

Millstone Unit one OPERATIONS MANUAL

SECTION 9.1

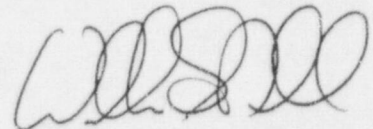
"PROCEDURE USE"

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7-11-97
Effective Date

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PROCEDURE USE

1.0 PURPOSE

- 1.1 This Section describes specific expectations for Operations personnel related to procedure use. The guidance in this Section supplements DC 4, "Procedural Compliance".

2.0 SITUATIONS REQUIRING PROCEDURES

- 2.1 Procedures are required IAW Technical Specification 6.8.1 for Plant operation and administrative functions. Appendix 'A' of Regulatory Guide 1.33 provides a list of systems or evolutions which require procedures. The following guidelines should be considered when determining whether or not a procedure is necessary to accomplish a particular activity or evolution:

1. The activity has the potential to affect Emergency Safety Features (ESF) equipment or its support systems.
2. The activity can affect the reactor components or fuel.
3. The activity is performed on operating equipment or could cause personnel injury or equipment damage.
4. The activity requires coordination between two or more work groups.
5. Task has the potential to cause a system or component to become inoperable.
6. The activity, in the judgment of the SM/US, is so complex that an approved procedure is required.

- 2.2 For situations where a procedure is needed and procedural guidance does not exist, the SM/US may direct performance of the necessary actions without formal procedural guidance. Efforts shall be made to develop a procedure for future use.

- 2.3 Guidance for operation/manipulation of plant equipment shall only be provided by an approved administrative process(i.e., OP, SP, Department Instruction, etc.). Operating guidance shall not be provided by memorandum, night orders, or other unapproved guidance.

3.0 PROCEDURE USE GUIDELINES

- 3.1 Plant operations shall be conducted in accordance with approved operating procedures.
- 3.1.1 If the evolution will result in any changes in the Control Room (e.g. alarms, loss of indication, equipment trips, etc.), then Control Room personnel shall be notified about the evolution.
- 3.1.2 Operations personnel shall utilize procedures in accordance with level of use designation (refer to DC 4).

3.1.3 Portions of procedure sections may be used with the authorization of the SM/US per DC-4. These should be identified before the procedure is performed.

3.2 Personnel are responsible to:

1. Notify the SM/US if they are not qualified to perform the procedure.
2. Verify the procedure is appropriate for the task.
3. Verify the procedure copy is the latest revision and has all the changes issued against it.
4. Review and understand procedural guidance before actual performance.
 - a) It may be beneficial to highlight key points. (e.g., target flow rate)
 - b) Non-applicable steps should be identified and lined-out ahead of time.
 - c) If the sequence of steps is being altered, identify the new sequence on the copy after obtaining authorization from the US or SM in accordance with DC-4.
 - d) If an action will result in an ESF actuation, then the US/SM shall be notified of the expected ESF actuation.
 - e) Determine how each step of the procedure will be physically carried out.
 - f) Understand the effects of each manipulation, including expected indications, before performing the manipulation (avoid cookbook operation).
 - g) A pre-job brief with the appropriate personnel should be performed prior to procedure performance in accordance with 1-OM-4.2.
5. Carry out the procedure as written.
 - a) Verify all prerequisites are satisfied.
 - b) Compare actual component description to procedure description.
 - c) Notify Control Room personnel prior to the manipulation of any component which will result in any changes in the Control Room. (alarms, loss of indication, equipment trips, planned ESF actuations, etc.)
 - d) Personnel will utilize the STAR program to manipulate any plant component.
 - e) Monitor and verify expected indications/results.
 - f) Notify the SM/US if equipment response is not consistent with procedure intent or expected results
6. Be aware of task interruptions (i.e., distractions).
 - a) Before resuming the procedure, always review system status and verify last step performed.

- b) When a long break occurs during task performance, the performer should verify requisite conditions (prerequisites) are met and review previously completed steps before continuing.

4.0

SPECIFIC PROCEDURE USE

4.1

System Operating Procedures

- 4.1.1 Procedure PREREQUISITES provide a complete listing of systems required to be in operation or available to support accomplishing the procedure PURPOSE.
- 4.1.2 If a listed system is known or suspected to be in an alignment that does not support the PURPOSE, then the listed procedure(s) (or appropriate procedure(s) in the listed procedure section) should be used to align the system in a manner to support the procedure PURPOSE.
- 4.1.3 To meet the PREREQUISITES for a listed system to be placed in operation or to be made available, the Operator is expected to consider his knowledge of, or review, the following:
1. Narrative Logs
 2. Plant/system/equipment status
 3. Control Room panel, local control panel, and local indications of equipment status
 4. Procedures referenced in the PREREQUISITES
 5. Performance of the referenced procedures as needed to achieve confidence that the listed system will support the PURPOSE of the procedure being performed.
- 4.1.4 It is not required that each procedure listed in the PREREQUISITES actually be performed in its entirety each time a procedure is entered. The SM/US will determine what procedure sections to perform to meet the PREREQUISITES.

4.2

Off-Normal Procedures

- 4.2.1 Symptoms and Immediate Actions of Off-Normal Procedures shall be memorized by licensed personnel. Control Room personnel shall be able to initiate these actions without reference to the ONP.
- 4.2.2 Off-Normal Procedures shall be directed by the SM/US unless plant conditions require their attention elsewhere. ONP's may then be turned over to the Control Operators for implementation.

4.3

Emergency Operating Procedures

- 4.3.1 Entry Conditions into and Immediate Actions of EOP's shall be memorized by licensed personnel. Control Room personnel shall be able to initiate these actions without reference to the EOP's.
- 4.3.2 Use and implementation of EOP flowcharts is governed by EOP 550.2, "Unit One Emergency Operating Procedures User's Guide."

5.0 PLANT TRANSIENTS

- 5.1 During significant events (e.g., major leaks, pipe ruptures, fires, etc.), individuals are susceptible to responding emotionally (e.g., haste, fear, etc.) rather than responding as they are trained. It is precisely these situations that require following safety and radiological practices to protect the individual. When coming upon a scene, individuals shall ensure their safety first.
- 5.2 Before deviating from any procedural requirement, the situation shall be assessed, and the SM/US will determine the proper action. (i.e., taking emergency action that departs from a license condition or a technical specification when the action is immediately necessary to maintain public health and safety and no action consistent with license conditions and technical specifications that can provide similar protection is immediately apparent). Situations involving 10CFR50.54(x) require notification and concurrence of the SM/US.
- 5.3 The plant is designed for significant events (e.g., automatic scrams, system isolations, fire system actuation, etc.). It is preferable to clean up or to repair the plant rather than to risk safety by rushing inappropriately to take an action (e.g., closing a valve or stopping a leak) in an area threatening to safety, including High Radiation Areas and areas with changing radiological conditions.
- 5.4 In an emergency, Operators are expected to take prompt actions to mitigate the event. This includes initiating EOP and ONP Immediate Actions or Operating Procedure steps without reference to the applicable procedure.
- 5.4.1 If an operator identifies a condition where immediate action is required, they shall:
1. Confirm the requirement for action (e.g. check backup indications)
 2. Announce to the other control room personnel the condition and intended action(s)
 3. Perform the actions. Confirmation is not required before performance
- 5.4.2 When doubt exists in regard to the level of procedure use required, the SM/US shall make the determination.
- 5.5 System Operating Procedures
- 5.5.1 If time and conditions of a transient permit, system operating procedures should be used as described for non-transient plant conditions to perform the actions.
- 5.5.2 During significant plant transients, Control Operators shall be capable of operating ESF equipment without reference to the procedure.
- 5.5.3 When time and conditions of the transient permit, the procedure shall be consulted to verify that the task was performed correctly. The SM/US shall be notified if the procedure was performed incorrectly to identify any adverse effects on the plant.