

# REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 draft revs to procedures generation package .

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03-02



JULY 24 1987

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U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:


Re: Turkey Point Units 3 & 4  
Docket Nos. 50-250 and 50-251  
Procedures Generation Package  
NRC TAC Numbers 44345 and 44346

By letter dated May 8, 1987 you provided FPL a draft safety evaluation on the Procedures Generation Package (PGP) for Turkey Point Units 3 and 4. That evaluation identified several items which needed to be addressed to complete the review of the PGP.

Attached is our response to those items. Also attached are draft revisions of the PGP (including the plant specific deviation documentation sheets), Administrative Procedures 0-ADM-109 ("Writers Guide for Emergency Operating Procedures"), 0-ADM-110 ("Verification Guideline for Emergency Operating Procedures"), and 0-ADM-111 ("Emergency Operating Procedure Validation Plan"), and Administrative Procedure 0103.37 ("Standardization of Acronyms and Abbreviations"). These documents are referenced in our response, and are needed for your review.

If you have any questions, please contact us.

Very truly yours,

  
C. O. Woody  
Group Vice President  
Nuclear Energy

COW/PLP/gp

cc: Dr. J. Nelson Grace, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant

Attachments

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PDR ADDCK 05000250  
P PDR

*A003*  
*11*

RESPONSE TO NRC REQUEST  
FOR  
ADDITIONAL INFORMATION  
ON  
TURKEY POINT NUCLEAR PLANT

PROCEDURES GENERATION PACKAGE

COVER PAGE

- |             |  |
|-------------|--|
| Enclosure 1 | Responses to Specific NRC Concerns on PGP                            |
| Enclosure 2 | Plant Specific Deviation Documents                                   |
| Enclosure 3 | O-ADM-109, Writers Guide for Emergency Operating Procedures          |
| Enclosure 4 | O-ADM-110, Verification Guideline for Emergency Operating Procedures |
| Enclosure 5 | O-ADM-111, Emergency Operating Procedure Validation Plan             |
| Enclosure 6 | AP-0103.37, Standardization of Acronyms and Abbreviations            |

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A. PLANT SPECIFIC TECHNICAL GUIDELINES (P-STG)

Concern:

1. The description of the EOP Basis Document (Section 5.6 of O-ADM-109) should be modified to ensure that all deviations from and additions (including plant-specific bracketed information) to the generic technical guidelines are documented, and an analysis or other technical justification supporting these differences is included.

Response:

The purpose of the EOP Basis Document (Section 5.6 of O-ADM-109) stipulates the intended use of the Basis Document. Deviations from and additions to generic technical guidelines are documented, and justification supporting these differences between the guidelines and the EOP's are enclosed as a portion of the Procedure Generation Package resubmittal.

Concern:

2. Safety significant differences from the ERGs and their justification should be included in the PGP. The EOP Basis Document, or appropriate portions thereof, can be used for this purpose.

Response:

Please find the enclosed Plant Specific Deviation Documentation Sheets.

## B. WRITERS GUIDE

### Concerns:

1. Notes and cautions provide operators with important supplemental information concerning specific steps or sequences of steps in the EOPs. The information on cautions and notes in Section 5.3.4 (pp.17-18) should be expanded and revised with regard to the following:
  - a. Because caution statements provide information used to prevent actions by Control Room operators that could injure personnel or endanger public health or safety, it is important that they be distinguished from notes, which provide less critical information. Some emphasis techniques, such as encircling cautions with asterisks, should be used to distinguish cautions from notes and to alert Control Room personnel to their more critical nature.

### Response:

Administrative Procedure O-ADM-100, Procedure Preparation, Review, and Approval, provides administrative guidance for the preparation, review, approval, and revision of plant procedures developed under Project 3 of the Performance Enhancement Program. Section 5.6 of O-ADM-100, Use of Cautionary Information, Examples, and Notes, provides guidance pertaining to distinguishing emphasis techniques for Cautions and Notes. Information found in O-ADM-100, Section 5.2.6 has been duplicated in the attached draft of O-ADM-109, Writers Guide for Emergency Operating Procedures. Section 5.3.5.

### Concern:

- b. Notes are intended to provide supplemental information and cautions are intended to attract attention to essential or critical information in procedures; neither is intended to include any instructions, directions, or operator actions. Section 5.3.4.3 states that it is acceptable for transition instructions to be included in a note or caution. The Writers Guide should be revised to indicate that transitions are not acceptable in notes and cautions. The example caution in Section 5.3.4.3 should also be corrected.

### Response:

Notes contain administrative or advisory information which supports operator action. Cautions contain information about potential hazards to personnel or equipment. They also advise on actions in a passive form on transitions which may become necessary depending on changes in plant conditions.

Concern:

2. Conditional and logic statements should be used in EOPs to describe a set of conditions or a sequence of actions. These statements can be confusing, so it is important that the Writers Guide provide explicit guidance for their use. The guidance provided in Section 5.3.3 (p. 17) should be revised with regard to the following:
  - a. The terms NOT and "can NOT" are included in the list of logic terms provided in the Writers Guide. Other than in conjunction with IF, it is not clear how these terms are to be used when writing EOPs. For this reason, NOT and "can NOT" should not be used as separate logic terms in EOPs. See NUREG-0899, Appendix B, for additional information.
  - b. The Writers Guide does not discuss the difference between the conjunction "and" and the logic term AND, or the difference between the conjunction "or" and the logic term OR. Unless the difference between conjunctions and logic terms is clear, operators could mistake a list for a logical sequence. The Writers Guide should be revised to specify the formatting of conjunctions so they will not be confused with logic terms.
  - c. Section 5.3.3.7 indicates that OR should only be used in the inclusive sense. If priorities cannot be established among equally acceptable alternatives, then it may become necessary to use the exclusive "or". The Writers Guide should be revised to provide formatting instructions for the exclusive "or".
  - d. Because logic terms can be confusing, the Writers Guide should be expanded to provide examples of the correct use of logic terms that will be used in the EOPs.

Response:

Section 5.3.4 of the enclosed draft Writers Guide O-ADM-109 has been revised to include the above concerns.





Concern:

3. Critical Safety Function Status Trees provide important safety information to operators. The discussion of Status Trees in Section 5.3.12 (p. 23) should be revised with regard to the following:
  - a. So that procedure writers can produce Status Trees that are consistently and correctly formatted, the Writers Guide should include a list of symbols that may be used in Status Trees. Because Status Trees involve decision making and branching, they would be most clearly presented using flow chart symbols. The Writers Guide should be revised to reflect these concerns.
  - b. Sections 5.3.12.1 and 5.3.12.5 discuss "branch" and "block" versions of Status Trees. Section 5.3.12.1 references Enclosure 2 (p. 32), which gives no further explanation of branch and block Status Trees. Section 5.3.12.1 states that the orientation of Status Trees on the page (i.e., horizontal or vertical) and the type of Status Trees used (i.e., branch or block) should be consistent over the set. The Writers Guide should be revised to indicate the single orientation and the single format that will be used in all Status Trees, and to provide an example of a properly formatted Status Tree.

Response:

Section 5.3.13 of the enclosed draft Writers Guide O-ADM-109 has been revised to include the above concerns.

Concern:

4. Transitions to other procedures or sections of procedures can be disruptive and cause unnecessary delays. The discussion of referencing and branching in the Writers Guide should be revised with regard to the following:
  - a. In addition to the guidance provided in Section 5.3.5 (p. 18), the Writers Guide should describe the criteria procedure writers are to use to determine when the steps of a referenced procedure are to be included in the procedure rather than referenced (this information may be provided on Page 19 which was not provided for review).

Response:

Section 5.3.6 of the enclosed draft Writers Guide O-ADM-109 has been revised to include the above concern.



Concern:

- b. In order to facilitate rapid movement from one part of the EOPs to another, some method for easily identifying the sections or subsections in the EOP, such as tabbing, should be specified.

Response:

Step numbering is the method used to facilitate rapid movement from one part of the EOPs to another. Procedural tabbing is used to facilitate rapid movement from one procedure to another.

Concern:

5. Placekeeping aids can assist operators in keeping track of their position within a procedure. Placekeeping aids are of particular importance when performing concurrent steps or procedures, or in situations where the user's attention is diverted. The Writers Guide should be revised to specify some form of placekeeping aid.

Response:

Placekeeping aids are user implemented aids that are not a function used by a procedure writer and, therefore, is not considered necessary in the Writers Guide.

Concern:

6. To minimize confusion, delays, and errors in the execution of EOP steps, the following concerns should be addressed in the Writers Guide:
  - a. EOPs should be structured so that they can be executed by the minimum shift staffing and Control Room staffing required by the Technical Specifications.
  - b. Action steps should be consistent with the roles and responsibilities of operators.
  - c. Action steps should be structured to minimize the movement of personnel around the Control Room while carrying out procedures (where the technical guidelines permit).
  - d. Action steps should be structured to avoid unintentional duplication of tasks.

Response:

The enclosed draft Writers Guide has been revised to reflect the above concerns.



Concern:

7. The proper use of emphasis techniques can make procedures easier to understand. Section 5.4.3.d (p. 24) indicates that operator action steps may be capitalized for emphasis. Because Section 5.3.2.5.b (p. 14) indicates that expected responses should also be capitalized, capitalization of operator action steps could cause confusion. Further, text written in all capitals is more difficult to read than mixed case. For these reasons, the Writers Guide should be revised to indicate that operator action steps should not be capitalized for emphasis.

Response:

The enclosed draft Writers Guide has been revised to reflect the above concern.

Concern:

8. Instructions should be written for the various types of action steps that an operator may take to cope with different plant situations. The guidance provided in the Writers Guide for writing instructional steps should be expanded as follows:
  - a. Section 5.2.3.4 (p. 13) states that "many of the operator actions provided in a procedure imply continuous performance". The Writers Guide should be revised to include a method which will specifically indicate, rather than imply, when a step should be performed continuously. The Writers Guide should also specify how the interval of performance should be specified, how operators will be reminded to perform the task, and how operators will be told to stop performing the task.

Response:

The enclosed draft Writers Guide has been revised as follows:

Many of the operator actions provided in a procedure provide procedural guidance for continuous performance throughout the remainder of the procedure. This intent is conveyed by the use of appropriate action verbs such as monitor, maintain, or control.

Concern:

- b. Both high level and instructional steps are not defined in the Writers Guide. Section 5.3.2.5 (pp. 14-15) should be revised to include clear definitions of these steps, along with explicit instructions for how these steps should be written.

Response:

The enclosed draft Writers Guide has been revised to reflect this concern.



Concern:

- c. Section 5.2.3.2 (p. 12) states that "if the order of substep performance is not important, the substeps are to be designated by bullets. If the logical OR is used, both choices must be designated by bullets". These two uses of bullets could lead to operator confusion. In the first instance, all steps identified by bullets must be performed by operators. In the second instance, when OR is used, operators will perform one of the steps indicated by bullets OR the other, but not both; i.e., operators will not perform all of the steps indicated by bullets. So that the meaning of bullets is clear to operators, this discussion of the use of bullets should be revised to indicate bullets should be used in lists and should not be used in logic statements. Note that the OR in the example Step 26.b in Enclosure 1 (p. 31) is both incorrectly formatted and located in a manner which makes it easy to overlook.

Response:

The enclosed draft Writers Guide has been revised to reflect this concern.

Concern:

- d. Instruction steps should be written as complete sentences. Sections 5.3.2.6.c (p. 15) and 5.4.2.1.c (p. 24) indicate that operator instruction steps are not to be written as complete sentences and that contingency actions are to be written as complete sentences. The Writers Guide should be revised to indicate that all instructions should be written in complete sentences. Substeps written in the form of a verification (i.e., the example provided for Section 5.3.2.5.c) can be an exception to the above.

Response:

The enclosed draft Writers Guide has been revised to clarify the use of sentence structure methodology use for operator instruction steps and contingency steps.

Concern:

- e. The Writers Guide should address the definitions of and formats for the following types of action steps: (1) steps for which a number of alternative actions are equally acceptable; (2) time-dependent steps; and (3) diagnostic steps.

Response:

The enclosed draft Writers Guide has been revised to address the above concern.





Concern:

- f. Section 5.3.2.3 (p. 14) states that the actions in a particular step are not required to be completed before going on to the next step unless the previous step is "short". This section also states that, "if an assigned task is very lengthy, additional steps may be performed prior to completion. If a particular task must be completed prior to continuation, this condition must be stated clearly in that step or substep". These instructions require operators to make a subjective judgement: if a step is "short", the operator should complete it before going to the next step; however, if a step is "very lengthy", the operator may perform other steps before completing the first step, unless he or she is told not to do so. Because "short" and "lengthy" steps are not quantitatively defined, operators will not be certain whether or not to perform steps concurrently. The Writers Guide should be revised to clarify when a step should be completed before the next step is begun, and should state how the operator will be informed that a step must be completed before he is allowed to continue.

Response:

The enclosed draft Writers Guide has been revised to address the above concern.

Concern:

9. Information should be presented so that interruptions in the flow of information to operators are minimal. To achieve this, each procedure should be written so that action steps, cautions, and notes are complete on one page. In addition, no page rotation or breaking of words should be allowed. The Writers Guide should be expanded to include these requirements.

Response:

The enclosed draft Writers Guide has been revised to reflect these requirements.

Concern:

10. It is important that a consistent method of step numbering be used throughout EOPs. The Writers Guide should be revised with regard to the following:
  - a. Section 5.3.2.6.e (p. 16) states, "If the right-hand column contains multiple contingency actions which do not correspond to multiple substeps in the left-hand column, then different designators should be used in each column". Although an example follows, the Writers Guide should be revised to require the use of specific types of designators, particularly the designators that should be used at the detailed instruction level.

Response:

The enclosed draft Writers Guide has been revised to reflect the use of designators.

Concern:

- b. The entire step number should be used at each step level in EOPs. Then, if the operator is told to GO TO Step 4.b.3, for example the entire step number will be in front of the step and there will be no confusion on the part of the operator as to whether he is at the correct step.

Response:

Turkey Point Operations and Training Departments have not indicated any confusion with the step numbering system presently in use.

Concerns:

11. Acronyms and abbreviations used in EOPs should be readily understood by both procedure preparers and plant operators. Section 5.4, which discusses abbreviations and acronyms, should be revised with regard to the following:
  - a. Section 5.4.3.1.e (p. 24) indicates that "abbreviations are commonly capitalized". Section 5.4.6.2 (p. 26) states that abbreviations and acronyms from AP-0103.37, Standard Acronyms and Abbreviations should be capitalized whenever they are used. Abbreviations and acronyms should be used in the same format as they are shown in the inclusive list of abbreviations and acronyms. These sections should be revised accordingly.

- b. Section 5.4.6.1 (p. 86) states that "abbreviations and acronyms should be used whenever possible to simplify procedures". Because abbreviations and acronyms are more difficult to understand than the words they replace, abbreviations and acronyms should not be overused. The Writers Guide should be revised to state that abbreviations and acronyms will be used only to simplify complicated expressions. The Writers Guide should further state that abbreviations and acronyms should be consistent with control panel markings and unit of measure used in procedures.
- c. In order to determine that the abbreviations and acronyms used in the EOPs are appropriate, a copy of AP-0103.37 should be provided for review.

Response:

The enclosed draft Writers Guide has been revised to reflect the above concerns and AP-0103.37 is enclosed for review.

Concern:

- 12. Vocabulary and syntax used in procedures should be readily understood by both procedure preparers and plant operators. Section 5.4.4.2 (p. 25) states that Enclosure 3 (pp. 33-5) contains a list of "frequently used verbs". Enclosure 3 should be expanded to be an inclusive list of acceptable action verbs. Section 5.4.4.2 should be revised accordingly.

Response:

The enclosed draft Writers Guide has been changed to indicate that the listed verbs are acceptable and are not all inclusive.

Concern:

- 13. It is important that operators know where to find all of the instrumentation and controls that are referenced in the EOPs. The Writers Guide should be revised with regard to the following:
  - a. Section 5.3.6.1 (p. 20) indicates that location information should be included when similar components are used in both primary and secondary systems. This section should be expanded to indicate that location information should also be included if the components are infrequently used or if there would otherwise be a possibility of operator confusion. Further, an example of how to present location information should be provided.



- b. Section 5.3.6.1 (p. 20) indicates that equipment, controls, and displays will be identified in "operator language" terms. Because operator language terms may not always match engraved names on panels, operators may have difficulty recognizing easily the identity of equipment or controls. The Writers Guide should be expanded to describe an approach that allows operator language terms to be associated directly with panel engravings (e.g., enclosing engraved panel names in parentheses).

Response:

The enclosed draft Writers Guide has been revised to reflect the above concerns.

Concern:

- 14. Procedure writers should be given sufficient information to produce procedures that are consistently and correctly formatted. Instructions and examples in the Writers Guide should be revised as follows:

- a. Sections 5.1.2 and 5.1.3 (p. 10) describe the use of and formatting for the revision date. In the example in Enclosure 1 (p. 31), the label "approval date" is used. The Writers Guide should be revised to correct this inconsistency.

Response:

The enclosed draft Writers Guide has been revised to reflect the above concern.

Concern:

- b. Section 5.1.3 (p. 10) should be expanded to indicate that each EOP page will include the name of the facility, as well as the unit, to which it applies.

Response:

The first page of each procedure adequately addresses the concern.

Concern:

- c. Section 5.2.1.1.a (p. 11) states that the cover sheet will include the "title, number, revision, applicable unit, etc". The cover sheet should include, in addition to the items listed, the revision date, the total number of pages in the EOP, and a place for review and approval signatures. This section should be revised to indicate that each of these items will be included on the cover sheet.



Response:

Each EOP contains the revision approval date on Page 1. A list of the total pages ("List of Effective Pages") and the revision approval date for each page is included on Page 2. If a list of effective pages is not contained within a procedure, the top right block of the procedure will contain the page number and the total number of pages within the procedure (i.e., \_\_\_\_\_ of \_\_\_\_\_). Review and approval signatures appear on FPL Form 5714A, which accompanies each EOP to the Plant Nuclear Safety Committee for review and which is subsequently retained as a Quality Assurance record. These measures, which are utilized for all plant procedures, are also adequate for EOPs.

Concern:

- d. The note in Section 5.2.1 (p. 11) states that a procedure might contain only "the three required elements". The list of procedure elements in Section 5.2.1 (p. 11) includes only two required elements; i.e., cover sheet and instructional steps. This discrepancy should be corrected.

Response:

The enclosed draft Writers Guide has been revised to reflect this concern.

Concern:

- e. Section 5.2.2.1 (p. 12) indicates that margins will be set by preprinted borders on the pages. This is a good method for ensuring that all information is contained on a page, however, the text of the Writers Guide should include specific margin requirements for borders and text.

Concern:

- f. To ensure readability, the Writers Guide should be expanded to include specific spacing, type style, and pitch size requirements for EOPs.

Response:

- e. O-ADM-109, Writers Guide for Emergency Operating Procedures, is primarily intended to provide instructions to the procedure writers regarding procedure preparation. The use of pre-printed borders, as well as specific spacing, type style, and pitch size are not items of concern to the procedure writer. At FPL's Turkey Point Plant these functions are established within the Word Processing section of the Procedures Upgrade Program (PUP) Group. Standard forms are available to assist the procedure writer in formatting his/her procedure if desired; however, the specific items identified by the concerns are standardized using computerized word processing software programs. These measures, which have been in place for over three years, ensure readability. EOPs readability has not been a problem since the upgraded EOPs were implemented in 1985.
- f.





Concern:

- g. Section 5.4.2.1.a (p. 24) includes an example of the use of a colon that uses a period rather than a colon. This example should be corrected.

Response:

The enclosed draft Writers Guide has been revised to correct the example.

Concern:

15. Section 5.2.2.3 (p. 12) discusses foldout pages. Foldout pages are subject to wear that may lead to tearing. The Writers Guide should be revised to either specify another format to be used to present the information contained in the foldout pages or the manner in which such disadvantages will be overcome.

Response:

Turkey Point is currently preparing to implement a plan in which information formerly contained on "foldout pages" will appear on the back sides of procedure pages in a manner such that the information is available and visible to the operators when needed. This will prevent inadvertent page tearing. This plan is not relevant to the writer of the EOP, and therefore it is not described in O-ADM-109. A sample "foldout page" is provided in the revised O-ADM-109 for writer reference in proper formatting.

Concern:

16. Because they will be used in stressful conditions and under time constraints, EOPs must be easily accessible to operators and should be easily identifiable. The Writers Guide should be expanded to address the availability and accessibility of the EOPs to Control Room staff.

Response:

O-ADM-109, Writers Guide for Emergency Operating Procedures, is primarily intended to provide administrative and technical guidance to the procedure writer regarding procedure preparation. The Operations Department Control Room staff practices concerning procedure identifiability, availability, and accessibility provide guidance that the EOPs are easily accessible to operators and are easily identifiable.



Concern:

17. It is important that all copies of EOPs be clearly legible to preclude operator difficulty in reading them. The Writers Guide should be revised with regard to the following:
- a. Section 5.5 (p. 27) should be expanded to indicate that the quality of EOP copies will approximate the quality of the originals.
  - b. Enclosure 2 (p. 32) describes the color coding to be used in Critical Safety Function Status Trees. The Writers Guide should also describe how color-coded Status Trees will be produced and reproduced to maintain the color coding.

Response:

The enclosed draft Writers Guide has been revised to reflect the concern of 17.a. The current coding techniques used for CSFSTs makes special production and reproduction techniques unnecessary.

Concern:

18. EOPs must be current to be usable. The Writers Guide should describe a system for ensuring that the EOPs are updated in a timely fashion when changes occur in plant design, Technical Specifications, technical guidelines, the Writers Guide, the Control Room, or other plant procedures that affect the EOPs. The Writers Guide should also include a statement of commitment to use the Writers Guide in revising existing EOPs. See NUREG-0899, Subsection 6.2.4, for additional information.

Response:

At Turkey Point Plant, programs are in place to ensure that reviews are performed when changes occur in plant design, Technical Specifications, technical guidelines, etc. However, O-ADM-109, is not the appropriate place to describe such review programs. The following procedures are examples of plant procedures designating review functions that may result in revisions to EOPs:

AP-0190.15	Plant Changes and Modifications (PC/Ms)
AP-0103.18	Facility Operating License Amendments and/or Changes
AP-0109.1	Preparation, Revision, Approval and Use of Procedures
AP-0109.7	Responsibilities of the Procedure Upgrade Program Group
O-ADM-100	Procedure Preparation, Review and Approval



### C. VERIFICATION AND VALIDATION PROGRAM

#### Concern:

1. The PGP should specifically indicate that, in addition to operators, subject matter experts and procedure writers will be involved in the validation and verification process, and should include a description of the roles played by these persons.

#### Response:

The enclosed draft Validation Procedure, O-ADM-111, has been changed in Section 3.2.1.4 to address the above concerns.

#### Concern:

2. Section 5.1 of the PGP (p. 9) states that the methodology for EOP validation utilizes present, available methods while recognizing and allowing for future improvements. The validation program states that a combination of table-top, walk-through, or reference methods will be used and states that the Procedure Upgrade Supervisor will determine the method(s) used. The validation program should be revised to address the following:
  - a. The validation program should be revised to address future improvements, most notably the use of a plant reference simulator. The validation program should state that when a plant reference simulator is available, the full set of EOPs will be revalidated.

#### Response:

The enclosed draft Validation Procedure, O-ADM-111, has been changed in Section 1.0 to reflect the above concern.

#### Concern:

- b. The validation program should state that the simulator method, when available, is the primary method of EOP validation and should include the criteria for selecting the scenarios to be run during the validation process. These criteria should be developed to ensure that all procedures are validated and should ensure that single, sequential, and concurrent failures are addressed. A review of the capabilities and the limitations of the simulator will then identify what can be validated on the simulator.

Concern:

- c. For the parts of the EOPs that cannot be validated on the simulator, the criteria for selecting any additional validation that may be needed and the methods of validation to be used should be specified. This additional validation should address the criteria identified above for simulator validation.

Concern:

- d. Section 5.1 (p. 9) of the PGP states that the validation program will validate that part of the EOP not covered by any technical validation of generic technical guidelines. Section 3.2.1.2 (p. 4) of O-ADM-111 implies that validation may not be necessary. The PGP should be revised to state that all parts of all procedures should be validated as part of your program, either by simulator validation or by additional means addressed above.

Response:

- b. Turkey Point Plant's EOP Validation Program is established on
- c. the premise that the site-specific simulator, when available,
- d. will be the primary method for EOP validation. Current plans, including the development of criteria for selecting scenarios to be run, criteria for selecting any additional validation that may be needed, and the means to be used when such additional validation is needed are all contingent on availability of the site-specific simulator. When the simulator is onsite and functional, Procedure Upgrade Program Group personnel and Training Department personnel (including simulator specialists) will implement these plans and develop such criteria, subject to simulator modeling limitations.

Concern:

- 3. The EOPs will require a certain number of operators to carry out the various activities and steps. The validation program should indicate that the EOPs will be exercised during simulator exercises or Control Room walk-throughs with the minimum Control Room staff required by the facility Technical Specifications.

Response:

The above concern is checked in Attachment 5, II.B.2 of the enclosed draft Validation Procedure, O-ADM-111.

Concern:

4. The verification and validation programs must determine if the instruments and controls that were identified during the task analysis are the ones that are referred to in the EOPs and are available in the Control Room. A discussion of this should be included in the PGP. (This task may be done in conjunction with the Control Room Design Review.)

Response:

The above concerns are addressed and checked in Attachment 5 of the enclosed draft Validation Procedure, O-ADM-111.

Concern:

5. Particular attention should be paid to deviations from and additions to the generic technical guidelines that are of safety significance during the verification and validation programs. These verification and validation steps can be accomplished separately or as a part of the verification and validation programs. The PGP should discuss how the deviations from and additions to the generic guidelines are to be verified and validated.

Response:

All EOPs will be validated and verified per the Procedures Generation Package.

Concern:

6. The PGP should specifically address the manner in which feedback from the validation and verification process will be used to address the accuracy, readability, completeness, and usability of the EOPs. While a few of these points are noted in Enclosure 1 (pp. 12-14) of the validation plan, they should be specifically addressed in the program description.

Response:

The above concerns are addressed in Section 5.3.3, Resolution of the enclosed draft Validation Procedure, O-ADM-111.

Concern:

7. The PGP should include a description of the method by which multiple units will be handled in the validation and verification process to account for unit differences.

Response:

The enclosed draft Validation Procedure, O-ADM-111, has been revised to include the above concern in Section 3.2.1.3.b.





D. TRAINING

All concerns have been incorporated.