



Sig Level 3

Order: TARP Procedure non-compliance
Order Type: NUCR
Status: TECO CNE PRT MANG NMAT PRC SETC
Notification:
Unit: SH
Functional Location: SH.OP-AP.ZZ-0101(Q) POST-TRANSIENT RESPONSE REQUIREMENTS
Equipment:
Assembly:
Location:
Room:
System: OP
Priority: 3 Medium
Main Work Center: R-RP00
Status: TECO CNE PRT MANG NMAT PRC SETC
Basic Dates: Start: 07/24/2002 Finish: 07/24/2002 Overdue:
Sfty Rltd/QA Req'd:
Sfty Class:
ule Code: NA
SEISMIC
EQ

Permission to Begin Work Date: 00:00:00
Time:

Description of Work: TARP Procedure non-compliance
07/18/2002 12:03:04
NOTIFICATION SUMMARY:

Procedure non-compliance: SH.OP-AP.ZZ-0101, POST-TRANSIENT RESPONSE REQUIREMENTS (TARP) teams may not be performing required actions and personnel are not aligned with the emergency response organization.

1) DESCRIBE THE ACTUAL CONDITION?

SH.OP-AP.ZZ-0101, POST-TRANSIENT RESPONSE REQUIREMENTS describes the responsibilities of the Transient Assessment Response Plan (TARP) team. The following statements are from SH.OP-AP.ZZ-0101 and all relate to TARP Team transient response responsibilities.



Section 3.12 states, TARP Team Members:

Review all "After-the-Fact" ECG classifications to ensure that the station is not in an emergency situation as well as the circumstances concerning why an "After-the-Fact" classification was made.

EP TARP team personnel should review all Unusual Event classifications and subsequent notifications for accuracy and timeliness. Create a timeline on EP related activities and perform "Observation Checklist" from NC.EP-DG.ZZ-0001(Z), Maintenance of Emergency Preparedness Performance Indicator (PI) Data.

Section 5.2.4, states the TARP Team should review all "After the Fact" ECG classifications to ensure that the station is not in an emergency situation as well as the circumstances under which the "After-the-Fact" classification was made.

Section 5.1.1 expects that TARP Team members to be Emergency Duty Responders or not duty responders to be fit-for duty and within 60 or 90 minutes of the plant

ATTACHMENT 1, TRANSIENT ASSESSMENT RESPONSE PLAN (TARP), requires TARP team initiation for 16 items that may require reporting per ECG. They include:

1. Unplanned ESF activations.
2. Valid ECCS/SI actuations with discharge to the RCS/vessel.
3. Exceeding any Tech Spec Safety Limit.
4. Violations of Tech Spec Action Statements or design basis.
5. Unplanned or inadvertent criticality.
6. Radioactive or non-rad spill/discharge onsite or from offsite that adversely affects the unit(s).
7. Any occurrence resulting in an environmental impact (NJPDES, EPA reportable occurrence, ECG reportable environmental event).
8. Any radiation over-exposure per ECG.
9. Unexpected contamination of > 100 ft² area outside plant structures OR discovery that contaminated person or material may have left the Protected Area
10. Fatality.
11. Deviation from procedures pursuant to 10CFR50.54(x).
12. Plant in unanalyzed condition that impacts plant safety.
13. Plant in a condition not covered by normal/abnormal or emergency procedures.
14. Significant Loss of Control of Security Protective Measure.
15. PZR code safety valve discharge at Salem.
16. After-the-fact emergency condition reported per ECG.

ATTACHMENT 2, TARP DUTY ROSTER AND CALLOUT LIST, requires consulting with Emergency Preparedness concerning TARP team alignment of personnel.



If an emergency (ALERT or higher) is declared after or during TARP team implementation, the TARP team will be terminated and superseded by the Emergency Response Organization.

Contrary to these procedural requirements, TARP teams may not be performing all Sections and are being staffed without Emergency Preparedness alignment. It appears that the procedure is being leveraged more as a defacto staffing tool, then a transient assessment and Emergency Plan response related activities. This is evident in that D TARP team has only 2 out of 26 responders are EP responders.

This conclusion was made after reviewing the TARP Team procedural requirements with a former TARP Team Leader who has lead over 20 assessments in the past.

2) HOW DOES THIS ISSUE IMPACT PLANT OR PERSONNEL SAFETY?

Procedure compliance improves human performance by reducing the changes of knowledge based human errors. In this case, the most likely errors are:

Errors of Omission: Transient response is not classified as an emergency when it is.

Errors of Commission: Transient response is misclassification in Emergency Response Plan.

3) PSEG NUCLEAR OR REGULATORY REQUIREMENT NOT MET?

Regulatory and moral obligation to ensure transients are classified correctly relative to Emergency Response Organization with minimum chances of human error to misclassify a emergency during a transient.

4) WHAT CAUSED THE CONDITION?

Misuse of safety related #Q# procedure as a staffing tool.

Failure to follow procedures.

Imprecise communication - procedure is vague.

5) WHAT ACTIONS, IF ANY, HAVE BEEN TAKEN TO CORRECT THE CONDITION?

Have had several meetings with supervisor and manager on issue. At manager level the need for a notification was agreed to.

6) RECOMMENDED ACTION/CORRECTIVE ACTION AND WORK CENTER RESPONSIBLE FOR CORRECTING CONDITION. (USE TITLE/POSITION, NOT NAME)



Recommended Action: Apply a reasonable approach to procedural interpretation and complied with as written.

7) ANY OTHER RELEVANT INFORMATION?(WHO, WHEN, WHERE, WHY, REFERENCES, ESTIMATED COST, EMISTAG, ECT)

Other example of SH.OP-AP.ZZ-0101(Q) non-compliance:

20068549	06/06/2001	3	Pagers did not support
TARP team callout			
20077260	09/14/2001	3	SH.OP-AP.ZZ-0101(Q)
TARP contacts not made			
20079140	10/05/2001	3	failure to notify QA
onTARP notification			
20082863	11/07/2001	3	SH.OP-AP.ZZ-0101(Q)
Violation of			
SHOP-101,TARP Procedure			
20099631	05/10/2002	3	SH.OP-AP.ZZ-0101(Q)
TARP procedure			violation

20104118	06/27/2002	3	SH.OP-AP.ZZ-0101(Q)
TARP pager, pager did			not
function			



2

OP	Sub Op.	Work Center	Description	Start Date	Work	No	Durtn
0010		R-RP00	TARP Procedure non-compliance	07/24/2002	4.0	1	4.0
0020		R-CRT00	ENTER TREND CODING	07/24/2002	1.0	1	1.0

SAFETY: The Only C.H.O.I.C.E.

Commitment Help Oversight Involvement Communication Empowerment



Object Id	Object Description	Location	Room	SFTY RLTD/ QAR	SFTY CLASS/ QGC	SEIS	EQ	QA REQ
SH.OP-AP.ZZ-0101(Q)	POST-TRANSIENT RESPONSE REQUIREMENTS							
	TARP Procedure non-compliance							

07/18/2002 12:03:04
NOTIFICATION SUMMARY:

Procedure non-compliance: SH.OP-AP.ZZ-0101, POST-TRANSIENT RESPONSE REQUIREMENTS (TARP) teams may not be performing required actions and personnel are not aligned with the emergency response organization.

1) DESCRIBE THE ACTUAL CONDITION?

SH.OP-AP.ZZ-0101, POST-TRANSIENT RESPONSE REQUIREMENTS describes the responsibilities of the Transient Assessment Response Plan (TARP) team. The following statements are from SH.OP-AP.ZZ-0101 and all relate to TARP Team transient response responsibilities.

Section 3.12 states, TARP Team Members:

Review all "After-the-Fact" ECG classifications to ensure that the station is not in an emergency situation as well as the circumstances concerning why an "After-the-Fact" classification was made.

EP TARP team personnel should review all Unusual Event classifications and subsequent notifications for accuracy and timeliness. Create a timeline on EP related activities and perform "Observation Checklist" from NC.EP-DG.ZZ-0001(Z), Maintenance of Emergency Preparedness Performance Indicator (PI) Data.

Section 5.2.4, states the TARP Team should review all "After the Fact" ECG classifications to ensure that the station is not in an emergency situation as well as the circumstances under which the "After-the-Fact" classification was made.

Section 5.1.1 expects that TARP Team members to be Emergency Duty Responders or not duty responders to be fit-for duty and within 60 or 90 minutes of the plant

ATTACHMENT 1, TRANSIENT ASSESSMENT RESPONSE PLAN (TARP), requires TARP team initiation for 16 items that may require reporting per ECG. They include:

1. Unplanned ESF activations.
2. Valid ECCS/SI actuations with discharge to the RCS/vessel.
3. Exceeding any Tech Spec Safety Limit.
4. Violations of Tech Spec Action Statements or design basis.
5. Unplanned or inadvertent criticality.
6. Radioactive or non-rad spill/discharge onsite or from offsite that adversely affects the unit(s).
7. Any occurrence resulting in an environmental impact (NJPDES, EPA reportable occurrence, ECG reportable environmental event).
8. Any radiation over-exposure per ECG.
9. Unexpected contamination of > 100 ft² area outside plant structures OR discovery that contaminated person or material may have left the Protected Area
10. Fatality.
11. Deviation from procedures pursuant to 10CFR50.54(x).
12. Plant in unanalyzed condition that impacts plant safety.
13. Plant in a condition not covered by normal/abnormal or emergency procedures.

14. Significant Loss of Control of Security Protective Measure.
15. PZR code safety valve discharge at Salem.
16. After-the-fact emergency condition reported per ECG.

ATTACHMENT 2, TARP DUTY ROSTER AND CALLOUT LIST, requires consulting with Emergency Preparedness concerning TARP team alignment of personnel. If an emergency (ALERT or higher) is declared after or during TARP team implementation, the TARP team will be terminated and superseded by the Emergency Response Organization.

Contrary to these procedural requirements, TARP teams may not be performing all Sections and are being staffed without Emergency Preparedness alignment. ~~It appears that the procedure is being leveraged more as a defacto staffing tool, then a transient assessment and Emergency Plan response related activities.~~ This is evident in that D TARP team has only 2 out of 26 responders are EP responders.

~~→ THIS TEAM IS NOT TO PERFORM THE EMERGENCY RESPONSE~~
This conclusion was made after reviewing the TARP Team procedural requirements with a former TARP Team Leader who has lead over 20 assessments in the past. ~~THERE IS NO REQUIREMENT TO BE ON E-PLAN, BUT THOSE WHO ARE ON E-PLAN ARE ON STAFF FOR TARP~~

2) HOW DOES THIS ISSUE IMPACT PLANT OR PERSONNEL SAFETY?

Procedure compliance improves human performance by reducing the changes of knowledge based human errors. In this case, the most likely errors are:

Errors of Omission: Transient response is not classified as an emergency when it is.

Errors of Commission: Transient response is misclassification in Emergency Response Plan.

3) PSEG NUCLEAR OR REGULATORY REQUIREMENT NOT MET?

Regulatory and moral obligation to ensure transients are classified correctly relative to Emergency Response Organization with minimum chances of human error to misclassify a emergency during a transient.

4) WHAT CAUSED THE CONDITION?

Misuse of safety related #Q# procedure as a staffing tool.
Failure to follow procedures.
Imprecise communication - procedure is vague.

5) WHAT ACTIONS, IF ANY, HAVE BEEN TAKEN TO CORRECT THE CONDITION?

Have had several meetings with supervisor and manager on issue. At manager level the need for a notification was agreed to.

6) RECOMMENDED ACTION/CORRECTIVE ACTION AND WORK CENTER RESPONSIBLE FOR CORRECTING CONDITION. (USE TITLE/POSITION, NOT NAME)

EXHIBIT 12
0 17

Recommended Action: Apply a reasonable approach to procedural interpretation and complied with as written.

7) ANY OTHER RELEVANT INFORMATION? (WHO, WHEN, WHERE, WHY, REFERENCES, ESTIMATED COST, EMISTAG, ECT)

Other example of SH.OP-AP.ZZ-0101(Q) non-compliance:

20068549	06/06/2001	3	Pagers did not support TARP team callout
20077260	09/14/2001	3	SH.OP-AP.ZZ-0101(Q) TARP contacts not made
20079140	10/05/2001	3	failure to notify QA on TARP notification
20082863	11/07/2001	3	SH.OP-AP.ZZ-0101(Q) Violation of
SHOP-101, TARP Procedure			
20099631	05/10/2002	3	SH.OP-AP.ZZ-0101(Q) TARP procedure violation
20104118	06/27/2002	3	SH.OP-AP.ZZ-0101(Q) TARP page, pager did not function

J 7C

SEE LONG TEXT
Response to

SL3

No condition adverse to quality could be validated. There is no impact on plant, industrial safety, or business goals.

The initiator noted two concerns with the SH.OP-AP.ZZ-0101 rev 6, Post Accident Response Requirements:

1. Tarp teams may not be performing all sections and are being staffed without EP alignment
2. It appears that the procedure is being used as a defacto staffing tool, then [sic] a transient assessment and emergency plan response related activities.

Review of the procedure and discussion with EP personnel reveal the following.

All procedure sections are being followed.

Alignment with EP teams exist, EP members that are on the TARP team are on the same shift.

There are EP members on the TARP teams to do classification reviews.

There is not a requirement that TARP members be EP members.

Staffing of the TARP team is done by management decision. The procedure describes responsibilities, process, and actions in response to plant transients and events. No issue appears to exist.

No actions or corrective actions are required.



OK

7C

Order: TARP Procedure non-compliance
Operation: 0010 TARP Procedure non-compliance
Work center: R-RP00 NNUC
Status: TECO CNF PRT MANC NMAT
Number of People: 1
Scheduled Dates: Start: 07/24/2002 Finish: 07/24/2002
Planned Hours: 4.0
Actual Dates: Start: 07/24/2002 Finish: 08/05/2002
Actual Hours: 0.000 Personnel Number: _____
Completion Confirmation Number: 2080975

Confirmation Text: _____

SEE LONG TEXT
SEE LONG TEXT
Response to SL3

No condition adverse to quality could be validated. There is no impact on plant, industrial safety, or business goals.

The initiator noted two concerns with the SH.OP-AP.ZZ-0101 rev 6, Post Accident Response Requirements:

1. Tarp teams may not be performing all sections and are being staffed without EP alignment
2. It appears that the procedure is being used as a defacto staffing tool, then [sic] a transient assessment and emergency plan response related activities.

Review of the procedure and discussion with EP personnel reveal the following.

All procedure sections are being followed.

Alignment with EP teams exist, EP members that are on the TARP team are on the same shift.

SAFETY: The Only C.H.O.I.C.E.

Commitment Help Oversight Involvement Communication Empowerment

EXHIBIT 12

PAGE 11 OF 12 PAC



There are EP members on the TARP teams to do classification reviews.

There is not a requirement that TARP members be EP members.

Staffing of the TARP team is done by management decision. The procedure describes responsibilities, process, and actions in response to plant transients and events. No issue appears to exist.

No actions or corrective actions are required.

Signature: _____

Confirmation Text: _____

Concur with response.

Signature: _____

Confirmation Text: _____

reviewed response and concur-
reviewed response and concur

Signature: _____

Description of Work: _____

SAFETY: The Only C.H.O.I.C.E.

Commitment Help Oversight Involvement Communication Empowerment

EXHIBIT 12