

NINE MILE POINT NUCLEAR STATION UNIT 2TECHNICAL DEPARTMENT PROCEDUREPROCEDURE NO. TDP-9INDEPENDENT SAFETY ENGINEERING GROUP

		<u>DATE AND INITIALS</u>		
<u>APPROVALS</u>	<u>SIGNATURES</u>	<u>REVISION 0</u>	<u>REVISION 1</u>	<u>REVISION 2</u>
Technical Superintendent W. C. Drews	<u>[Signature]</u>	<u>1/1/86</u> <u>[Signature]</u>	_____	_____
Technical Services Superintendent J. R. Spadafore	<u>[Signature]</u>	<u>1/9/86</u> <u>[Signature]</u>	_____	_____
Supervisor Technical Support R. G. Randall	<u>[Signature]</u>	<u>1-7-86</u> <u>[Signature]</u>	_____	_____

Summary of Pages

Revision 0 (Effective 1/9/86)

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Date
December 1985
NIAGARA MOHAWK POWER CORPORATION

THIS PROCEDURE NOT TO BE
USED AFTER JANUARY 1990
SUBJECT TO PERIODIC REVIEW.

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TDP-9

INDEPENDENT SAFETY ENGINEERING GROUP

1.0 PURPOSE

This procedure describes the purpose, requirements and activities of the Unit 2 Independent Safety Engineering Group. This procedure does not apply to Unit 1, and is effective for Unit 2 when the Technical Specifications take effect.

2.0 REFERENCES

- 2.1 NUREG 0737, I.B.1.2
- 2.2 AP-3.4.2 Operation Experience Assessment
- 2.3 FSAR Section 1.10
- 2.4 Technical Specification 6.2.3
- 2.5 TDP-5 Administration of Operations Assessment Items
- 2.6 TDP-3 Instructions For Procedure Review
- 2.7 AP-2 Production and Control of Procedures

3.0 DISCUSSION

NUREG 0737, Section I.B.1.2, and, as a result, the Unit 2 FSAR and Technical Specifications require an Independent Safety Engineering Group. This group will perform much of the work specified in AP-3.4.2. This procedure augments, but in no way supercedes AP-3.4.2.

4.0 GROUP COMPOSITION AND PERSONNEL QUALIFICATIONS

The ISEG shall be composed of at least five, dedicated, full-time engineers located onsite. Each shall have a bachelor's degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field. (T.S. 6.2.3)

5.0 RESPONSIBILITIES

The principal function of the ISEG is to examine plant operating characteristics and the various NRC and industry licensing and service advisories, and to recommend areas for improving plant operations or safety. The ISEG will perform independent review of plant activities, including maintenance, modifications, operational concerns and analysis and make recommendations to the Supervisor Technical Support-Nuclear. (T.S. 6.2.3)



6.0 PROCEDURE

- 6.1 The ISEG shall analyze, make recommendations regarding, and provide documentation of disposition of the various plant, NRC and industry reports as specified in AP-3.4.2 Section 5, using TDP-5.
- 6.2 The ISEG will observe plant operations and maintenance activities to determine that these activities are being performed properly and provide written recommendations (when useful improvements can be achieved). The ISEG does not perform detailed (QA-type) audits and is not responsible for sign-off functions associated with daily operational activities (FSAR 1.10). The recommended frequency of such observations is one per ISEG engineer per month, but will depend on other workloads. These observations must be documented.
- 6.3 The ISEG may meet the requirement for independent review of the items in section 5.0 above by functioning as an independent reviewer of documents per AP-2. The site may take credit for the ISEG engineer as being one of the two independent reviewers without conflicting with 6.2 above or FSAR section 1.10. ISEG will use TDP-3 when reviewing procedures.
- 6.4 The site may take credit for ISEG activities performed by the Supervisors and Superintendents in the ISEG's management chain up to but not including the General Superintendent, provided the documentation requirements of 7.0 below are complied with. The site may not take credit for these individuals in meeting the five man requirement of 4.0 above.

7.0 DOCUMENTATION

- 7.1 The activities of the ISEG must be documented and presented to SORC via the Operations Assessment Procedure, AP-3.4.2. AP-3.4.2 provides for SRAB review of the OAC minutes and associated documents. In this manner assurance is provided that operational, financial, or political situations do not adversely impact the ISEG's commitment to safety.
- 7.2 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the Manager - Nuclear Technology (TS 6.2.3). SORC (OAC) minutes may be used to satisfy this T.S. requirement.

