



Paragraphs

Character

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-DC 577-0001(Z) Maintenance or Emergency Preparedness Performance Indicator (PI) Data.

Section 5.2.4, states the TARP Team should review all "After the Fact" EOC 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 EOC. They include:

1. Unplanned ESE activations.
2. Valid EOC/ST actuations with discharge to the RCS/vessel.



P00 (1) (100) | sappb00 | DVR | 14:12

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Paragraphs Char formats

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

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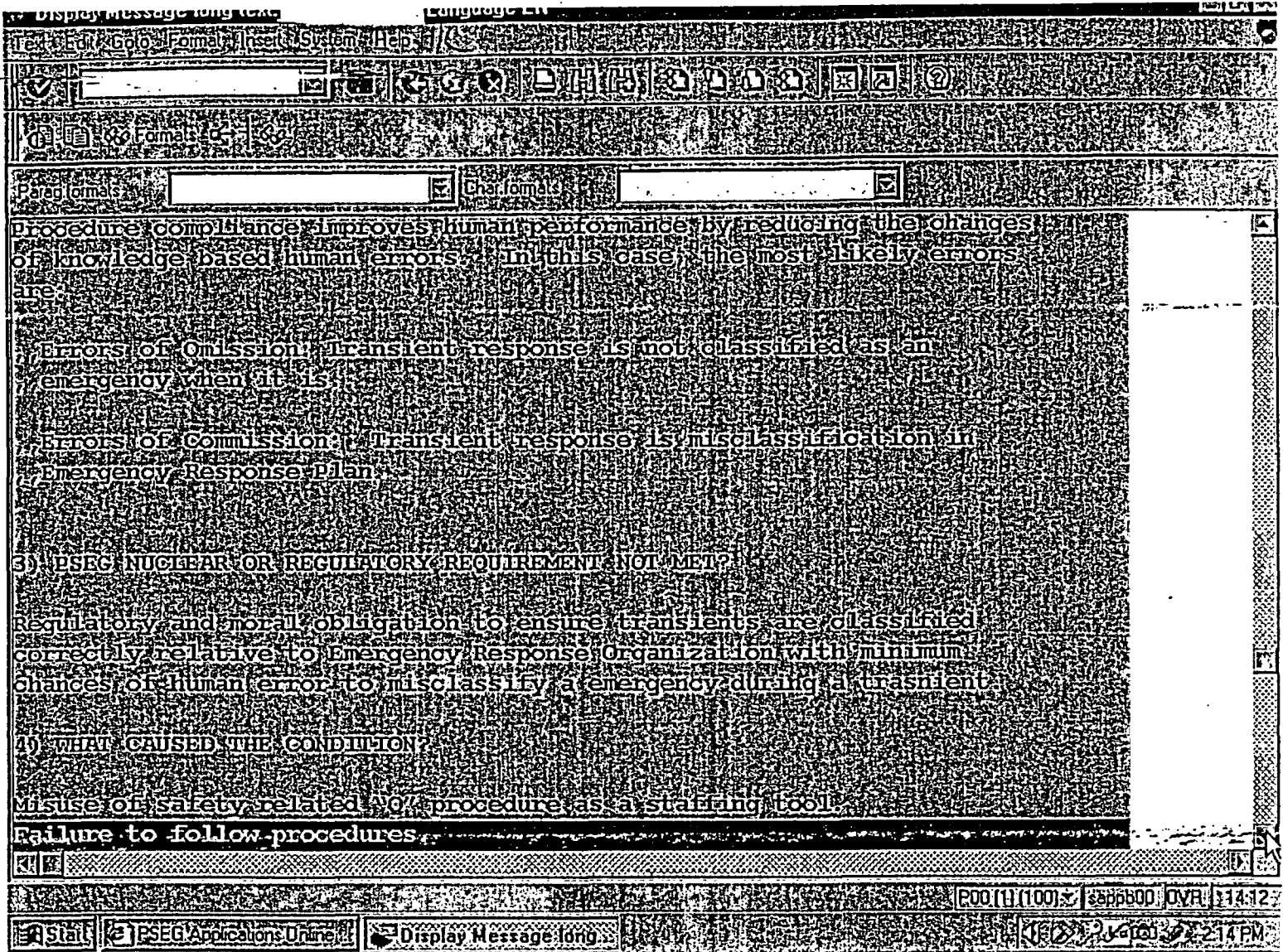
If an emergency (AMER) or higher is declared after or during TARP team implementation, the TARP team will be terminated and superseded by the Emergency Response Organization.

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 de facto 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





Paragraphs

Character

Misuse of safety related VO 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, EMITTING ECT)



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Paragraphs Char format

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

other example of SH-OP-AP-ZZ-0101(O) non-compliance:

20068549, 06/06/2001, 3, Pagers did not support TARP team callout

20077260, 09/14/2001, 3, SH-OP-AP-ZZ-0101(O), TARP contacts not made

20079140, 10/05/2001, 3, failure to notify OA on TARP notification

20082863, 11/07/2001, 3, SH-OP-AP-ZZ-0101(O), violation of

SHOP-101 TARP procedure

20099631, 05/10/2002, 3, SH-OP-AP-ZZ-0101(O), TARP procedure

violation

201041EB, 06/27/2002, 3, SH-OP-AP-ZZ-0101(O), TARP page, pager did

not function

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2/2/2002 2:15 PM



7C Was this pre Determine
(walk off)? Planned

Order: [redacted] 7C TARP Procedure non-compliance
Order Type: NUCR
Status: REL PCNF PRT MANC NMAT PRC SETC
Notification: [redacted] 7C
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 [redacted]

Status: REL PCNF PRT MANC NMAT PRC SETC
Basic Dates: Start: 07/24/2002 Finish: 07/24/2002 Overdue:

Sfty Rltd/OA Reqd
Sfty Class
Qty Grp Code: NA
SEISMIC
EQ

Permission to Begin Work Date: 00:00:00

Description of Work
TARP Procedure non-compliance
07/18/2002 12:03:04 [redacted]
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
<div style="background-color: black; height: 40px; width: 100%;"></div>			
20104118	06/27/2002	3	SH.OP-AP.ZZ-0101(Q)
TARP page, pager did			not
function			

Operation List Summary

08/08/2002



7c

OP	Sub Op.	Work Center	Description	Start Date	Work	No	Durtn
0010		R-RP00	TARP Procedure non-c ompliance	07/24/2002	4.0	1	4.0

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

Commitment Help Oversight Involvement Communication Empowerment

Object List Summary



page 1 of 1 *7*

Object Id	Object Description	Location	Room	SFTY RLTD/ QAR	SFTY CLASS/ QGC	SEIS	EQ	QA REQ
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17
nc
SH.OP-AP.ZZ-0101(Q)

POST-TRANSIENT RESPONSE REQUIREMENTS

TARP Procedure non-compliance

Operation Key Info
08/08/2002



7C

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

Commitment Help Oversight Involvement Communication Empowerment

Operation Key Info
08/08/2002



non-compliance Order: TARP Procedure
non-compliance Operation: 0010 TARP Procedure
Status: Permit No's Work center: R-RP00 NNUC
Dates: REL PCNF PRT MANC NMAT Number of People: 1 Scheduled
Actual Dates: Start: 07/24/2002 Finish: 07/24/2002 Planned Hours: 4.0
0.000 Personnel Number: Completion Confirmation Number:
2080975 Confirmation 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.

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.

Confirmation Text:

Signature:

Confirmation Text:

Signature:

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

Commitment Help Oversight Involvement Communication Empowerment



reviewed response and concur- mannon

Signature:

Description of Work:

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

Commitment Help Oversight Involvement Communication Empowerment