



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20546

MAR 1 1988

AEOD/S801

MEMORANDUM FOR: Brian Sheron, Director
Division of Reactor and Plant Systems, RES

Jack W. Roe, Director
Division of Licensee Performance and
Quality Evaluation, NRR

FROM: Thomas M. Novak, Director
Division of Safety Programs, AEOD

SUBJECT: AEOD/S801 - SIGNIFICANT EVENTS THAT INVOLVED PROCEDURES

Enclosed is the "Special Study Report - Significant Events Involving Procedures" conducted by AEOD. The data are based on licensee event reports (LERs) of events that occurred in 1984 and 1985. Based on the study, we find that reportable events associated with procedures were experienced in all modes of operation, during operations, maintenance and testing. Events described in LERs as having been the result of procedure defects might also have been due to other factors, such as inadequate training, poor maintenance practices, and personnel error. Based on a review of current requirements regarding procedures, visits to five sites, and several procedures, we find that the current procedures in many plants would need improvement.

Although several plants have initiated procedure improvement programs and the emergency procedures are now symptom based, we are still of the opinion that the results of this study are generally applicable today. We should also recognize that the large number of procedures involved, the established administrative programs that would be required to be changed, and the necessary training associated with changes in procedures, make it difficult to make improvements in procedures fast.

We understand that value impact analyses requiring licensees to upgrade procedures in addition to emergency operating procedures are currently being done. The enclosed study may be of value in those analyses.

We plan to issue this report as part of the 1987 AEOD Annual Report.

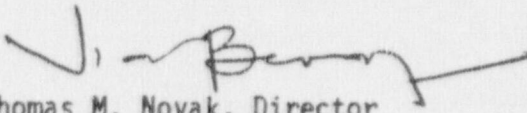
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Brian Sheron
Jack Roe

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If you have any questions or comments on this study, please contact Gene Trager of my staff on extension 24496.


h Thomas M. Novak, Director
Division of Safety Programs
Office for Analysis and Evaluation
of Operational Data

Enclosure: As stated

cc: E. Jordan
C. J. Heltemes
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