

PROCEDURES GENERATION PACKAGE

Turkey Point Plant

Unit 3 and Unit 4

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PROCEDURES GENERATION PACKAGE

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PROCEDURES GENERATION PACKAGE

1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this Procedures Generation Package (PGP) is to describe the Emergency Operating Procedures (EOPs) development at Turkey Point Plant Units 3 and 4 which are Westinghouse 3 - loop pressurized water reactors.

1.2 SCOPE

This document was developed in response to Supplement 1 to NUREG-0737, Item 7.2b, Page 15.

1.3 ORGANIZATION

This document consists of the following six parts:

Section 1.0	Introduction
Section 2.0	Plant Specific Technical Guidelines
Section 3.0	Writers Guide for EOPs
Section 4.0	EOP Verification Program
Section 5.0	EOP Validation Program
Section 6.0	EOP Training Program

Each part describes the approach taken as part of the overall EOP Implementation Plan for Turkey Point Plant Unit 3 and Unit 4.

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2.0 PLANT-SPECIFIC TECHNICAL GUIDELINES

2.1 GENERAL

- 2.1.1 The following program for converting the Westinghouse Owners Group Emergency Response Guidelines (ERGs) into EOPs has been developed and will be used by Turkey Point Plant Unit 3 and Unit 4.
- 2.1.2 The Westinghouse Owners Group Emergency Response Guidelines, Revision 1, dated September 1, 1983, will be used for the implemented EOPs.
- 2.1.3 The following major items were considered in the methodology to be used:
 - 1. Mechanics of conversion
 - 2. Location of the plant-specific technical information
 - 3. How the plant-specific technical information will be used
 - 4. The use of existing EOP's
 - 5. Documentation requirements
 - 6. Use of the background information supplied with technical guidelines

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2.2 PROGRAM DESCRIPTION

2.2.1 Mechanics of Conversion

1. Preparation

The designated EOP writing team will obtain and review the following Plant-specific Technical Information (EOP source documents):

- a. Westinghouse Owners Group Emergency Response Guidelines (ERGs), Revision 1, with background information
- b. FSAR Unit 3 and Unit 4
- c. Turkey Point Plant Writers Guide for Emergency Operating Procedures
- d. Technical Specifications for Unit 3 and Unit 4
- e. The most current revision of existing EOPs
- f. As-built plant drawings

2. Writing Plant Specific EOPs from Westinghouse ERGs

The EOP writing team will follow the ERG's step-by-step, adding footnoted information where designated. Concurrently, the writers will review appropriate EOP source documents. The use of plant specific technical information or analysis resulting from plant unique design will be included to the ERG format. The inclusion of these design requirements will be covered by two separate documents, the Basis Document, which outlines the logic used for inclusion of the step into the ERG, and the Transition Document, which delineates the flow of information from the ERGs to the plant specific EOPs. The Basis Document is described in 0-ADM-109, Writers Guide for EOPs, for Turkey Point.

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2.2 PROGRAM DESCRIPTION

2.2.1 Mechanics of Conversion (Cont'd)

3. Plant Specific Deviation Form

Plant specific differences generated between generic guidelines and plant specific EOPs will be documented on the deviation form shown in Enclosure 1. This form will provide the technical justification for step deviations between the generic guidelines and the plant specific procedures.

4. Transition from Existing EOPs to the Upgraded Plant Specific EOPs

The EOP writing team will ensure that required information in the existing EOPs is properly incorporated into the upgraded plant specific EOPs which are derived from the Westinghouse ERGs. This will be accomplished by means of a Transition Document, detailed in the Turkey Point EOP Writers Guide, 0-ADM-109.

2.2.2 Documentation

The completed Transition Documents will be provided as a source document to assist in the EOP verification process and in the revision, review and approval process.

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3.0 WRITERS GUIDE FOR EOPs

3.1 GENERAL

- 3.1.1 A writers guide for EOPs is a plant-specific document that provides instructions for writing EOPs. In addition to establishing sound writing principles, the guide helps to promote consistency among all EOPs and their revisions, independent of the number of EOP writers.
- 3.1.2 The writers guide will be revised, as necessary, based on feedback from operator training, experience, and procedure validation.

3.2 DOCUMENT DESCRIPTION

- 3.2.1 Information on the following major items is included in the plant-specific writers guide for EOPs.
 - 1. EOP format
 - 2. EOP organization
 - 3. EOP content
 - 4. Mechanics of style
- 3.2.2 The Turkey Point Plant Writers Guide for Emergency Operating Procedures, is based on both the industry document Emergency Operating Procedures Writing Guideline (INPO 82-017), and the Writers Guide for Emergency Response Guidelines dated September 1, 1983, developed by the Westinghouse Owners Group.

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4.0 EOP VERIFICATION PROGRAM

4.1 GENERAL

EOP verification is the evaluation performed to confirm the written correctness of the procedure and to ensure that applicable generic and plant-specific technical information has been incorporated properly. This evaluation also checks that the human factors aspects presented in the writers guide for EOPs have been applied.

4.2 PROGRAM DESCRIPTION

4.2.1 When developing this EOP verification program, the following major items were considered:

1. How EOP verification will be performed
2. How completion of the EOP verification process will be documented
3. What process will be used in resolving discrepancies

4.2.2 The verification program is based on the industry document Emergency Operating Procedures Verification Guideline (INPO 83-004), developed by the EOPIA Review Group and published by INPO.

4.2.3 The Turkey Point Plant verification procedure for emergency operating procedures is provided in Administrative Procedure 0-ADM-110 and addresses the following objectives:

1. EOPs are technically correct, i.e., they accurately reflect the technical guidelines and other EOP source documents
2. EOPs are written correctly, i.e., they accurately reflect the Plant-specific Writers Guide
3. A correspondence exists between the procedures and the control room/plant hardware
4. The language and level of information presented in the EOPs are compatible with the qualifications, training, and experience of the operating staff

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5.0 EOP VALIDATION PROGRAM

5.1 GENERAL

EOP validation is the evaluation performed to determine that the actions specified in the procedure can be performed by the operator to manage the emergency conditions effectively. The methodology for EOP validation utilizes present, available methods at the Turkey Point Plant while recognizing and allowing for future improvements. The EOP validation will evaluate the operators' ability to manage emergency conditions using the EOPs. It will validate that part of the EOP not covered by any technical validation of generic technical guidelines.

5.2 PROGRAM DESCRIPTION

5.2.1 When developing this EOP validation program, the following major items were considered:

1. How EOP validation will be performed
2. How to appropriately use walk-throughs or table-top methods of validation
3. How operating and training experience will be integrated into the program evaluation
4. The evaluation criteria to be applied and the methods to be followed in resolving discrepancies
5. How completion of the EOP validation process will be documented

5.2.2 The program is based on the industry document Emergency Operating Procedures Validation Guideline, (INPO 83-006), developed by the EOPIA Review Group and published by INPO. The Turkey Point Plant validation procedure for emergency operating procedures is provided in Administrative Procedure 0-ADM-111 and addresses the following objectives:

1. EOPs are usable, i.e., they can be understood and followed without confusion, delays, and errors
2. A correspondence exists between the procedures and the control room/plant hardware
3. The instructions presented in the EOPs are compatible with the shift manpower, qualifications, training, and experience of the operating staff
4. A high level of assurance exists that the procedures will work, i.e., the procedures guide the operator in mitigating transients and accidents

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6.0 EOP TRAINING PROGRAM

6.1 GENERAL

The EOP training program was developed to support implementation of the EOPs. The EOP writer interfaces with the Training Department to ensure a supportive program.

6.2 PROGRAM DESCRIPTION

6.2.1 When developing the EOP training program, the following major items were considered:

1. What type of operator training should be provided (initial, requalification)
2. What method of operator training should be followed
3. What operator knowledge and skill level is desired
4. What training material is needed to support EOP training requirements
5. What current operator licensing requirements exist
6. What method should be provided for operator feedback into the training program and EOP development

6.3 TRAINING PROGRAM GOALS

6.3.1 The initial, overall training goals for the EOP training program are as follows:

1. To enable the operators to understand the structure of the EOPs
2. To enable the operators to understand the technical basis of the EOPs
3. To enable the operators to use the EOPs under operational conditions

6.3.2 Training program objectives to support these goals will be developed for each lesson plan.

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6.4 INITIAL EOP TRAINING METHODS

The EOP training program is established to instruct operators in the EOPs. The program consists of classroom instruction and procedure walk-throughs. Non-plant specific simulator exercises will be conducted when available but is not considered a requirement for EOP implementation.

6.4.1 Classroom Instruction

Classroom instruction sessions will be conducted. Included in the information presented during this method will be the following:

1. The logic behind the development of EOPs
2. The process used to develop the EOPs
3. The EOPs themselves, including supporting technical and human-factors information

6.4.2 Procedure Walk-Throughs

An important part of the instruction on EOPs will be the practical experience gained through procedure walk-throughs. This walk-through training will also concentrate on information flow and interaction with the physical plant.

6.4.3 Simulator Exercises

Training on the EOPs will be conducted for all licensed operators using scenarios on a non-plant specific simulator. Training will be conducted with all operators performing their normal control room functions. Until the plant-specific simulator is completed, complicated scenarios will be discussed during classroom instruction and procedure walk-throughs.

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6.5 REQUALIFICATION TRAINING

All licensed operators will conduct procedural walk-throughs for refresher training. The walk-throughs may be conducted either in the plant control room or at a simulator. Simulator scenarios will be as described in Section 6.4.3. Simulator exercises will be evaluated by the Nuclear Training Department or Operations Department Supervision. Evaluation results will be critiqued for feedback to the operators and to determine additional training needs.

6.6 TRAINING ON REVISIONS TO EOPs

Training on revisions to EOPs will be accomplished through a program of required readings (self taught), pre-shift briefings, or lectures in the requalification program. Determination of appropriate methods will be made by the Nuclear Training Department.

6.7 INPUTS INTO TRAINING PROGRAM CHANGES

6.7.1 Supporting Training Material Changes

Changes to supporting training material will be factored into updated lesson plans and operator memos. Some of the supporting material identified to date is as follows:

1. ERGs
2. Background Information
3. Associated WCAPs

6.7.2 Operator Feedback

Operator feedback resulting from EOP verification, EOP validation, and training critique forms will be used to keep the training program and EOPs current and relevant.

6.8 EVALUATION

An evaluation will be performed to ensure that the training program goals have been accomplished.

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ENCLOSURE 1

Turkey Point Plant

**Plant Specific Deviation
Documentation Sheet**

PLANT SPECIFIC DEVIATION DOCUMENTATION SHEET

EOP TITLE: _____

EOP NUMBER: _____

Page ____ of ____

Generic EOP Guideline Step Number	Plant Specific EOP Step Number	JUSTIFICATION OF DIFFERENCES	SIGNATURE/DATE

*F-015

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ATTACHMENT 1

TURKEY POINT PLANT

WRITERS GUIDE

FOR

EMERGENCY OPERATING PROCEDURES

