

INFORMATION ONLY

OR19C 67X-0003

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Rev.: 2

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
PERRY NUCLEAR POWER PLANT OPERATIONS MANUAL

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FEB 21 1986

* TEMPORARY INSTRUCTION *

TITLE: Identifying and Evaluating January 31, 1986
Suspected Earthquake Damage

TYPE OF INSTRUCTION: General Temporary

REVISION: 2 EFFECTIVE DATE: 2/20/86 EXPIRATION DATE: 8/20/86

		DATE
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Identifying and Evaluating January 31, 1986
Earthquake Related Damage

GTI-0003

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10CFR50.59 Applicability Check

	<u>Yes</u>	<u>No</u>
Is there a change to the plant as described in the FSAR? Reason: <u>THIS INSTRUCTION DESCRIBES NO CHANGE TO THE PLANT, ONLY EXAMINES THE REVIEW PROCESS FOR ABNORMALITIES IDENTIFIED IN THE PLANT</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there a change to a procedure/instruction as described in the FSAR? Reason: <u>THIS INSTRUCTION ONLY CHANGES THE WC PROCESSES USING STANDARD PROCEDURES DOES NOT AFFECT THE PLANT IN ANY MANNER NOR CONSIDERED IN THE FSAR</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there a test or experiment not described in the FSAR? Reason: <u>NO TESTS OR EXPERIMENTS ARE DESCRIBED IN THE INSTRUCTION</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there a change to the Technical Specifications? <u>NO CHANGE TO TECHNICAL SPECIFICATIONS IS REQUIRED BY THE INSTRUCTION</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there an affect on the environment or change on the Environmental Protection Plan? Reason: <u>THIS INSTRUCTION HAS NO AFFECT ON THE ENVIRONMENT OR THE E.P.P.</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Answers to all questions are "No", no potential for an Unreviewed Safety or Environmental Question exists, no further review required.		
<input type="checkbox"/> Answers to one or more questions is "Yes", further review required.		
Prepared By: <u>Kenneth Shuman</u>	Date: <u>2/18/86</u>	
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SCOPE OF REVISION:

1.0 Purpose

To describe the process for the documentation, review and evaluation of (1) items identified during the plant inspections conducted immediately after the January 31, 1986 seismic event and (2) newly discovered items that may have resulted from the seismic event.

2.0 Scope

In order to accurately document the impact of the January 31, 1986, seismic event at the Perry Nuclear Power Plant, damage that may have resulted from the event must be identified and properly evaluated.

This instruction describes the process for reviewing and evaluating the system/structural engineering inspection team results identified immediately following the January 31, 1986, seismic event. It is used in conjunction with PAP-0606 "Condition Reports and Immediate Notifications" by documenting the items in the earthquake generated Condition Report Investigation Summary.

This instruction also describes the process for reviewing and evaluating new Work Requests to identify any damage which could have been caused by the earthquake and not identified in the inspection team results described above. Any further documentation of plant system, structure and component (SSC) damage shall be through the generation of a Work Request.

3.0 Responsibilities

- 3.1 The GSE Technical Section shall review the disposition of Earthquake Inspection Team Items (EITIs) identified during the January 31, 1986, seismic event through the Condition Report process. He shall forward the Condition Report dispositioning these items to PORC for review.
- 3.2 The General Supervising Engineer, Outage Planning Section has the overall responsibility for Work Request review and evaluation, and for informing the Nuclear Regulatory Commission of earthquake related damage.
- 3.3 The PWC Review Team is responsible for the review and initial screening of incoming Work Requests. The Review Team will identify plant or equipment damage which could have potentially resulted from the January 31, 1986 earthquake.
- 3.4 The Compliance Engineer shall coordinate the disposition of the EITIs with the appropriate onsite engineering organization for input into the Condition Report process.

4.0 References

- 4.1 POP-1501, "Identification and Control of Deficient Items".
- 4.2 PAP-0502, "Preparation, Review, Approval, Revision, and Cancellation of Administrative Procedures".
- 4.3 PAP-0606, "Condition Reports and Immediate Notifications".
- 4.4 PAP-0902, "Work Request System".
- 4.5 PAP-0905, "Work Order Process".
- 4.6 Confirmatory Action Letter, (CAL-RIII-86-01A), dated February 4, 1986.

5.0 Definitions

5.1 Earthquake Inspection Team Items (EITIs)

Items identified within 24 hours following the January 31, seismic event by the system/structure engineering inspection team and any others items deemed appropriate by the GSE Technical Section. These items will be evaluated utilizing this instruction for applicability to established Corrective Action programs (e.g. Work Request, Nonconformance Report, etc).

5.2 Project Work Center (PWC) Review Team

A review team composed of design and PWC engineers assigned to review new Work Requests. The personnel assigned to the review team include engineers with the following backgrounds:

- Engineers who are trained and experienced in plant design features, system testing, operations and plant Technical Specifications.
- An engineer experienced in piping design and construction and in stress analysis.
- An engineer experienced in building structural design and construction.
- Engineers representing the electrical and mechanical disciplines who are experienced in plant design and construction.

6.0 Details

6.1 General

- 6.1.1 Nonconformance Reports (NRs) and Work Requests (WRs) shall be generated utilizing the criteria of POP-1501, "Identification and Control of Deficient Items".
- 6.1.2 Initial disposition of EITIs will be tracked by the Compliance Engineering Unit and shall be incorporated into an appropriate Condition Report (CR) Investigation Summary.
- 6.1.3 All additional abnormal or unusual observations shall be initially documented by a Work Request. These items shall not be reworked, repaired, adjusted, or otherwise disturbed prior to review and disposition in accordance with this instruction.
- 6.1.4 Those conditions which may involve potentially reportable events or SSC OPERABILITY shall also be processed in accordance with PAP-0606 " Condition Reports and Immediate Notifications".

6.2 Review/Documentation of EITIs

- 6.2.1 The Compliance Engineering Unit shall interface with the Nuclear Engineering Department (NED) to review and evaluate each EITI.
- 6.2.2 Each EITI shall be evaluated by NED to determine:
1. If the item under review is:
 - a. Safety Related,
 - b. Augmented Safety Related, or
 - c. Non-Safety Related.
 2. If the item under review is:
 - a. Earthquake related,
 - b. Indeterminate, or
 - c. Non-earthquake related.

Note: Justification shall be provided for each non-earthquake related evaluation.

3. If the disposition of the item requires:
 - a. An NR or WR, in accordance with POP-1501, "Identification and Control of Deficient Items", or
 - b. No action, indicating the item is not a deficiency.

Note: Justification shall be provided for "no action" evaluations.

- 6.2.3 The Compliance Engineering Unit shall include the engineering disposition of the EITIs (as determined in 6.2.2 above) in the applicable CR Investigation Summary.
- 6.2.4 The Technical Section PPTD, shall take measures to initiate the corrective action documents identified by the CR Investigation Summary. WRs generated as a result of this shall be processed in accordance with Section 6.4 of this instruction.
- 6.2.5 The Corrective Action document shall include the disposition of the item as determined by Section 6.2.2 above.
- 6.2.6 The applicable Condition Report (CR) documenting the seismic event shall include the disposition of each EITI. After GSE Technical review, the CR shall be reviewed by PORC and approved by the Managers PPOD/PPTD. The applicable CR shall be closed out when all EITIs are dispositioned in accordance with PAP-0606, "Condition Reports and Immediate Notifications".
- 6.3 Review/Documentation of New Work Requests
 - 6.3.1 New Work Requests generated per PAP-0902, "Work Request System", shall be routed through the PWC Review Team prior to being converted into a Work Order.

Note: If requested by the Unit Supervisor, a Work Order may be immediately initiated for tracking purposes only. The Unit Supervisor shall ensure that the applicable Work Request contains the following statement:

"Work may not commence until the seismic evaluation is completed in accordance with GTI-0003."

The original Work Request shall then be routed as described below.

6.3.2 The PWC Review Team shall assign a number to the WR and enter it in their Seismic Review Tracking Log (Attachment No. 1). The number assigned shall be a two part number:

XXX - YYY

XXX - Sequential Day of the year

YYY - Sequential number for the day

A brief description of the WR will be entered along with the WR number.

6.3.3 The PWC Review Team will initially screen new WR's to identify those which describe a condition that could possibly have been caused by the earthquake. A "Y"(YES) or "N"(NO) will be entered in the Tracking Log to indicate results of the initial screening process. A conservative approach will be taken during the initial screening. Conditions such as the following will be designated for further evaluation:

- 1) Electrical anomalies
- 2) Instruments found out of calibration
- 3) Unexplained piping, tubing leaks
- 4) Building or structural abnormalities
- 5) Hanger or Snubber abnormalities

WR's that are not earthquake related will be released to the PWC for generation of a Work Order.

Note: Work Requests (WRs) generated as a result of Section 6.2 of this instruction need not be reviewed again by the PWC Review Team for earthquake applicability.

6.3.4 WR's initially identified as potentially earthquake related will be further evaluated by NED.

6.3.5 The evaluation discussed in 6.3.4 above will determine:

1. If the WR under review is:
 - a. Safety Related,
 - b. Augmented Safety Related, or
 - c. Non-Safety Related.

2. If the WR under review is:

- a. Earthquake related,
- b. Indeterminate, or
- c. Non-earthquake related.

Note: Justification shall be provided for each non-earthquake related evaluation.

3. If the disposition of the WR requires:

- a. An MR, in accordance with POP-1501, "Identification and Control of Deficient Items", or
- b. No action, indicating the item is not a deficiency (in this case, the WR should be canceled in accordance with PAP-0902, "Work Request System").

Note: Justification shall be provided for "no action" evaluations.

6.3.6

Engineering evaluation results will be documented on the Evaluation Form, Attachment 2. This form shall be maintained with the Seismic Review Tracking Log.

6.3.7

A brief description of the evaluation results will also be entered in the Seismic Review Tracking Log. Non earthquake related and Non Safety Related WR's will be released for generation of a Work Order.

6.3.8

If the Work Request is identified as potentially earthquake related, the GSE Outage Planning Section shall be notified as soon as possible.

6.3.8

The NRC shall be notified by the GSE Outage Planning Section of all potentially earthquake related conditions within 24 hours.

6.4

Processing Work Requests

6.4.1

WRs which are either Non-Safety Related or non-earthquake related shall be released to the PWC for Work Order processing in accordance with PAP-0905, "Work Order Process".

6.4.2

All other WRs, shall be further processed by the PWC as follows:

- 1. Attachment 3, Work Directions, is attached to the WR and sent to the work unit planners.

2. The Work Package is developed per PAP-0905, "Work Order Process" and Attachment 3.
3. The Work Package is routed to the NRC representative for review.
4. Once released by the NRC, the PWC will release the package to the field.

6.5 Records

- 6.5.1 The following documents are generated by this procedure:

Quality Assurance Records

Seismic Review Tracking Log
Evaluation Form
Work Directions

Non-Quality Records

None

Records identification and disposition are accomplished in accordance with the Records Retention/Disposition Schedule (RR/DS) and handled in accordance with PAP-1701, "Records Management".

7.0 Attachments

- 7.1 Attachment 1 - Seismic Review Tracking Log
Form: GTI-0003-1
- 7.2 Attachment 2 - Evaluation Form: GTI-0003-2
- 7.3 Attachment 3 - Work Directions Form: GTI-0003-3

WR #	POT. C'D BY SERVING (Y/N)	BRIEF DESCRIPTION OF WORK REQUEST	PENG EVAL	DATE TIME	EVALUATION OF "YES" RESP. IN COLUMN 2

EVALUATION FORM

Earthquake Evaluation of

Work Request # _____

Engineering Report by _____ Ext. 6090

Time/Date _____

Safety Related Non-Safety Related Augmented Safety Related

Earthquake Related Indeterminate Non-Earthquake Related

Talked to WR Originator Talked to PPTD Engineer

Field Inspection

Comments:

Conclusions:

WR # _____

WORK DIRECTIONS

The attached Work Request has been evaluated as Caused By or Potentially Caused By the January 31, 1986 earthquake. The following special controls are to be implemented:

- 1) Contact a Design Engineering representative to determine if special procedures or controls are necessary in preparing the Work Order.

Ed Christianson
John Eppich
Tom Fetterman

Roger Parker
Daryl Gaffney
Jan Shingler

- 2) Upon arrival at work area, record any additional unusual as-found conditions not described on W.R.

- 3) Prior to work in the field, route the work package by the NRC Resident Inspector for review and determination of an NRC Hold Point in the W.O. is desired.

NRC Hold Point
desired ?

_____ YES
_____ NO

NRC Resident Inspector

This Control Sheet is to be included as a part of the Work Order Package.