PROCEDURE DEVELOPMENT

PROJECT ACTION PLAN

FOR

TEMPORARY AND INTERIM

PROCEDURE CHANGE INCORPORATION

AS PROCEDURE REVISION

REVISION 1

APRIL 6, 1988

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EXECUTIVE SUMMARY

The completion of the recent outage and initial power ascension has resulted in a large number of temporary and interim changes to Station Procedures per RSAP-0507 Change Notices to Procedures.

The following is a summary of a three-phase approach to incorporate these changes into procedure revisions.

1.0 Introduction

This action plan provides the method used to ensure applicable procedure changes are incorporated as procedure revisions. Temporary and interim changes are approved methods for temporarily changing procedures for a 90 day duration prior to incorporation as a revision.

2.0 Action Plan

2.1 Daily Fast Action Response

A. Operations Department Procedures

- o Staff dedicated to incorporating changes 4
- o Total procedures with outstanding changes 78

B. Surveillance Procedures

- o 21 surveillance scheduled to be run between 04/07/88 and 05/01/88.
- o 8 of these 21 surveillance have changes
- o 3 of these 8 have been incorporated as revisions.
- o 5 of these 8 are being incorporated prior to the scheduled performance date or prior to their expiration date.
- o 30 other surveillances due to be run beyond 05/01/88 will have changes incorporated 5 days prior to the run date or 30 days prior to their expiration of the temporary or interim change.

C. Operating Procedures

- o 33 operating procedures have changes and all 33 are scheduled to be revised prior to 05/01/88 or prior to the expiration of the change.

D. Casualty Procedures

- o 10 casualty procedures have changes and all 10 are scheduled to be revised prior to 05/01/88 or prior to the expiration of the change.

E. Maintenance Procedures

- o Staff dedicated to incorporating changes 4
- o Total procedures with outstanding changes 118

F. Maintenance Surveillance

- o 47 surveillances scheduled to be run between 04/07/88 and 05/01/88
- o 16 of those 47 surveillances have changes
- o 16 revisions are in the process of being approved prior to their performance date or expiration date
- o 36 surveillances scheduled for performance after 05/01/88 will have revision completed 5 days prior to their scheduled performance.
- o 11 Electrical Maintenance procedures will be revised within 30 days of expiration of the change.
- o 41 Instrument Maintenance procedures will be revised within 30 days of expiration
- o 11 Mechanical procedures will be revised within 30 days of expiration
- o 2 Maintenance Administrative procedures will be revised within 30 days of expiration

2.2 Maintain daily status

- o On a daily basis changes issued in the previous 24 hours are distributed to responsible groups to incorporate or coordinate with revision schedules or performance schedules.

2.3 Additional Management Controls

- o Document Control Procedures provide site-wide distribution of all temporary changes that are approaching expiration, and notification of all expired changes. The responsible department has the responsibility to revise the procedure by incorprating the change if required.

- o The Procedure Development Project has delivered to each department procedure coordinator the list of temporary changes for incorporation as revisions where applicable.

- o Document Control Procedures provide daily status and tracking of all temporary changes.

3.0 Interim Migration Plan

Interim measures currently in progress include continuing the immediate action plan while expediting the development of the long term fix. Interim measures include:

- Continue methodology described in Section 2 above until the numbers of Temporary Change Notices are reduced to an acceptable level.

- A new Procedure Change Notice Program has been developed and is currently being reviewed by Rancho Seco Management. Some key elements of the program which, when implemented, are expected to reduce the total number of Temporary Change Notices and to provide better control are as follows:

  1. Implement a single method to make Temporary Changes. At present, there are three types to Temporary Changes (Procedure Temporary Change Notice, Procedure Interim Change Notice, Procedure Change Notice). The new program provides for <u>one</u>.

  2. Implement a single Procedure Action Request form for all procedure actions. At present there are three Temporary Change Notice forms and two Procedure Request forms. The new program provides for <u>one</u>.

  3. Implement a new process for Temporary Changes which are to become permanent. At present, all change notices can become permanent and can stay active for 90 days. The new program will require Temporary Changes (that are designated to become permanent), be word processed into a revision at the end of the approval cycle (14 days). Those designated "Temporary" will expire after 90 days.

  4. The new program will require a Status Tracking System be implemented to appraise procedure owners of the Temporary Change Status of procedures they are responsible for and to provide visibility to management.

4.0 Long Term Action Plan

- Implement long term process improvements

- Continue with upgrade of all plant procedures to eliminate need for "Change Notices".

ATTACHMENT VII

GCA 88-258

NRC Observation:	The NRC Team observed that the current Rancho Seco Technical Specifications do not address shunt trip feature of the current Reactor Trip Breaker.
Rancho Seco Response:	As a result of NRC Generic Letter 83-28, automatic actuation of the shunt trip attachment was installed and Proposed Amendment 114, to the Technical Specification was submitted to include provisions for testing the shunt trip attachment and the Silicone Controlled Rectifier (SCR) relays. The Proposed Amendment modifies the Rancho Seco Technical Specifications in accordance with the guidelines contained in NRC Generic Letter 85-10. Generic Letter 85-10 presents acceptable changes in the form of Model Standard Technical Specifications (STS). Previously, there were no requirements for testing the SCR relays; therefore, the Model STS sections on SCR relays have been included in Proposed Amendment 114 to the Rancho Seco Technical Specifications. Although the NRC has not as yet, approved Proposed Amendment 114, Revision 1, Supplement 1, dated December 9, 1986 (JEW 86-1986), the shunt trip devices installed in the Reactor Trip Breakers are tested under EM.178, CRD Breaker Preventive Maintenance.

ATTACHMENT VIII

GCA 88-258

NRC Observation: The NRC Team observed instances of apparent inadequate seismic restraints or other measures to insure proper Storage Control of temporary storage cabinets or other non-permanently attached hardware within the plant.

Rancho Seco Response: Other than Containment, there is no formal procedure to address seismic storage controls. The System Engineering Group has developed a System Progress Report Program to provide a documented means by which the System Engineer maintains a knowledge of the status of his system and actively participates in the maintenance, testing, and operation of his system.

As part of the system assessment, a System Progress Report is prepared to document the material condition of the system and any required corrective actions. Corrective actions shall be initiated by an EAR, Work Request, PDQ, or other document. The System Engineers responsibility will encompass the control of non-seismically controlled equipment that could impact systems.

Since November 1987, Quality Assurance has been performing housekeeping surveillance activities in preparation for restart. The most recent inspection occurred on March 23, 1988, during which time the Nuclear Service Electrical Building and Auxiliary Building were walked down in accordance with AP.18, Plant Housekeeping and Inspections. Concerns similar to those of the NRC Team have been noted by Quality and appropriate corrective actions generated.

ATTACHMENT IX

GCA 88-258

NRC Observation:	The NRC questioned numerous members of the operating staff as to why the 'B' letdown cooler is out of service. There was no evidence of an overall understanding of that question.
Rancho Seco Response:	Operating personnel are aware of the operability status of the 'B' letdown cooler. It is normally valved out by procedure. The history of the 'B' letdown cooler being valved out is currently being investigated by System Engineering Department. In order to preclude any further confusion an entry was made in the Night Order Book giving the reason the 'B' letdown cooler is valved out. This entry will address a suspected tube leak and provide guidance on maintaining the cooler in an "out of service" condition.

ATTACHMENT X

GCA 88-258

NRC Observation: The NRC is concerned that a Shift Supervisor Emergency Maintenance (SSEM) Work Request (WR141983) was issued for a trouble shooting condition. Specifically, an SSEM was issued for the failed surveillance of the number 3 Control Rod Drive (CRD) breaker.

Rancho Seco Response: Quality Assurance recognized that the generation of the subject SSEM was inappropriate and issued a "stop work" on the issuance of any future SSEM's. The critical issue was that WR141983 did provide the instructions or controls necessary to prevent the loss of potentially significant investigative evidence, which may prevent the identification of the root cause.

Operations department and Quality Assurance are (jointly) revising RSAP 0803, Work Requests, in order to establish new criteria under which an SSEM can be issued and provide the administrative controls necessary to assure maintenance activities are performed in accordance with 10 CFR 50 Appendix B Criteria V, Instructions, Procedures, and Drawings, and Criteria XVI, Corrective Action requirements. The revision to RSAP 0803 is forecast to be revised by May 9, 1988.