

Evaluation
Report

July, 1981

H.B. Robinson
Unit #2
Carolina
Power & Light
Company

INPO

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EVALUATION
OF
H. B. ROBINSON NUCLEAR PLANT

Carolina Power and Light Company

July 1981

II. CAROLINA POWER AND LIGHT CORPORATE AND H. B. ROBINSON
STATION PERSONNEL CONTACTED

Senior Executive Vice President and Chief Operating Officer
Executive Vice President, Power Supply and Engineering
and Construction
Vice President, Technical Services
Vice President, Nuclear Operations
Assistant to Vice President, Nuclear Operations
Manager, Training
Manager, Quality Assurance
General Manager, Robinson Plant
Manager, Operations and Maintenance
Manager, Technical and Administration
Maintenance Supervisor
Operating Supervisor
Engineering Supervisor
Environmental and Radiological Control Supervisor
Administrative Supervisor
Training Supervisor
Project Engineer
Performance Engineer
Records Clerk
Senior Records Clerk
Modification Technician
Plant Engineer
Training Specialist
Instrumentation and Control Engineer
Instrumentation and Control Foreman
Mechanical Maintenance Planner
Instrumentation and Control Maintenance Planner
Mechanical Foreman
Environmental and Radiation Control Engineer
Senior Radiation Control Specialist
Radiation Control Technician Foreman
Radiation Control Technician
General Employee Training Instructor
Operations Engineer
Operations Technician
Shift Foreman
Senior Control Operator
Control Operator
Shift Engineer
Auxiliary Operator
Training Instructors

SUMMARY

The Institute of Nuclear Power Operations (INPO) conducted its first evaluation of Carolina Power and Light's (CP&L) H. B. Robinson Nuclear Generating Plant during the weeks of February 23 and March 2, 1981. H. B. Robinson #2 consists of one 665 megawatt (electrical) Westinghouse pressurized water reactor plant. It is located near Hartsville, South Carolina on Lake Robinson. The plant was placed in commercial operation in March 1971.

PURPOSE AND SCOPE

INPO conducted an evaluation of site activities to make an overall determination of plant operating safety, to evaluate management systems and controls and to identify areas needing improvement.

The evaluation was based on preliminary INPO criteria, and information was assembled from discussions, interviews, observations and reviews of plant documents. Emergency preparedness was not included in the scope of the evaluations, nor were corporate activities, except as an incidental part of the station evaluation.

The evaluation team examined station organization, training and qualifications, operations, maintenance, radiological and chemistry activities and site technical support. Since evaluations were based on best practices, recommendations are not limited to minimum safety requirements.

DETERMINATION

Within the scope of this evaluation the team determined the plant is being safely operated. The following beneficial practices and accomplishments were noted:

Improvements were recommended for the following:

Recommendations are intended to augment CP&L efforts to achieve the highest possible standards in its nuclear operations. In taking corrective action, CP&L should consider possible underlying issues of findings and recommendations. CP&L responses to the report are considered satisfactory. To follow the timely completion of these responses, INPO requests written notification upon achievement of improvements at key target dates.

Specific evaluation findings are in the accompanying DETAILS, and information of an administrative nature is in the ADMINISTRATIVE APPENDIX. These findings were presented at an exit meeting at the plant on March 6, 1981, and were further discussed along with CP&L responses on May 19, 1981, in a meeting with CP&L management.

The evaluation staff appreciates the excellent cooperation received from all levels of the Carolina Power and Light Company.

E. P. WILKINSON
President

PAT INSP-1981 - Avg in all areas except
Collective Actions.

CAROLINA POWER & LIGHT COMPANY

Response Summary

The INPO evaluation team concluded that the Robinson Plant Unit 2 is being safely operated. Carolina Power & Light Company (CP&L) concurs. However, the company also is aware of areas where improvement is needed in order to ensure the highest standards of excellence are maintained. The evaluation has assisted in identification of some of these areas where improvement is needed, and INPO's recommendations have assisted in identification of additional corrective actions.

Specific implementation dates have been established for many of the INPO recommendations.

CP&L looks forward to a continuing close working relationship with INPO as we work together to improve our operations.

DETAILS

This portion of the report includes the detailed findings. It is composed of six sections, one for each of the major evaluation areas. Each section is headed by a summary describing the scope of the evaluation and the overall finding in that area. The summary is followed by the specific findings, recommendations and utility responses related to each of INPO's evaluation procedures. Items which relate to criteria that have not been included in INPO procedures but which are generally recognized as desirable accepted techniques of industry and management are listed as Category II. The evaluation procedures used are listed in the ADMINISTRATIVE APPENDIX.

ORGANIZATION AND ADMINISTRATION

The organizational structure, personnel qualifications, administrative controls, management objectives, quality assurance, information handling, industrial safety and equipment surveillance were evaluated.

As noted earlier, major strengths in this area are the goals and objectives program, the position descriptions and accountabilities in use and the industrial safety program.

OBJECTIVES

(INPO Procedure OA-101, Revision 1)

The evaluation team examined the methods used to establish and disseminate management goals and objectives and the methods used to track progress so timely completion of objectives is ensured. The team also examined the objectives in use to determine if they provide substantive guidance to managers and supervisors and if they support the plant mission and company objectives. The degree to which the objectives are used to guide day-to-day activities was also examined.

Finding

ORGANIZATION STRUCTURE

(INPO Procedure OA-102, Revision 2)

The evaluation team examined the plant organization to determine if it supports safe and efficient operation of the station. The team reviewed the responsibilities, authorities and accountabilities of staff positions to determine if they are clearly defined, well understood and compatible with each other and if excessive burdens were placed on any individuals. They also reviewed the staffing levels to

determine if sufficient qualified people are available to provide backups for management personnel and to prevent excessive overtime. Methods used to evaluate the performance of individuals at the station were also examined.

1. Finding (Criterion A)

Recommendation

Response

2. Finding (Criterion E)

Recommendation

Response

3. Finding (Criterion F)

Recommendation

Response

ADMINISTRATIVE CONTROLS

(INPO Procedure OA-103, Revision 1)

The station administrative procedures were examined to determine if clearly defined controls are in effect and if adherence to these controls is maintained.

Finding (Criterion D)

Recommendation

Response

QUALITY PROGRAMS

(INPO Procedure OA-104, Revision 4)

The quality assurance (QA) program was reviewed to determine if an approved program is in place which covers all aspects of plant operations, the program is adequately staffed and the organizational relationships ensure independence of the quality assurance staff from production responsibilities. The effectiveness of the quality assurance program was not within the scope of current evaluation criteria and was not evaluated.

1. **Finding (Criterion A)**

Recommendation

Response

2. **Finding (Criterion C)**

Recommendation

Response

INFORMATION PROGRAMS

(INPO Procedure OA-105, Revision 5)

The team examined the methods used to process and evaluate operational safety and reliability information to determine how such information is identified and if the review process ensures appropriate actions are determined and completed in a timely manner.

Finding (Criteria A,D)

Recommendation

Response

INDUSTRIAL SAFETY

(INPO Procedure OA-106, Revision 1)

The team examined the industrial safety program to determine if management is clearly committed to industrial safety, the program is supported at all levels of the station staff and the program is effective in minimizing safety hazards and accidents.

Finding

SURVEILLANCE PROGRAM

(INPO Procedure OA-107, Revision 1)

The team examined the surveillance program to determine if adequate procedures, including acceptance criteria, are in use. They also evaluated the methods used to schedule surveillance tests, control operations so that safety is not adversely affected during testing, and identify and resolve deficient conditions identified during testing.

Finding

PERSONNEL QUALIFICATIONS

(INPO Procedure OA-108, Revision 1)

The team examined the methods used to establish qualification requirements for each job position and to ensure positions are filled with qualified personnel.

Finding

TRAINING AND QUALIFICATION

The following areas were evaluated: training organization and administration, training resources, licensed operator training and requalification, non-licensed operator training, shift technical advisor training, maintenance training and training effectiveness. In these areas positive features were noted, including an extensive written training plan that describes the various methods of training, the formulation of training materials and the discipline training programs. Also, the licensed operator candidates are provided eight weeks of full scope simulator training on normal, abnormal and emergency conditions prior to their licensing examinations. However, some areas require improvement, as identified in the findings listed below.

TRAINING ORGANIZATION AND MANAGEMENT
(INPO Procedure TQ-211, Revision 2)

In this area, the team examined the training organization and the administrative guidance used by the organization to develop, implement and evaluate training activities and programs used for the qualification of plant operations personnel.

1. Finding (Criterion B)

Recommendation

Response

2. Finding (Criterion F)

Recommendation

Response

3. Finding (Category II)

Recommendation

Response

TRAINING RESOURCES

(INPO Procedure TQ-221, Revision 2)

In this area, the team examined the training facilities, equipment and materials available to support the delivery of training programs for plant personnel.

1. Finding (Criterion A)

Recommendation

Response

2. Finding (Criterion F)

Recommendation

Response

TRAINING EFFECTIVENESS

(INPO Procedure TQ-231, Revision 2)

In this area, the team examined plant management and training organization practices relating to evaluation of training program effectiveness, audit of training activities and evaluation of instructor and trainee performance in training programs.

1. Finding (Criterion A)

Recommendation**Response**

2. Finding (Criterion C)

Recommendation**Response**

NON-LICENSED OPERATOR TRAINING

(INPO Procedure TQ-242, Revision 2)

In this area, the team examined the training program and training practices used to initially qualify non-licensed operator candidates and to maintain and improve the qualifications of existing non-licensed operators.

Finding (Criterion D)

Recommendation

Response

LICENSED OPERATOR TRAINING
(INPO Procedure TQ-243, Revision 2)

In this area, the team examined the qualification program and training practices used to maintain and improve the qualifications of licensed personnel.

1. **Finding** (Criterion G)

Recommendation

Response

2. **Finding** (Criterion I)

Recommendation

Response

3. Finding (Category II)

Recommendation

Response

LICENSED OPERATOR REQUALIFICATION TRAINING
(INPO Procedure TQ-244, Revision 2)

An evaluation of the licensed operator requalification program was conducted to determine the effectiveness of the program in maintaining a high level of knowledge and skill for holders of operator licenses.

1. Finding (Criterion B)

Recommendation

Response

2. Finding (Criterion G)

Recommendation

Response

3. Finding (Criterion I)

Recommendation

Response

4. Finding (Category II)

Recommendation

Response

SHIFT TECHNICAL ADVISOR TRAINING
(INPO Procedure TQ-245, Revision 1)

In this area, the team examined the qualification program and training practices used to initially qualify shift technical advisor (STA) candidates and to maintain and improve the qualifications of the STA.

Finding (Criterion A, B, C, D, & E)

Recommendation

Response

OPERATIONS

In this area, the conduct of shift operations, tagout practices, organization and administration, use of procedures, plant status controls, operations facilities and equipment and shift turnover were evaluated. The team noted the shift personnel exhibit a professional attitude toward their duties, and the auxiliary operators show a good knowledge and understanding of plant systems and equipment. However, some areas need improvement, as identified in the findings listed below.

CONDUCT OF SHIFT OPERATIONS
(INPO Procedure OP-301, Rev. 2)

The team examined the conduct of shift operations to determine if operator activities are related to plant operation, cleanliness and order exist in the control room, log keeping is timely and accurate and out-of-tolerance instrumentation is identified to the operators.

1. Finding (Criterion B)

Recommendation

Response

2. Finding (Criterion C)

Recommendation

Response

3. Finding (Criterion D)

Recommendation

Response

TAGOUT PRACTICES

(INPO Procedure OP-302, Rev. 2)

In this area, the team examined the formal tagout procedure to determine if it is highly respected and understood by the plant staff, senior reactor operator (SRO) approval is required for removal of safety related equipment from service, double verification is required of safety related manual valves that do not have control room indication, a second verification of tagged equipment takes place, tag coloring and numbering is not confusing and the clearance log is periodically reviewed.

1. Finding (Criterion A)

Recommendation

Response

2. Finding (Criterion F)

Recommendation

Response

3. Finding (Criterion G)

Recommendation

Response

OPERATIONS ORGANIZATION AND ADMINISTRATION
(INPO Procedure OP-303, Rev. 2)

In this area, the team examined the operations organization and administration to determine if a well defined and understood organizational structure exists, department management has adequate authority to accomplish assigned tasks, adequate administrative support is provided to maximize productive time for personnel operating the plant, all instructions are issued in a businesslike manner, administrative programs are established for activities affecting employees and position descriptions are available and utilized for all personnel.

1. **Finding (Criterion A)**

Recommendation

Response

2. **Finding (Criterion D)**

Recommendation

Response

USE OF PROCEDURES
(INPO Procedure OP-304, Rev. 2)

In this area, the evaluation team examined the use of procedures to determine if management policies exist for use of procedures, procedures are being utilized, procedures are written clearly, instructions in emergency procedures allow quick and appropriate responses to situations and a system for revising and controlling procedures is in effect.

1. Finding (Criterion B)

Recommendation

Response

2. Finding (Criterion C)

Recommendation

Response

3. Finding (Criterion D)

Recommendation

Response

4. Finding (Criterion E)

Recommendation

Response

PLANT STATUS CONTROLS
(INPO Procedure OP-305, Rev. 1)

In this area, the team examined the plant status controls to determine if management approved policies exist that give guidance in the area of plant status controls, operability status of equipment is properly controlled, a senior licensed individual is assigned responsibility for plant status controls, and special situations such as outages and post accident recovery have provisions for adequate plant status controls.

1. **Finding** (Criterion G)

Recommendation

Response

2. **Finding** (Category II)

Recommendation

Response

OPERATIONS FACILITIES AND EQUIPMENT
(INPO Procedure OP-306, Rev. 2)

In this area, the evaluation team examined the operations facilities and equipment to determine if equipment is accessible for operation, programs are effected to maximize equipment availability, the working environment contributes to overall efficiency and safety of plant operations, communication equipment is adequate and watch stations are adequate.

Finding

SHIFT TURNOVER
(INPO Procedure OP-309, Rev. 2)

In this area, the team examined shift turnover to determine if procedures specify shift turnover requirements for all operating shift positions; shift turnovers include mechanisms to communicate pertinent information regarding equipment status, operations or testing in progress; and pertinent logs are reviewed.

Finding (Criterion B)

Recommendation

Response

MAINTENANCE

The maintenance organization, the preventive maintenance program, maintenance procedures, maintenance history and the administrative systems for controlling and documenting maintenance work were evaluated. Also, the methods used to control and calibrate test equipment and instrumentation, and the overall adequacy of the maintenance facilities and equipment were reviewed.

It was noted that a comprehensive preventive maintenance (PM) program is being initiated. Maintenance procedures are well written, definitive and are a significant tool in the maintenance program. Material condition of the plant indicates a need for more detailed attention to identify and take action to correct deficiencies, such as: secondary leakage, routine calibration and maintenance on non-safety-related equipment, housekeeping and equipment history. Additionally, some problems exist in the control and storage of measuring and test equipment. Specific findings are detailed as follows:

MAINTENANCE ORGANIZATION AND ADMINISTRATION (INPO Procedure MA-401, Revision 2)

The mechanical and instrumentation and control (I&C) subunits were evaluated to determine if these groups are organized to accomplish required maintenance tasks. Particular attention was given to the interfaces between these groups and plant management. Other areas of interest included the availability of position descriptions, delegation of responsibilities and authorities, administrative programs, safety and communications programs and the administrative/clerical work load on department personnel.

Finding (Category II)

Recommendation

Response

PREVENTIVE MAINTENANCE (INPO Procedure MA-402, Revision 1)

A review was made to determine if preventive maintenance (PM) activities are being performed and whether a well defined and effective program is in place.

The administrative procedures governing the program and the station organization established to implement the procedures were also examined. Other areas of interest were criteria used to define the equipment included in the program, the use of equipment history files in conjunction with the program, the adequacy of individual PM procedures for safety-related equipment and inspection frequencies.

Finding (Criterion B)

Recommendation

Response

MAINTENANCE PROCEDURES

(INPO Procedure MA-403, Revision 2)

A review was made to determine the existence and adequacy of maintenance procedures and vendor manuals for safety-related and major balance-of-plant work activities. Procedures and manuals were examined to determine the types of activities covered, scope, level of detail, review and approval cycle, document control requirements and methods of revision. An evaluation was also made of the effectiveness of procedures in controlling and documenting work and inspection activities.

Finding

WORK CONTROL SYSTEM

(INPO Procedure MA-404, Revision 1)

A review was made of the administrative mechanism used for identifying and reporting equipment problems. An evaluation was performed to determine if the work control system was effective for planning and documenting the completion of maintenance work. Specific areas of interest included the administrative procedure for requesting corrective maintenance and those provisions in the system related to planning, authorizing and documenting the work.

1. Finding (Category II)**Recommendation****Response****2. Finding (Criterion B 7)****Recommendation****Response****MAINTENANCE HISTORY**

(INPO Procedure MA-405, Revision 2)

A review was made to determine if complete, functional maintenance history records are being retained and used in evaluation of equipment performance. Specific areas of interest included the amount and types of equipment included in the program, traceability and retrievability of records and methods used for review and evaluation of maintenance histories.

Finding (Criteria A,B,C,D & E)

Review of evaluation is made of the maintenance history.
Recommendation

Response

CONTROL AND CALIBRATION OF TEST EQUIPMENT AND INSTRUMENTATION

(INPO Procedure MA-406, Revision 1)

A review was made to determine the adequacy and effectiveness of methods used for calibration and control of test equipment and instrumentation. Specifically, methods used for identifying, calibrating, storing and issuing measuring and test equipment were examined. Procedures establishing and governing the calibration program and existing calibration records were also reviewed.

1. **Finding** (Criterion A)

Recommendation

Response

2. **Finding** (Criterion E)

Recommendation

Response

3. Finding (Criterion F)

Recommendation

Response

4. Finding (Criterion G)

Recommendation

Response

MAINTENANCE FACILITIES AND EQUIPMENT
(INPO Procedures MA-408, Revision 1)

A review was made to determine the adequacy and condition of maintenance facilities and equipment. The location, size and condition of office, work and storage space were examined, along with the condition of maintenance tools and equipment. Work and storage facilities and equipment were found to be adequate, except as noted below:

Finding (Criterion E)

Recommendation

Response

RADIATION PROTECTION & CHEMISTRY

Radiation Protection and Chemistry were evaluated by reviewing the performance of radiological protection training, dosimetry, internal and external exposure control, radioactive waste control and water chemistry control. This portion of the evaluation was primarily an examination of plant programs and facilities as they function under normal (non-outage) conditions. With this in mind, it was concluded that the plant's radiological protection and chemistry programs were adequate to protect the public, plant workers and the environment. However, there were areas which require improvements.

RADIATION PROTECTION AND CHEMISTRY ORGANIZATION & ADMINISTRATION

(INPO Procedure RC-501, Rev. 1)

An evaluation was performed to determine the effectiveness of the radiation protection and chemistry organizations and their associated administrative control mechanisms. Areas reviewed included the formal organizational structure, procedures for conduct of operations, staffing levels, training and re-training programs, position descriptions and management authority.

Finding

ALARA PROGRAM

(INPO Procedure RC-502, Revision 1)

This area was evaluated to determine if the company is making a substantive effort to maintain exposures as low as reasonably achievable (ALARA). Those aspects of an ALARA program specifically addressed were issuance of a senior management policy statement, assignment of responsibility for implementation, comprehensiveness and mechanisms for setting goals and measuring the success of the program.

A formal ALARA program is implemented with two permanent staff members assigned the responsibilities for the coordination and implementation of the program. Examples of good ALARA practices were the design review of the new radioactive waste facility, involvement in outage planning, review of new plant procedures and plant modifications. However, the formal ALARA program has only been in existence for about a year and its success in reducing exposure cannot yet be measured.

Finding

PERSONNEL DOSIMETRY

(INPO Procedure RC-503, Rev. 2)

An evaluation was performed to determine the effectiveness of the plant's dosimetry program in measuring, evaluating and recording occupational radiation exposures. Areas examined included the scope of the dosimetry program and procedural controls for use. Determinations were made as follows:

Finding (Category II)

Recommendation

Response

RADIATION SURVEILLANCE AND CONTROL

(INPO Procedure RC-504, Rev. 1)

An evaluation was performed to determine the effectiveness of the plant's radiological surveillance program and radiological work control mechanisms in

identifying radiological conditions to workers and management and in minimizing the radiation and contamination levels. Areas of interest included surveillance program procedures and scope, radiological conditions in the plant, surveillance methodology and the level of management review of surveillance data. The radiological surveillance and work control methods were generally effective, but problems were noted in identifying and controlling the spread of contamination at the source. Determinations were as follows:

Finding (Category II)

Recommendation

Response

WASTE AND DISCHARGE CONTROL (LIQUID)

(INPO Procedure RC-505, Rev. 2)

This area was evaluated to determine if there is a system of controls that will minimize the generation of radioactive waste, reduce the likelihood of having an inadvertent release, detect the presence of contamination in systems where it should not be and ensure that all activities related to this area are effectively coordinated between different departments involved in radioactive waste handling. Determinations are as follows:

Finding (Category II)

and methods of solidifying waste.

Recommendation**Response****RADIOLOGICAL SURVEY EQUIPMENT CONTROL AND CALIBRATION**

(INPO Procedure RC-508, Rev. 2)

An evaluation was performed to determine the effectiveness of the plant's radiological survey equipment control and calibration program in maintaining a sufficient inventory of instruments with a high degree of accuracy for the radiological measurements made with these instruments. The evaluation covered procedures, storage conditions, reference standard traceability, operational response checks and equipment identification. The instrument control and calibration program was effective in accomplishing its intended purpose. Determinations were made as follows:

1. Finding (Category II)

Recommendation

Response

2. Finding (Category II)

Recommendation

Response

PERSONNEL HEALTH PHYSICS INDOCTRINATION
(INPO Procedure RC-507, Revision 2)

An evaluation was performed to determine the effectiveness of the plant's health physics indoctrination program in informing personnel of the risks associated with radiation exposure and available methods for minimizing exposure. Areas reviewed included management policy, scope and depth of the indoctrination, the training environment and training indoctrination.

The plant had recently implemented a company-wide general employee training program which was developed to standardize training within the company. Taken as a whole, the indoctrination program appears to be structured and conducted in a manner that achieved the objective of preparing personnel to work in radiologically controlled areas of the plant.

Finding

The finding concerning the classroom training facilities is reflected in the training section of the report.

PROCESS WATER CONTROLS

(INPO Procedure RC-508, Rev. 2)

An evaluation was performed to determine the effectiveness of plant process water controls in maintaining the integrity of plant systems. Areas reviewed included procedures, laboratory quality control, bulk chemical, cleaning agent and reagent control, training and systems chemistry.

1. **Finding** (Criterion B)

Recommendation

Response

2. **Finding** (Criterion A)

Recommendation

Response

HEALTH PHYSICS FACILITIES AND EQUIPMENT
(INPO Procedure RC-509, Revision 2)

An evaluation was performed to determine the adequacy of the plant's chemistry and health physics facilities and equipment in satisfying plant needs and in contributing to safe and efficient plant operation. Areas of interest included the number and types of instruments and equipment, the protective clothing inventory, the design and working environment of facilities and the ease of access to and physical conditions of the radiological controlled areas.

The original plant design does not provide adequate space for health physics and chemistry facilities within the auxiliary building. Plant personnel have attempted to utilize the available space in the best possible manner. Improvements in the facilities are needed as noted below:

Finding (Criterion B)

Recommendation**Response**

RESPIRATORY PROTECTION PROGRAM
(INPO Procedure RC-511, Revision 2)

An evaluation was performed to determine the effectiveness of the plant's respiratory protection program in protecting personnel from airborne hazards. Areas reviewed included policy and procedures, identification and control of airborne hazards, selection and use of respirators, respirator maintenance, whole body counting and emergency capabilities. The plant program was judged to be adequate for the protection of personnel from known hazards. Determinations were made as follows:

1. Finding (Criterion C)**Recommendation**

Response

purity.

2. Finding (Category II)

Recommendation

Response

TECHNICAL SUPPORT

On-site engineering support was evaluated in light of current INPO criteria. It was noted that improvements could be made regarding control of plant modifications, performance monitoring, training of engineering personnel and reliability of the plant computer. These improvements are discussed in detail below:

ON-SITE ENGINEERING SUPPORT (INPO Procedure TS-702, Revision 1)

An evaluation was performed to determine the effectiveness of the on-site engineering support group in resolving problems and concerns of a technical nature. Areas reviewed included organizational structure, size, assignment of responsibilities and effectiveness of coordination with other groups. In addition, programs for control of design changes, on- and off-site incident review, plant performance monitoring, reactor engineering and other such engineering activities were reviewed. Determinations were made as follows:

1. **Finding** (Criterion 3)

Recommendation

Response

2. Finding (Category II)

Recommendation

Response

3. Finding (Category II)

Recommendation

Response

4. Finding (Category II)

Recommendation

Response

ADMINISTRATIVE APPENDIX

I. LISTING OF AREAS EVALUATED

ORGANIZATION AND ADMINISTRATION

- OA-101 Objectives
- OA-102 Organization Structure
- OA-103 Administrative Controls
- OA-104 Quality Programs
- OA-105 Information Programs
- OA-106 Industrial Safety
- OA-107 Surveillance Program
- OA-108 Personnel Qualifications

TRAINING

- TQ-211 Training Organization And Management
- TQ-221 Training Resources
- TQ-231 Training Effectiveness
- TQ-242 Non-Licensed Operator Training
- TQ-243 Licensed Operator Training
- TQ-244 Licensed Operator Requalification Training
- TQ-245 Shift Technical Advisor Training

OPERATIONS

- OP-301 Conduct of Shift Operations
- OP-302 Tagout Practices
- OP-303 Operations Organization and Administration
- OP-304 Use of Procedures
- OP-305 Plant Status Controls
- OP-306 Operations Facilities and Equipment
- OP-309 Shift Turnover

MAINTENANCE

- MA-401 Maintenance Organization and Administration
- MA-402 Preventive Maintenance
- MA-403 Maintenance Procedures
- MA-404 Work Control System
- MA-405 Maintenance History
- MA-406 Control and Calibration of Test Equipment and Instrumentation
- MA-408 Maintenance Facilities and Equipment

RADIATION AND CHEMISTRY

- RC-501 Radiation Protection and Chemistry Organization and Administration
- RC-502 ALARA Program
- RC-503 Personnel Dosimetry
- RC-504 Radiation Surveillance and Control
- RC-505 Waste and Discharge Control (Liquid)
- RC-506 Radiological Survey Equipment Control and Calibration
- RC-507 Personnel Health Physics Indoctrination
- RC-508 Process Water Controls
- RC-509 Health Physics Facilities and Equipment
- RC-511 Respiratory Protection Program

TECHNICAL SUPPORT

- TS-702 On Site Engineering Support