

# PARSONS POWER

## SAMPLE IDENTIFICATION FOR TIER 3 PROCESS REVIEW

### Millstone Unit 2 ICAVP

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## TABLE OF CONTENTS

<b>1. INTRODUCTION</b> .....	<b>3</b>
1.1. CONFIGURATION MANAGEMENT PRINCIPLES .....	3
1.2. INSPECTION AREAS .....	4
1.3. SAMPLE SPECIFICATION/IDENTIFICATION .....	6
<b>2. ENGINEERING</b> .....	<b>7</b>
2.1. SETPOINT CHANGES .....	7
2.2. SPECIFICATION REVISION .....	7
2.3. DRAWING REVISIONS .....	8
2.4. CALCULATIONS REVISIONS .....	8
2.5. LICENSING DOCUMENT CHANGES .....	9
2.6. NON-CONFORMANCE REPORT ( USE AS IS) .....	9
2.7. ENGINEERING WORK REQUEST .....	9
2.8. VENDOR TECHNICAL INFORMATION UPDATES .....	10
<b>3. INFORMATION AND RECORDS MANAGEMENT</b> .....	<b>11</b>
3.1. SOFTWARE DESIGN AND CHANGE CONTROL .....	11
3.2. ELECTRONIC DATABASE CHANGE CONTROL / DATA QUALITY .....	12
3.3. DOCUMENT CONTROL AND RECORDS MANAGEMENT .....	13
<b>4. PARTS PROCUREMENT/SUPPLY</b> .....	<b>15</b>
4.1. COMMERCIAL GRADE DEDICATION .....	15
4.2. EQUIVALENCY SUBSTITUTION.....	15
<b>5. OPERATIONS &amp; MAINTENANCE</b> .....	<b>16</b>
5.1. PROCEDURE AND ASSOCIATED TRAINING SAMPLE SELECTION .....	16
5.2. ISI/IST, ASME SECTION XI REPAIR AND REPLACEMENT .....	18
5.3. TEMPORARY CHANGES, INCLUDING JUMPER, LIFTED LEAD, AND BYPASS CONTROL.....	18
5.4. EMERGENCY CHANGES .....	19

## 1. INTRODUCTION

Tier 3 of the Millstone Unit 2 ICAVP will verify the adequacy of the Millstone Unit 2 Configuration Management Plan.(CMP) to identify and correct design and configuration management deficiencies associated with past change processes.

Parsons Project Procedure for Millstone Unit 2 ICAVP, PP-03 : "Process Review, CMP Horizontal Slice", identifies Tier 3 inspection areas and provides a description of the sample composition. This document identifies the sample to be used for the review and its basis for each of the inspection areas.

### 1.1. Configuration Management Principles

Configuration Management, (CM) is the effective control of a facility's as-built configuration and operation to ensure compliance with approved and/or accepted technical requirements and governing criteria in order to meet safety and operating goals.

The classical principles of CM are Identification, Control, Verification, and Status Accounting:

- Identification/Baseline - This includes both the selection of the items, (structures, systems, components, and computer software) that will be subject to CM, and selection of the documentation which describes its functional and physical characteristics.
- Change Control - The process by which changes to the configuration items are accomplished. This includes approval of changes, revision to documentation when the change implementation is complete, and document revision distribution.
- Verification - The substantiation that:
  - configuration changes either satisfy the original design requirements or comply with approved revisions to those requirements, or
  - the resultant configuration changes are completed and in compliance with the approved change.

This principle also includes resolution of conflicts between documents and actual field conditions.

- Status Accounting - This addresses the tracking and reporting of the current configuration items and any in-process changes thereto.

## **1.2. Inspection Areas**

Implementation of the above principles of CM is typically the responsibility of functional areas such as Engineering, Operations & Maintenance, and Parts Procurement/Supply. In addition, Information and Records Management is an enabling support function used by each of the implementing functional areas. The Tier 3 inspections will look at the results of change processes in each of these four functional areas to verify that changes have been identified and properly executed from initiation of the change, its approval, implementation, verification, recording and incorporation of change information into CM documents.

To accomplish the objective of the Tier 3 inspection, nineteen (19) inspection areas have been identified for review. These have been grouped into four functional areas:

### **ENGINEERING**

- 1) Setpoint changes
- 2) Specification Revision
- 3) Drawing Revisions
- 4) Calculations Revisions
- 5) Licensing Document Changes
- 6) Non-Conformance Report (use as is)
- 7) Engineering Work Request
- 8) Vendor Technical Information Updates

### **INFORMATION AND RECORDS MANAGEMENT**

- 9) Software Design and Change Control
- 10) Electronic Database Change Control / Data Quality
- 11) Document Control and Records Management

### **PARTS PROCUREMENT/SUPPLY**

- 12) Commercial Grade Dedication
- 13) Equivalency Substitution

### **OPERATIONS & MAINTENANCE**

- 14) Revisions to Operations & Maintenance Procedures
- 15) Conduct of Operations & Maintenance
- 16) Surveillance Testing
- 17) ISI/IST, ASME Section XI Repair and Replacement
- 18) Temporary Changes, including jumper, lifted lead, and bypass control
- 19) Emergency changes

Parsons Project Procedure for Millstone Unit 2 ICAVP, PP-03 : "Process Review, CMP Horizontal Slice", identifies 15 inspection areas. To facilitate sample identification and specification, a few of the inspection areas listed in PP-03 have been split in two resulting in the above nineteen inspection areas.

The information in this document is organized by functional area and associated inspection areas. Exhibit 1 is a summary of the number of items contained in the Tier 3 sample.

### Exhibit 1 - Summary of Sample

Inspection Area	Sample Number
<b>Engineering/Licensing Documents</b>	
Setpoint Changes	80
Specification Revisions	32
Drawing Revisions	32
Calculation Revisions	64
Licensing Document Changes	25
Non-conformance Reports, (NCR)	32
Engineering Work Request, (EWR)	32
Vendor Technical Information	12 vendor manuals
<b>Information and Records Management</b>	
Software Design and Changes	10 modifications for detailed review
Electronic Database Changes	
- electronic checks between databases	approx. 31,200
- manual checks with documents and plant	200
Document & Record Management	720
<b>Parts Procurement, Substitution, Dedication</b>	
Commercial Grade Dedications	100
Equivalency Substitutions	50
<b>Operations and Maintenance</b>	
Revisions to Ops & Maint. Procedures	130 procedures
Conduct of Ops & Maint.	(part of the above 130 procedures)
Surveillance Testing	(part of the above 130 procedures)
ISI/IST ASME Section XI	30
Temporary Changes/Jumper, Lifted Lead, Bypass	50
Emergency Changes	No population has been identified.
<b>TOTAL MANUAL INSPECTION ITEMS</b>	<b>1599</b>
<b>TOTAL ELECTRONIC INSPECTION CHECKS</b>	<b>31,200</b>
<b>TOTAL SAMPLE SIZE</b>	<b>32,799</b>

### **1.3. Sample Specification/Identification**

Based on the sample specification identified in this document, Parsons will select Millstone Unit 2 documents and data and perform its review in accordance with procedure PP-03.

Several of the inspection area samples will be comprised of changes representing a cross section of time frames when the change occurred. Four time periods of approximately 5 year since 1975 will be used as follows:

1. 1975-1981
2. 1982-1986
3. 1987-1991
4. 1992-1997

Note: If examples do not exist within a time period, additional examples from other time periods will be selected to maintain the total sample size for the inspection area.

When selecting a sample, the following criteria will apply to all of the inspection areas:

- Select items categorized as Safety Related and/or Risk Significant.
- Select from systems not chosen for Tier 1 review.
- Select items within the systems completed by NNECo, (if applicable).
- Select changes that have technical significance, e.g., do not select trivial, or editorial changes.
- Experience with past industry problem areas, and/or vendors will be used when selecting between specific items that meet the above criteria.
- When possible, select items which complement Tier 1 or Tier 2 inspections and will provide a more complete investigation.

Since the CMP system reviews are being completed by NNECo in 2 batches, the ICAVP Tier 3 process review will conduct sampling and evaluation in two phases. Phase 1 will select examples from the first CMP completed batch of systems. Phase 2 will select examples from the second CMP completed batch of systems. This will ensure the sampling population includes CMP systems from both batches. This document identifies the total sample size for the combination of both Phase 1 and 2

## 2. ENGINEERING

The Engineering functional area portion of the Tier 3 process review will inspect the following:

- Setpoint changes
- Specification Revision (not associated with a modification)
- Drawing Revisions (not associated with a modification)
- Calculations Revisions (not associated with a modification)
- Licensing Document Changes
- Non-Conformance Report (use as is)
- Engineering Work Request
- Vendor Technical Information Updates

Tier 3 will review specification revisions, drawing revisions, and calculations revisions not associated with a modification to the physical plant. A review of modifications and the changes to engineering documents associated with a modification is part of the Tier 1 scope of work.

### 2.1. Setpoint changes

**Sample Identification** - Unit 2 setpoints are presently controlled by various departments (approximately 10) as identified by NNECo procedure NGP 3.16 and Specification SP-ST-EE-329. The various departments control different types of setpoints. Examples of setpoints from each department will be selected. The procedures for changing setpoints has changed over time, so examples will be selected from different time periods.

**Sample Specification** - The Setpoint Change Record (SCR) log, and design modification logs will be reviewed in order to select the sample.

**Sample To Be Use** - Two (2) setpoint changes for each of the current controlling departments will be selected for the four 5 year periods since 1975. *Total sample size is 80 setpoint changes.*

### 2.2. Specification Revision (not associated with a modification)

**Sample Identification** - Specifications are controlled by the engineering disciplines, Mechanical, Electrical, I & C, and Civil/Structural. Specifications in each discipline are further divided into Standard Design Specifications and Project Specific Specifications. Examples will be selected for each discipline for both specification types, over different time periods with a cross section of specifications generated by NNECo, the NSSS vendor, and the original plant design AE.

**Sample Specification** - Specification changes will be identified through the change control document process, primarily the Design Change Notice (DCN).

**Sample To Be Use** - Two (2) specifications from each controlling discipline, (one Project Specific specifications and one Design Standard specifications) for the four 5 year periods. *Total sample size is 32 specifications.*

### **2.3. Drawing Revisions, (not associated with a modification)**

**Sample Identification** - Drawings are controlled by the engineering disciplines, Mechanical, Electrical, I & C, and Civil/Structural. Examples will be selected for each discipline over different time periods. The sample will consist of a cross section of drawing types within each discipline including upper tier drawings, (P&ID, electrical one line, etc.) and lower tier drawings, (isometrics, terminal connections, etc.)

**Sample Specification** - Changes to design drawings will be reviewed through the various change mechanisms that result in Design Change Notices (DCN), such as Non-conformance Reports (NCR), Condition Reports (CR), Drawing Discrepancy Information Sheets, etc.

**Sample To Be Use** - Two (2) drawing change documents from each controlling discipline, for the four 5 year periods. *Total sample size is 32 drawing change documents.*

### **2.4. Calculations Revisions (not associated with a modification)**

**Sample Identification** - Calculations are controlled by the engineering disciplines, Mechanical, Electrical, I & C, and Civil/Structural. Calculation revisions could be generated by NNECo or a Vendor. Examples will be selected for each discipline for both NNECo or a Vendor generated change, over different time periods.

**Sample Specification** - The calculation examples chosen will be based on apparent complexity of the change and selected from Calculation Change Notices, (CCN's) as tracked by the Calculation Tracking Program (CTP), or other revision lists.

**Sample To Be Use** - Two (2) NNECo generated calculation revisions from each controlling discipline for the four 5 year periods, and two (2) discipline vendor calculation revisions for the four 5 year periods. *Total sample size is 64 calculation revisions.*



## **2.5. Licensing Document Changes**

**Sample Identification** - FSAR changes, Technical Specification changes, and License Amendments make up the population for this area. Both Technical Specification changes and License Amendments receive detailed NRC review. Therefore the ICAVP review will concentrate on FSAR Changes.

**Sample Specification** - Select examples from FSAR Change Requests and Technical Specification Change Request. Select examples from different sections or chapters of the documents.

**Sample To Be Use** - Five (5) FSAR changes, for the four 5 year periods will be selected. One (1) Technical Specification for the four 5 year periods. *Total sample size is 25 licensing documents.*

## **2.6. Non-Conformance Report ( use as is)**

**Sample Identification** - Non-Conformance Reports (NCR) are dispositioned by controlling disciplines, Mechanical, Electrical, I & C, and Civil/Structural. Examples of significant NCRs will be selected for each discipline over different time periods.

**Sample Specification** - Select from NCR dispositioned as "use-as-is".

**Sample To Be Use** - Two (2) NCR from each controlling discipline, for the four 5 year periods. *Total sample size is 32 NCRs.*

## **2.7. Engineering Work Request**

**Sample Identification** - Engineering Work Requests (EWR) are responded to by controlling disciplines, Mechanical, Electrical, I & C, and Civil/Structural. Examples will be selected for each discipline over different time periods.

**Sample Specification** - EWRs do not have a specific disposition of "use as is". EWRs were not established to be a change control mechanism. EWR responses that identify non-conforming conditions or the need for a change to design/licensing documents, procedures, or the plant should be implemented through other approved change control processes such as a modification (DCR, MMOD), FSAR Change Request (FSARCR), Item Equivalency Evaluation (IEE), Specification change (done through a Design Change Notice), etc.. Therefore we will select from EWRs that do not reference document and design control processes.

**Sample To Be Use** - Two (2) EWRs from each controlling discipline, for the four 5 year periods. *Total sample size is 32 EWRs.*

## **2.8. Vendor Technical Information Updates**

**Sample Identification** - A sample will be selected from vendor manuals for: key safety-related components identified as part of Millstone Unit 2 response to Generic Letter 90-03, equipment in safety related systems, and equipment in risk significant systems. This will provide a sample with a good cross section of equipment types.

**Sample Specifications** - Vendor manuals for equipment will be selected based on the following considerations:

- equipment for which the OEM is no longer in business
- OEM/supplier components with multiple models
- manuals for equipment skids consisting of a collection of many components
- high use vendor manuals as identified by the number of corrective maintenance work orders

The vendor manual sample will be selected from Non-Tier 1 systems

**Sample To Be Use** - *Twelve (12) Vendor manuals* will be selected for review.

### 3. INFORMATION AND RECORDS MANAGEMENT

The Information and Records Management functional area portion of the Tier 3 process review will inspect the following:

- Software Design and Change Control
- Electronic Database Change Control / Data Quality
- Document Control and Records Management

#### 3.1. Software Design and Change Control

**Sample Identification** - Select custom designed software which provides significant support functions for a cross section of organizations (Engineering, Operations, and Maintenance) and activities. The sample will include changes from various time frames. The sample focuses on custom software or custom database structures as experience indicates a higher likelihood of problems compared to industry standard software packages.

**Sample Specification** - Software which support quality activities or the processing of quality component and/or parts data.

**Sample To Be Use** - For the following applications, *review all* software modifications contained in the Software Document File, (SDF) for 1) significance/complexity of the change, 2) completeness of the documentation:

- PMMS, Production Maintenance Management System - Primary database for maintenance related equipment. It includes modules for equipment identification, (ID), maintenance work orders, (WO), bill of materials, (BOM), and the master equipment parts list, (MEPL);
- CTP, Calculation Tracking Program;
- GRITS, Generation Records Information & Tracking System - Primary database for design documents and associated change control;
- MIMS, Material Information Management System ;
- CATS, Computer Aided Tagging System;
- PM Evaluation database - Database which support I&C calibration/setpoint/testing/PM,
- IST Pump Database, IST Valve Database, Program Group Surveillance Tracking Database, and the ISI Computer Informational Database. - Databases which support the ISI/IST programs.

- Plant Simulator
- Plant Computer

*Sample: All modifications reviewed for completeness, select 10 complex modifications for detailed inspection. The sample will include, to the extent possible, a modification from each of the above applications, and a cross section of age.*

### **3.2. Electronic Database Change Control / Data Quality**

**Sample Identification** - One of the most widespread and important data keys is equipment ID. Equipment ID is used by Engineering, Operations, Maintenance, and Procurement. Therefore, we will check data change control by verifying the accuracy of equipment ID data among various databases, paper documents, and the physical plant.

**Sample Specification** - While electronic comparison between databases can be used to check every equipment ID, a sample is necessary for manual checks with paper documents and the physical plant. We will use the Critical Components identified by Tier 2, (i.e. safety related components which actively mitigate FSAR postulated accidents) as the population for selecting a sample to check database accuracy with paper documents and the physical plant. The items selected will have a cross section of types of equipment.

**Sample To Be Use** - Two different samples sizes will be used for electronic reviews between databases and manual reviews against paper documents and the physical plant.

#### Electronic Checks:

<b>Population</b>	<b>Compared With</b>	<b>Compare</b>	<b>Sample To Be Use</b>
Safety related (Cat I) components which actively mitigate FSAR postulated accidents, (Tier 2 database). Number of components to be determined by Tier 2  (Estimated to be: 900 to 1,200)	PMMS	Equipment ID and Quality Category	100%
All components in PMMS (30,188)	Component references in other applications/databases	Equipment ID and Quality Category	100%

Manual Checks:

Population	Compared With	Compare	Sample To Be Use
Components with changed nuclear indicators i.e. safety related to non-safety related, or vise-versa (from MEPL Log)	PMMS database with MEPL paper document	Quality Category	100 Components
Safety related (Cat I) components from Tier 2 database	Tier 2 database with MEPL Determinations	Quality Category	100 Components
Safety related (Cat I) components from Tier 2 database	PMMS with Drawings & Plant	Equipment ID	100 Components

**3.3. Document Control and Records Management**

**Sample Identification** - Document Samples will include a cross section of every Change Control Document type and Design Documents type. We will review the current revision of a document to validate Millstone 2's controlled document program.

Change Control Documents for Unit 2 are:

DCN            Design Change Notice  
DCR            Design Change Record  
MMD            Minor Modification  
VDC            Vault Drawing Change  
VDS            Vault Drawing Submittal

Design Documents for Unit 2 are:

DBDP	Design Basis Documentation Packages
DWG	Drawings
EEVL	Engineering Evaluations
ERC	Engineering Record Correspondence
ERT	Engineering Report
SPEC	Specifications
VTM	Vendor Technical Manual

**Sample Specification** - A cross section of age to ensure the review includes changes produced under different revisions of procedures commencing in August of 1975

A Cross Section of Disciplines to ensure that the review includes differing processes across disciplines, i.e. Mechanical, Electrical, I&C, and Civil/Structural.

**Sample To Be Use** - A sample of each document type will be taken by reviewing 3 examples per discipline, over the four 5 year periods. *This sample represents a total of 720 documents.*

#### **4. PARTS PROCUREMENT/SUPPLY**

The Parts Procurement/Supply functional area portion of the Tier 3 process review will inspect the following:

- Commercial Grade Dedication
- Equivalency Substitution

##### **4.1. Commercial Grade Dedication**

**Sample Identification** - A cross section of equipment types and age of the Commercial Grade Dedication package will be included to review dedication evaluations performed by different disciplines.

Qualification of a commercial grade part for use in a safety related system is accomplished by testing critical characteristics, or a combination of testing and taking credit for some portions of a Vendor's quality program. The sample will address both of these cases. Commercial grade dedication programs started in the late 1980's. The sample will include a cross section of dedication evaluations performed after its implementation at Millstone Unit 2.

**Sample Specification** - Select from a list of Commercial Grade Dedication packages or parts.

**Sample To Be Use** - 50 Commercial Grade Dedication packages that use testing. 50 Commercial Grade Dedication packages that take credit for a vendor's program for a total *sample size of 100 packages*

##### **4.2. Equivalency Substitution**

**Sample Identification** - A cross section of equipment and part types and age of the equivalency evaluation will be included to sample different disciplines and historical processes used in performing the equivalency evaluations.

**Sample Specification** - Select from a listing of the equivalency evaluations. Currently, the equivalency substitution evaluation is being performed via a Item Equivalency Evaluation, (IEE). Prior to Nov. 1996 IEE's were called RIE's, and prior to 1995 three separate Unit 2 lists were maintained (PEG, TSE, and PSE).

**Sample To Be Use** - *50 Equivalency Evaluations.*

## 5. OPERATIONS & MAINTENANCE

The Operations & Maintenance functional area portion of the Tier 3 process review will inspect the following:

- Revisions to Operations & Maintenance Procedures
- Conduct of Operations & Maintenance
- Surveillance Testing
- ISI/IST, ASME Section XI Repair and Replacement
- Temporary Changes, including jumper, lifted lead, and bypass control
- Emergency changes

### 5.1. Procedure and Associated Training Sample Selection

For the first three inspection areas within the Operations and Maintenance functional area, a sampling approach has been developed to select procedures and associated training to be inspected.

**Sample Identification** – Unlike the previous three inspection functional areas discussed in this document, (Engineering, Information and Records Management, and Parts Procurement/Supply) to assure the plant currently meets the design and licensing bases, it is prudent to look at just current documents for conducting operations, maintenance, surveillance testing, and training. For example, the current condition of the plant is not reflected by surveillance tests performed 10 years ago or a 5 year old valve lineup on a system. It is the current equipment testing procedure and results, and the current valve lineup procedure compared against the current design requirements that has significance. Therefore, rather than starting with a population of procedure revisions since plant startup, the Tier 3 sampling approach starts with the population of current procedures and will use four varied avenues to select a cross section of current procedures for inspection. The selected procedures will be reviewed to determine if previous procedures changes, that are still in effect, meet design and license bases.

**Sample Specification** – The type of procedures and associated training interface to be included in the sample are:

- abnormal operating procedures
- emergency operating procedures
- standard operating procedures
- maintenance procedures
- surveillance procedures
- maintenance work orders written to control non standard maintenance



**Sample To Be Use** – the sample will consist of items from a), b), c), and d) as follows:

- a) **Changes Required by Plant Modification** - This portion of the sample looks at the interface between the Engineering and Operations & Maintenance functional areas. Modifications will be reviewed for changes required in Operations, Maintenance, Surveillance Testing and Training. Not all physical plant modifications require a change to procedures or training, therefore a number of modifications will be reviewed until a *total of 30 procedures* are identified with at least two procedure changes for each type of procedure identified above.
- b) **Procedures Associated With Critical Equipment Having High Maintenance** - Select 100 items from the critical equipment from Tier 2 with a cross section of equipment types and systems. Review the Production Maintenance Management System (PMMS) database to obtain the number of corrective work orders or maintenance requests within the time period of July 1, 1992 to the present. Based on this information and operational experience with past industry problems, identify 20 components having high maintenance with a cross section of equipment types. *Select a total of 50 procedures or maintenance work orders* relating to these components making sure that each of the procedure types identified above are represented.
- c) **Procedures Associated With Licensing Event Reports, (LER)** - Ten (10) pieces of equipment associated with past Millstone Unit 2 LERs will be selected based on operational experience with industry problems and the number of LER occurrences. For these 10 items, *25 procedures* that control the operation, maintenance, and surveillance of the components, or the system it is installed in will be selected. Each of the procedure types identified above will be represented.
- d) **Procedures Associated With Nuclear Industry Experience** - Starting with nuclear industry failure data, a listing of equipment failure rates at Combustion Engineering Nuclear Steam Supply System Plants will be obtained for the following equipment types:
  - Instrumentation, Controllers
  - Instrumentation, Transmitter/Primary Detector/Element
  - Circuit Closers/Interrupters
  - Heat Exchangers
  - Blowers
  - Motors
  - Pumps
  - Relays
  - Valves and Dampers
  - Valve Operators

A component with high failure rates for each equipment type will be selected. For these 10 components, 25 Millstone Unit 2 procedures that control the operation, maintenance, and surveillance of the components, or the system it is installed in, will be selected. Each of the procedure types identified above will be represented.

*Sample size from a), b), c, and d)) above is 130 procedures or maintenance work orders*

### **5.2. ISI/IST, ASME Section XI Repair and Replacement**

**Identification of Sample** - The Millstone Unit 2 ISI/IST Program complies with the requirements for nuclear power plant components contained in the ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition up to and including the 1981 Winter Addenda except where relief has been specifically granted by the USNRC. Implementation of the ISI/IST program is controlled by its own set of controls and procedures.

**Specification of Sample** - The sample will consider all mechanical equipment such as pumps, valves, piping (including in-line components), piping supports, and pressure vessels that has been designated as within the scope of the Section XI program. One sample group will look at Section XI surveillance and test procedures. The other sample group will look at repair or replacement procedures/work packages. Consideration will be given to those examples include code case, relief, or other deviations from the Section XI requirements.

**Sample to be Used** - Select a sample of 15 surveillance and test procedures and 15 repair or replacement procedures/work packages. Within this sample group at least 3 packages shall include an example of a code case application, relief request, or other requirements deviation. *Total sample size is 30 procedures/packages.*

### **5.3. Temporary Changes, including jumper, lifted lead, and bypass control**

**Sample Identification** - The sample will encompass temporary changes not controlled by approved work procedures, e.g. instrument calibration procedures, surveillance test procedures, etc.. These procedures will be reviewed by Tier 1 for selected systems and by other Tier 3 inspection areas. The sample will contain a cross section of temporary change types and length of time installed.

**Sample Specification** – Use the Jumper Device Index Sheets to identify existing jumpers/temporary changes. In addition to the sample selected, the inspection will include review of any undocumented temporary changes observed during walk downs associated with the ICAVP.

**Sample To Be Use** – *50 temporary changes.*

#### **5.4. Emergency changes**

Some nuclear utilities have a special process for emergency changes to procedures that specifies the controls and the organizational positions that can be used in a streamlined process to make changes that can not wait for normal processing. No procedure of this type has been identified specific to emergency changes for Millstone Unit 2 different from the normal change processes. Should such a procedure be identified, a sample plan will be developed.