel hatch; and explain why the tag was not placed directly on the item (High Radiation Area, No Access, Containment, or Personal Safety).
- (20) Line 20. P.O. Number (if known):
- If available, enter the purchase order (P.O.) number or part number for the system or component.

NOTE

Lines 21 and 22 are used to describe Nonhardware problems.

- (21) Line 21. Title & ID Number of Controlling Document (include revision number).
- Enter the procedure, specification, drawing, etc., title, number, and revision that controls the activity having the problem or concern. If the Issue concerns a drawing discrepancy, a marked-up drawing shall accompany the IR. (See Section 5.1.D.1.b.)
- If the problem or concern is with computer software, indicate the application name, module name, screen number, etc.
- (22) Line 22. Requirement Violated (if known).
- Enter the requirement that is not being complied with. Indicate the specific requirement when possible by paragraph number, page number, and a brief description of the requirement, if known.

5.1 Issue Report Initiation (Continued)

NOTE

If the Initiator desires anonymity, the Initiator may leave the Initiator's Name, Phone Extension, and Group entries blank and send the IR directly to IAU without a Reviewing Supervisor's review.

If the Initiator desires confidentiality, the Initiator may call the Nuclear Hotline. (Ext. 4141)

(23) Line 23. Initiator's Name.

Print Initiator's name (unless Initiator desires anonymity). Also enter the following information:

- (a) Initiator's phone extension.
 - (b) Date and time.
 - (c) Initiator's group designator.
 - (d) Indicate under the IR Number in the top right of the form if a continuation sheet was used.
- 2. Take the IR to a knowledgeable Reviewing Supervisor for review, preferably one in the Initiator's chain of command.
 - 3. If the Initiator is a Supervisor or above, then he/she may also complete Part B (the Reviewing Supervisor's Section).

5.2 Tagging Deficient Hardware or Equipment

- A. The IR Initiator shall use deficiency tags to identify deficient hardware or equipment:
 - 1. BGE Deficiency Tag: This tag (Green, Attachment 3) shall be used to identify deficient material, parts, or components for which an IR has been initiated.
 - 2. Control Panel Deficiency Tag: This tag (small Green, Attachment 3) shall be used on deficient control or instrument panel equipment where lack of space warrants a small tag.

NOTE

Deficiency tags should be hung on equipment only to identify a hardware related deficiency. These tags should not be used when a programmatic deficiency is identified.

5.2 Tagging Deficient Hardware or Equipment (Continued)

- B. Control Panel Information Tags (small Brown, Attachment 3) are used to identify deficient items remote from the Control Room. This tag provides Operations with information on use of equipment, e.g., a pump with a packing leak. These tags are controlled by Plant Work Control in conjunction with Control Room deficiency tracking.
- C. The IR Initiator shall clearly mark deficient hardware or equipment with BGE Deficiency Tags, Control Panel Deficiency Tags, or Control Panel Information tags, as applicable, containing the following information:
 - 1. IR number.
 - 2. Date tag was put in place.
 - 3. Description of the Issue.
 - 4. Equipment involved.
- D. The Initiator shall place the tags in a manner that will not obstruct operation or observation of any installed plant instrumentation, controls or labels. Neatly affixing tags on walls or cabinets at the point of entry into normally inaccessible, cramped or environmentally unsuitable areas is an acceptable practice.
 - 1. Do not place tags on equipment inside containment (generates equipment operability concerns due to lost tags, primarily clogged sumps). [B-7]
 - 2. Do not place tags on security barriers, accesses, or alarm equipment.
- E. BGE Deficiency Tags, Control Panel Deficiency Tags, and Control Panel Information Tags shall be removed according to MN-1-101, Control of Maintenance Activities, or in the case of a Not Approved IR, according to Section 5.3, Reviewing Supervisor's Action, of this procedure.

5.3 Reviewing Supervisor's Action

- A. Immediately upon receipt of an IR, the Reviewing Supervisor shall perform the following:
 - 1. Notify the Shift Supervisor if the IR presents an Immediate Personnel or Equipment Safety Concern, or an Operability or Reportability Concern. [B-4] [B-5] [B-6]
 - 2. If there is doubt regarding operability of the item(s) documented on the IR, contact the System or Design Engineer for consultation. This must be done in an expeditious manner so as to allow the IR to still be received by IAU within three working days of being initiated.
 - 3. Review Part A for accuracy and completeness. Contact Initiator if information in Part A is inaccurate or unclear and modify the IR to correct the discrepancies. Initial and date all changes.

5.3 Reviewing Supervisor's Action (Continued)

NOTE

The Reviewing Supervisor has the option to request additional information in order to determine the validity of the Issue. The Reviewing Supervisor may consider the potential need for immediate action on the problem or concern when requesting additional information.

- B. The Reviewing Supervisor shall, using permanent black or dark blue ink, per PR-2-100, Document and Drawing Control, complete Part B according to instructions on the reverse side of the IR and outlined below. [B-4] [B-5] [B-6]

1. If additional space is required, provide the additional information along with the IR number on a continuation sheet.

NOTE

If the Reviewing Supervisor approves the IR, that Supervisor becomes the Co-Initiator and is accountable for content and validity of information in Parts A and B.

NOTE

The reviewing supervisor should complete all information requested in PART B.

NOTE

There are currently two versions of the issue report form in use. These are shown as Attachment 2 and 2A. Part B of these forms differ slightly. Where differences exist, the step will indicate to which form the step applies.

2. Line 1. Is the problem or concern an Immediate Personnel or Equipment Safety Concern? [B-4] [B-5] [B-6]
- a. If the problem or concern involves one of the following situations or conditions that requires immediate notification of the Shift Supervisor, circle YES:
- (1) Personnel injury or an unexpected radiation or hazardous material exposure.
 - (2) Fire, flood, or hazardous material spill could occur.
 - (3) Safety or Radiological rule violation could occur.
 - (4) Damage to plant equipment could occur.
 - (5) Failure of life support system or safety equipment could occur.

5.3 Reviewing Supervisor's Action (Continued)

- (6) Security rule violation could occur. If so, contact the Security Supervisor at Extension 4024.
3. Line 2. Is there an Operability Concern (Tech Spec or Other)? [B-4] [B-5] [B-6]
- a. Consideration should be given to the affect of the Issue on the specific safety function of the following structures, systems, and components (SSCs) under the scope of Generic Letter 91-18.
- (1) Safety-Related SSCs.
 - (2) Systems and components supporting Safety-Related SSC's
 - (3) All Tech Spec-Related Equipment.
 - (4) SSCs described in the UFSAR.
 - (5) Appendix R Fire Safe Shutdown Equipment as described in the Interactive Cable Analysis (ICA)
- b. If the problem or concern could affect the structures, systems, or components under the scope of Generic Letter 91-18, Tech Spec Equipment or Tech Spec-Related Support Equipment; and if any of the following conditions exist, circle YES:
- (1) Exhibits excessive vibration, noise, leakage, smoke, etc.
 - (2) Does not operate as expected.
 - (3) May not be capable of performing its intended safety function.
 - (4) Does not or could not meet operational or functional requirements.
- c. If the Operability Concern differs from that of the initiator, the Reviewing Supervisor shall include a brief justification for the 'NO' determination on his/her part. An additional sheet may be used if necessary.
4. Line 3. Is the problem or concern a Reportability Concern? [B-4] [B-5] [B-6]
- a. If the problem involves a situation or condition listed below, or one that requires immediate notification of the Shift Supervisor, circle YES:
- (1) Could cause errors in the information displayed to Operators by process instrumentation, plant computer, etc., which could adversely impact safe plant operation.

5.3 Reviewing Supervisor's Action (Continued)

- (2) Mistakenly modifies a system or causes a system to operate improperly.
 - (3) Makes or modifies a pathway for radioactive gas or liquid to escape from the plant.
 - (4) Needs to be reported to BGE Management or to the NRC (refer to CCI-118, Nuclear Operations Section Initiated Reporting Requirements).
 - (5) An automatic trip should have occurred but did not. (For power plant or associated safety systems only.)
 - (6) May cause an unplanned shutdown of a system or unit, or an unplanned reduction in power generation.
 - (7) A plant communications system needed in a plant emergency is not working.
 - (8) A system made to protect people or equipment is not working properly and if it fails it may cause serious injury or unit shutdown.
 - (9) Likely to cause media interest.
5. If lines 1, 2, or 3 are circled YES, immediately contact the Shift Supervisor. The Shift Supervisor will evaluate the concern and fill in the Shift Supervisor's Name and Date Contacted portions of the IR. [B-4]
 - a. Contact the Control Room if the problem is an emergency.
 - b. Contact the Shift Supervisor if and when the reviewer is reasonably sure that any of the situations described in Lines 1, 2, or 3 are YES.
 - c. Follow the Shift Supervisor's directions.
 - d. The Shift Supervisor shall complete the appropriate section PART B (for Attachment 2) or, completing PART C of Attachment 2A. All requested information on either Attachment shall be filled in where known.
6. If the Reviewing Supervisor circles NO on lines 1, 2, or 3 when the Initiator circles YES, an explanation shall be provided by the Reviewing Supervisor.
7. Line 4. Is a Root Cause Analysis Recommended? If YES, explain why. If assistance is required, contact Plant Engineering for hardware problems, or the Operating Experience Review Unit for non-hardware problems. Root Cause Analysis requirements can be found in QL-2-101.

5.3 Reviewing Supervisor's Action (Continued)

8. Line 5. Was Problem Corrected-on-the-Spot? If YES, are further actions required? Indicate in Line 6, Recommended Actions, as follows:

NOTE

Corrected-On-The-Spot (COTS) is minor, immediate corrective action taken by qualified personnel. This applies to both programmatic issues and Rover Maintenance Activities as defined in MN-1-101.

- a. The Reviewing Supervisor shall validate actions taken by observing, reviewing, inspecting, etc., the work performed by the Initiator. Ensure actions described in Part A, Line 8 corrected the problem and that no further corrective action is required.
- b. Indicate if any follow-on actions are necessary even though the initial problem was corrected.

EXAMPLES:

Procedural problems that are identified and corrected by an immediate change.

When an individual performing a procedure makes a mistake that is immediately caught by the work Supervisor. The Supervisor counsels the individual and ensures correct action is taken. No further corrective action is required.

In both examples, however, an IR is required for documentation and trending purposes

9. Line 6 (Attachment 2) Recommended Actions To Resolve Issue:
- a. Enter recommendations for corrective action.
 - b. For hardware problems, recommendations should include disposition of Rework, Repair, Reject, or Accept-As-Is.
10. Line 6 (Attachment 2A) Recommend group(s) to resolve issue:
- a. Enter the work group whose business function can best resolve this issue.

NOTE

No matter which attachment is being used, the Reviewing Supervisor is encouraged to discuss the issue with the Supervisor of the target organization to obtain the target's agreement to accept sponsorship of the issue's resolution.

11. Line 7 (Attachment 2) Approve IR?
- a. Indicate if IR is Approved
 - b. Circling YES means the Reviewing Supervisor agrees that the IR documents a valid problem or concern and that the Reviewing Supervisor accepts responsibility as the Co-Initiator of the IR.

5.3 Reviewing Supervisor's Action (Continued)

- c. Circling NO means that the Reviewing Supervisor considers the problem or concern invalid and does not accept responsibility as the Co-Initiator. If the IR is not approved, explain why in the Recommended Actions to Resolve Issue Line (6).
 - d. If the Initiator and Reviewing Supervisor disagree on the validity of the Issue, and no agreement is obtained within a reasonable time (as determined by the Reviewing Supervisor), the Reviewing Supervisor shall document disapproval of the IR indicating the basis for disapproval, then sign and date the IR and forward it to IAU so that IAU receives it within three working days of initiation.
 - (1) If the IR is a hardware IR, the Initiator shall remove associated tags and give them to the Reviewing Supervisor.
 - (2) The removed tags shall be attached to the IR and forwarded to IAU by the Reviewing Supervisor.
12. Line 7 (Attachment 2A). Recommended Actions to Resolve Issue:
- a. Enter recommendations for corrective action.
 - b. For hardware problems, recommendations should include disposition of Rework, Repair, Reject, or Accept-As-Is.
13. Line 8 (Attachment 2). Signature: Date:
- a. Print last Name. Sign and date the IR to indicate completion of Supervisor's Review and that the information in Part A and Part B is accurate.
14. Line 8 (Attachment 2A). Approve IR?
- a. Indicate if IR is Approved.
 - b. Circling YES means the Reviewing Supervisor agrees that the IR documents a valid problem or concern and that the Reviewing Supervisor accepts responsibility as the Co-Initiator of the IR.
15. Line 9 (Attachment 2A Only). Name: Date:
- a. Print last Name. Sign and date the IR to indicate completion of Supervisor's Review and that the information in Part A and Part B is accurate.
16. Hardware issues should be forwarded to the OMC for initiation of a Maintenance Order. Issues that are programatic should be forwarded to IAU and must be received by IAU within three working days of the date of IR initiation. The Supv-IAU should be notified if this timeframe can not be met.

5.4 Issue Report Processing by the Issues Assessment Unit

- A. IAU shall perform the following upon receipt of an IR: [B-2] [B-3] [B-5] [B-6]
1. Verify if a hardware deficiency exists and, if not previously reviewed by the OMC, transmit the original IR to the OMC for completion of Part C, lines 9 through 19. Hardware deficiencies corrected using Rover Maintenance are handled by the OMC and RMG. The OMC shall return the completed IR to IAU for processing.

NOTE

IAU may perform the IR screening prior to, or in parallel with, forwarding the IR to the OMC.

2. Invalid IRs are closed by IAU.
3. Valid programatic IRs that are Corrected-On-The-Spot and require no further action are also closed by IAU.
4. If IAU returns the IR to the Reviewing Supervisor for clarification or revision, the Reviewing Supervisor shall promptly clarify or revise the IR and return it to IAU for further processing.
5. Screen the IR as follows:
 - a. Screen the IR for operability, mode change restraint, reportability, and safety significance, and immediately notify the Shift Supervisor, if not previously notified by the Initiator or Reviewing Supervisor, if the IR identifies an immediate personnel or equipment safety concern, or an operability or reportability concern.
 - b. If the Issue involves a possible security concern, contact the Security Supervisor.
 - c. If the issue identifies a challenge to Appendix R compliance, refer to SA-1-102 for appropriate compensatory measures and instructions.
 - d. All IRs screened as Nuclear Safety Significant shall be presented to POSRC according to NS-2-101, Conduct of the Plant Operations and Safety Review Committee (POSRC)/Procedure Review Committee (PRC)/Qualified Reviewer (QR).
6. Classify the IR, based on pre-established criteria, according to disposition of the Issue:
 - a. L-1 Classification is applied to IRs meeting the criteria for a PDR per QL-3-102, Program Deficiency Reporting. QAU will make the final determination regarding which IRs meet the QL-3-102, criteria.
 - b. L-2 classification is applied to all IRs not classified L-1.

5.4 Issue Report Processing by the Issues Assessment Unit (Continued)

- c. Determine appropriate action that should be implemented to resolve the Issue. An Issue Resolution Sponsor will be recommended based on the business function most likely to be able to correct the problem.
7. The Supervisor-IAU, or his designee, shall act as Chairman - IRRG and present the issue to the Issue Report Review Group (IRRG) for the purpose of providing additional insight into the final disposition of IRs with programmatic concerns.
 - a. The IRRG is responsible for reviewing the results of the IR screen and concurring with the proposed corrective actions recommended by the IR screener. The IRRG shall also review the recommendation for the Issue Resolution Sponsor to ensure that this individual has cognizance of the business function that can best resolve the issue.
 - b. A current or past CCNPP SRO shall always be present at IRRG meetings. [B-8]
 - c. If agreement cannot be reached between the Chairman - IRRG and a majority of the members, the Issue shall be brought to the attention of the POSRC Chairman by the Chairman - IRRG. The final decision shall rest with the POSRC Chairman.
 - d. If an individual member of the IRRG is dissatisfied with classification or assignment of an IR, the member may appeal the decision to the POSRC Chairman for resolution.
8. Supervisor - IAU shall have Part C, Lines 1 through 7 completed, as appropriate. [B-2] [B-3] [B-5] [B-6]
9. IRs identifying Mode Restraints shall be processed according to Section 5.6, Mode Restraining Issue Reports.
10. For L-1 non-maintenance IRs, process the IR in accordance with QL-3-102, Program Deficiency Reporting
11. Process L-2 IRs as follows:
 - a. Enter all non-maintenance L-2 IRs on AT/AIS.
 - b. Transmit a copy of the L-2 IR to the appropriate Action Organization if an IR documents a plant program or process deficiency and is not being implemented as a Program Deficiency Report (PDR). [B-9]
12. Actions necessary to resolve the IR shall be assigned to the responsible Action Organization's General Supervisor, Manager - Direct Report, or person authorized by a Department Manager to act as a Issue Resolution Sponsor for the target organization.

5.5 Action Organization's Corrective Action

- A. Upon receipt of an IR, Action Organizations shall review the IR and determine its appropriate disposition based on the safety significance of the Issue. Possible dispositions include Invalidation, Rejection, or Acceptance.
1. If the assigned Action Organization determines no Corrective Action is required or that the process and controls are already adequate, then the IR shall be considered invalid. Invalidation of an IR requires a Resolution Document which describes why the Issue is believed to be invalid. The AT/AIS milestone shall then be updated to indicate why the IR was invalid or reference the appropriate closure document. The AT/AIS milestone will then be updated to DISCONTINUED.
 2. If the assigned Action Organization determines it is not the organization responsible to correct the Issue, the assigned Action Organization shall reject IAU's AT/AIS entry and recommend the group to which the Issue should be assigned and why. Rejection of an IR requires the General Supervisor, Superintendent, or Manager - Direct Report, of the rejecting organization to provide written approval and justification for the rejection to IAU. The action taken section of the milestone should be updated to reflect this justification and reference the rejection memo. The AT/AIS milestone will be updated to reject-acknowledged (RA) by IAU.

If a disagreement arises between IAU and the Action Organization concerning appropriate corrective action or IR disposition, IAU and the Action Organization shall attempt to resolve the disagreement. If the disagreement cannot be resolved within a reasonable period, the IR and supporting documentation shall be escalated to the next higher level of management until the appropriate IR corrective action is agreed upon.

NOTE

It is the responsibility of the targeted Issue Resolution Sponsor to communicate with the proposed new sponsor to obtain concurrence with the proposed assignment before notifying IAU of the proposed change. Failure to obtain agreement will be escalated to the next level of Management.

3. Action Organizations shall, upon accepting ownership responsibility, evaluate the safety and economic significance of the issue, and develop a plan for its resolution. The Issue Resolution Sponsor will update the Action Item milestone to OPEN and provide an Estimated Completion Date within three weeks of the milestone initiation.
4. Issue Resolution Sponsors and supporting action organizations must strive to resolve issues within 90 days of acceptance. In the event this requirement can not be met, justification for longer resolution periods shall be documented in terms of the risks (nuclear, personnel, and economic) of having the issue recur before corrective actions are taken, and approved by the sponsor's General Supervisor (or above) or Manager-Direct Report. (This requirement applies to programmatic issues only; Hardware issues are corrected under a separate priority assigned by the Operations Maintenance Coordinator [OMC])

5.5 Action Organization's Corrective Action (Continued)

5. The Action Organization shall resolve the Issue by the completion date. If an extension to the completion date is necessary, the responsible Action Organization General Supervisor, Manager - Direct Report, or person designated by a department manager to act as Issue Resolution Sponsor for the Action Organization, shall consider the request, based on the safety and economic significance of the Issue, and may authorize the extension if appropriate. This approved extension shall be communicated, in writing, to IAU. IAU shall then update the AT/AIS and extend by opening a new milestone reflecting the new extended due date.
 6. If, during resolution of an Issue, an operability concern arises for any reason, e.g., as a result of new information, the Action Organization Supervisor shall notify the Shift Supervisor for operability reevaluation.
- B. Closure of action items to other established processes is not permitted.
- C. The Action Organization's General Supervisor has the authority to close an IR by deciding not to take action on the IR. The General Supervisor may decide that an Issue is of such low risk and priority when compared to other work that it does not rate application of resources within a reasonable planning horizon. In this case, the resolution document shall reflect this management decision, the Issue shall be closed on AT/AIS, and the resolution document distributed as required by paragraph 5.5.D below.
- D. Upon completion of all required actions, the Issue Resolution Sponsor shall provide a Resolution Document to describe actions taken to resolve the Issue. This document shall provide sufficient detail to ensure a reasonable understanding of the Issue, its cause, and its resolution. The required information shall be documented according to QL-2-102 and will include the following:
1. References to the IR and AT/AIS number of the issue being resolved, and a statement of work to be performed per the AI Required Action.
 2. Definition of the problem if found to be different from the original description.
 3. What the cause was determined to be (when applicable to the issue at hand). (Can be by deduction or formal Root Cause Analysis).
 4. A description of what was done to resolve the issue.
 5. A description of what measures were put in place to prevent recurrence of the issue (when appropriate to the issue at hand).

5.5 Action Organization's Corrective Action (Continued)

6. Reference to the IR numbers, AT/AIS numbers, and appropriate closure documents, e.g., an MO or FCR, for subordinate milestones.
 7. Operability determinations documented according to NO-1-106, Functional Evaluation/Operability Determination, shall be identified as a RELATED DOCUMENT.
 8. For Accept-As-Is or Repair dispositions, an RDO shall review and approve or revise the disposition and determine if disposition constitutes a design change. [B-10]
 - a. If the IR requires an Accept-As-Is or Repair disposition, and the assigned engineer is not a member of an RDO, the assigned engineer may provide the disposition with RDO approval.
- E. On completion of the Resolution Document, the Issue Resolution Sponsor shall update AT/AIS with the actions taken, the Department Close Date, and change the Milestone Status to "C".
- F. The Action Organization shall transmit the Resolution Document to IAU within thirty (30) calendar days of changing AT/AIS status to "C". The Action Organization shall provide a copy of the Resolution Document to the IR Initiator and Reviewing Supervisor. [B-9]
- G. IAU will forward the complete IR package to Records Management within 30 days of receipt according to PR-3-100, Records Management.

5.6 Mode Restraining Issue Reports

- A. If an IR documents a non-hardware issue that the IRRG believes must be resolved prior to the plant entering a particular MODE, the IR shall be coded as MODE Restraining. Mode Restraining Codes are as follows:

1. Sample Mode Restraining Code: MRUIRO7

a. MR = Mode Restraining Designator

b. U1 = Unit Designator

U1 = Unit 1

U2 = Unit 2

U1U2 = Unit 1 and Unit 2

c. RO = Type of Outage

RO = Refueling Outage Commitment or Requirement

SD = Any Unit Shutdown Commitment or Requirement

d. 7 = Mode to which the Unit is Restrained.

7 = No Fuel can be reloaded into the Core

6 = Plant cannot enter Mode 5

5 = Plant cannot enter Mode 4

4 = Plant cannot enter Mode 3

3 = Plant cannot enter Mode 2

2 = Plant cannot enter Mode 1

EXAMPLE MRUIRO7

This is a Mode Restraining IR for Unit 1's next or current refueling outage. Fuel cannot be reloaded into the core until the Issue is resolved.

EXAMPLE MRU2SD5

This is a Mode Restraining IR for Unit 2's next or current cold shutdown outage. The Unit cannot enter Mode 4 until the Issue is resolved.

NOTE

There may be unusual cases when it is necessary to enact Mode Restraint when going from a higher mode to a lower mode. For this situation, the codes listed above can still be used, but should be annotated accordingly.

5.6 Mode Restraining Issue Reports (Continued)

- B. The person having responsibility for the business function that can most effectively resolve the MODE Restraining issue shall be assigned as the IR Resolution Sponsor. The AT/AIS action required text will clearly specify the MODE Restraint and what the recommended corrective actions are. The IR Resolution Sponsor has the responsibility for evaluating the issue and ensuring that corrective actions necessary to resolve the MODE Restraint are fully implemented and documented in time to allow MODE change.
1. This requirement does not permit the closure of a MODE Restraint to another process, e.g., initiation of an MO to have some action performed. The responsible individual must ensure that actions necessary to fully resolve the MODE Restraint are actually complete.
 2. The IR Resolution Sponsor is responsible for initiating any additional actions beyond those recommended to ensure the MODE Restraint is fully resolved and documented.
 3. The IR Resolution Sponsor shall document the resolution of the MODE Restraint and communicate this fact to Outage Management when the MODE Restraint is fully resolved
 - a. If the IR Resolution Sponsor determines that the recommended MODE Restraint is not valid, the reasons for this decision shall be documented and copies forwarded to Outage Management and to the IAU.
- C. In addition to assigning a milestone to the Issue Resolution Sponsor, the IAU will assign a separate milestone to Outage Management to track the MODE Restraint and ensure the MODE Restraining portions of the issue are resolved prior to the plant entering the restrained MODE on completion of the outage.
1. When the need for a MODE restraint is identified, IAU shall ensure prompt notification of this fact to both the IR Resolution Sponsor and Outage Management. This may include phone notification with documentation to follow (by FAX or Mail).
 2. Outage Management shall clear the MODE Restraint on notification from the Issue Resolution Sponsor responsible for resolving the MODE Restraint issue.
- D. When an IR documents a hardware issue which must be resolved prior to the plant entering a particular MODE, the OMC will assign an appropriate priority (usually Pri A) and indicate the MODE to which the plant is restrained. The maintenance activity must be completed before entering the restrained MODE.
1. The IAU will not issue a MODE Restraint for hardware issues unless the issue has some programmatic implication. If such a condition exists then IAU will issue an additional MODE Restraint to ensure the programmatic issue is resolved prior to the plant entering the restrained MODE.

5.6 Mode Restraining Issue Reports (Continued)

2. Changes to the assigned 'A' priority to work associated with the current outage will be approved by the OMC.
3. "Hardware Only" MODE restraints will not be tracked by Outage Management.

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6]

NOTE

The following steps apply to the form shown in Attachment 2.

- A. The Operations Maintenance Coordinator (OMC) (or designee) shall, upon receipt of an IR, perform the following:
1. Review the IR to determine if an MO is required.
 2. Complete Part C, Lines 9 through 19 as follows:
 - a. The Shift Supervisor or Control Room Supervisor may, as needed, conduct the OMC review.
 - b. Line 9. Is an MO Required? Indicate if an MO is required to resolve the problem. If an MO is not required, circle NO, sign, date, and return the IR to IAU for further processing.
 - c. Line 10. Priority. Enter the Work Accomplishment Priority associated with performing maintenance. Priorities shall be indicated as follows:

- (1) Priority E - Immediate

Maintenance that is needed immediately to protect structures, systems, components, plant personnel, health and safety of the general public, or to avoid unnecessary or undesirable plant transients. Immediate maintenance can be declared only by the Shift Supervisor and must be within the boundary of the current Tech Specs and other license conditions. The maintenance order and associated documentation shall be completed concurrent with or after performance of the maintenance activity as specified in MN-1-101, Control of Maintenance Activities.

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

NOTE

Immediate maintenance to CCNPP's power plants does not necessarily imply invoking 10 CFR 50.54(x). However, under extreme circumstances, emergency maintenance may be performed outside of Technical Specification or other license conditions if all of the following three 10 CFR 50.54(x) conditions are met:

1. The action is required to protect the health and safety of the general public.
2. No action consistent with license conditions or technical specifications that can provide adequate or equivalent protection is immediately apparent.
3. The action is authorized by the Shift Supervisor. If the Shift Supervisor is unavailable or cannot be notified and immediate action is required, a licensed Senior Reactor Operator may authorize this action.

NOTE

10 CFR 50.54 (x) does not apply to the Independent Spent Fuel Storage Installation (ISFSI)

(2) Priority 1 - Urgent

Maintenance that should be started immediately to correct problems that seriously jeopardize plant availability or reliability. Required paperwork shall be initiated prior to commencing hands-on work. Includes emergent maintenance activities involving Limiting Conditions for Operation (LCOs) which require power reduction within 72 hours. The job will work around-the-clock.

(3) Priority 2 - Operational Concerns

Priority maintenance to address deteriorating or failed safety or reliability equipment. Includes regulatory issues or management concerns requiring priority maintenance activity. Work package preparation shall start and a target completion date established on the first work day. OMC notification is required if field work will not begin within 72 hours (24 hours for 7-day LCO actions which require power reductions). Includes emergent maintenance activities involving LCOs which require power reduction within seven days. Certain jobs may work around-the-clock as determined by the OMC.

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

(4) Priority 3 - Priority Maintenance

Maintenance requiring priority planning and support (e.g., Control Room deficiencies, out-of-service annunciators, Operator workarounds, T-mods greater than 90 days old, chemistry concerns, RAD concerns, regulatory commitments, thermal performance concerns, STP alerts, personnel safety concerns, and system performance restoration). This applies to equipment designated as Appendix R Fire Safety Shutdown Equipment (FSSE). For Appendix R FSSE, the OMC should establish a completion date IAW SA-1-102. Priority 3 jobs should normally be worked within 30 days.

(5) Priority 4 - Quarterly System Schedule Maintenance

Maintenance to restore degraded or deficient power plant equipment, and repetitive maintenance such as preventive maintenance, Surveillance Test Procedures, and performance evaluations. Priority 4 jobs should normally be worked within 2 QSS cycles. Jobs that can not or should not be done within 2 QSS cycles (e.g., yearly PM's, minor or major modifications) will be scheduled in the appropriate QSS cycle.

(6) Priority 5 - Other Maintenance

Maintenance such as Rover Maintenance, enhancements, shop spares, non-critical systems, and other work that will be completed as resources become available.

NOTE

The purpose of the following priorities is to define which activities should be accomplished prior to Mode 1 operations.

(7) Priority A - Outage Maintenance

Maintenance required to be completed prior to returning a unit to service.

(a) Plant Safety

Maintenance or other activities that shall be performed to correct failure or degradation of nuclear safety-related equipment.

(b) Technical Specifications

Maintenance or other activities that shall be accomplished to comply with Technical Specifications.

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

(c) System Availability

Maintenance or other activities that shall be accomplished to declare a system operable as defined by Technical Specifications.

(d) Equipment Reliability

Maintenance or other activities that shall be performed to prevent or correct failure or degradation of equipment that could contribute to a plant trip.

(e) Commitments

Management-imposed mode restraining commitments that shall be completed prior to mode change or start-up.

(f) Surveillance test procedures or preventive maintenance activities

Surveillance test procedures or preventive maintenance that can only be performed during an outage and are being performed to satisfy technical specification requirements or management-imposed mode restraining commitments.

(8) Priority OP - Outage Priority Maintenance

Maintenance requiring priority planning and support in order to prepare that work for completion during the next power reduction or unscheduled outage (e.g., Control Room deficiencies, out-of-service annunciators, operator workarounds, T-modes which are greater than 90 days old, chemistry concerns, RAD concerns, regulatory commitments, thermal performance concerns, personnel safety concerns, and system performance restoration). Priority OP maintenance should normally be ready to work within 30 days of prioritization by the OMC.

(9) Priority B - Routine Outage Maintenance

Maintenance and modifications which support safe, efficient operation

(a) System Availability

Maintenance or other activities that shall be accomplished to make a system operable as defined by Operations, e.g., second train availability.

(b) Equipment Reliability

Maintenance or other activities that are necessary to correct equipment deficiencies

(c) Public or Plant Safety

Implementation of long-term modifications or enhancements that do not have immediate impact on public or plant safety.

(d) Plant Efficiency

Maintenance or other activities that would increase plant efficiency with a high cost benefit.

(e) Commitments

Maintenance or other activities required to fulfill management-imposed non-mode-restraining commitments.

(f) Preventive Maintenance Activities

Maintenance or other activities associated with preventive maintenance.

(10) Priority C - Other Maintenance

Maintenance or other activities that are dependent upon manpower availability, and do not rate assignment of a higher priority.

(11) Maintenance preparation activities (e.g., planning, engineering, etc.,) should normally be pursued in the following order: Pri 1; Pri 2, Pri A, Pri OP, Pri 3, Pri 4, Pri 5, Pri B, and, Pri C.

d Line 11. Mode to Work.

Enter the highest mode to which the MO can be worked.

NOTE

MODE Qualifiers as shown in MN-2-100 may be added to the MODE as needed

e Line 12. RMG.

Enter the Responsible Maintenance Group (RMG). The RMG has overall responsibility for performance of the MO.

f Line 13. Operability Concern?

If YES notify the Shift Supervisor. Enter the Technical Specification paragraph number for affected systems or components involved

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

g Line 14. Mode Change Restraint? If YES Describe Below.

- (1) Circle YES if a mode change restriction exists (or will exist) until corrective maintenance is performed and the component or system is returned to service. Indicate the mode Affected by the mode Change Restraint per Section 5.6, Mode Restraining Issue Reports, paragraph A.
- (2) Describe any restrictions under Work Considerations or Comments.

h Line 15. CCI-118 Report Needed?

Circle YES if a CCI-118 Report is needed. Notify the Shift Supervisor if not previously contacted.

i Line 16. Shift Supervisor Approval Required Prior to Starting Work?

Circle YES or NO, as appropriate.

j Line 17. Work Considerations or Comments.

Enter Work Considerations or Comments applicable to the problem or concern and its resolution. Following are several examples:

- (1) Technical Specification Limitations.
- (2) Power generation considerations.
- (3) Work package considerations.
- (4) Work completion deadlines, including those required for Appendix R hardware impairments.
- (5) Appendix R work restriction/Compensatory Measures
- (6) Cautions.

k Line 18. OMC Signature: Date:

Sign the IR, indicating the OMC review is complete and information contained on Part C is correct.

l Line 19. OMC Clerk: MO Number:

- (1) The OMC Clerk shall enter appropriate information into NUCLEIS if the IR is Approved, that is, YES was circled in Part C, Line 9
- (2) Enter the MO Number in the space provided

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

4. If an MO is required, provide the IR to the OMC Clerk for data entry into NUCLEIS and return the original IR annotated with the MO number to IAU.
5. If an MO is not required, circle NO and sign, date, and return the IR to IAU.

NOTE

If it is determined that the identified deficiency does not require maintenance action, and deficiency tags were hung, the OMC will indicate on the IR that the tags should be removed and provide a copy of the IR to the initiator.

NOTE

The following steps apply to the form shown in Attachment 2A.

- B. (For Attachment 2A) The Operations Maintenance Coordinator (OMC) (or designee) shall, upon receipt of an IR, perform the following:
1. Review the IR to determine if an MO is required.
 2. Complete Part D, Lines 1 through 11 as follows:
 - a. The Shift Supervisor or Control Room Supervisor may, as needed, conduct the OMC review.
 - b. Line 1. Is an MO Required? Indicate if an MO is required to resolve the problem. If an MO is not required, circle NO, sign, date, and return the IR to IAU for further processing.
 - c. Line 2. Priority. Enter the Work Accomplishment Priority associated with performing maintenance. Priorities shall be indicated as shown in Section 5.7.A.2.c steps 1 through 9.
 - d. Line 3. Mode to Work

Enter the highest mode to which the MO can be worked.

NOTE

MODE Qualifiers as shown in MN-2-100 may be added to the MODE as needed.

- e. Line 4. RMG.

Enter the Responsible Maintenance Group (RMG). The RMG has overall responsibility for performance of the MO.

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

f Line 5. Operability Concern?

If YES notify the Shift Supervisor. Enter the Technical Specification paragraph number for affected systems or components involved.

g Line 6. Mode Change Restraint? If YES Describe Below.

(1) Circle YES if a mode change restriction exists (or will exist) until corrective maintenance is performed and the component or system is returned to service. Indicate the mode Affected by the mode Change Restraint per Section 5.6, Mode Restraining Issue Reports, paragraph A.

(2) Describe any restrictions under Work Considerations or Comments.

h Line 7. CCI-118 Report Needed?

Circle YES if a CCI-118 Report is needed. Notify the Shift Supervisor if not previously contacted.

i Line 8. Shift Supervisor Approval Required Prior to Starting Work?

Circle YES or NO, as appropriate.

j Line 9. Work Considerations or Comments.

Enter Work Considerations or Comments applicable to the problem or concern and its resolution. Following are several examples:

- (1) Technical Specification Limitations.
- (2) Power generation considerations.
- (3) Work package considerations.
- (4) Work completion deadlines.
- (5) Cautions.

k Line 10. OMC Signature: Date:

Sign the IR, indicating the OMC review is complete and information contained on Part C is correct.

5.7 Operations Maintenance Coordinator's Review of the Issue Report [B-5] [B-6] (Continued)

3. If an MO is not required, circle NO and sign, date, and return the IR to IAU.

NOTE

If it is determined that the identified deficiency does not require maintenance action, and deficiency tags were hung, the OMC will indicate on the IR that the tags should be removed and provide a copy of the IR to the initiator.

4. If an MO is required, provide the IR to the OMC Clerk for data entry into NUCLEIS and return the original IR annotated with the MO number to IAU.
- a. Line 11. OMC Clerk: MO Number:
- (1) The OMC Clerk shall enter appropriate information into NUCLEIS if the IR is Approved, that is, YES was circled in Part D Line 1.
- (2) Enter the MO Number in the space provided.
5. Return the IR to IAU.

5.8 Back Shift and Weekend Processing of Issue Reports

- A. Personnel who initiate IRs on the back shift or on weekends when personnel typically assigned to review and process IRs are not on site, shall perform the following actions:
1. Operations Shift personnel:
- a. Part A - Initiator. The Initiator shall:
- (1) Complete Part A of the IR (refer to Section 5.1, Issue Report Initiation).
- (2) Take the IR to the Shift Supervisor or Control Room Supervisor.
- b. Part B - Reviewing Supervisor. The Shift Supervisor or Control Room Supervisor shall:
- (1) Complete Part B of the IR (refer to Section 5.3, Reviewing Supervisor's Action).
- (2) If high priority maintenance is needed, complete the OMC section of Part C, lines 9 through 18, of the IR. (Refer to Section 5.7, Operations Maintenance Coordinator's Review of the Issue Report.) and notify appropriate maintenance personnel of the need for high priority maintenance. Obtain an MO number (line 19) for this activity on the next normal work day.

5.8 Back Shift and Weekend Processing of Issue Reports (Continued)

- (3) If the identified deficiency is a candidate for Rover or Manual MO maintenance per MN-1-101, the Shift Supervisor or Control Room Supervisor shall complete lines 9 thru 18 and forward the IR to appropriate maintenance personnel for corrective actions per MN-1-101.
 - c. Part C - OMC. The Shift Supervisor or Control Room Supervisor shall:
 - (1) If maintenance personnel have been called-in, complete the OMC portion of Part C, lines 9 through 18, (refer to Section 5.7, Operations Maintenance Coordinator's Review of the Issue Report) and provide a copy of the IR to the maintenance craft.
 - (2) Forward the original IR to IAU for processing.
2. Personnel other than Operations Shift personnel:
 - a. Part A - Initiator. The Initiator shall:
 - (1) Complete Part A of the IR (refer to Section 5.1, Issue Report Initiation).
 - (2) Take the IR to a knowledgeable Reviewing Supervisor, preferably in the Initiator's chain of command, who will complete Part B of the IR.
 - (3) If a knowledgeable Reviewing Supervisor is not on site, and high priority maintenance is needed, or the IR is an immediate personnel or equipment safety, operability or reportability concern, contact a knowledgeable Reviewing Supervisor (preferably the Initiator's work group supervisor) by phone and discuss the problem.
 - (a) If a Reviewing Supervisor was contacted by phone, the Initiator shall complete Part B of the IR and sign the IR per telecon with (Reviewing Supervisor's name).
 - (b) If a Reviewing Supervisor cannot be contacted, the Initiator shall take the IR to the Shift Supervisor or Control Room Supervisor who will complete Part B.
 - (4) If a knowledgeable Reviewing Supervisor is not on site and high priority maintenance is not needed or the IR is not an immediate personnel or equipment safety, operability or reportability concern, provide the IR to the Initiator's immediate work group supervisor, when available, for processing.

5.8 Back Shift and Weekend Processing of Issue Reports (Continued)

- b. Part B - Reviewing Supervisor. The Reviewing Supervisor (if not available, then the Shift Supervisor or Control Room Supervisor), shall:
 - (1) Complete Part B of the IR (refer to Section 5.3, Reviewing Supervisor's Action).
 - (2) If high priority maintenance is necessary, take the IR to the Shift Supervisor or Control Room Supervisor.
 - (3) If high priority maintenance is not needed, forward the IR to IAU.
- c. (For Attachment 2) Part C - OMC. The Shift Supervisor or Control Room Supervisor shall:
 - (1) Complete the OMC portion of Part C (refer to Section 5.7.A, and 5.8.A.1.b & c, Operations Maintenance Coordinator's Review of the Issue Report) and provide a copy of the IR to the called-in maintenance craft.
 - (2) Forward the original IR to IAU for processing.
- d. (For Attachment 2A) Part D - OMC. The Shift Supervisor or Control Room Supervisor shall:
 - (1) Complete the OMC portion of Part D (refer to Section 5.7.B, and 5.8.A.1.b & c, Operations Maintenance Coordinator's Review of the Issue Report) and provide a copy of the IR to the called-in maintenance craft.
 - (2) Forward the original IR to IAU for processing.

5.9 Procurement-Related Deficiencies Having an Adverse Plant Impact

- A. An IR shall be initiated to document deficiencies identified during the procurement process that could have an adverse impact on plant equipment, programs, or processes.
- B. Procurement deficiencies not having an adverse impact on plant equipment, programs, or processes, shall be documented and processed according to PM-1-102, Processing and Control of Procurement Related Deficiencies.

5.10 Issues Assessment Unit Closure of Issue Reports

- A. IAU shall close IRs according to IAU administrative procedures when an IR has been evaluated to be one of the following:
 - 1. Invalid
 - 2. A duplicate Issue

5.10 Issues Assessment Unit Closure of Issue Reports (Continued)

3. Not requiring additional action; that is, it was Corrected-On-The-Spot or no corrective action is required.
- B. IRs closed by IAU and associated documentation shall be transmitted to Records Management according to PR-3-100, Records Management.
- C. Valid IRs will be closed according to Action Item Tracking Guidelines and procedures.
- D. IAU shall transmit a copy of nonmaintenance IRs to the Initiator and Reviewing Supervisor for information if ~~no action was taken by an action organization.~~ [B-9]

5.11 Action Item Tracking

- A. Action Organizations shall track and status assigned IR actions to completion using the AT/AIS number.
- B. NUCLEIS tracks and provides the status of MOs resulting from IRs that identify plant hardware deficiencies.
- C. When all actions necessary to *fully resolve* an issue are completed, the IR Resolution Sponsor will change the status code to 'C' on the assigned action item milestone. The resolution document, describing action taken to correct and prevent recurrence of the issue, shall be sent to the Supervisor-IAU for inclusion in the IR file and subsequent transfer to Records Management.
- D. On receipt of the resolution document, IAU will change the milestone status code to 'V' to indicate that the resolution has been received and the issue is closed.
- E. If there is a request for an OPERABILITY evaluation according to NO-1-106, AT/AIS will be updated to reflect the NO-1-106 document as a RELATED DOCUMENT, and a RESOLUTION DOCUMENT. IAU will also include this cross-reference in the IR Tracking Database.

5.12 Trending Issue Report Data

- A. IR information shall be entered by IAU onto a computerized data base for access by organizations performing trend analysis.
- B. Adverse trends shall be documented on IRs and provided to IAU for processing.

6.0 BASES

- [B-1] Basis for the Issues Management System is the Performance Improvement Plan Task 4.10-0 (transferred from QAP-38, Issues Assessment System).
- [B-2] Nuclear Hotline Investigation 5-90 (AI number CT9015748): Addresses the organization, responsibilities, and activities of IAU (replaces the Problem Report Review Group).
- [B-3] INSR 91-80/80-00/00, Page 21 (AI number CT9015748): Addresses the organization, responsibilities, and activities of IAU (replaces the Problem Report Review Group).
- [B-4] INSR 90-23/23-00/00, Page 6 (AI number CT9015748): Improve the ability to fully assess and communicate safety consequences of deficient equipment when generating an IR.
- [B-5] POSRC OI 91-001-011: Ensure the IR process addresses MR process weaknesses (problem description details, operability of other or associated equipment, prompt evaluation of operability, timely evaluation by OMC, reviewing supervisor's review for operability, shop generated MOs receiving OMC review, and specialized problems reviewed for operability impact).
- [B-6] POSRC OI 90-142-02: Implement means to evaluate safety significance of deficient equipment.
- [B-7] NCR 8821, Do Not Place Tags Inside Containment.
- [B-8] INSR (Inspection Report) 91-82/82-03/03 (AI number CT9200012): Requirement for currently licensed SRO to be present at IRRG meetings. (C09200057)
- [B-9] Nuclear Hotline Investigation 5-90: IAU provides a copy of valid nonmaintenance IR to Initiator and Reviewing Supervisor.
- [B-10] Calvert Cliffs UFSAR, Appendix 1B, Paragraph 1B.15, Non-conforming Materials, Parts or Components.
- [B-11] Response to IPAT, INSR 91-82/82-03/03: Change the way IR data is entered on AT/AIS in order to improve the ability to readily analyze data while at the same time reducing the administrative workload devoted to IR activity.

7.0 RECORDS

The following records are generated by use of this procedure:

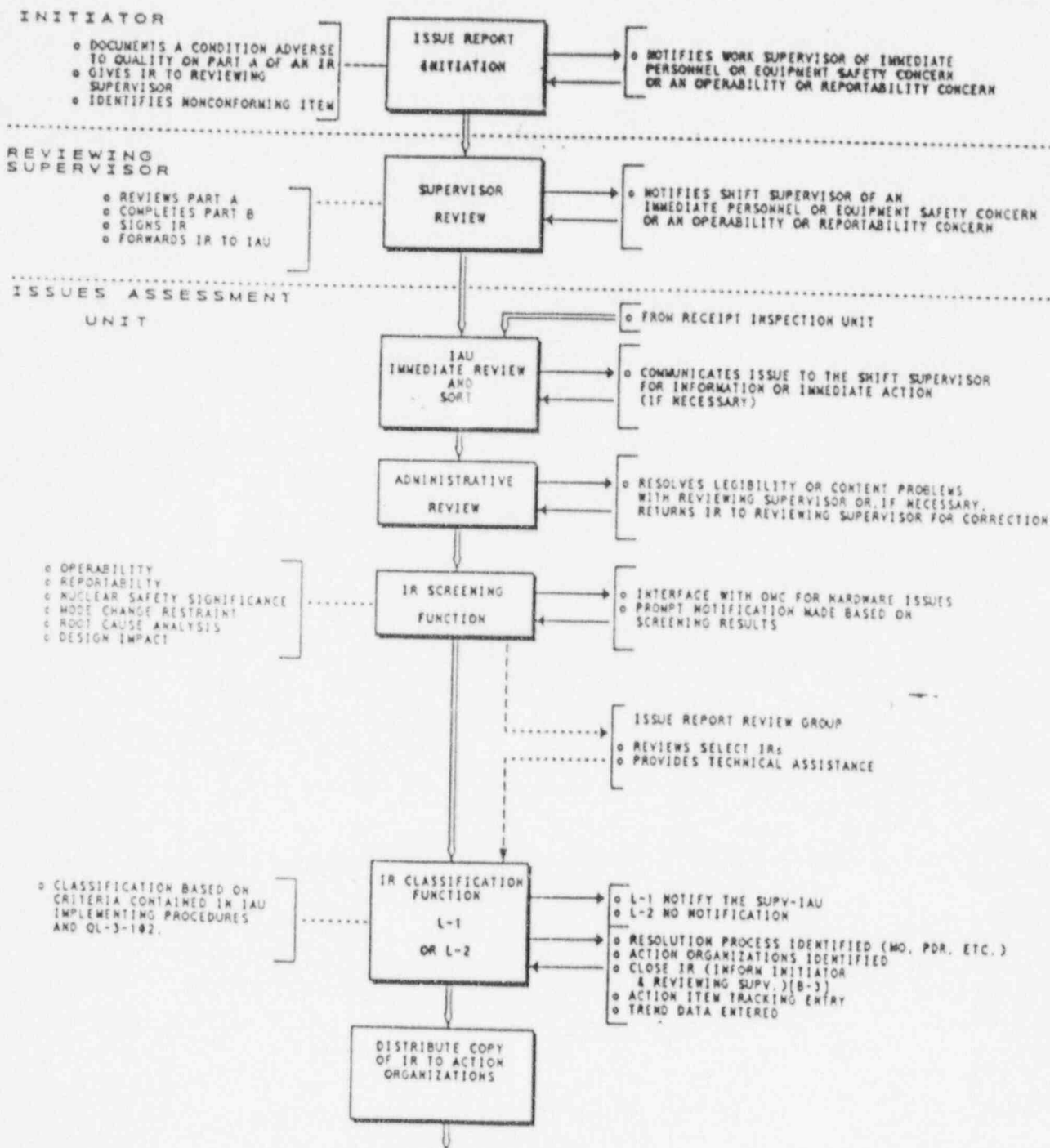
- Original IRs
- IR screening documents
- Resolution documents
- AT/AIS IR acceptance or rejection documents

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

ATTACHMENT 1, ISSUE REPORT PROCESS FLOW OVERVIEW (Page 1 of 2)

ATTACHMENT 1 (PAGE 1 OF 2)

ISSUE REPORT PROCESS FLOW OVERVIEW

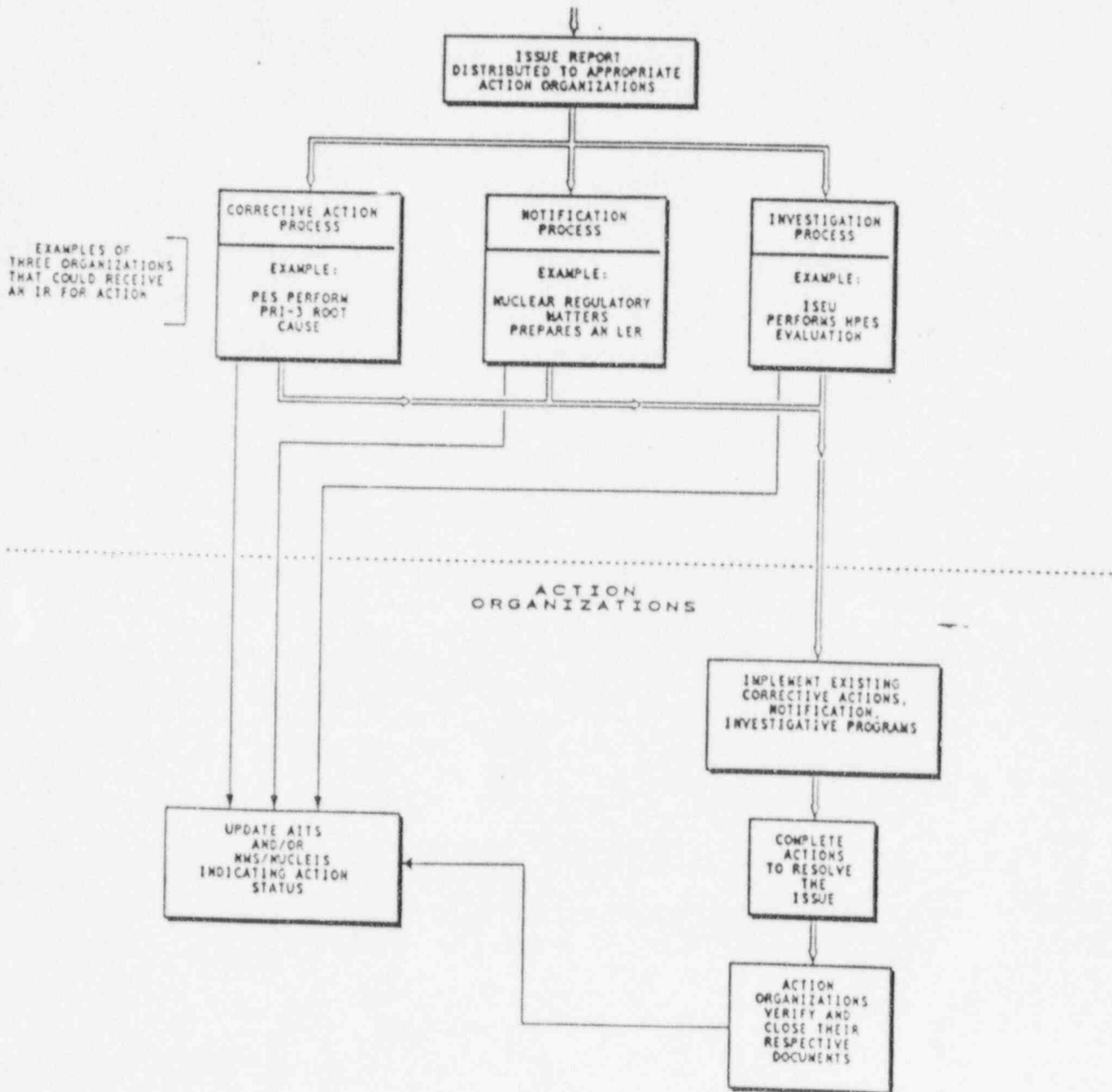


ATTACHMENT 1, ISSUE REPORT PROCESS FLOW OVERVIEW (Page 2 of 2)

ATTACHMENT 1 (PAGE 2 OF 2)

ISSUE REPORT PROCESS FLOW OVERVIEW

FROM ATTACHMENT 1 PAGE 1 OF 2



ATTACHMENT 2, ISSUE REPORT (Page 1 of 2)

PLEASE PRINT ALL INFORMATION

ISSUE REPORT

INSTRUCTIONS ON REVERSE SIDE

PART A - INITIATOR (Complete PART A Including Hardware and/or Non-Hardware Section(s) As Applicable)

1. Do you have an IMMEDIATE Personnel Safety / Equipment Safety Concern? No Yes
2. Do you have an Operability (Tech Spec or Other) Concern? No Yes
3. Do you have a Reportability Concern? No Yes

If 1, 2 and/or 3 are "Yes",
IMMEDIATELY contact your
Supervisor.

Cont. Shd. Attached - Yes No

4. Describe the Issue: _____

5. Date / Time Discovered: ____ / ____ / ____ AM / PM 6. Activity in Progress When Discovered: _____

7. Was Issue Corrected-On-The-Spot? No Yes 8. Immediate Actions Taken: _____

9. Apparent Cause: _____ 10. Effect of Issue: _____

11. Extent of Issue: _____ 12. Is This a Recurring Issue? No Yes

13. Recommendations: _____

HARDWARE INFORMATION - Circle Failure Codes on Reverse Side of IR Form

14. Equipment Noun Name: _____ 15. Unit: _____ 16. System: _____

17. Equipment Number: _____ Location: _____

18. Tag(s) placed? No Yes Tag # / Type 1. _____ 2. _____ 3. _____
Location of Tag(s) 1. _____ 2. _____ 3. _____

19. If "No", Explain: _____ 20. P.O. # (if known): _____

NON-HARDWARE INFORMATION - (e.g., Inadequate Procedures / Documentation, Deficient Workmanship, Faulty Design, Personnel Error, Failure to Follow Procedures, etc.)

21. Title & ID Number of Controlling Document (Include Rev. No.): _____

22. Requirement Violated (if known): _____

23. Initiator's Name (Print): _____ Ext: _____ Date: ____ / ____ / ____ Time: ____ AM/PM Group: _____

PART B - REVIEWING SUPERVISOR Complete This Section. Forward IR in the Envelope Accompanying this IR.

1. Is issue an IMMEDIATE Personnel Safety / Equipment Safety Hazard? No Yes If 1, 2 and/or 3 are "Yes", Immediately Contact the Shift Supervisor
2. Do you have an Operability (Tech Spec or Other) Concern? No Yes Name: _____ Date: ____ / ____ / ____ Time: ____ AM/PM
3. Do you have a Reportability Concern? No Yes

4. Root Cause Analysis Recommended? No Yes If "Yes" explain why: _____

5. Was Issue Corrected-On-The-Spot? No Yes If "Yes" are further actions required? No Yes (If "Yes" indicate in "Recommended Actions" below)

6. Recommended Actions: Resolve Issue: _____

7. Approve IR? Yes No If "No", Explain in "Recommended Actions" above. 8. Signature: _____ Ext: _____ Date: ____ / ____ / ____

PART C - IAU AND OMC REVIEW

1. IR Classification: _____ 2. AITS #: _____ 3. IAU Actions Complete / Date: _____

4. Action Organization: _____ Actions: _____

5. Action Organization: _____ Actions: _____

6. Action Organization: _____ Actions: _____

7. IAU SIGNATURE: _____ Comments: _____

OMC COMPLETE LINES 9 THROUGH 18 BELOW

9. MO Required? YES NO (If "NO", Sign, Date, & Return to IAU) 10. Priority: _____ 11. Mode: _____ Work: _____ 12. RMG: _____

13. Operability Concern? NO YES TS #: _____ 14. Mode Change Restrained? NO YES If "YES" Describe Below: _____

15. CCH-118 Report Needed? NO YES (If "YES", Notify Shift Supv.) 16. Shift Supervisor Approval Required Prior to Starting Work? NO YES

17. Work Considerations / Comments: _____

18. OMC SIGNATURE: _____ Date: ____ / ____ / ____ 19. OMC Check: MOF: _____

ATTACHMENT 2, ISSUE REPORT (Page 2 of 2)

ISSUE REPORT INSTRUCTIONS

CONTINUATION SHEETS CAN BE USED WHEN ADDITIONAL SPACE IS NECESSARY

INITIATOR - CIRCLE FAILURE CODES Below

| STATUS CODE (CIRCLE 1) | SYSTEM EFFECT CODE (CIRCLE 1) | FAILURE DETECTION CODE (CIRCLE 1) |
|---|---|--|
| SYSTEM LEVEL (For single train/channel system) A SYSTEM IN SERVICE (OPERATING / STANDBY) B SYSTEM IN TEST C SYSTEM IN MAINTENANCE D SYSTEM OUT OF SERVICE (NOT IN MAINTENANCE) | A LOSS OF SYSTEM FUNCTION B DEGRADED SYSTEM OPERATION C LOSS OF TRAIN / CHANNEL D DEGRADED TRAIN / CHANNEL E SYSTEM FUNCTION OR OPERATION UNAFFECTED | A OPERATIONAL ABNORMALITY B IN-SERVICE INSPECTION C SURVEILLANCE TESTING D PREVENTIVE MAINTENANCE E SPECIAL INSPECTION F AUDIOVISUAL ALARM H ROUTINE OBSERVATION J INCIDENTAL OBSERVATION K CORRECTIVE MAINTENANCE |
| CHANNEL LEVEL (For multiple train/channel system) E TRAIN / CHANNEL IN SERVICE (OPERATING / STANDBY) F TRAIN / CHANNEL IN TEST G TRAIN / CHANNEL IN MAINTENANCE H TRAIN / CHANNEL OUT OF SERVICE (NOT IN MAINTENANCE) | PLANT EFFECT CODES (CIRCLE UP TO 3) A RESULTED IN REDUCED POWER OPERATION B RESULTED IN UNIT OFF LINE C RESULTED IN REACTOR TRIP D RESULTED IN PERSONNEL INJURY E RESULTED IN OFF SITE RADIATION F RESULTED IN DAMAGE TO OTHER EQUIPMENT G RESULTED IN NO SIGNIFICANT EFFECT | FAILURE SYMPTOM CODE (CIRCLE 1) A PHYSICAL FAULT B OUT OF SPECIFICATION C DEMAND FAULT D ABNORMAL CHARACTERISTIC E RELEASED LEAKAGE F CONTAINED LEAKAGE |

PART A - INITIATOR

If questions 1, 2 and/or 3 are answered "Yes" then immediately contact your supervisor or, if not available, another knowledgeable supervisor, preferably in your chain of command. If no supervisor is available, contact the Shift Supervisor.

- IMMEDIATE PERSONNEL SAFETY / EQUIPMENT SAFETY CONCERNS:** Answer "YES" if, in your opinion, any of the following could occur:
 - a. Personnel injury or an unexpected radiation or hazardous material exposure could occur.
 - b. Fire, flood or hazardous material spill could occur.
 - c. Safety or Radiological rule violation could occur.
 - d. Damage to plant equipment could occur.
 - e. Failure of life support system or of safety equipment could occur.
 - f. Security rule violation could occur. Contact the Security Supervisor at Ext. 4024.
- OPERABILITY CONCERNS:** Answer "Yes" if, in your opinion, the problem or concern affects Plant / Process Equipment and/or Tech Spec related Support Equipment - AND ANY of the following exist:
 - a. Exhibits excessive vibration, noise, leakage, smoke, etc.
 - b. Does not operate as expected.
 - c. Would not be capable of performing its intended function.
 - d. Does not or could not meet operational or functional requirements.
- REPORTABILITY CONCERNS:** Answer "Yes" if, in your opinion, the problem or concern meets any of the following conditions:
 - a. Could cause errors in the information displayed to Operators by process instrumentation, plant computer, etc., which could adversely impact safe plant operations.
 - b. Mistakenly modifies a system or makes it operate improperly.
 - c. Creates or modifies a pathway for radioactive gas or liquid to escape from the plant.
 - d. Needs to be reported to BG&E management or to the NRC (Refer to CCI-118).
 - e. An automatic trip should have occurred, but didn't (for power plant or associated safety systems only).
 - f. May cause an unplanned shutdown of a system or unit or an unplanned reduction in power generation.
 - g. A plant communications system needed in a plant emergency is not working (Refer to CCI-118).
 - h. A system which is made to protect people or equipment is not working properly and if it fails may cause a serious injury or unit shutdown.
 - i. Likely to cause Media (TV, Newspaper) interest.
- ACTIVITY IN PROGRESS WHEN DISCOVERED:** Describe activity in-process when problem discovered (e.g., PMT, STP, evolution, test, inspection, etc.).
- CORRECTED-ON-THE-SPOT CRITERIA:** COTS can be performed on minor program and hardware deficiencies. All of the following criteria must be met to perform COTS.
 - a. COTS must involve only minor and immediate corrective action.
 - b. Personnel must be qualified, pre-approved and authorized to perform COTS on the equipment or process.
 - c. Equipment, personnel and tools must be immediately available.
 - d. Replacement parts must not be used (except parts obtained from the stock or minor replacement parts per CCI-200).
 - e. COTS must not be performed if a Safety tagging boundary must be established.
 - f. Equipment must be sufficiently isolated from service at the time COTS is performed so that the COTS activity will not initiate an automatic action or adversely affect plant operations.
 - g. Equipment operability must not be adversely affected.
 - h. Activities prohibited by the "Rover MO" program are prohibited by COTS.
 - i. COTS must be documented on an IR form AND reviewed by your supervisor within the work period the COTS was performed.
- IMMEDIATE ACTIONS TAKEN:** List action (if any) performed by the initiator to mitigate or resolve the issue.
- APPARENT CAUSE:** If possible, indicate what caused the problem (e.g., Personnel Error, Faulty Design, Lack of Procedures, Inadequate Controls / Documentation, etc.).
- EFFECT OF ISSUE:** Describe the equipment/activities impacted by the problem.
- EXTENT OF ISSUE:** Describe known or suspected boundary of problem (e.g., "Could affect all STPs", etc.). Indicate if the problem could have GENERIC IMPLICATIONS or affect the Operability of other associated equipment/systems/processes. Include all known examples, types, and number of deficiencies (e.g., 3 of 5 head bolts, etc.). Be as specific and detailed as possible.
- IS THIS A RECURRING ISSUE?** Indicate if condition described is known to be a repetitive or recurring problem.
- RECOMMENDATIONS:** Recommend action, if any, which will address/mitigate/resolve concern. Include who should resolve the concern.
- TAGS PLACED:** Indicate if Tags were placed and enter the identification number from the tag (Tag #) and the tag type (e.g., BG&E Deficiency Tag, BG&E Hold for QC Clearance Tag, etc.). Indicate the Location where the Tags were placed.
- TITLE AND ID NUMBER OF CONTROLLING DOCUMENT:** Indicate what procedure, spec/drawing/etc., has the problem, or controls the activity with the problem. If the problem is with computer software, indicate the application name, module name, and/or screen number.
- REQUIREMENT VIOLATED:** Whenever possible list specific paragraph or section of the requirement violated.
- INITIATOR:** Indicate if continuation sheet(s) were used. Take promptly to your immediate supervisor. If your supervisor cannot be contacted, take to another supervisor, preferably in your chain of command. If no supervision is available, take to the Shift Supervisor.

PART B - REVIEWING SUPERVISOR (Includes the Control Room Supervisor for Operations Personnel)

- Is there an IMMEDIATE PERSONNEL SAFETY / EQUIPMENT SAFETY HAZARD?
- Do you have an OPERABILITY (Tech Spec or Other) Concern?
- Do you have a REPORTABILITY concern?

If you have a concern with 1, 2 and/or 3 IMMEDIATELY contact the Shift Supv. Document the name of the Shift Supervisor contacted, date and time.

- Using the following criteria determine if a ROOT CAUSE ANALYSIS should be recommended:
 - a. All reportable occurrences.
 - b. Two or more similar failures of a component within the prescribed surveillance frequency.
 - c. A component or process failure mechanism is new/unique based on previous plant or industry experience.
 - d. A condition of a major quality concern to BG&E senior management (e.g., G.S. level and above).
 - e. The existence of an abnormal trend affecting plant safety or quality.
- Was issue CORRECTED-ON-THE-SPOT (COTS)? Using the Criteria provided in PART A, above, indicate if issue was corrected and met all COTS Criteria.
- RECOMMEND ACTIONS necessary to completely resolve the issue. This may include a disposition of Rework, Repair, Accept-As-Is or Reject.
- APPROVE IR: If you don't approve the IR, explain why. Your explanation will be provided to the Initiator. The Initiator removes associated tag(s) and attaches to IR.
- SIGN and DATE the IR then forward to the IAU.

ATTACHMENT 2A, ISSUE REPORT REVISED (Page 1 of 2)

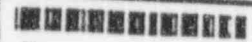
PLEASE PRINT ALL INFORMATION

ISSUE REPORT

INSTRUCTIONS ON REVERSE SIDE

PART A - INITIATOR Complete PART A including Hardware and/or Non-Hardware section(s) as applicable.

1. Do you have an IMMEDIATE Personnel Safety/Equipment Safety Concern? NO YES If 1, 2 and/or 3 are "YES",
2. Do you have an Operability (Tech Spec or Other) Concern? NO YES IMMEDIATELY contact
3. Do you have a Reportability Concern? NO YES your Supervisor.
4. DESCRIBE THE ISSUE: _____



No.

Cont. Sht. Attached- Yes No

5. Date/Time Discovered: ____/____/____ AM/PM 6. Activity in Progress When Discovered: _____
7. Was Issue Corrected-On-The-Spot? NO YES 8. Immediate Actions Taken: _____
9. Apparent Cause: _____ 10. Effect of Issue: _____
11. Extent of Issue: _____ 12. Is This a Recurring Issue? NO YES
13. Recommendations: _____

HARDWARE INFORMATION

14. Equipment Noun Name: _____ 15. Unit: _____ 16. System: _____
17. Equipment Number: _____ Location: _____
18. Tag(s) placed? NO YES Tag #/Type 1. _____ Location of Tag(s): 1. _____
2. _____ 2. _____
19. If "NO" Explain: _____ 20. P.O. # (if known): _____

NON-HARDWARE INFORMATION (e.g., inadequate Procedures/Documentation, Deficient Workmanship, Faulty Design, Personnel Error/Failure to Follow Procedure, etc.)

21. Title & ID Number of Controlling Document (include Rev. No.): _____
22. Requirement Violated (if known): _____
23. INITIATOR'S NAME (PRINT): _____ Ext.: _____ Date: ____/____/____ Time: ____ AM/PM Group: _____

PART B - REVIEWING SUPERVISOR

Complete this section. Forward IR to the Issues Assessment Unit (IAU).

1. Is Issue an IMMEDIATE Personnel Safety/Equipment Safety Hazard? NO YES If 1, 2 and/or 3 are "YES", IMMEDIATELY contact the Shift Supervisor
2. Do you have an Operability (Tech Spec or Other) Concern? NO YES
3. Do you have a Reportability Concern? NO YES
4. Root Cause Analysis Recommended? NO YES If "YES" explain why: _____
5. Was Issue Corrected-On-The-Spot? NO YES If "YES" are further actions required? NO YES (indicate in "Recommended Actions" below):
6. Recommended Group(s) to Resolve Issue: _____
7. Recommended Actions to Resolve Issue: _____
8. Approve IR? YES NO If "NO", Explain in "Recommended Actions" above 9. NAME(Print) _____ Ext.: _____ Date: ____/____/____

PART C - SHIFT SUPERVISOR REVIEW

Complete this section if 1, 2 or 3 of the Reviewing Supervisor section is answered YES

1. Is Issue an IMMEDIATE Personnel Safety/Equipment Safety Hazard? NO YES
2. Do you have an Operability (Tech Spec or Other) Concern? NO YES TS# _____
3. Do you have a Reportability Concern? NO YES CCI 118# _____
4. Operability Determination Process Implemented NO YES
5. Comments: _____

NAME(PRINT): _____ Ext.: _____ Date: ____/____/____ Time: ____ AM/PM

PART D - OMC & IAU REVIEW (Complete this section as applicable)

1. MO Required? YES NO (NO Sign, date, & return to IAU) 2. Priority: _____ 3. Mode to Work: _____ 4. RMG: _____
5. Operability Concern? NO YES TS# _____ 6. Mode Change Restraint? NO YES If "YES" Describe Below: _____
7. CCI-118 Report Needed? NO YES (If YES, notify Shift Supervisor) 8. Shift Supervisor Approval Required Prior to Starting Work? NO YES
9. Work Considerations/Comments: _____
10. OMC SIGNATURE: _____ Date: ____/____/____ 11. OMC Clerk, MO# _____
12. IAU Action: Classification L: _____ AIT# _____

ATTACHMENT 2A, ISSUE REPORT REVISED (Page 2 of 2)

ISSUE REPORT INSTRUCTIONS

CONTINUATION SHEETS CAN BE USED WHEN ADDITIONAL SPACE IS NECESSARY

PART A - INITIATOR

If questions 1, 2 and/or 3 are answered "Yes", immediately contact your supervisor or, if not available, contact another supervisor preferably in your chain of command. If no supervision is available, contact the Shift Supervisor.

1. **IMMEDIATE PERSONNEL SAFETY/EQUIPMENT SAFETY CONCERNS** - Answer "YES" if, in your opinion, any of the following could occur:
 - a. Personnel injury or an unexpected radiation or hazardous material exposure could occur.
 - b. Fire, flood, or hazardous material spill could occur.
 - c. Safety or Radiological rule violation could occur.
 - d. Damage to plant equipment could occur.
 - e. Failure of the support system or safety equipment could occur.
 - f. Security rule violation could occur. Contact the Security Supervisor at Ext. 4024.
2. **OPERABILITY CONCERNS** - Answer "YES" if, in your opinion, the problem or concern affects Plant/Process Equipment; Power Generating Equipment and associated Auxiliaries; Tech Spec equipment and/or Tech Spec related Support Equipment - AND ANY of the following exist:
 - a. Exhibits excessive vibration, noise, leakage, smoke, etc.
 - b. Does not operate as expected
 - c. Would not be capable of performing its intended function
 - d. Does not or could not meet operational or functional requirements
3. **REPORTABILITY CONCERNS** - Answer "YES" if, in your opinion, the problem or concern meets any of the following conditions:
 - a. Could cause errors in the information displayed to Operators by process instrumentation, plant computer, etc. which could adversely impact safe plant operation.
 - b. Mistakenly modifies a system or makes it operate improperly.
 - c. Masks or modifies a pathway for radioactive gas or liquid to escape from the plant.
 - d. Needs to be reported to BG&E management or to the NRC (Refer to CCI-118)
 - e. An automatic trip should have occurred but didn't (for power plant or associated safety systems only).
 - f. May cause an unplanned shutdown of a system or unit or an unplanned reduction in power generation.
 - g. A plant communications system needed in a plant emergency is not working (Refer to CCI-118).
 - h. A system which is made to protect people or equipment is not working properly and if it fails may cause a serious injury or unit shutdown.
6. **ACTIVITY IN PROGRESS WHEN DISCOVERED** - Describe activity in process when problem discovered (e.g., PMT, STP, evolution/test/inspection, etc.)
7. **CORRECTED-ON-THE-SPOT CRITERIA** - COTS can only be performed on program deficiencies.
8. **IMMEDIATE ACTIONS TAKEN** - List actions (if any) performed by the Initiator to mitigate or resolve the issue.
9. **APPARENT CAUSE** - If possible, indicate what caused the problem (e.g., Personnel Error; Faulty Design; Lack of Procedures; Inadequate Controls/Documentation, etc.)
10. **EFFECT OF ISSUE** - Describe the equipment/activities impacted by the problem.
11. **EXTENT OF ISSUE** - Describe known or suspected boundary of problem (e.g., "Could affect all STP's"; etc.). Indicate if the Problem could have GENERIC IMPLICATIONS or affect the Operability of other associated equipment/systems/processes. Include all known examples, types, and number of deficiencies (e.g., 3 of 5 head bolts; etc.) Be as specific and detailed as possible.
12. **IS THIS A RECURRING ISSUE?** - Indicate if condition described is known to be a repetitive or recurring problem.
13. **RECOMMENDATIONS** - Recommend actions, if any, which will address/mitigate/resolve concern. Include who should resolve the concern.
16. **TAGS PLACED** - Indicate if Tags were placed and enter the identification number from the tag (TAG #) and the tag TYPE (e.g., BG&E Deficiency Tag; BG&E Hold for QC Clearance Tag, etc.) Indicate the LOCATION where the Tags were placed.
21. **TITLE AND ID NUMBER OF CONTROLLING DOCUMENT** - Indicate what procedure/spec/drawing/etc. has the concern, or, controls the activity with the concern. If the problem is with computer software, indicate the application name, module name, and/or screen number.
22. **REQUIREMENT VIOLATED** - Whenever possible, list the specific paragraph or section of the Requirement Violated.
23. **INITIATOR** - Indicate if continuation sheet(s) were used. Take promptly to your immediate supervisor. If your supervisor cannot be contacted, take to another knowledgeable supervisor preferably in your chain of command. If no supervision is available, take to the Shift Supervisor.

PART B - REVIEWING SUPERVISOR

(Includes the Control Room Supervisor for Operations Personnel)

If the Initiator answers YES to 1, 2 or 3 and the Reviewing Supervisor answers NO, an explanation must be provided.

1. Is Issue an IMMEDIATE PERSONNEL SAFETY/EQUIPMENT SAFETY HAZARD?
 2. Do you have an OPERABILITY (Tech Spec or Other) Concern?
 3. Do you have a REPORTABILITY Concern?
- If you have a concern with 1, 2 and/or 3, IMMEDIATELY contact the Shift Supervisor.
4. Using the criteria in CCI-165 to determine if a ROOT CAUSE ANALYSIS should be recommended.
 5. Was Issue CORRECTED-ON-THE-SPOT (COTS)? COTS can only be performed on program deficiencies.
 6. RECOMMEND GROUP(S) that you feel should resolve this issue.
 7. RECOMMEND ACTIONS necessary to completely resolve the Issue. This may include a disposition of Rework, Repair, Accept-as-is, or Reject.
 8. APPROVE IR? If you don't approve the IR, explain why. Your explanation will be provided to the Initiator. The Initiator removes associated deficiency tag(s) and attaches to IR.
 9. PRINT NAME and DATE the IR then forward to the IAU.

NOTE: With regard to the instructions in PART A, Item 7 and PART B, Item 5, corrective maintenance can be performed as COTS providing that the maintenance activities satisfy the Rover Maintenance or Manual MO maintenance activities specified in MN-1-101.

ATTACHMENT 3, BGE DEFICIENCY TAG, BGE CONTROL PANEL DEFICIENCY TAG, AND
BGE CONTROL PANEL INFORMATION TAG

(TAGS SHOWN BELOW ARE NOT TO SCALE)

241 (23-138)

BALTIMORE GAS & ELECTRIC COMPANY

DEFICIENCY TAG

EQUIP. DESC. _____

PROBLEM _____

ORIGINATOR _____ UNIT _____ DATE _____

02485

BGE Deficiency Tag (light Green)
(Sample)

IR No.: _____ DATE: _____

EQUIP.: _____

PROBLEM: _____

(M) (A)

BGE Control Panel Deficiency Tag (light Green)
(Sample)

Circle (M) to indicate Main tag or (A) to indicate an Auxiliary (support) tag

IR No.: _____ DATE: _____

EQUIP.: _____

PROBLEM: _____

(M) (A)

BGE Control Panel Information Tag (Brown)
(Sample)

Circle (M) to indicate Main tag or (A) to indicate an Auxiliary (support) tag