Diablo Canyon Project Units 1 and 2 Project Procedures Manua' Procedure III-8, Rev 2 Issued: 11/02/83 Page 1 of 10

DIABLO CANYON PROJECT UNITS 1 and 2 PROJECT PROCEDURES MANUAL

TITLE: PROCEDURE FOR OPERATING NUCLEAR PLANT MODIFICATION (QUALITY)

1 SCOPE

This procedure defines the methods and steps taken to implement the Operating Nuclear Plant Modification Program and effect changes to the design of Diablo Canyon Units 1 and 2. It is effective upon the date approved for Unit 1 and upon receipt of an operating license for Unit 2, or at such earlier time as directed by the Project Completion Manager.

2 DISCUSSION

The instructions contained herein are provided to control the activities of personnel working on the Diablo Canyon Project (DCP) with regard to plant modifications. The goal of this procedure is to provide a well structured program for implementing plant modifications.

When a nuclear power plant receives an operating license, it is considered to be complete. The design, construction, and operating procedures for Diablo Canyon have been evaluated by the Nuclear Regulatory Commission (NRC) and determined to meet regulatory requirements as stated in the Safety Evaluation Report and Operating License including Appendix A (Technical Specifications) and Appendix B (Environmental Protection Plan). The NRC evaluation is based on licensee submittals, including the Final Safety Analysis Report and Licensee Written Responses to NRC Staff questions. Any plant modification which would modify the evaluated basis for the plant, create an unreviewed safety question or cause a change to the Technical Specification or "Environmental Protection Plan," must be evaluated in a similar manner. The applicable requirements when making a modification are set forth in 10CFR50.59 and the Operating License Technical Specifications.

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Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure ILI-8, Rev 2 Issued:11/02/83 Page 3 of 10

- (5) The modifications must be constructed in accordance with approved design documents or authorization for variance must be obtained. Authorization for variance may be in the form of: (a) pre-established guidelines, (b) verbal authorization where the variance is minor and does not affect the intent or intended function of the present design, or (c) by formal signature and revision of the modification request and associated design.
- (6) The final documentation process makes provision for the following in a timely manner: (a) notification of all departments when a modification has been completed and accepted for operation, (b) distribution of as-built information to operating, maintenance and Engineering personnel, (c) incorporation of as-built information on Engineering drawings and (d) distribution of complete and up-to-date Engineering drawings.

The activities outlined herein are necessary to meet the above requirements and assure that plant modifications are handled in an orderly manner resulting in assurance of safe plant operations.

3 RESPONSIBILITES

The Project Completion Manager is responsible for the following:

- The overall plant modification program.
- Interfaces between Nuclear Plant Operations (NPO), Engineering, and General Construction (see Section 1-4 of the Project Procedures Manual Introduction).

The Project Engineer is responsible for the following:

- Furnishing design as required to meet project schedules.
- Furnishing information needed by the Licensing Group to prepare submittals in connection with plant modification.

The Project Construction Superintendent is responsible for the following:

- Completion of construction activities assigned to the General Construction Department.
- Providing as-built information to the Plant Manager.
- Notifying the Plant Manager and Project Manager that work is complete.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 5 of 10

Plant Modification Follower (PMF):

A document employed to provide cover for the design resulting - from an identified need for a plant modification and to provide documentation that each step necessary to accomplish design, approval, construction, and verification of plant modifications is documented.

In the text of this procedure, the term PMF is considered to include the design package.

Construction

Any activity undertaken to effect a modification or design change.

Important to Safety (as applied to Plant Modifications):

- All changes to items designated as "Q" in the Diablo Canyon Q-list.
- (2) All changes to Fire Protection System components.
- (3) Any change which is itself not safety-related, but which could affect functioning of safety-related equipment. For example, a change to the supports for the Auxiliary Steam Line which runs through the Auxiliary Feedwater Pump Room.
- (4) A change which could result in a change to equipment, analyzed accidents, etc., as described in FSAR.
- (5) Any change which could result in a change to the Technical Specifications, Process Control Program, off-site dose calculation procedure, or environmental radiation monitoring program.
- (6) All changes to systems designed to contain radioactive materials including gaseous and liquid radioactive waste, sampling systems, etc., which are "described in the FSAR."

Important to Environmental Quality:

A proposed change, test, or experiment shall be deemed to involve an unreviewed environmental question if:

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 7 of 10

- c. The Project Engineer will forward the PMF and design package through the Project Control Section (PCS) to the Power Plant Engineer.
- General Construction (GC)
 - a. When a need for a modification is identified, GC will either initiate a PMF, Exhibit III-8-1, with the appropriate sections completed and a DCR and forward it to Engineering for processing, or based on delegated authority, prepare a PMF, approve the DCR, attach the design drawings and safety evaluation and forward it to the Power Plant Engineer.
- Nuclear Plant Operations (NPO)
 - a. When a need for a plant modification is identified, NPO will either initiate a PMF, Exhibit III-8-1, in accordance with Administrative Procedure C-1, or initiate a DCR in accordance with Administrative Procedure C-1, Suppl. 2. If a DCR is initiated, it will be forwarded to the Project Engineer for action. If a PMF is initiated under the NPO delegation of authority, it will be forwarded to the Power Plant Engineer with a copy to the Project Engineer.
- Systems Interaction Program (SIP)
 - a. Plant modifications may be required to correct unacceptable conditions identified by the SIP. Postulated interactions, documented on an Interaction Documentation Sheet (IDS), shall be evaluated to determine whether a plant modification is necessary.
 - b. If it is determined that a plant modification is necessary, an Action Request Transmittal (ART) or DCN shall be generated.
 - c. The initiator of the ART shall initiate a PMF, Exhibit III-8-1, and complete a safety evaluation.
 - d. The approved ART and Safety Evaluation shall be forwarded under cover of the PMF to the SIP Project Engineer.
 - e. The SIP Project Engineer is responsible for document control related to SIP activities.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 9 of 10

 During the course of construction, system interaction evaluation should take place.

D._ Revisions

- Minor revisions (MRs) to the DCN which do not alter the safety classification, safety review, or intent of the original PMF may be approved jointly by Engineering, by the DCPP department head, if the DCN was approved by delegation of authority and the Power Plant Engineer without PSRC review. MRs shall be appropriately documented using the form provided in EMP 3.6 ON.
- 2. If the revision is more extensive than an MR, the Power-Plant Engineer shall be notified and the implementing organization shall request a DCN revision from the organization that developed the DCN. The revision shall be forwarded to the Plant Engineer and handled as a new design issue per EMP 3.6 ON.
- E. Post Construction
 - At the completion of construction, ftart-up or Post Installation tests shall be conducted.
 - When the modification has been verified complete and prior to acceptance for operation by the Plant Manager, a final Systems Interaction inspection shall be completed.
 - The work shall be verified completed by the responsible organizations. Verification will be noted on the PMF.
 - After verification, the PMF shall be forwarded to the Power Plant Engineer. Any as-built information must be attached to the PMF.
 - 5. The Power Plant Engineer will notify the Diablo Canyon Project Completion Manager and Project Engineer that work is complete and submit as-built information by attaching marked-up drawings to the DCN to the Project Engineer for processing.

Plant Drawing Control will be notified to distribute as-built copies of the drawings for "operation and maintenance."

 Following acceptance by the Plant Manager, the modification will be released for operation in accordance with procedures established by the Plant Manager.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 1 Issued:11/02/83 Exhibit III-8-1, Rev 1 Sheet 1 of 2

PLANT MODIFICATION FOLLOWER

DESCRIPTION OF CHANGE:



REASON FOR CHANGE:

CHANGE	REQUESTED	BY: _	 DATE:	-
REQUEST	AUTHORIZE	D BY:	DATE:	

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 1 Issued: 11/02/83 Exhibit III-8-1, Rev 1 Sheet 2 of 2

PLANT MODIFICATION FOLLOWER (Cont'd)

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Project Procedures Manua Issued: 11/02/83 Exhibit III-8-2, Rev O Issued: 11/02/83

OPERATING NUCLEAR PLANT MODIFICATION CONTROL

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DIABLO CANYON PROJECT UNITS 1 and 2 PROJECT PROCEDURES MANUAL

TITLE: PROCEDURE FOR OPERATING NUCLEAR PLANT MODIFICATION (QUALITY)

1 SCOPE

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This procedure defines the methods and steps taken to implement the Operating Nuclear Plant Modification Program and effect changes to the design of Diablo Canyon Units 1 and 2. It is effective upon the date approved for Unit 1 and upon receipt of an operating license for Unit 2, or at such earlier time as directed by the Project Completion Manager.

2 DISCUSSION

The instructions contained herein are provided to control the activities of personnel working on the Diablo Canyon Project (DCP) with regard to plant modifications. The goal of this procedure is to provide a well structured program for implementing plant modifications.

When a nuclear power plant receives an operating license, it is considered to be complete. The design, construction, and operating procedures for Diablo Canyon have been evaluated by the Nuclear Regulatory Commission (NRC) and determined to meet regulatory requirements as stated in the Safety Evaluation Report and Operating License including Appendix A (Technical Specifications) and Appendix B (Environmental Protection Plan). The NRC evaluation is based on licensee submittals, including the Final Safety Analysis Report and Licensee Written Responses to NRC Staff questions. Any plant modification which would modify the evaluated basis for the plant, create an unreviewed safety question or cause a change to the Technical Specification or "Environmental Protection Plan," must be evaluated in a similar manner. The applicable requirements when making a modification are set forth in 10CFR50.59 and the Operating License Technical Specifications. Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 2 of 10

For an operating nuclear power plant (a plant for which an operating license has been issued), it is imperative that an integrated and highly structured plant modification control program be in place. This program must provide for an orderly method of making plant modifications to improve safety, reliability, or maintainability. It must provide for documented review to assure that plant safety or environmental quality are not degraded in any manner when a modification is made and must also be conducted in accordance with regulatory requirements and the operating license.

Plant modifications consists of several stages: design, review and approval, installation, test, acceptance, release for operation and final documentation. Imr'ementation of all phases is required before a modification can be considered complete and operable. The policy for Diablo Canyon is that this procedure provides the safest, most expeditious and cost effective sequence of accomplishing plant modifications and is the sequence to be followed. Exceptions to this policy shall be by written agreement between the Vice President of Nuclear Power Generation, Engineering and General Construction on a case-by-case basis and at the specific request of the Project Manager. For each case, the Project Manager shall define the reasons for exemption and propose alternate controls to assure that the objectives of the program are met.

In order to be effective, the operating nuclear power plant modification control program will be based on the following:

- Schedules and commitments to allow sufficient time for an orderly and formal process containing the following steps: design, review and approval, installation, test, acceptance, training, release for operation and final documentation.
- (2) Schedules and resources adjusted as necessary to maintain this sequence.
- (3) The vast majority of modifications will be constructed from complete design issued via approved Engineering drawings.
- (4) The reasons for making the modification and justification for the conclusion that the modification is necessary and does not adversely affect safety or environmental quality, must be a part of the review and approval process. Review and approval must also be in accordance with regulatory requirements (10CFR50.59) and the operating license including submittals to the NRC when required.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 3 of 10

- (5) The modifications <u>must be constructed in accordance with</u> approved design documents or <u>authorization for variance</u> <u>must be obtained</u>. Authorization for variance may be in the form of: (a) pre-established guidelines, (b) verbal authorization where the variance is minor and does not affect the intent or intended function of the present design, or (c) by formal signature and revision of the modification request and associated design.
- (6) The final documentation process makes provision for the following in a timely manner: (a) notification of all departments when a modification has been completed and accepted for operation, (b) distribution of as-built information to operating, maintenance and Engineering personnel, (c) incorporation of as-built information on Engineering drawings and (d) distribution of complete and up-to-date Engineering drawings.

The activities outlined herein are necessary to meet the above requirements and assure that plant modifications are handled in an orderly manner resulting in assurance of safe plant operations.

3 RESPONSIBILITES

The Project Completion Manager is responsible for the following:

- The overall plant modification program.
- Interfaces between Nuclear Plant Operations (NPO), Engineering, and General Construction (see Section 1-4 of the Project Procedures Manual Introduction).

The Project Engineer is responsible for the following:

- Furnishing design as required to meet project schedules.
- Furnishing information needed by the Licensing Group to prepare submittals in connection with plant modification.

The Project Construction Superintendent is responsible for the following:

- Completion of construction activities assigned to the General Construction Department.
- Providing as-built information to the Plant Manager.
- Notifying the Plant Manager and Project Manager that work is complete.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 4 of 10

> Preparation of Plant Modification Followers for design activities within his delegation of authority.

The Plant Manager is responsible for the following:

- Safety aspects under the Technical Specifications of all plant modifications after receipt of an operating license.
- Approval of all plant modifications prior to start of construction or installation.
- Providing necessary information to the Licensing Group needed to prepare submittals regarding plant modifications.
- Preparation of Plant Modification Followers for design activities within his delegation of authority.
- Maintaining the as-built condition of the plant until Engineering issues the as-built drawings.

The Project Licensing Engineer is responsible for the following:

- Preparation of licensing submittals in connection with plant modifications.
- Updating the FSAR.
- 4 DEFINITIONS

Design Change:

A design change is any modification, addition, or delation to plant structures, systems, or components as described on approved specifications, drawings, or supplier documents which could affect:

- The function and/or the design operating characteristics of the structure, system, or component under normal and/or abnormal operating conditions.
- (2) The reliability or failure rate of the structure, system, or component under normal and/or abnormal operating conditions.
- (3) The safety consequences of a malfunction or failure of the structure, system, or component.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 5 of 10

Plant Modification Follower (PMF):

A document employed to provide cover for the design resulting from an identified need for a plant modification and to provide documentation that each step necessary to accomplish design, approval, construction, and verification of plant modifications is documented.

In the text of this procedure, the term PMF is considered to include the design package.

Construction

Any activity undertaken to effect a modification or design change.

Important to Safety (as applied to Plant Modifications):

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- (2) All changes to Fire Protection System components.
- (3) Any change which is itself not safety-related, but which could affect functioning of safety-related equipment. For example, a change to the supports for the Auxiliary Steam Line which runs through the Auxiliary Feedwater Pump Room.
- (4) A change which could result in a change to equipment, analyzed accidents, etc., as described in FSAR.
- (5) Any change which could result in a change to the Technical Specifications, Process Control Program, off-site dose calculation procedure, or environmental radiation monitoring program.
- (6) All changes to systems designed to contain radioactive materials including gaseous and liquid radioactive waste, sampling systems, etc., which are "described in the FSAR."

Important to Environmental Quality:

A proposed change, test, or experiment shall be deemed to involve an unreviewed environmental question if:

 Diablo Canyon Project Units 1 and 2
Project Procedures Manual Procedure III-8, Rev 2
Issued: 11/02/83
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- It concerns a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by Staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing Board.
- It results in a significant change in effluents or power level (level accordance with 10 CFR Part 51.1 (b) (2)).
- It creates a significant environmental effect not previously reviewed and evaluated in the documents specified above.

5 INSTRUCTIONS

This section describes the actions by various departments to initiate, approve, implement, and verify plant modifications. (See Exhibits III-8-1 and III-8-2 for procedural form and flow chart, respectively.)

A. Initiation

- Engineering
 - a. When a need for modification has been identified, the responsible engineer will initiate design activities in accordance with Engineering Manual Procedure 3.6 ON.
 - b. The complete and approved design package will be forwarded to the Project Engineer for review. The design package will be under the cover of a Plant Modification Follower (PMF), Exhibit III-8-1, and will contain as a minimum the following:
 - a description of the modification
 - the reason for the modification
 - Design Change Notice [refer to Engineering Manual or Action Request Transmittal (refer to Systems Interaction Program Manual)]
 - design drawing list
 - design drawings
 - safety evaluation

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 7 of 10

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- c. The Project Engineer will forward the PMF and design package through the Project Control Section (PCS) to the Power Plant Engineer.
- General Construction (GC)
 - a. When a need for a modification is identified, GC will either initiate a PMF, Exhibit III+8-1, with the appropriate sections completed and a DCR and forward it to Engineering for processing, or based on delegated authority, prepare a PMF, approve the DCR, attach the design drawings and safety evaluation and forward it to the Power Plant Engineer.
- Nuclear Plant Operations (NPO)
 - a. When a need for a plant modification is identified, NPO will either initiate a PMF, Exhibit III-8-1, in accordance with Administrative Procedure C-1, or initiate a DCR in accordance with Administrative Procedure C-1, Suppl. 2. If a DCR is initiated, it will be forwarded to the Project Engineer for action. If a PMF is initiated under the NPO delegation of authority, it will be forwarded to the Power Plant Engineer with a copy to the Project Engineer.
- Systems Interaction Program (SIP).
 - a. Plant modifications may be required to correct unacceptable conditions identified by the SIP. Postulated interactions, documented on an Interaction Documentation Sheet (IDS), shall be evaluated to determine whether a plant modification is necessary.
 - b. If it is determined that a plant modification is necessary, an Action Request Transmittal (ART) or DCN shall be generated.
 - c. The initiator of the ART shall initiate a PMF, Exhibit III-8-1, and complete a safety evaluation.
 - d. The approved ART and Safety Evaluation shall be forwarded under cover of the PMF to the SIP Project Engineer.
 - e. The SIP Project Engineer is responsible for document control related to SIP activities.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 8 of 10

- f. The SIP Project Engineer shall assure that all required steps - technical reviews, analyses, etc., are performed in accordance with the program manual, Systems Interaction Program (SIP) for Seismically-Induced Events, latest revision. When the SIP Project Engineer approves the ART and appropriate section of the PMF, the package shall be forwarded to the Project Engineer for approval and transmittal to the Power Plant Engineer.
- g. The System Interaction Program is completed when the SIP final report is submitted. Subsequently, review for system interaction is performed during the design activity.

B. Approval

Regardless of who originated the plant modification or provided the design, all plant modification and significant changes thereto must be approved by the Plant Manager or his delegate. As required by the operating license, the Plant Staff Review Committee (PSRC) reviews each plant modification which is important to safety or environmental quality and recommends to the Plant Manager what action he should take.

- Approved design, under cover of a PMF, will be furnished to the Power Plant Engineer as prescribed in Section A above.
- 2. The Power Plant Engineer is responsible for screening all modification and assuring that the PSRC reviews all those that affect any structure, system or component important to safety or environmental quality. The Plant Manager may approve those not affecting any structure, system, or component important to safety or environmental quality without Plant Staff Review Committee review.
- The Plant Manager assigns the work required by plant modifications to either GC or the Plant Staff.
- 4. After Plant Manager approval, distribution shall be made in accordance with Nuclear Plant Administrative Procedure (NPAP) C-1, Supplement 1. At this time, a status notation will be entered against each affected drawing in the Records Management System (RMS).

C. Construction

 Construction activities shall be conducted under procedures established by the group to which the work was assigned.

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 9 of 10

- During the course of construction, system interaction evaluation should take place.
- D. Revisions
 - Minor revisions (MRs) to the DCN which do not alter the safety classification, safety review, or intent of the original PMF may be approved jointly by Engineering, by the DCPP department head, <u>if the DCN was approved by delegation</u> of <u>authority and the Power Plant Engineer without PSRC</u> <u>review.</u> MRs shall be appropriately documented using the form provided in EMP 3.6 ON.
 - 2. If the revision is more extensive than an MR, the Power Plant Engineer shall be notified and the implementing organization shall request a DCN revision from the organization that developed the DCN. The revision shall be forwarded to the Plant Engineer and handled as a new design issue per EMP 3.6 ON.
- E. Post Construction
 - 1. At the completion of construction, Start-up or Post Installation tests shall be conducted.
 - When the modification has been verified complete and prior to acceptance for operation by the Plant Manager, a final Systems Interaction inspection shall be completed.
 - The work shall be verified completed by the responsible organizations. Verification will be noted on the PMF.
 - After verification, the PMF shall be forwarded to the Power Plant Engineer. Any as-built information must be attached to the PMF.
 - 5. The Power Plant Engineer will notify the Diablo Canyon Project Completion Manager and Project Engineer that work is complete and submit as-built information by attaching marked-up drawings to the DCN to the Project Engineer for processing.

Plant Drawing Control will be notified to distribute as-built copies of the drawings for "operation and maintenance."

 Following acceptance by the Plant Manager, the modification will be released for operation in accordance with procedures established by the Plant Manager. Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 2 Issued:11/02/83 Page 10 of 10

- The Power Plant Engineer will forward the PMF to the Project Engineer.
- The Project Engineer is responsible for revising and/or issuing final drawings.
- When each drawing is issued, the RMS information shall be updated.
- The PMF, without drawings, shall be RMS-indexed for permanent retention.
- F. PMF Form Completion
 - The six review items under Design Activities will be completed by the DCN approving organization. Initialing the material requirements item indicates that the DCN package has properly specified the material requirements; e.g., member size, material properties, sizes, types, etc., and who is to procure the material.

6 DISTRIBUTION

A copy of PMF, Sheets 1 and 2 only, shall be forwarded to the Diablo Canyon Project Manager after completion of each major section of Sheet 2.

7 REFERENCES:

- (1) Engineering Manual Procedure 3.6 ON
- (2) Nuclear Plant Administrative Procedure AP C-1 and Supplements
- (3) General Construction Drawing Control Procedure Operating Instruction OEI-1
- (4) 10CFR50.59 Changes, Test, and Experiments
- (5) Quality Assurance Manual for Operating Muclear Plants
- (6) Nuclear Power Generation Procedure W-682
- (7) Systems Interaction Program Manual
- (8) Facility Operating License No. DPR-76 and Appendices

8 EXHIBITS

III-8-1 Plant Modification Follower

III-8-2 Plant Modification Flow Chart

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 1 Issued:11/02/83 Exhibit III-8-1, Rev Y Sheet 1 of 2

PLANT MODIFICATION FOLLOWER

DESCRIPTION OF CHANGE:

REASON FOR CHANGE:

CHANGE	REQUESTED B	Y: _	 DATE:	-
REQUEST	AUTHORIZED	BY:	 DATE:	

Diablo Canyon Project Units 1 and 2 Project Procedures Manual Procedure III-8, Rev 1 Issued: 11/02/83 Exhibit III-8-1, Rev 1 Sheet 2 of 2

PLANT MODIFICATION FOLLOWER (Cont'd)

	DESIGN	ACTIVITIES	
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PLANT MANAGER APPROVAL			
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