CONDITION REPORT SCREENING AND PROCESSING	90DP-0IP03	Revision 9

PROCEDURE INTENT

The purpose of this procedure is to provide instructions for the screening, assignment, review, closeout, trend coding and processing of Condition Reports as required by procedure 90AC-0IP04, Condition Reporting.

EFFECTIVE DATE 06-14-96

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APPENDICES

1.0 PURPOSE AND SCOPE

1.1 Purpose

The purpose of this procedure is to provide instructions for the review, assignment, trend coding and processing of Condition Reports/Disposition Requests (CRDRs) as required by procedure 90AC-0IP04, Condition Reporting.

1.2 Scope

This procedure describes the functions, duties, interfaces and responsibilities necessary to review, assign, process, distribute, trend code and file CRDRs. The procedure also describes related document turnover requirements.

2.0 RESPONSIBILITIES

2.1 CRDR Partition Administrator

2.2 Nuclear Assurance Division (NAD) CRDR Reviewer

2.3 Section Leader Corrective Action (CA)

2.4 CRDR Review Committee

2.5 Nuclear Assurance Department Leader

2.6 CRDR Review Committee Representative

2.7 NAD CRDR Initiator

3.0 PROCEDURE

3.1 General Requirements

3.1.1 The review of CRDRs should be conducted in Four (4) stages as applicable.

- CRDR Initial Review by Strategic Analysis Group (a review performed on all new Condition Reports prior to the CRDR Review Committee Review, refer to Section 3.2).
- CRDR Review/Assignment (A review performed on all new Condition Reports by the CRDR Review Committee; refer to Section 3.3 and Appendices A and G).
- CRDR Evaluation Review (reviews performed on completed evaluations or investigations; refer to Section 3.4 and Appendix B).
- CRDR Closeout Review (A review performed upon completion of all Condition Report Corrective Actions; refer to Section 3.6 and Appendix C).

3.1.2 Trend coding will be completed on all CRDRs in accordance with 60DP-0QQ02, Trend Analysis and Coding.

NAD CRDR Initiator

3.1.2.1 Trend coding for 'Q' CRDRs will be completed by the initiator of the CRDR in accordance with 60DP-0QQ02.

CRDR Partition Admin.

3.1.3 All new CRDRs are delivered to the CRDR Partition Administrator who shall log the new CRDRs into the Strategic Analysis CRDR Log as follows:

3.1.3.1 Assign a number to the CRDR, X-Y-ZZZZ, (X = Unit, Y = Last digit of year, ZZZZ = Sequential number) unless otherwise noted.

3.1.3.2 CRDRs initiated by Nuclear Assurance during conduct of oversight activities will be designated by a 'Q' in the first sequential number location (i.e., __-__Q__ __ __).

3.1.3.3 No CRDR number is to be left unaccounted for in the CRDR Manual Log(s) or in the CATS database.

3.1.4 A CRDR number assignment log is maintained for each unit.

Section Leader CA

3.2 CRDR Initial Review

3.2.1 All new CRDRs, once numbered, are reviewed for legibility, accuracy, and completeness.

3.2.1.1 The information provided must be sufficient to support an accurate review, assignment, and resolution of the condition.

3.2.1.2 CRDRs that are not legible, accurate, or complete shall be discussed with or returned to the originators leader for remediation, prior to submittal to the CRDR Review Committee.

3.3 CRDR Review Committee Review

CRDR Review Committee

3.3.1 All new CRDRs are delivered to the CRDR Review Committee, who shall:

3.3.1.1 Review and classify all CRDRs in accordance with the guidelines provided in Appendix G, Condition Classification Guide.

3.3.1.2 Assign a CRDR Owner who will be responsible for completing the requested evaluation or action.

3.3.1.3 Identify Approval requirements.

Senior Management and Nuclear Assurance Department Leader concurrence is required on all SIGNIFICANT CRDR Evaluations/Investigations.

Nuclear Assurance Department Leader concurrence is required on all ADVERSE 'Q' CRDR evaluations.

3.3.1.4 Assigning an evaluation/investigation completion date not to exceed 30 days from the date of the CRDR Review Committee Review, except as noted.

For CRDR marked as POTENTIALLY SIGNIFICANT, a due date not to exceed 14 calendar days will be assigned for the requested additional information.

CRDR Review Committee

3.3.2 Initiate a CRDR Transmittal/Assignment Form (Appendix A) to document the results of their review.

CRDR Partition Admin.

3.3.3 Complete the CRDR Transmittal/Assignment Form, as directed, by the CRDR Review Committee, with considerations to include:

- Distribution instructions to affected organizations
- Special or unique data entry instructions
- Assignment
- Potential Reportability
- Applicable System Designator
- Quality Classification
- Classification

- Target/Due Date For Response
- Additional Approval requirements, i.e., Senior Management, Nuclear Assurance
- NAD Point of Contact
- Initial Trend Coding

CRDR Review Committee Rep. → 3.3.4 Shall sign the CRDR Transmittal/Assignment Form documenting the results of the committee's review.

CRDR Partition Admin. → 3.3.5 The Condition Report Package will be further processed in accordance with Section 3.7.

3.4 CRDR - Evaluation Reviews

CRDR Partition Admin. → 3.4.1 After the completed CRDR Evaluations or Investigations are delivered to Strategic Analysis, coordinate the completion of a CRDR for Evaluation Review with a NAD CRDR Reviewer.

NAD CRDR Reviewer → 3.4.2 Assemble an evaluation package consisting of the following:

1. Original CRDR, CRDR Transmittal/Assignment Form.
2. Original evaluation or investigation.
3. Other reference material used in the evaluation, as available.

3.4.3 Complete the appropriate CRDR Evaluation Review Form (Appendix B) and:

- Identify any document distribution instructions to the CRDR Controller
- Identify special data entry instructions to the CRDR Controller
- Sign and date the Evaluation Review Sheets when comments are resolved and the CRDR Review is complete

3.4.4 The evaluation package shall then be turned over to the CRDR Partition Administrator for further processing in accordance with Section 3.7.

3.5 Nuclear Assurance CRDR Escalation

NA Dept. Leaders → 3.5.1 The Director, Nuclear Assurance (NAD) and NA Department/Section Leaders have the responsibility to escalate Quality/Nuclear Safety related issues and deficiencies to the level of management appropriate to accomplish effective and timely corrective action.

3.5.2 Quality/Nuclear Safety issues should be considered for escalation to a higher level of management on a case by case basis using the guidelines provided in Appendix E, Escalation Guidelines and Transmittal.

3.6 CRDR Closeout Review

CRDR Partition Admin. ➤ 3.6.1 For CRDRs that are NOT SIGNIFICANT and NOT "Q", close the CRDR when the CRDR owner requests closure. No closeout review is required.

3.6.2 For CRDRs that are SIGNIFICANT or "Q", after the CRDR Owner has requested closure, close the CRDR Master Record in CATS and assign a Closeout Review Action to a NAD CRDR Reviewer.

NAD CRDR Reviewer ➤ 3.6.3 Assemble a Closeout Package consisting of the following:

a. CRDR package developed in Section 3.4 plus:

b. Other reference material used in the Closeout Review, as appropriate.

3.6.4 Complete the CRDR Closeout Review Sheet (Appendix C) by:

- Identifying any document distribution instructions to the CRDR Controller
- Identifying special data entry instructions to the CRDR Controller
- Signing and dating the CRDR Closeout Review Sheet when all comments are resolved

3.6.5 The Closeout Package and Closeout Review Form shall be turned over to the CRDR Partition Administrator for further processing in accordance with Section 3.7.

CRDR Partition Admin.

3.7 CRDR Filing, Distribution, Processing and Records Turnover

3.7.1 Filing

An active CRDR File should be assembled for each open CRDR (excluding CRDRs classified as REVIEW). The file should contain:

- Copies of the CRDR, CRDR Transmittal/Assignment Form and CRDR Response/Evaluation Form
- Reference information used to review the CRDR through to final CRDR closure (as available)
- Copies of completed evaluations or investigations, including any revisions or supplements
- Copies of any Nuclear Assurance Division evaluation/verification reviews
- Copies of CATS Action Notification Sheets or equivalent (as available)
- Copies of correspondence (letters or memos) that address corrective action response/status or are related to the CRDR (as available)
- Other relevant reference information or material (as available)

The file should be maintained until the CRDR master record is closed in CATS, after which the CRDR file may be purged.

3.7.2 Distribution and Processing

NOTE

For SIGNIFICANT CRDRs see Section 3.7.3 for additional distribution requirements.

3.7.2.1 Distribution - Review/Assignment Stage

1. Original CRDR, CRDR Transmittal/Assignment Form with CRDR with attachments to:
   - Assigned organization

2. Copy of CRDR and CRDR Transmittal/Assignment Form with attachments to:

   - CRDR File

3. Copy of CRDR and CRDR Transmittal/Assignment Form without attachments to:

   - Originator
   - System Engineering
   - As indicated on the CRDR Transmittal/Assignment Form

3.7.2.2 Distribution - Evaluation Review Stage

1. Original CRDR materials, including but not limited to:

   - CRDR and initial attachments
   - CRDR Transmittal/Assignment Form
   - Evaluation including attachments
   - CRDR Evaluation Review Forms
   - Nuclear Assurance Evaluation/Verification sheets

Are to be submitted to Document Distribution and Control, see Section 3.7.5.

2. Copy of CRDR and CRDR Evaluation without attachments to:

   - Originator
   - CRDR Owner
   - Department/Section Leaders of responsible organizations assigned actions
   - Nuclear Training
   - CRDR File
   - As indicated on the CRDR Evaluation Review Form
   - System Engineering

3.7.2.3 Distribution - Closeout Review Stage

1. Original CRDR Closeout Review Forms with attachments, if any, are submitted to Document Distribution and Control.

2. Copy of CRDR Closeout Review Form as indicated on the CRDR Closeout Review Form, distribution instructions.

3.7.3 SIGNIFICANT Condition Reports - Additional distribution.

3.7.3.1 Copies of Condition Reports classified as SIGNIFICANT should include:

- NRC Resident
- NAD Point of Contact

3.7.3.2 Copies of completed evaluations for Condition Reports classified as SIGNIFICANT should be distributed as follows:

Non-Reactor Trip Investigations - should be distributed as directed by the Section Leader, Corrective Actions. The suggested distribution is:

- Applicable Senior Management
- Nuclear Regulatory Affairs
- NRC Resident
- Applicable Nuclear Assurance Department Leader
- ERCFA Program Manager
- OSRC Coordinator
- Maintenance Support - FDT
- System Engineering

Reactor Trip Investigations - should be distributed as directed by the Section Leader, Corrective Actions. The suggested distribution is:

- Applicable Senior Management up to and including Executive Vice President
- OSRC Coordinator
- All Unit Operations Department Leaders

- Nuclear Regulatory Affairs
- NRC Resident
- Nuclear Assurance Operations, Department Leader
- ERCFA Program Manager
- Maintenance Support - FDT
- System Engineering

NOTE

The CRDR Master Record may be closed in CATS prior to the completion of the CRDR Closeout Review by Nuclear Assurance provided:

1. All of the corrective actions are closed in CATS.
2. The CRDR owner has requested the CRDR be closed.

3.7.4 Update CATS per the CRDR, CRDR Transmittal/Assignment, CRDR Evaluation Review or Closeout Review Forms in accordance with 90GB-0CQ01, Commitment Action Tracking System 'P' CATS and Appendix D. The CRDR number is used as the primary CATS tracking number.

3.7.5 Records Turnover

After the CRDR Evaluation Review has been completed, the CRDR Package assembled in Section 3.7.2.2 is submitted to NIRM in accordance with procedure 84AC-0RM05, Document/Record Turnover Control requirements.

4.0 DEFINITIONS AND ABBREVIATIONS

4.1 **Adverse Condition** - An all-inclusive term used to reference any item or activity that does not conform to requirements. An Adverse condition is synonymous with terms such as failure, malfunction, deficiency, deviation, defective material and equipment, and nonconformances.

4.2 **Corrective Actions** - Measures taken to correct an adverse condition and when necessary, to prevent recurrence of the condition.

4.3 **CRDR Owner** - The leader of the assigned responsible organization, may be assigned at any level down to and including Section/Team Leader (Supervisor).

4.4 **CRDR Partition Administrator** - A member of the Strategic Analysis Department responsible for control and coordination of the CRDR Partition on CATS.

4.5 **CRDR Partition Controller** - Member of the Strategic Analysis Department who are directly responsible for the input and maintenance of the CRDR Partition on the CATS System.

4.6 **Interim Actions** - Temporary measures taken to correct any adverse condition pending completion of final corrective actions.

4.7 **MRule Functional Failure** - Is the failure of a structure, system, train, or component (SSC) within the scope of the MRule to perform its intended function (i.e., the key safety function performed by the SSC that required its inclusion within the scope of the MRule). The loss of function can be either direct, i.e., the SSC that performs the function fails to perform its intended function or indirect, i.e., the SSC fails to perform its intended function as a result of the failure of another SSC (either safety related or nonsafety related).

4.8 **Maintenance Rule (MRule)** - 10CFR50.65 - Requirement for monitoring the effectiveness of Maintenance at Nuclear Power Plants.

4.9 **Performance Criteria** - The basis for the determination that MRule components or systems are performing at satisfactory level. The basis defines system boundaries and functions, and acceptable levels of availability, reliability or condition.

4.10 **Root Cause** - The most basic reason(s) for a failure, problem or deficiency which if corrected, will prevent recurrence.

4.11 **Senior Management** - General term used to define PVNGS Management personnel, generally considered Directors and direct reports to Vice Presidents and above.

4.12 **Significant Adverse Condition** - A significant adverse condition is one that, if uncorrected, significantly affects the safe, reliable, and economic production of electricity. (Specific criteria for significant adverse conditions is identified in Appendix G.)

4.13 **Transportability** - The likelihood that the condition, or like condition, exists in other locations, components, procedures, documents or situations.

4.14 **'Q' CRDR** - Condition Report/Disposition Request initiated by Nuclear Assurance during conduct of oversight activities. The CRDR will carry a 'Q' in the 3rd number location (i.e. --'Q'---).

5.0 REFERENCES

5.1 Implementing

5.1.1 90GB-0CQ01, Commitment Action Tracking System "P" CATS

5.1.2 84AC-0RM05, Document/Record Turnover Control

5.1.3 60DP-0QQ02, Trend Analysis and Coding

5.1.4 PVNGS, Event Reporting Manual

5.1.5 01IG -0AP02, Technical Dictionary

5.1.6 40DP-9OP26, Operability Determinations

5.2 Developmental.

5.2.1 60PR-0QQ01, Corrective Action Program, Rev. 0

5.2.2 90AC-0IP04, Condition Reporting, Rev. 8

5.2.3 QATS 290013 01 (1.1)

5.2.4 QATS 292003 09 (1.1)

5.2.5 CRDR 320102 44 (Appendix F and G)

5.2.6 CRDR 94Q103 02 (Appendix A)

5.2.7 CRDR 950770 08 (Appendix G)

5.2.8 RCTS 043001 24 (3.6)

5.2.9 RCTS 040946 01 (3.7.2.1)

5.2.10 INPO 020001.02 (3.3.3)

6.0 APPENDICES

6.1 Appendix A - CRDR Transmittal/Assignment (Sample)

6.2 Appendix B - CRDR Evaluation Review (Sample)

6.3 Appendix C - CRDR Closeout Review (Sample)

6.4 Appendix D - CRDR Partition Data Entry Guidelines

6.5 Appendix E - Escalation Guidelines and Transmittal

6.6 Appendix F - CRDR Condition Guidelines

6.7 Appendix G - Condition Classification Guide

Appendix A - CRDR Transmittal/Assignment (Sample)

CRDR REVIEW COMMITTEE TRANSMITTAL/ASSIGNMENT

To: _____ TARGET DATE: _____ CRDR Number _____

☐ **Audit Finding** (Evaluation is due 14 days from issue date)

Enclosed, please find the CRDR which has been assigned to your organization by the CRDR Review Committee. Please complete the Investigation / Evaluation by the date indicated above. The condition has been classified as:

☐ POTENTIALLY SIGNIFICANT - Criteria _____ Additional information is required to further define or clarify the condition. Return the CRDR, with the requested information, to the CRDR Review Committee, for Re-classification/Re-assignment by the target date.

☐ See below comments for the specific required information.

OR

☐ An Operability Evaluation is required to support the attached Operability Determination. The Operability Evaluation shall be completed in accordance with 40DP-9OP26, Appendix B.

☐ SIGNIFICANT - Criteria _____ - Investigate per ☐ 90DP-0IP06 ☐ 90DP-0IP07 ☐ 70DP-0EE01.

Designated Senior Manager _____
(concurrence is required for SIGNIFICANT CRDR evaluation)

Nuclear Assurance Dept. Leader _____ _____
(concurrence is required for SIGNIFICANT CRDR evaluation) NAD Point of Contact

☐ ADVERSE - Evaluate per ☐ 90DP-0IP08 or ☐ 70DP-0EE01

Nuclear Assurance Dept. Leader _____
(concurrence is required for Q CRDR evaluation)

☐ REVIEW (Copy only) - Evaluate per 90DP-0IP08. (No Formal Response to Strategic Analysis Dept. required.)

Additional Direction/Comments: _____

Signed: _____
Review Committee / Date

CRDR Control: Ext. 5758/5788 - Located in Building B, 3rd Floor

SIGNIFICANT Distribution.:	Distribution.:		
	Originator _____	_____	_____
	System Engineering (7565)		
NRC Resident (7393)	☐ FDT (7646)	_____	_____
NAD Point of Contact	☐ ME - _____	_____	_____

Coding Form for CRDR's)

(Sample)

CRDR # _____

Quality ☐ NQR Classification ☐ QR

Systems __ __ , __ __ , __ __ , __ __

	C C C C R R P P P O O I I I
**30	Description __ __ __ __ __ __ __ __ __ __ __ __ __ CAUSE RESULT PROG ORG Issue#
**30	Description __ __ __ __ __ __ __ __ __ __ __ __ __ CAUSE RESULT PROG ORG Issue#
**30	Description __ __ __ __ __ __ __ __ __ __ __ __ __ CAUSE RESULT PROG ORG Issue#
**30	Description __ __ __ __ __ __ __ __ __ __ __ __ __ CAUSE RESULT PROG ORG Issue#
**30	Description __ __ __ __ __ __ __ __ __ __ __ __ __ CAUSE RESULT PROG ORG Issue#

**70 __ __ __ __ __ __ X __ __ __ __ __ __ __ __ __ __ __ __

**70 __ __ __ __ __ __ X __ __ __ __ __ __ __ __ __ __ __ __

**70 __ __ __ __ __ __ X __ __ __ __ __ __ __ __ __ __ __ __

**09 _____ _____ _____

Source Doc's: _____ ☐ Linked CRDR

References: _____

Cross Reference To: _____ _____ Initials/Date

Keywords: _____

Distribution Consideration:

Equipment/System Perf. Issues (CPP/SPP) FDT (7646)	Emergency Planning .... J. Nielsen (7996)
Radiation Protection Issues ..... J.Knox (7902) I' Akers/D. Elkinton (7996)	Chemistry ..... G. Mobbs/C. Chavet (7666))
Audit Findings ..... Audit Team Leader	Security ..... B. Whitney (7996)
Overtime/FFD ..... B.Whitney (7996)	Operations ..... Department Leaders
Maintenance ..... Department Leaders	Training ..... O. Doctor (6190)
Equipment/System/ Perf. Issues (CPP/SPP) .....Applicable ME Leader	OE CRDRS .....STA Section Leader (7833)

Appendix B - CRDR Evaluation Review (Sample)

CRDR EVALUATION REVIEW
ADVERSE CRDRs
(Not For 'Q' CRDRs)

CRDR NUMBER ☐☐☐☐☐☐

		YES	NO	N/A
1.	Does the Evaluation and/or conclusions NOW represent a potentially significant condition? If yes, the CRDR shall be re-presented to the CRDR Review Committee.	☐	☐	
2.	For the Action(s) that will be entered into CATS, is the Action Assignment information complete, i.e., Responsible Organization identified, Priority, Target Date.	☐	☐	☐
3.	Can the CRDR be closed in CATS, i.e., the adverse condition has been corrected?	☐	☐	

4. Actions/Information to Add; By CRDR Control

a) Actions: Per Completed Evaluation ☐,

and/or Attached CATS Sheets ☐, Added: _____

b) References: _____

c) Keywords: _____ Added: _____

_____ Added: _____

d) Additional instructions: _____

_____

NA Reviewer's Comments:

_____

_____

_____

_____

_____

_____

_____

_____

Continuation Sheets Used ☐ YES ☐ NO

Standard Distribution - _____

Completed

☐ FDT (Sta. 7646) - Component/System Performance CRDRs

☐ Additional - Distribution: _____

_____

Review completed by: _____ Date: _____

Signature / Name

Appendix B - CRDR Evaluation Review (Cont'd)
(Sample)

CRDR EVALUATION REVIEW
ADVERSE 'Q' CRDRs

CRDR NUMBER ☐☐☐☐☐☐

		YES	NO	N/A
1.	Does the Evaluation and/or conclusions NOW represent a potentially significant condition?If yes, the CRDR shall be re-presented to the CRDR Review Committee.	☐	☐	
2.	Does the evaluation adequately define/complement the condition description? (i.e., is the full scope of the condition addressed?)	☐	☐	
3.	Has the effects of the condition on all units been addressed? (Transportability).	☐	☐	
4.	Do the corrective action(s) correct the adverse condition identified?	☐	☐	
5.	Are the corrective actions timely?	☐	☐	
6.	For the Action(s) that will be entered into CATS, is the Action Assignment information complete, i.e., Responsible Organization identified, Priority, Target Date.	☐	☐	☐
7.	Can the CRDR be closed in CATS, i.e., the adverse condition has been corrected?	☐	☐	

8. Actions/Information to Add; By CRDR Control

a) Actions: Per Completed Evaluation ☐,

and/or Attached CATS Sheets ☐, Added: _____

b) References: _____

_____

c) Keywords: _____ Added: _____

_____ Added: _____

d) Additional instructions: _____

_____

Appendix B - CRDR Evaluation Review (Cont'd)
(Sample)

CRDR EVALUATION REVIEW
ADVERSE 'Q' CRDRs (Cont'd)

CRDR NUMBER | | | | | | |

NA Reviewer's Comments:

Continuation Sheets Used ☐ YES ☐ NO

Standard Distribution

☐ FDT (Sta. 7646) - Component/System Performance CRDRs

☐ Additional - Distribution: _____

Review completed by: _____ Date: _____
Signature / Name

Appendix B - CRDR Evaluation Review (Cont'd)
Sample

Page 1 of ____

CRDR EVALUATION REVIEW
Significant (Root Cause) Conditions

CRDR REVIEWER:_____ CRDR Number:_____
(Print Name)

		YES	NO
1.	Is the Lead Investigator/Evaluator qualified to the applicable Evaluator Job Qualification Card (JQC)?	☐	☐
2.	Does the Investigation contain all the required concurrence and approval signatures in accordance with the appropriate procedures?	☐	☐
3.	Does the Evaluation identify the root cause of the condition and can the reviewer understand how the root cause(s) contributed to the event?	☐	☐
4.	Is the root-cause(s) identified in the Evaluation consistent with and supported by the facts?	☐	☐
5.	Has each root cause been corrected or dispositioned by a Corrective Action, either open or closed?	☐	☐
	NOTE: Some completed actions may need to be entered into CATS to support continued compliance with the Investigation Results. Contact Partition Administrator for details.		
6.	Do any of the Corrective Actions need to be entered into CATS?	☐	☐
7.	For the Corrective Actions that will be entered into CATS, is the Assignment Information complete, i.e., responsible organization identified, priority, target date, scope of action?	☐	☐
8.	Are changes to the Evaluation required as the results of comments made under Questions 1 through 7?	☐	☐
9.	Complete and/or update a Coding Worksheet, per 60DP-0QQ02, for each inappropriate action.		
	Attach the completed Coding Worksheet(s)	☐	☐
10.	Based on the text of the completed Investigation did a MRule Functional Failure occur?	☐	☐
	If YES, add the keyword **MRULEFF** to Block 13.c.		
11.	Should any additional comments, references or keywords be added to the CATS Data Base?	☐	☐
	If yes, provide appropriate instructions in Item 13.		

Appendix B - CRDR Evaluation Review (Cont'd)
Sample

Page 2 of ____

12. Can the CRDR be closed in CATS, i.e., all of the required actions are complete, including Nuclear Assurance concurrence on the evaluation and completed actions, and adequate objective evidence is available and/or retrievable from DDC or the CRDR file? ☐ ☐

13. Actions/Information to add: By CRDR Control

a) Actions: Per Completed Evaluation ☐,

and/or Attached CATS Sheets ☐, Added: _____

b) References: _____ Added: _____

_____

c) Keywords: _____ Added: _____

_____

_____

d) Additional Instructions: _____

_____

_____

_____

14. Coding Worksheets Attached, Total of _____ ☐ YES ☐ NO

NA Reviewer Comments

_____

_____

_____

_____

_____

_____

_____

Continuation Sheets Used ☐ YES ☐ NO

☐ * Standard Distribution - Completed Evaluations _____
Completed

☐ * Standard Distribution - Closed CRDRs (If Item 12 is checked yes). _____
Completed

☐ Additional - Distribution: _____

_____

Review completed by: _____ Date: _____
Signature/Name

*Standard Distribution plus SIGNIFICANT CRDR Distribution (step 3.7.3.2)

Appendix C - CRDR Closeout Review (Sample)

CRDR CLOSEOUT REVIEW

(SIGNIFICANT AND "Q" - CRDRs)

CRDR NUMBER | | | | | | |

		YES	NO	
1.	Ensure the CRDR Owner requested closure. If YES, if available, attach copy of Closure Request, or Record the Document Number of the Closure Request in step 4 below as a reference.	☐	☐	
2.	Can the CRDR be closed in CATS?	☐	☐	
3.	For SIGNIFICANT CRDRs Only, is an Effectiveness Review required? If YES, record the Evaluation/Audit below in Step 4.	☐	☐	☐

By CRDR Control

4. CATS information to Add/Change:

1) References _____ Added _____

2) Disposition Documents _____ Added _____

_____

3) Keywords _____ Added _____

_____

4) Evaluation/Audit _____

NA Reviewer's Comments/Instructions:

_____

_____

_____

_____

_____

_____

Continuation Sheets Used ☐ YES ☐ NO

☐ Additional - Distribution: _____

_____

Review completed by: _____ Date: _____

Signature / Name

Appendix D - CRDR Partition Data Entry Guidelines

A. The guidelines for data entry presented in this appendix address items previously covered by a CRDR Desk Guide, which are not addressed by 90GB-0CQ01, Commitment Action Tracking System 'P' CATS.

B. Data entry of master records and actions is facilitated by the use of "templates" which can be copied for use with a specific CRDR using the CATS "Repeat" ("R") function. The templates are stored as CRDR Master Records 0000XX, based on CRDR Classification, as follows:

CRDR Type	Template
POTENTIALLY SIGNIFICANT (Is an interim category, not allowed after CRDR classification has been finalized.)	000000 (Type 0 in CATS)
SIGNIFICANT	000001 * (Type 1 in CATS)
SIGNIFICANT (ERCFA)	000011 * (Type 1 in CATS)
SIGNIFICANT (Rx Trips)	000021 * (Type 1 in CATS)

* Include action templates for:
Evaluation Action (01)
NAD Evaluation Review (02)
NAD Closeout Review (03)
NRA Reportability Review (04)
NRA Complete LER (05)

ADVERSE	000002 (Type 2 in CATS)
ADVERSE (Linked)	000012 (Type 2 in CATS)

Note

See Section I for additional data entry Requirements for REVIEW CRDRs.

REVIEW	000003 (Type 3 in CATS)
DUPLICATE	000004 (Type 4 in CATS)
NAD Evaluation or Closeout Review Actions for ADVERSE or 'Q' CRDRs	000016.01 (Type 2 CRDR)

C. MASTER RECORD SCREEN

1. For the initial Master Record (M/R) for a CRDR, the 6-digit M/R number is identical to the CRDR number without hyphens.

2. Type:

   CRDR classified as POTENTIAL SIGNIFICANT is a Type 0 in CATS.

   CRDR classified as SIGNIFICANT is a Type 1 in CATS.

   CRDR classified as ADVERSE is a Type 2 in CATS.

   CRDR classified as REVIEW is a Type 3 in CATS.

3. Unit is always "09"

4. System(s): Insert up to four (4) system designators. A list of valid system codes is available via CATS Standard Report LT90R05.

5. Deficiency: Y if CRDR is Type 0, 1 or 2
   N if CRDR is Type 3.

6. Qual Class: QR or NQR as indicated.

7. Issue Date: Date of CRDR Assignment.

8. Owner Org: Organization to whom the CRDR has been assigned. For CRDRs not assigned; enter "Strategic Analysis Department".

9. Title: Unit, nature of event, e.g.:

   U-2 AUX FEEDWATER PUMP LEAK

10. Enter brief description of the event. Use only job titles, never personal names, in referring to people, e.g.,

    Note that an additional four (4) lines (total of 8 lines) of description can be entered after CATS has accepted entry of the basic M/R. The additional four lines are entered using the PF13 Description/Comments screen.

11. Comments: If any of the following statements is applicable, the statement must always appear in commitment comments. The field may also be used to summarize current status and/or basis for closure. Note that an additional four (4) lines (total of 8 lines) of comments can be entered after CATS has accepted entry of the basic M/R. The additional four lines are entered using the PF13 Description/Comments screen.

    NUCLEAR ASSURANCE CONCURRENCE ITEM - Significant and 'Q' CRDRs only.

    SENIOR MANAGEMENT CONCURRENCE ITEM - Significant CRDRs only.

12. Initiating Org: The organization which initiated the CRDR (Block 9).

13. Primary Source Document:

    Doc Type: "CRDR"

    Number: 6-digit CRDR number without hyphens.

    Date: Condition Date (1st choice). If Condition Date is blank, then use Discovery Date (2nd choice). If Discovery Date is also blank, then use Origination Date (3rd choice).

14. Contact Name: Name of Nuclear Assurance Point of Contact.

15. Ext: Nuclear Assurance Point of Contact extension number, in "82-nnnn" format.

D. REFERENCE DOCUMENTS RECORD SCREEN

1. Enter references listed in Blocks 1 and 2 of the CRDR or on the CRDR Transmittal/Assignment Form. The Partition Controller may specify that specific documents be included or excluded.

E. ADDITIONAL TEXT SCREEN

At initial entry of the CRDR, the following "code lines" are entered as follows:

- - - - column positions in 72-column record - - - - - >

```
0         1         2         3         4         5
123456789 0123456789 0123456789 0123456789 0123456789 012345...0
```

.....
(enter the text description of the event from Block 1 of the CRDR, beginning each line of text with a single pound sign (#) in column 1.)

.....
(enter text of immediate corrective actions from Block 14 of initial CRDR, If none were identified, then enter "## NA"

Keywords should be entered if shown on the CRDR Transmittal/Assignment Form, or other request for entry of keywords. They should be preceded by "KEYWORDS:"

Coding Information may be added at the discretion of Section Leader Corrective Action. Coding information to be added will be per the CRDR Transmittal/Assignment page.

F. ACTION RECORDS

1. Actions should generally be entered in the following sequence:

NOTE

Action 00 will be used for the initial action associated with CRDRs classified as POTENTIALLY SIGNIFICANT (Type 0).

1st - CRDR Investigation or Evaluation (Action 01)
2nd - CRDR Draft Report (Action 02)
3rd - Action for Nuclear Regulatory Affairs to evaluate reportability (see Section G)
4th- Corrective Action
etc.

Entries on the Action Screen are as follows:

NOTE

The following fields, items 2, 3 & 4 apply to CRDR Actions that are Commitments to Regulatory Agencies such as the NRC and INPO.

2. Hard Due: D = Action is "Hard Due" dated for a specific date.
M = Action is "Hard Due" dated for a specific milestone.
S = Action is "Soft Due" dated commitment.

3. Date: If Item 2 above is "D," enter the Hard Due date specified.

4. Source: This is the source of the Hard Due field (Field Item 2):

NAS = Nuclear Assurance Strategic Analysis
NRC = Nuclear Regulatory Commission
INPO = Institute of Nuclear Power Operations

5. Target Date: For initial investigation action, as indicated on the CRDR Transmittal/Assignment Form, with time measured from Issue Date of the master record. Due dates for any subsequent actions are otherwise established and changeable in accordance with the related Investigation/Evaluation and the Condition Reporting Procedure.

6. For Initial/Evaluation Actions:

   Priority: Priority 2 if Type 0 or 1
   3 if Type 2
   4 if Type 3

   For subsequent actions, the Priority will be per the completed evaluations.

   If the action is hard due dated, i.e., a D, M or S has been entered in the "HARD due" field, see item 2, the action will be Priority 2.

7. Unit: Unit to which this action applies, in the narrowest sense. The initial investigation action will normally reflect the unit in which the event occurred leading to a CRDR. Unit 09 should be used only if the action truly applies to all three units.

8. Active (Y/N): "N" (May be changed to "Y" later after nature of the disposition documents has been determined.)

9. Resp Org: For Initial Action, the Commitment Owner is identified by the "To" block of the CRDR Transmittal/Assignment Form. For subsequent actions, the Resp Org is established in accordance with the completed Investigation/Evaluation and the normal Commitment Management processes.

10. Discipline: For the Initial Action, is usually set to "ADMIN" if valid for the Commitment Owner's department.

    A current "valid value" list of disciplines for each Resp Org is available from the CATS II system via Exception Report LT90R08.

11. Concurrence by: Initial action will be left blank. Subsequent corrective actions entered require the Commitment Owner to obtain Section Leader or Department Leader acceptance of the action. Per the Commitment Owner's notation, the name of the accepting person should be entered (Last Name, First Initial). If the name of the person is not specifically noted, the entity specified should be entered.

12. Description: Concise description of the required action. For most evaluation actions, use Action 01 for the "basic pattern" associated with the CRDR Category (stored as CRDR Master Records (see Template Discussion, Section B)) these may be copied using the CATS "Repeat" ("R") function.

13. Comment: Must identify all non-standard requirements with which the Responsible Organization must comply in order to properly and unequivocally justify its closure of the Action.

    If copies of the selected documents must be sent to Strategic Analysis Department or any other organization for review/concurrence prior to closure of the Action, that must be stated as an Action Comment. If anyone besides the Commitment Owner must be notified when the Action is closed, that must be stated as an Action Comment.

14. Disposition Documents: Enter disposition documents when available, using standard CATS formats per Report LT90R02. For initial entry of CRDR Investigation/Evaluations, enter:

    CRDR nnnnnn 0001 01 01

G. REPORTABILITY EVALUATION ACTION RECORD

1. Enter an action for NRA if it has been determined that the condition is potentially reportable. The Action Description should read:

   EVALUATE CRDR nnnnn FOR REPORTABILITY DETERMINATION.

2. If it is known, or after it has been determined, that a condition is reportable, enter an action with Action Description reading:

   COMPLETE (Type of Report; i.e., LER, SR, Response to NOV) AS SPECIFIED BY CRDR nnnnn.

H. SUBSEQUENT ENTRY INSTRUCTIONS

1. Subsequent updates to master records and/or actions in the CRDR Partition are to be in accordance with procedure 90GB-0CQ01. Of particular concern are:

   a. When the identification of a work document that will be used to accomplish an action (e.g., WO, WR, PROC, PMTK) is known when the action is entered (or any time prior to its closure), enter it as a Disposition Document as soon as it is known.

   b. When an action is closed by reliance upon another CATS item, the relied-upon CATS item must be entered as a Disposition Document for the closed item.

   c. Whenever supporting paperwork is received for closure of an Evaluation Action, access the Action's PF17 (Additional Text screen) and enter "EVALUATION RECEIVED."

   d. Actions that were completed during the evaluation should be entered in Commitment Additional Text as follows:

      ```
      - - - - column positions in 72-column record - - - - - >
      0         1         2         3         4
      123456789 0123456789 0123456789 0123456789 012345....
      ### .....
      ```

      (enter the text description of actions completed during the evaluation, beginning each line of text with a single pound sign (#) in column 1.)

I. REVIEW CRDRs

The master record for REVIEW CRDRs will be added to CATs as closed.

Action 01 will be added to CATs as a Priority 4 open action assigned to the organization identified on the CRDR Transmittal/Assignment Form.

All other CATs related information should be entered into the system per the CRDR Transmittal/Assignment Form.

Appendix E - Escalation Guidelines and Transmittal

Quality/Nuclear Safety issues should be considered for escalation to a higher level of management, on a case by case basis, using the following guidelines:

1. Response to, or evaluation of, a **SIGNIFICANT** CRDR has not been received by agreed-upon dates and an extension has not been approved by the responsible Senior Management.

2. Failure to provide adequate response or corrective action to **SIGNIFICANT** or 'Q' CRDR.

3. Corrective Actions have not been completed by agreed-upon dates or in a timely manner.

Escalation and notification will be effected by discussion with appropriate management, assignment of an action to the appropriate (higher) level of management necessary to provide satisfactory resolution of the issue or deficiency and documentation of the escalation on the PVNGS Escalation Transmittal (Page 2 of 2, this Appendix).

PVNGS Quality/Nuclear Safety Escalation Transmittal

SAMPLE

TO: _____ DATE: _____

FROM: _____ CRDR NO. _____

YOUR IMMEDIATE ATTENTION IS REQUIRED

The attached quality/nuclear safety issue or deficiency is being escalated to you for the following reasons:

___ An acceptable response or request for extension has not been received and more than ___ days have passed since this CRDR was first transmitted for response.

___ Acceptable corrective action has not been completed in a timely manner.

___ OTHER: _____

_____

_____

Your immediate attention ( ) is ( ) is not required to provide the following action:

___ Provide initial response to the identified deficiency by _____ .

___ Provide additional response to the identified deficiency by_____ .

___ Provide a new schedule for completion of corrective action by _____ .

_____ Nuclear Assurance Department Leader

_____ Director, Nuclear Assurance concurrence for escalation to Senior Management

THIS IS THE ___1st, ___2nd, ___3rd ESCALATION OF THIS ISSUE.

cc: Director, Nuclear Assurance (w/o Attachments)

CRDR File

NA Dept. Leader _____

Other: _____ _____ _____

_____ _____ _____

Appendix F - CRDR Condition Guidelines

CRDR conditions are conditions which have the potential to adversely affect the safe, reliable and economic production of electricity. Examples may include but are not limited to:

1. Failure to follow procedure, such as
   - Step performed incorrectly
   - Step not performed
   - Valve or component misalignment
   - Use of uncontrolled or out-of-date documents
2. Failure to follow regulatory requirements, such as:
   - Tech Spec LCOs and Surveillances
   - Reg. Guide, 10CFR, UFSAR
   - Conditions which could result in reports to external agencies (i.e., LERs, NOVs, SRs)
   - Radiological events that cause overexposures or inadvertent or unmonitored releases
   - Controlled Document deficiencies or omission of important steps or information that result or could result in adverse impacts on (1) personnel safety; (2) power production (e.g., trips plant or power reduction); (3) equipment safety (e.g., plant equipment unable to perform it's function); (4) causes non-compliance with Tech Specs (e.g., incorrect acceptance criteria); (5) causes non-compliance with UFSAR, Reg. Guides, PVNGS accepted INPO practices; or (6) the document will not accomplish its objective.
3. Failure to follow external or internal commitments (CATS)
4. Failure to follow established management expectations, failures or events that require further investigation as determined by PVNGS management, such as:
   - Department Principles and Standards
   - Programmatic differences between units
   - Sensitive Issues Manual
   - Breakdown or degradation in the control of operations, maintenance, engineering, chemistry, radiation protection, training, security, materials, procurement, etc. activities
   - Failures or events that require further investigation as determined by PVNGS management
   - Plant transients, including reactor trips, turbine trips, and control system problems
   - Events that result in systems or major components being declared inoperable
   - Events that result in common mode failures where a single cause or failure mode may impact several components
   - Failure of Maintenance Rule related components or system. Reference the "Key Safety Function" or "Special Concerns" fields on SIMS screens such as WMN021, WMC003, WMB007, WMB011, or WMC017, etc. (coded as MA, MB or MC).
   - Premature or repetitive component or equipment failures
   - Industrial safety events (OSHA recordable)
   - Human errors, including cognitive errors

Appendix G - Condition Classification Guide

The CRDR should be reviewed and classified using the following classification guidelines:

SIGNIFICANT - CRDRs considered to be a Significant Adverse Condition if it represents or caused a:

1. **Severe or Unusual Plant Transient**

   A change to plant operating conditions that involved any one of the following:

   a. any turbine trip, reactor trip or valid ESFAS actuation other than turbine overspeed testing or reactor trip associated with normal plant shutdowns

   b. caused major equipment damage (such as damage to important valves or major piping)

   c. caused by unusual conditions (such as earthquake, fire, flood, plane crash, gas explosion, or other external causes)

   d. required unusual actions to manage the event (such as actions not specified in abnormal or emergency operating procedures) or was misdiagnosed by the operators

   e. proceeded in any unexpected way (such as different from the safety analysis or plant design)

   f. included multiple equipment malfunctions or personnel errors that significantly increase the severity of the transient (such as malfunctions or errors in addition to the first one that directly caused the shutdown)

   g. involved a plant condition that severely inhibited the operator's ability to control or reduce the severity of the event or its consequences

   h. cause an unplanned plant shutdown or power reduction in excess of 10%

2. **Safety System Malfunctions or Improper Operation**

A significant degradation in the ability of a safety system to perform its function during a test or plant transient, due to any of the following:

NOTE

Single failures in a single- or multi-train systems are typically not considered significant as long as the safety function could still be accomplished. However, an event should be considered potentially significant if there was a single failure or other condition that concurrently affected (or had the potential to concurrently affect) the operability of components in multiple safety systems, or more than one independent train or channel within a safety system (e.g., common cause failure of components).

a. safety equipment failures (such as failure of a pump to start or continue running)

b. actuation failures (such as failure of actuation circuitry or logic to actuate equipment)

c. alignment or calibration errors (such as valve mispositioning or miscalibration of setpoints) that resulted in failure or potential failure of equipment to perform its intended function.

d. improper operation by control room or equipment operators (such as premature termination, inappropriate operation, or actuation) that aggravated a transient.

3. **Major Equipment Damage**

A malfunction that resulted in damage to major plant equipment and caused any of the following:

a. unplanned plant outage or operation at significantly reduced power level

b. replacement or extensive repair to major equipment (such as steam generator, turbine, reactor coolant pump)

c. fuel rod failure that required a shutdown

4. **Fuel Handling or Storage Events**

   A fuel handling or storage event that involved any of the following:

   a. damage to a nuclear fuel assembly that released radioactivity from the fuel.

   b. substantial uncontrolled loss of water from any area where fuel is required to be submerged (such as the spent fuel pool, fuel transfer canal, or reactor refueling cavity).

   c. unanticipated loss or degradation of neutron absorber that increased the effective neutron multiplication factor (k-eff).

5. **Excessive Radiation Exposure or Severe Personnel Injury**

   An incident involving personnel at the plant that led to any of the following:

   a. An individual exceeds a regulatory exposure limit

   b. A known locked high radiation area is found improperly posted or is without proper locks or barricades in place

   c. An unauthorized entry into any high radiation area, locked high radiation area, or very high radiation area

   d. An investigation is required for occurrences of any of the following:

      - an accident resulting in a fatality (injury or illness)
      - an accident resulting in a serious injury or illness
      - an accident or injury resulting in a lost work day of APS personnel
      - any other incident (tagging/near miss) having great potential for serious injury or illness to personnel.

6. **Excessive Discharge of Radioactivity**

   Any release off-site of radioactivity in solid, liquid, or gaseous form in excess of regulatory limits.

7. **Conditions which result in non-routine report (per 10CFR50.73) to the NRC (e.g., LERs)**

8. **Any NRC Regulatory Violation (NOV) Severity Levels I-IV**

9. **Deficiencies in Areas Such as Design, Analysis, Operation, Maintenance, Testing, Procedures, or Training**

   Discovery of a deficiency in an area such as design, analysis, operation, maintenance, testing, procedures, or training that is likely to cause a significant event as defined in criteria 1 through 8.

10. **Other Events Involving Nuclear Safety or Plant Reliability**

    An event involving plant safety, reliability, or risk that is judged to be significant due to its causes or consequences. This may include events that had a strong potential to be more severe if different conditions that could be reasonably expected had been present.

    a. two or more concurrent failures of redundant components or barriers

    b. problems that could easily have escaped detection

    c. problems that resulted from a fundamental misunderstanding of plant performance or safety requirements

    d. severe water chemistry excursion, e.g., action Level 3 exceeded for SG chemistry requiring prompt corrective action

    e. problem trends, patterns, or failure rates that have a strong potential to lead to a significant event as defined in criteria 1 through 8.

    f. improper or nonconservative decisions by operators or plant management that reduced the margin of nuclear safety.

11. **Significant Quality Issue**

    A Significant Quality Issue is a condition that has been identified where there has been a significant breakdown in any portion of the Quality Assurance Program which could have resulted in the occurrence of one of the above, criteria 1 through 10, and criteria 12. Such breakdowns in the QA Program are significant whether or not the breakdown actually resulted in one of the above.

12. Maintenance Rule Cause Determination Required

Cause Determination, to the appropriate depth, is required when a MRule **Functional Failure** has occurred. A **MRule Functional Failure** is the failure of a structure, system, train, or component (SSC) within the scope of the MRule to perform its intended function (i.e., the **key safety function** performed by the SSC that required its inclusion within the scope of the Mrule). The loss of function can be either direct, i.e, the SSC that performs the function fails to perform its intended function or indirect, i.e., the SSC fails to perform its intended function as a result of the failure of another SSC (either safety related or nonsafety related).

Examples of functional failures:

- The failure of a LPSI injection valve to open when called upon which would prevent any train of LPSI from performing its key safety function.
- The failure of any one of the charging pumps or gas turbine generator independent of the "systems" capability to fulfill its key safety function.
- The failure of an inside or outside containment isolation valve, independent of whether containment isolation can be achieved by the redundant valve.
- The failure of a transmitter or instrument loop to provide a vital signal or indication necessary for the performance of a key safety function, independent of whether redundant instrumentation exists.
- Any component failure that causes a reactor trip, turbine trip or reactor power reduction.
- Failures of 1 channel in a multi-channel system are considered functional failures even though redundant channels are functional (e.g., Channel A of the RPS - e.g., The low DNBR parameter fails and is placed in trip or bypass. Even though the other 3 channels are functional, this is considered a functional failure of the SA system.)
- The failure of the high refrigerant temperature sensor from the Essential Chiller Compressor which prevents the Essential Chiller from starting or trips the chiller after a start.

For High Risk Significant and Low Risk significant Standby Systems, functional failures are applied at the train or channel level. For Low Risk Significant Normally Operating Systems, functional failures are based on a loss of the plant level function e.g., failure of a condensate pump that does not result in either a trip or unplanned capability loss would be considered a functional failure.

The Key Safety Functions are as a defined in 01IG-0AP02, Technical Dictionary, the Key Safety Functions are listed below for convenience:

- . Reactivity Control
- Maintenance of Vital Auxiliaries
- RCS Inventory and Pressure Control
- RCS Heat Removal
- Containment Integrity
- Containment Atmosphere Control
- Trip Initiator
- Indirect Radioactive Release

13. **Human Intervention**

A situation in which human intervention prevents a Nuclear Safety Event as defined in criteria 1, 2 or 6 above.

POTENTIALLY SIGNIFICANT CRDRs- An interim category used when additional information is required to finalize the CRDR classification. The requested additional information should be provided to the Strategic Analysis department on a CRDR Continuation sheet.

ADVERSE CRDRs- Describes or represents a condition which adversely affect the safe, reliable and economical production of electricity. Adverse conditions are synonymous with terms such as failures, malfunctions, deficiencies, deviations, defective material/equipment and nonconformances.

See Appendix F, CRDR Condition Guidelines for additional details.

REVIEW CRDRs- The condition is not considered to be an adverse condition to quality. The CRDR condition should be reviewed by the CRDR owner and dispositioned during the conduct of day-to-day work activities or business processes.