PILGRIM NUCLEAR POHER STATION

Procedure No. 1.3.4-14

EOP VALIDATION PROGRAM

Total Pages: 37

Approved

Quality Assurance Manager /Date

Approved

Nuclear Operations Manager Date

Safety Evaluation: Required/Not Required

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PURPOSE

This document provides appropriate requirements and instructions for validating the PNPS Emergency Operating Procedures (EOPs).

II. APPLICABILITY

The requirements and instructions specified herein apply to the overall process of developing new EOPs and revising existing EOPs.

This document supplements existing PNPS procedures governing procedure preparation, revision, and control but does not supplant them.

III. DEFINITIONS

<u>FOP Source Documents</u> - Guidelines 'rocedures, data, and other records which comprise the technical basis of the EOPs and requirements for their development.

<u>FOP Operational Correctness</u> - A EOP characteristic that refers to the compatibility of the procedures with plant hardware, plant responses, operator capabilities, other plant procedures, and the composition and manning level of on-shift personnel.

<u>EOP Validation</u> - The process of confirming and documenting the operational correctness and usability of the EOPs.

FOP Usability - An EOP characteristic that refers to the adequacy of the procedures' level of detail and the understandability of the information presented in the procedure.

IV. REQUIREMENTS AND INSTRUCTIONS

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A. Validation Methodology and Evaluation Techniques

As stated above, the general attributes of EOP usability and operational correctness are evaluated through the validation process. The specific EOP characteristics encompassed by this definition are as follows:

Attribute	Procedure Characteristic
Usability	Level of detail Understandability
Operational Correctness	Compatibility with plant hardware Compatibility with plant response Compatibility with other plant procedures Compatibility with operator capabilities Compatibility with normal shift composition and manning level

The evaluation criteria against which each of these procedure characteristics is evaluated are listed in Table 1 (page 5).

The EOP Validation Program employs the following evaluation techniques:

- Observation of licensed operators using the EOPs during real-time execution of multiple transfent and accident scenarios conducted on the PNPS simulator.
- Walkthroughs/talkthroughs by licensed operators of those EOPs (and steps of EOPs) which cannot be effectively addressed through simulated exercises. Procedure walkthroughs shall be conducted in a control room setting (either at the plant or the PNPS simulator).
- Collection of operator opinions using prepared questionnaires.

Performance of validation activities and the results of associated evaluation shall be documented on the forms illustrated in Attachments A. B. and C. Additional details regarding preparation for and execution of individual EOP Validation Program activities are provided in the remaining sections of this procedure.

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_Character1stic	Evaluation Criteria
Level of detail	Does the EOP provide the information necessary for operators to evaluate key plant conditions and take the appropriate action?
	Is the level of detail provided in the EOP consistent with the knowledge and capabilities of the intended users?
	Where appropriate, are response times, equipment limitations, instrument inaccuracies, and contingency actions adequately addressed in the EOP?
Understandability	Are operators able to correctly, and in a timely manner, interpret each of the steps of the EOPs?
Compatibility with plant hardware	Does the existing plant design permit the performance of prescribed actions as directed (specifically considering the availability of both information and controls), and in the sequence specified?
Compatibility with plant response	Are the specified actions offective in stabilizing plant conditions?
Compatibility with other procedures	Is the wording that is used in the EOPs consistent with that of other plant procedures?
	Where references to plant procedures are provided, does the specified procedure exist, is the number and title correct, and does it provide the appropriate instructions for the task or activity intended by the context of the reference in the EOP?
	Are the actions prescribed in the EOPs compatible with those specified in other plant procedures which may have to be executed concurrently?

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IV. B. Scenario Development

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Detailed event scenarios shall be developed to guide the performance of EOP validation exercises. The scenarios shall be of varying complexity and shall exercise to the fullest extent possible the scope of plant conditions and key actions addressed by the EOPs.

For the validation of recisions to the EOPs, the scope of scenarios need only encompass the changes made to the previously-approved procedures. If existing scenarios are determined to be adequate for this purpose, no new scenarios need be developed.

Scenario development should be a coordinated effort by a group of individuals having expertise in EOP development, plant systems and operations, and operator training. A trial check-out of the scenarios should be conducted prior to being used in the actual EOP validation exercises to ensure that the initial conditions and specified sequence of malfunctions will generate the desired plant symptoms and conditions. Also prior to actual use in validating the EOPs, scenarios shall be reviewed and approved by the Nuclear Training Organization.

The following process is suggested for developing the scenarios:

- 1. Identify the EOP rlowpaths to be exercised.
- At each major decision point in an EOP flowpath, specify the plant symptoms or conditions which would constrain operators to the desired response pattern.
- Define system degradations, instructor actions, or event complication: which could cause the specified plant symptoms or conditions.
- 4. Select initial plant conditions and simulator malfunctions which will initiate and cause plant conditions to progress in accordance with the desired response patterns.
- Record the necessary sequence of instructor actions, the anticipated plant response, and proper operator actions on an EOP Validation Scenario Outline (illustrated on page 3 of Attachment A.)
- Prepare a simple matrix of ECP flowchart paths vs. scenarios to confirm that the key plant conditions and operator actions addressed by the EOPs are, in fact, covered by the combined scope of the scenarios.

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IV. B. Scenario Development (Continued)

 Complete an EOP Validation Scenario Cover Sheet (illustrated on page 4 of Attachment A) to accompany each Scenario Outline.

An EOP Validation Test Plan (illustrated on page 5 of Attachment A) shall be developed which specifies the sequence for running the scenarios. Simulator exercises for each day should progress from simple to complex scenarios. In order to minimize the possibility of the control room operators responding in advance to "expected" events, the following factors should also be considered in developing the Test Plan:

- . Similar scenarios should not be executed consecutively.
- * The initiating event, plant symptoms, and the flowpath through each of the EOPs should be varied in successive scenarios.

C. Validation Team Member Composition and Oualifications

The team formed to conduct EOP validation exercises shall be composed of a designated Director, a simulator instructor, and a group of licensed operators. The designated Director shall be fully knowledgeable of the new and revised EOPs to be validated, and shall be experienced in BHR plant operations. Licensed operators who are participating in a validation exercise shall be organized to form a standard on-shift complement of licensed control room operators including a Hatch Engineer and Shift Supervisor, each performing their respective duties and assigned responsibilities.

All exercise participants shall have previously completed a formal training session on the organization, structure, conventions, and technical content of the EOP(s) being validated.

D. Performance of EOP Validation Exercises

EOP validation exercises shall be executed in the approved sequence specified in the Test Plan. The Exercise Director shall coordinate execution of each scenario.

The names of the Director, the simulator instructor, and the participating control room operators shall be recorded on the EOP Validuction Exercise Performance Record (illustrated on page 6 of Appendix A) for each exercise conducted.

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IV. D. Performance of EOP Validation Exercises (Continued)

Each exercise shall be conducted as follows:

- Set the initial plant conditions as specified on the EOP Validation Scenario Cover Sheet and in the EOP Validation Scenario Outline.
- 2. Describe the initial plant conditions to all exercise participants.

For exercises conducted during the first part of a program for validating an entire set of EOPs, a brief description should also be given on the scenario's expected progression of events, anticipated plant responses, and the EOP(s) and EOP flowpaths intended to be validated. As participants become familiar with the validation process, this pre-exercise briefing should become increasingly more limited in scope and shall eventually be discontinued.

- Run the scenario in accordance with the appropriate instructions detailed in the Scenario Outline. If a walkthrough/talkthrough sequence is required, the Director shall ask the control room operators to demonstrate and describe in detail the actions they would perform in response to the described plant conditions. As appropriate, the simulator instructor shall supply additional information specified in the Scenario Outline, including a description of the plant response to the actions the operators identify as having been taken.
- 4. Compare the actions taken (or described as having been taken) by the control room operators to the associated actions specified in the Scenario Outline. The Director (or designated assistant(s)) should note the following performance deviations at the appropriate location in the "Notes" column of the Scenario Outline:
 - Performance of an inappropriate step or action
 - · Formulation of an incorrect response to a decision
 - Misinterpretation of a procedure step
 - * Failure to perform a required (or expected) step or action
 - . Violation of a Limit
 - · Failure to observe a specified caution

If the Operator Actions listed on the Scenario Outline are performed correctly, a check mark () should be placed in the "Notes" column alongside the action statement.

E. Recording the Results of EOP Validation Exercises

After finishing each scenario, the Director shall complete an EOP Validation Exercise Checklist (Attachment B) and each participating control room operator shall complete an EOP Validation Exercise Questionnaire (Attachment C.)

The Director shall review all of the completed Validation Exercise Questionnaires with the simulator instructor and control room operators who participated in the exercise prior to beginning the next scenario. Additional explanatory remarks shall be recorded directly on the respective Questionnaires as appropriate.

The Director shall assign a unique identification number to each performance deviation, procedure discrepancy, operator concern, and other deficiency identified on the completed Validation Scenario Outlines, the Exercise Checklists, and Exercise Questionnaires. Multiple occurrences of a particular deviation, discrepancy, concern or other deficiency may be assigned the same number.

The Director shall also complete a Part I EOP Validation Discrepancy Report (illustrated on page 7 of Attachment A) for each numbered performance deviation, procedure discrepancy, operator concern, and other identified deficiency. A complete description of the discrepancy shall be provided; if more space is needed for this purpose, a Continuation Sheet (illustrated on page 9 of Attachment A) shall be used and the "Continuation Sheet Attached" box on the report shall be checked. The sequential and total number of Continuation Sheets used for an individual discrepancy shall be identified in the appropriate blanks on each Continuation Sheet.

At the conclusion of all EOP validation exercises, the Director shall verify that all of the following items have been properly completed for each scenario:

- EOP Validation Scenario Outlines and respective Cover Sheets
- 2. EOP Validation Exercise Performance Records
- 3. EOP Validation Exercise Checklists
- 4. EOP Validation Exercise Questionnaires
- 5. Part I EOP Validation Discrepancy Reports and associated Continuation Sheets
- 6. EOP Validation Test Plan

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E. Recording the Results of EOP Validation Exercises (Continued)

When completed, all of the items listed above shall be forwarded to the Nuclear Operations Section Manager for subsequent evaluation, resolution, and correction of identified discrepancies as described in Section F.

F. Evaluating, Resolving, and Correcting Identified Discrepancies

Each performance deviation, EOP discrepancy, operator concern, and other discrepancy identified through the validation process shall be analyzed to determine whether any corrective action is required. Resolution of all identified discrepancies and, if required, completion of associated corrective action(s) shall be documented on Part II of an EOP Validation Discrepancy Report (illustrated on page 8 on Attachment A.) If no corrective action is required, appropriate justification shall be provided.

The analysis and resolution of EOP discrepancies and the identification of appropriate corrective actions should be performed as a cooperative effort of several individuals having expertise in the EOPs, the EOP source documents, plant operation, and control room operator training. The procedure author(s) and individuals who participated in the validation exercises should also participate in the evaluation and resolution of identified discrepancies if possible. The following process shall be followed in completing this task:

- Review the description of the discrepancy. (If those who participated in the validation exercises are also participating in the discrepancy review and resolution process, they can supply additional information, as necessary.)
- 2. Determine whether any corrective action is necessary.
- If corrective action is appropriate, develop a recommended solution which corrects the discrepancy. Solutions may include changes to the EOP, additions to the EOP training program, modifications to plant equipment, or revisions to EOP source documents.

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- F. Evaluating, Resolving, and Correcting Identified Discrepancies (Continued)
- 4. Document the agreed-upon corrective action on Part II of the EOP Validation Discrepancy Report, using Continuation Sheets as necessary to completely record the action to be taken. If it is concluded that no corrective action is required, provide appropriate justification. The individual who prepares the description of the required corrective action (or the justification for no corrective action) shall sign and date the Report in the space provided.
- 5. When the corrective action has been implemented, the individual who completes the corrective action shall sign and date the associated EOP Validation Discrepancy Report Part II in the space provided.
- 6. Satisfactory completion of the required corrective action shall be independently verified by an individual designated by the Nuclear Operations Section Manager. The person who performs this task shall sign and date the associated EOP Validation Discrepancy Report Part II in the space provided.
- G. Documentation

Documentation of the validation of EOPs shall consist of the following items:

- 1. EOP Validation Scenario Outlines and respective Cover Sheets
- 2. EOP Validation Exercise Performance Records
- 3. SOP Validation Exercise Checklists
- 4. EOP Validation Exercise Questionnaires
- 5. Part I EOP Validation Discrepancy Reports and associated Continuation Sheets for each identified discrepancy
- Part II EOP Validation Discrepancy Reports and associated Continuation Sheets for each identified discrepancy

G. Documentation (Continued)

The completed documentation package shall be returned to the Muclear Operations Manager. A review of all materials for compliance with the requirements and instructions of the EOP Verification Program shall be performed by the Nuclear Operations Manager and the QA Director; these individuals shall sign and date the EOP Validation Record (illustrated on page 10 of Attachment A) when they have determined that all requirements have been satisfactorily completed.

All records of EOP Validation shall be retained as specified by NOO Procedure 1.3.7.

V. ATTACHMENTS

- A. Forms For Development and Performance of EOP Validation Program Activities
- B. EOP Validation Program Exercise Checklist
- C. EOP Validation Program Exercise Ouestionnaire

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ATTACHMENT A

FORMS FOR
DEVELOPMENT AND PERFORMANCE
OF
EOP VALIDATION PROGRAM
ACTIVITIES

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EOP	Validation	Test Plan	. 5
EOP	Validation	Exercise Performance Record	. 6
EOP	Validation	Discrepancy Report, Part I	. 7
EOP	Validation	Discrepancy Report, Part II	. 8
EOP	Validation	Discrepancy Report Continuation Sheet	. 9
EOP	Validation	Record	. 10

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BOSTON EDISON COMPANY PILGRIM NUCLEAR POHER STATION
EOP VALIDATION SCENARIO COVER SHEET SCENARIO # DESCRIPTION OF EVENT(S)/COMDITIONS (summary)
PROCEDURES EXERCISED (number and revision, and scope of coverage)
INITIAL CONDITIONS (simulator 1C number and description)
SIMULATOR MALFUNCTIONS (number and description)
EQUIPMENT OUT OF SERVICE (11st)
ESTIMATED RUN TIME OF SCENARIO (hours)
Prepared by:
Reviewed/Approved by: Nuclear Training Organization
Date:

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BOSTON EDISO PILGRIM NUCL	N COMPANY EAR POHER STA	TION	Rev
	E	OP VALIDATION TES	T PLAN
DAY #:	(Date		
Sequence	Scenario #	Run Time	Remarks
1.			
2.			
3.			
4.			
5.			
6.	-		
DAY #:	(Date)	
Sequence	Scenario #	Run Time	Remarks
1.	-		
2.	-		
3.			
4.	-	-	
5.	-	-	
6.	-		
Approved:	Exercise Dire	ector	
			Date

BOSTON EDISON COMPANY PILGRIM NUCLEAR POHER STATION

EOP VALIDATION EXERCISE PERFORMANCE RECORD

SCENARIO	
PARTICIP	ANTS
Exerc	ise Director
St mul	ator Director
Opera	and shift
PERFORM	ANCE CHECKLIST
171	Initial Conditions Set
1-1	Participants briefed
1-1	Scenario executed: Date Time
1=1	Performance deviations noted on Scenario Outline
171	EOP Validation Exercise Checklist completed
171	EOP Validation Exercise Questionnaire completed
121	Exercise results reviewed with participants
121	Part I EOP Validation Discrepancy Reports completed for each identified performance deviation, procedure discrepancy, operator concern, and other deficiency
All ch	ecklist items completed:
/s/ Ex	ercise Director Date

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	EOP V	ALIDATION DISCREPANCY REPORT
		Part I
DISCREF	ANCY ID #	
SCENARI	O # DURING MHICH D	ISCREPANCY HAS NOTED
SOURCE	OF DISCREPANCY	
171	Validation Scenar	10 Outline
121	Validation Exerci	se Checklist
171	Validation Exerci	se Questionnaire
1_1	Other (describe)	
EOP AP	PLICABILITY	
	number(s) revision	Flowchart Elements (describe)
	_	
	PTION OF DISCREPANCE	Y
DESCRI		

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	EOP VALIDATION DISCREPANCY REPORT	
	Part II	
ISCREPANCY ID #		
OP APPLICABILITY	(Number and revision)	
CORRECTIVE ACTION	(Description)	
		121
		121
Prepared by:		121
Prepared by: Nam. (Print)	Continuation Sheet(s) Attached	121
Prepared by: Nam. (Print)	Continuation Sheet(s) Attached	121
Prepared by: Nam. (Print) Signature Implemented by:	Continuation Sheet(s) Attached	121
Prepared by: Nam. (Print) Signature Implemented by: Name (Print)	Continuation Sheet(s) Attached Date	
Prepared by: Nam. (Print) Signature Implemented by: Name (Print)	Continuation Sheet(s) Attached Date	
Prepared by: Nam. (Print) Signature Implemented by: Name (Print) Signature Completion verifi	Continuation Sheet(s) Attached Date	

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	EOF V	LIDAT	ION DISCRE	PANCY REPURT	
		Con	tinuation	Sheet	
DISCREPANCY ID #			_		
EOP APPLICABILITY	(Number	and r	evision)	i harrian	
Continuation of:	Part I	121	Sheet		
	Part II	1_1	Sheet	of	
	-				
72 72 7 7					
				12/2 14	
		-			
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		EOP VALIDATION RECORD
OPs	VALIDATED (Numbe	r and Revision)
	1-1-1-1-1	
ATTA	CHMENTS	
1_1	EOP Validation S	Scenario Outlines and respective Cover Sheet
1_1	EOP Validation E	Exercise Performance Records
1_1	EOP Validation i	Exercise Checkiists
1_1	EOP Validation I	Exercise Questionnaires
121	Part I EOP Valid Continuation Sho	dation Discrepancy Reports and associated eets for each identified discrepancy
REVI	EMED BY:	
Muci	ear Operations	
		Date
QA I	Oirector	
		Date

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ATTACHMENT B

EXERCISE CHECKLIST

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INSTRUCTIONS FOR COMPLETING EOP VALIDATION EXERCISE CHECKLIST

The questions of this checklist shall be answered by the Exercise Director. One set of responses should be completed at the conclusion of each scenario.

This checklist should be completed as follows:

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7	USE	DIECK	1110

2.	Identify comments	the	scenar based,	io n	the	date	on	which	the h ti	ati	scena	rio	wers	run.
						Date								

- Enter the scenario number on the top of each attached page in the space provided.
- Answer each of the attached questions "yes" or "no" based on observation of the actions of the control room operators during the scenario. In the "Comments" section under each question provide EOP references as appropriate for the answer given. Also provide any additional remarks necessary to fully explain identified discrepancies, deficiencies, etc. Comments should be as specific as possible. Use the attached Comment Continuation Sheet when additional space is necessary to adequately explain a response to a particular question. Do not use the same Comment Continuation Sheet for making comments that are applicable to different questions.
- 5. When answers to all questions are completed, sign below.

MOTE

Discrepancy ID numbers shall be assigned after all EOP validation exercises have been completed.

Completed by:	
Name (print)	
Signature	

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F Ch.	A. TID	AILUM	EXERCISE	CHECKLIST

	Comment Continuation Sheet attached
ancy ID #	
Did the operators required actions, sequence?	correctly perform all Yes and do so in the proper
	Comment Continuation Sheet attached
Did the operators actions?	perform any inappropriate Yes
Comments	
Comments	

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SCENARIO		
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FOP V	ALTDATION	FYFRCISE	CHECKLIST	(Continued)
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4.	Did the operators appear to have difficulty Yes understanding any of the decisions or instructional steps presented in the EOP(s)?	No
	Comments	
	Comment Continuation Sheet attached	121
Discr	epancy ID #	
5.	Here the operators able to comply with all Yes prescribed instructions and actions?	No
	Comments	
Discr	Comment Continuation Sheet attached	ıΞι
6.	Were the prescribed instructions and actions Yes effective in stabilizing plant conditions?	No
	Comments	
	Comment Continuation Sheet attached	121
Disc	repancy ID #	

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	SCENARIO #	
P V/	ALIDATION EXERCISE CHECKLIST (Continued)	
	Did the operators appear to need additional Yes guidance at any time during the transient? Comments	No
scr	Comment Continuation Sheet attached	E
	Were all necessary system controls and Yes instrumentation available to the operators? Comments	No
	Comment Continuation Sheet attached	ıΞι

Additional comments:

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P							-	- 100

SCENAR	-	
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THE PERSON NAMED IN COLUMN TWO IS NOT THE OWNER, THE OW		

EOP VALIDATION EXERCISE CHECKLIST

Comment Continuation Sheet

Continuation of	comments on Chec	klist Questi	on number:	_	_
4					

-					
-			-		
				-	-

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ATTACHMENT C

EOP VALIDATION PROGRAM EXERCISE QUESTIONNAIRE

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INSTRUCTIONS FOR COMPLETING EOP VALIDATION EXERCISE QUESTIONNAIRE

Each control room operator participant is requested to complete this questionnaire based on personal impressions and observations during the scenario just performed.

This Questionnaire should be completed as follows:

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- 1		U 2 W	D 1	ACR.	TIME .

2.	Identify	the	scenari based,	lo n	umber	upon	wh	ich t	he at	tached a scenari	nswers o was	and
	Scenario					Date	_					

- Enter the scenario number on the top of each attached page in the space provided.
- Answer each of the attached questions "yes" or "no" based on the results of the scenario just executed. In the "Comments" section under each question provide EOP references as appropriate for the answer given. Also provide any additional remarks necessary to fully explain identified discrepancies, deficiencies, etc. Comments should be as specific as possible. Use the attached Comment Continuation Sheet when additional space is necessary to adequately explain a response to a particular question. Additional copies of Comment Continuation Sheets are available; do not use the same Comment Continuation Sheet for making comments that are applicable to different questions.
- 5. When answers to all questions are completed, sign below.

NOTE

Discrepancy ID numbers will be assigned by the Exercise Director after all EOP validation exercises have been completed.

Completed by:	
Name (print)	
Signature	

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SCENARIO		
SCEUVUTO	-	depression of

FIDE VALIDATION EVENCTOR CORDINATION	EOP MALIDATION	EXERCISE	QUESTIONNAIRE
--------------------------------------	----------------	----------	---------------

	Comment Continuation Sheet att	ached
ancy ID #		
Has any instruction EOPs difficult to un	or decision in any of the inderstand? Ambiguous? etc.	res
	Comment Continuation Sheet at	tached
pancy ID #		
Here you able to pe actions in the spec	erform all the prescribed ified sequence?	Yes
	Comment Continuation Sheet a	

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SCENARIO	
PCEMVKIO	_

Nas the flowpath through follow? Comments			Yes
Com	ment Continuatio		ttached
ancy ID #		_	
Did you need any additi guidance at any time du	onal procedural ring the transie	int?	Yes
Comments			
Con	ment Continuation		attache
pancy ID #		-	
Has any unnecessary in the EOP(s)	formation presen	t in	Yes
Comments			
	mment Continuati		

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SCENARIO		

EOP	VALIDATION	EXERCISE	QUESTIONNAIRE	(Continued)
-----	------------	----------	---------------	-------------

Was the terminolog consistent with the panels and in other	y used in the EOP(s) Yes at used on the control er procedures?
	Comment Continuation Sheet attached
	nd tables in the EOP(s) easy Yes
	Comment Continuation Sheet attached
	instrumentation and controls Yes
account of the test	control room?

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Did the available instrumentation provide the required range of indication and accuracy? Comments Comment Continuation Sheet attached ancy ID # Did the EOP(s) ever mislead you, specify inappropriate actions, or provide you with incorrect information? Comments		PAGE 0
Did the available instrumentation provide the required range of indication and accuracy? Comments Comment Continuation Sheet attached ancy ID # Did the EOP(s) ever mislead you, specify inappropriate actions, or provide you with incorrect information? Comments Comments	SCEN	ARIO
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EOP VALIDATION EXERCISE QUE	STIONNAIRE (Continued)
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13.	Where cross-references were provided in the EOP(s), was the specified procedure, section, step, etc., correct in each case?	Yes	No
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14. Additional comments:

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EOP VALIDATION EXERCISE QUESTIONNA!RE

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