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 PERKINS,K.E. Region 5 (Post 820201)

SUBJECT: Provides partial status of maint procedure upgrade program & addl clarification re upgrade of maint surveillance procedures.

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January 21, 1994  
G02-94-017

Docket No. 50-397

Mr. K. E. Perkins  
Acting Regional Administrator  
U.S. Nuclear Regulatory Commission  
1450 Maria Lane  
Walnut Creek, CA 94596

RECEIVED  
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Dear Mr. Perkins:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
MAINTENANCE PROCEDURE UPGRADE PROGRAM STATUS**

Reference: Letter GO2-93-125 dated May 27, 1993, from W. G. Council (SS) to B. H. Faulkenberry (NRC), "Response to the 1993 Systematic Assessment of Licensee Performance (SALP)"

The purpose of this letter is to provide a partial status of the Maintenance Procedure Upgrade Program and additional clarification regarding the upgrade of maintenance surveillance procedures.

The Supply System stated in the 1993 SALP response:

An upgrade of maintenance procedures is a major initiative at the Supply System. This five-year effort includes verification and validation for each maintenance procedure used to perform work in the plant. It covers approximately 1250 procedures and will complete in December 1996. The maintenance portion of the Technical Specification surveillance test procedure upgrade effort will be complete by March 30, 1994.

The Technical Specification Surveillance Improvement Project is currently underway within the Technical Support division. This effort will review each surveillance procedure to ensure that it is technically correct and satisfies the Technical Specification surveillance requirements.

The Technical Specification Surveillance Improvement Project (TSSIP) is progressing on schedule. This program has identified and led to the correction of several procedural deficiencies. This program will be completed by March 30, 1994 as scheduled.

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**MAINTENANCE PROCEDURE UPGRADE PROGRAM STATUS**

The Maintenance Procedure Upgrade Project Plan states that an upgraded procedure is one which is technically accurate, human factored, usable, and operationally correct. The Plan goes on to state that the procedures will be put through a verification and validation process as part of the upgrade. Procedure verification is a review of the technical content and the structure/format. Procedure validation is an evaluation of the procedure usability and operational correctness.

Experience with procedure verification and validation has proven that the process identifies many enhancements. These enhancements are not required for the procedure to be technically accurate or to meet the Technical Specification requirements, are often of a nature that will make the procedure or the process more efficient, and are therefore desirable long term improvements. These enhancements will be pursued as resources permit and as justified by the anticipated cost/benefit.

The maintenance surveillance procedure upgrade effort will include:

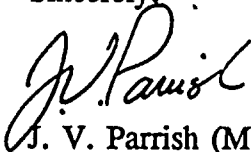
Validation of the maintenance surveillance procedures with the findings incorporated prior to the next performance of the procedure after March 30, 1994.

Technical verification of the maintenance surveillance procedures by March 30, 1994 with Technical Specification compliance issues resolved prior to the next performance of the affected procedures. Verification of conformance of the maintenance surveillance procedures to the writers guide (written correctness such as format, style, etc.) will be completed by December 31, 1995.

Enhancement opportunities identified during the verification process will be incorporated as resources permit and as justified by the anticipated cost/benefit.

The Maintenance Procedure Upgrade Project is an important part of the Supply System effort to ensure procedural compliance expectations are met. Any questions that members of your staff may have on this effort should be directed to Tim Messersmith at (509) 377-2141.

Sincerely,



J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

DAS/bk

cc: NS Reynolds - Winston & Strawn  
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