

DUQUESNE LIGHT COMPANY
BEAVER VALLEY POWER STATION
UNIT NO. 1

TECHNICAL ADVISORY PROCEDURE

TAG 6.0

TITLE: REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS

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Approved by W. J. Smith

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			Chief Engineer Initials	Approval Signature	Date	
1	1-6	NA	WSL 6/14/82	<i>[Signature]</i>	6/17/82	6/17/82
2	1-5	NA	WSL 7/23/82	<i>[Signature]</i>	7/23/82	7/23/82
3	1-5	NA	RWD 4-19-83	<i>[Signature]</i>	4/19/83	4/20/83
4	1-7	NA	RWD 9-27-83	<i>[Signature]</i>	10/3/83	10/4/83
5	1-8	NA	RWD 2-6-84	<i>[Signature]</i>	2/9/84	2/20/84

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS1.0 PURPOSE

- 1.1 The purpose of this procedure is to provide a formal channel of information and analysis to the Station for INPO operation data and Vendor Technical Bulletins.

2.0 SCOPE

- 2.1 This procedure is designed to provide a method for the TAG to comply with O.M. 1.48.9N, Operating Experience Feedback Selection Procedure.
- 2.2 To provide a cooperative implementation of the INPO and NRC joint agreement for operational data and analysis exchange.
- 2.3 This procedure provides a means for other station groups to respond to Operation Assessment Group Recommendations.

3.0 DEFINITIONS

- 3.1 SER : Significant Events Reports.
- 3.2 SOER : Significant Operating Experience Reports.
- 3.3 O&MR : Operation and Maintenance Reminders.
- 3.4 INPO : Institute of Nuclear Power Operations.
- 3.5 STA : Shift Technical Advisor.
- 3.6 TAE : Technical Advisory Engineer
- 3.7 TAG : Technical Advisory Group
- 3.8 T.B. : Technical Bulletin

4.0 RESPONSIBILITIES

- 4.1 The designated Technical Advisory Group member shall implement and comply with the requirements of this procedure.

5.0 PROCEDURE

- 5.1 Significant Event Report and Significant Operating Experience Report Review.

- 5.1.1 SER's are received at the Station via NETWORK. The Chief Engineer also receives a quarterly SER Summary from INPO via the U.S. Mail.

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)

SOER's are transmitted to the Chief Engineer from INPO by mail.

SER's and SOER's are presented to the TAE for action.

- 5.1.2 The TAE or his designee shall retain the original SER or SOER for the respective log. A copy of all SOER's are forwarded to the Training Department for information and use after receipt from INPO. A SOER log will be maintained to insure records transmittal.
- 5.1.3 The TAE shall designate an STA to evaluate the SER/SOER for applicability to Beaver Valley. All items in the SER/SOER are to be addressed. He shall enter the results of his evaluation and any subsequent recommendations on the "BVPS Technical Support SER/SOER Review" form (See Figure I). All references used in the evaluation should also be noted on this form.
- 5.1.4 After evaluation by the designated STA, the SER/SOER is routed to all other STA's for review. A copy of the recommended action and a request for any additional comments will be attached to the SER/SOER.
- 5.1.5 The TAE shall submit all reviewed SER/SOER's to the Operations Assessment Group for final review during their monthly meeting. Any SOER judged to require additional OSC action will be submitted to the OSC for review. The results of all reviewed SER/SOER's will be included in the OAG Monthly Report. Copies of the OAG Monthly Report will be transmitted to L & C, Maintenance, I & C, Training and Operations for information and identification of potential problems. Any problem judged to require Engineering action will be submitted to the Nuclear Engineering Department via an EM.
- 5.1.6 The TAE or his designee will maintain a permanent file of all SER/SOER evaluations and recommendations resulting from the OAG review.

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)

5.2 Operations and Maintenance Reminders Review.

- 5.2.1 Operation and Maintenance Reminders are obtained via the NETWORK System. O & MR's are presented to the TAE for action.
- 5.2.2 The TAE or his designee shall retain a copy of the O & MR for the O & MR log.
- 5.2.3 The TAE shall designate an STA to evaluate and process the reminders for applicability to Beaver Valley. He shall enter the results of his evaluation and any recommendations on the "Operations and Maintenance Reminder Review" form (see Figure II). All references used in the evaluation should be noted on this form.
- 5.2.4 After evaluation by the designated STA, the O & MR plus the STA recommendation is routed to all other STA's for information and/or comments.
- 5.2.5 The TAE will submit all reviewed O & MR's to the Operation Assessment Group for final review during their monthly meeting. The results of all reviewed O & MR's will be included in the OAG Monthly Report which is transmitted to appropriate Station groups for information and identification of potential problems. Any problem judged to require Engineering action will be submitted to the Nuclear Engineering Department via an EM.
- 5.2.6 The TAE or his designee will maintain a permanent file of all O & MR evaluations and recommendations resulting from the OAG review.

5.3 Technical Bulletin Review

- 5.3.1 T.B.'s are received at Beaver Valley Power Station by the Station Superintendent. The Station Superintendent transmits the T.B.'s to the Chief Engineer for review and attachment of the "Vendor Technical Bulletin Transmittal Form".
- 5.3.2 The T.B.'s are then forwarded to the Licensing and Compliance Group for initial review against NRC Bulletins, Circulars and Notices. If the referenced item was previously addressed or is presently being addressed, the document and remarks are indicated on the attached transmittal form. After review by the L & C Group, the T.B. is sent to the Technical Advisory Engineer (TAE).

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)

- 5.3.3 The TAE shall designate a Technical Advisory Group (TAG) member to review the T.B. against existing INPO documents (SOER's, SER's and O&MR's) as a cross-reference to determine if the subject of the T.B. is currently being responded to, or has been addressed at any previous date.
- 5.3.4 After evaluation by the TAG, the results of this evaluation shall be recorded on the "Vendor Technical Bulletin Transmittal Form." All references used in the evaluation shall be noted on this form. If the item is adequately addressed and documented by either Licensing and Compliance or the TAG, the document will be submitted to the OAG for final review at a subsequent monthly meeting. If determined not to have been adequately addressed by the L & C Group or by the TAG, the T.B. will require additional work by the Testing and Plant Performance Group. The T.B. will also require additional work by the Testing and Plant Performance Group if the OAG does not agree with the L & C Group or the TAG determination that it has been adequately reviewed. In either case, if additional work by the Testing and Plant Performance Group is required, the designated TAG member shall make a copy of the T.B. and transmittal form and place it in the T.B. Log to remain as a temporary record of the TAG evaluation and return the original to the TAE.
- 5.3.6 The TAE shall forward the reviewed T.B. and its associated transmittal form to the Testing and Plant Performance Group for further evaluation.
- 5.3.7 Following evaluation by the Testing and Plant Performance Group, the Vendor Technical Bulletin will be returned to the TAE who will submit the results to the OAG for final review during their monthly meeting. Following OAG review and recommended approval, the temporary copies in the T.B. Log will be discarded and the original filed.

6.0 ATTACHMENTS

- 6.1 BVPS Technical Support SER/SOER Application, Figure I
- 6.2 Operations and Maintenance Reminder Application, Figure II
- 6.3 Vendor Technical Bulletin Transmittal Form, Figure III

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)7.0 REFERENCES

7.1 SAP, Chapter 16

7.2 Operating Experience Feedback Selection Procedure, O.M.
1.48.9N

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station

BVPS Technical Support SER/SOER Application

SER/SOER No.

Recommendation Date

Comment Response:

References

FIGURE I

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station

Operations and Maintenance Reminder Application

O & MR No.

Recommendation Date

Comment Response:

References

FIGURE II

REVIEW OF INPO DATA AND VENDOR TECHNICAL BULLETINS (continued)

DUQUESNE LIGHT COMPANY
Beaver Valley Power Station

VENDOR TECHNICAL BULLETIN TRANSMITTAL FORM

T.B. No. _____

SUBJECT: _____

LICENSING AND COMPLIANCE REVIEW

NRC Bulletin, Circular, Info Notice Cross-Reference

Reference
Document

Remarks

_____	_____
_____	_____

Signature _____ Date _____

Send Reviewed T.B. and Form to the T.A.E.TECHNICAL ADVISORY GROUP REVIEW

INPO Document (SOER, SER, O&MR) Cross-Reference

Reference
Document

Remarks

_____	_____
_____	_____

Signature _____ Date _____

Send Reviewed T.B. and Form to the T&PP Supervisor.TESTING AND PLANT PERFORMANCE EVALUATIONComment Response: _____

References: _____

Send Reviewed T.B. and Form to the TAE.

FIGURE III

NUCLEAR DIVISION DIRECTIVE NO. 4

Corrective Action Systems

PURPOSE

To clearly identify the various and diverse systems which are utilized to identify, track and resolve items which require corrective actions to maintain or improve the safety posture or reliability of the Beaver Valley Power Station and/or to assure or improve its compliance with regulatory requirements.

APPLICABILITY

Applies to personnel employed in the Nuclear Division.

RESPONSIBILITY

The applicable department heads are responsible for administering this directive.

REQUIREMENTS

1. A Maintenance Work Request (MWR) shall be issued in accordance with the Maintenance Manual to initiate corrective or preventive maintenance activities on installed station equipment. All MWR's shall be tracked using the computerized maintenance planning system.
2. A nonconformance report (NCAR) shall be issued in accordance with the OQC Manual to initiate corrective action for nonconforming equipment, material or activities. The Director of Operations Quality Control is responsible to track NCAR's to completion.
3. The Onsite Safety Committee shall identify and initiate appropriate corrective actions (MWR, SMR, OMCN, or MMCN) for matters which are reviewed by them. These matters include Incident Reports, INPO SOERs, Vendors Bulletins, and items from IE Bulletins, Circulars and Notices referred to the OSC by the Superintendent of Licensing and Compliance.
4. The OSC is responsible for tracking to completion all items for which they have initiated corrective action that is not tracked within another tracking system.
5. The Superintendent of Licensing and Compliance is responsible for tracking to completion all items related to NRC and QA identified items which require corrective action.
6. The Licensing and Compliance Section is responsible for the preparation, review, evaluation and verification of all responses to the NRC.

NUCLEAR DIVISION DIRECTIVE NO. 4

REQUIREMENTS (continued)

7. An Incident Report shall be prepared for abnormal events as described in the Station Administrative Procedures. The details of the incident must be evaluated and corrective actions specified. These corrective actions must also be tracked by the OSC if not tracked within another tracking system.
8. The Offsite Review Committee is responsible for initiating investigations and recommending corrective actions for matters which involve significant safety concerns or chronic failures and/or repetitive occurrences of equipment failure or personnel error.

Nuclear Division Review:

<u>HP Williams</u>	<u>[Signature]</u>	<u>J. L. Siler</u>	<u>[Signature]</u>
Nuclear Operations	Nuclear Support Services	Nuclear Safety and Licensing	Nuclear Engineering

Quality Assurance Review:

DSB 10/12/81

Approval:

<u>J. Gray</u>	<u>10/12/81</u>
Vice President-Nuclear	Date

2. NPRDS/SEE-IN

Each utility should indicate or reaffirm its active participation in the NPRDS and SEE-IN programs. The utility should supply the necessary basic information and should report failures and problems on a timely basis. Adequate internal controls should be in place to ensure that this activity is timely, consistent, and controlled and should include incorporation of future revisions to these programs.

Response: BVPS-1 will continue to participate in the NPRDS and SEE-IN programs. Failure reports are submitted to INPO in accordance with the reporting criteria set forth in the Reporting Procedures Manual for the Nuclear Plant Reliability Data System (INPO 84-011). Site Administrative Procedures ensure failure information is forwarded to the Planning and Scheduling Group (per the Maintenance Work Request Forms). Planning and Scheduling Procedures ensure that failure-related information transcribed from Maintenance Work Request forms is reported on NPRDS. Information received from the SEE-IN program such as Significant Operating Experience Reports, Significant Event Reports, and Operations and Maintenance Reminders is ensured a review by Technical Advisory Procedure No. 6, Section 5. Future revisions to the NPRDS and SEE-IN programs will be reviewed for incorporation into existing procedures.

DUQUESNE LIGHT COMPANY
Nuclear Division

Site Administrative Procedures

CHAPTER 3D

THE MAINTENANCE WORK REQUEST

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DUQUESNE LIGHT COMPANY
Nuclear Division

Site Administrative Procedure

CHAPTER 3D

THE MAINTENANCE WORK REQUEST

I. PURPOSE

The purpose of this procedure is to describe the Maintenance Work Request and Failure Report Form 100 as a vehicle for initiating corrective action maintenance.

II. APPLICABILITY

This procedure applies to all personnel who initiate, review, approve, complete, assign reference numbers to, and maintain an indexed file of Maintenance Work Requests (MWRs).

III. DEFINITIONS

- A. Corrective Action Maintenance - Maintenance action taken to determine or correct any deficiency or non-conformance and return equipment or systems to the originally intended function.
- B. Design Change - Any change in structures, systems or components which requires a revision to a design output and which affects the safety-related functions(s) of those structures, systems or components.
- C. Maintenance group - For the purpose of this procedure, Maintenance group implies both the Maintenance and Instrument and Control groups.

The following are definitions for the purpose of Section VI, Instructions.

- 1. Maintenance Supervisor: Refers to Maintenance or Instrument and Control Supervisors.
- 2. Senior Maintenance Engineer: Refers to Senior Mechanical, Electrical, I&C or Computer Engineers.
- 3. Maintenance Engineers: Refers to Mechanical, Electrical I&C or Computer Engineers.
- 4. Maintenance Foreman: Refers to Mechanical, Electrical I&C or Building Foreman.

III. DEFINITIONS (Continued)

- C. 5. Planning & Scheduling Senior Engineer: Refers to Senior P&S Outage and non-Outage engineers.
- 6. Planning & Scheduling Engineer: Refers to Electrical, Mechanical, I&C, Construction, and Testing, Planning Engineers.
- D. Maintenance Work Request and Failure Report Form - A formal document used to report deficiencies which require corrective action maintenance. A copy of the form is shown in Appendix A, Figures 2 and 3.
- E. Work Package - consists of the MWR, written procedures or work instructions, Material Requisition Slips, and any other documentation required to perform a particular maintenance task.

IV. RESPONSIBILITIES

- A. For the purpose of this procedure, responsible individuals are identified in the instructions section.

V. REFERENCES

- A. Beaver Valley Power Station Conduct of Maintenance Manual (MM).
- B. Beaver Valley Power Station, Station Administrative Procedures, Chapter 8: Maintenance.
- C. Beaver Valley Power Station Quality Assurance Plan.

VI. INSTRUCTIONSA. General

- 1. The primary functions of the MWR are: to initiate corrective action maintenance, to identify any procedures or tests required to correct the deficiency, and to indicate the need for Quality Control (QC) coverage. Secondary functions include serving as a record of equipment operating and maintenance history, as an aid in manpower and cost planning, as an aid in scheduling, and as an aid in predicting the need for changes in a Preventive Maintenance Program.
- 2. The following general rules apply to all personnel who record information on an MWR:

VI. INSTRUCTIONS (Continued)

- A. 2. a. Prenumbered MWR's will be given to Operations, Maintenance, and the I&C group. Unnumbered MWR's may be obtained from the Maintenance Clerk or Central File.
 - b. All applicable blocks shall be filled out completely; all non-applicable blocks must be marked "N/A". (See the detailed instructions for applicability.)
 - c. Any incorrect entry shall be voided by a single line through the entry. Inserted adjacent to the voided entry must be the corrected entry, the initials of the person making the correction, and the date of the correction. Correction fluid and correction tape are strictly prohibited.
 - d. The information shall be entered in black ink: it may be typed or hand-printed but so as to be legible and compatible for photo-copying.
3. The following steps describe individual responsibilities as the MWR is processed through the flowpath depicted in Figure 1.
 - a. The originator, who may be any DLC BVPS supervisor or other responsible individual assigned by such a supervisor, shall fill out Section One of the MWR.
 - b. A copy of the MWR may be retained by the Originator, but the original and one photo-copy of priority 1 through 3 MWRs shall be sent directly to maintenance to be handled as specified in MM Chapter A, Section II, Emergency Work. The original and one photo-copy of priority 4 through 9 MWRs shall be brought to the MWR review meeting (held prior to the Daily Schedule Meeting in the Station Conference Room). Or, the original and copy may be sent to the Planning and Scheduling Group to be brought to the meeting. The Nuclear Station Operating Supervisor (NSOS) or his designated alternate (SRO) shall bring operations group originated MWRs to the MWR Review meeting and together with a Planning and Scheduling Representative shall review all MWRs with priorities 4 through 9 for accuracy and completeness. At this meeting the NSOS or designated alternate (SRO) will also determine the applicability of the "Authorization to do Work" and "Satisfactory Completion of Work" signature block. The reviewed MWRs shall be distributed to Maintenance Supervision during the Daily Schedule Meeting.

VI. INSTRUCTIONS (Continued)

- A. 3. c. Maintenance Supervision shall perform the following:
1. Void those MWRs which are invalid, do not contain sufficient information, or which duplicate another MWR which is being processed. A copy of voided MWRs shall be returned to the originator with a brief statement as to why the MWR was voided and the signature of the individual who made the determination. (Example: VOID - Duplicates MWR No. 82 7352, etc.) Original void MWRs shall be filed with completed MWRs.
 2. Determine whether the request is a Maintenance Task or a Design Change (DCP). If a DCP, follow the instructions in MM, Chapter A, Section 5b, otherwise continue.
 3. Fill out Section 2 of the MWR including additional work instructions as applicable per MM Chapter A, Section 5a.
- d. Once Section 2 is complete the Maintenance Clerk logs the MWR and sends a copy to the Planning and Scheduling Group for tracking. An Operations Quality Control (OQC) Representative shall review each MWR and indicate the need for OQC coverage by stamping, initialing, and dating the original.
- e. Planning and Scheduling will input the Tracking copy of the MWR's into the MWR Tracking Report. This report will be used to assess the MWR backlog for maintenance. Status' will be determined as follows:
1. Open - MWR has not been worked
 2. Complete Awaiting Paperwork (CAP) - if the MWR is reported complete on the maintenance foremans report or if the NSS signs off the satisfactory completion of work
 3. Complete - when section 4 of the MWR (see Appendix A Figure 3) is completed and signed off by maintenance.

VI. INSTRUCTIONS (Continued)

A. 3. e. The appropriate Maintenance Senior Engineers will perform a quarterly review of the MWR Tracking Report and Planning and Scheduling will make the appropriate revisions to insure the Reports accuracy.

f. MWR's will be scheduled for operating modes and outage modes in the following way:

1. Operating Mode -

- a) P&S engineer will develop a six day work schedule for his or her maintenance group.
- b) The appropriate senior maintenance engineer or his designated alternate will review the preliminary schedule with the Planning & Scheduling Engineer for comments and revisions if necessary.
- c) The Planning Engineer will revise the preliminary schedule if necessary incorporating maintenance's comments.
- d) The Senior Planning Engineer will conduct a Plan of the Week meeting on Thursday afternoon between the Station Operating Supervisor or his designated alternate, and the planning engineers to review and approve the next weeks work schedule for maintenance.
- e) The Senior Planning Engineer will process the reports for the Daily Schedule Meeting and the Planning Engineers will update the reports on a daily basis.

2. Outage Mode

- a) The Planning & Scheduling Engineer will arrange the outage MWR's into work packages.

VI. INSTRUCTIONS (Continued)

- A. 3. f. 2. b) The Operations Supervisor or his designated alternate will review the work packages for the validity of clearance points, priority of the MWR, and system conditions required to place the clearance.
- c) The Maintenance Supervisor will review the work packages for manpower, parts, duration and any additional comments about the proposed clearance.
- d) Outage MWR work packages will be factored into the scheduled outage by the Outage Senior Planning Engineer and the Planning Engineer.
- e) Outage work packages for unscheduled outages will be brought to the Operations Supervisor or his designated alternate after the plant parameters are determined for approval to be incorporated into the unscheduled outage.
- g. The Maintenance Engineer will forward the scheduled MWR's as well as the additional support MWR's to the Maintenance Foreman so it can be worked. The work is performed according to the procedures of the Conduct of Maintenance Manual Chapter 1 Section A.
- h. After task completion, the person in charge of the work party and the Maintenance Foreman shall fill out Section 3 of the work request. He will then forward the MWR and its associated documents to the Maintenance Supervisor or his designee for review to determine that all requirements have been satisfied and that all non-conformances have been properly resolved.

VI. INSTRUCTIONS (Continued)

- A. 3. i. The Maintenance Supervisor or his designee will forward the original copy of the MWR to the control room for the Shift Supervisor's signature. If the MWR is to be signed off pending some post maintenance testing, then the MWR will be placed in a MPS (MWR Pending Signature) file in the control room until such time that its ready for Shift Supervisor's signature. After the MWR is signed off it will be placed in the MSO (MWR's Signed Off) file in the control room and will be picked up by the operation's representative to the morning meeting for distribution back to maintenance in the morning meeting. Those MWR's that are signed off immediately will be returned to maintenance immediately.
- j. The appropriate Maintenance Sub Group provides a supervisory review of the completed work package and fills out Section 4 of the MWR.
- k. The Maintenance Clerk logs the MWR as complete, forwards a copy to the Planning and Scheduling Group (for updating the MWR Tracking Report), and files it in the maintenance files (for CAT II and III MWRs); or for CAT I MWRs transmits it along with all maintenance - originated/controlled supporting documents (eg., CMPs, MSPs, Material Requisition slips, Store Dept. "Accept" tags, etc.) to the Document Control Center. Supporting documents such as OSTs, QC General Inspection Reports, etc. shall be transmitted to the Document Control Center by the associated originating group and filed these separate from the MWR.

MWR TRACKING SYSTEM FLOW CHART

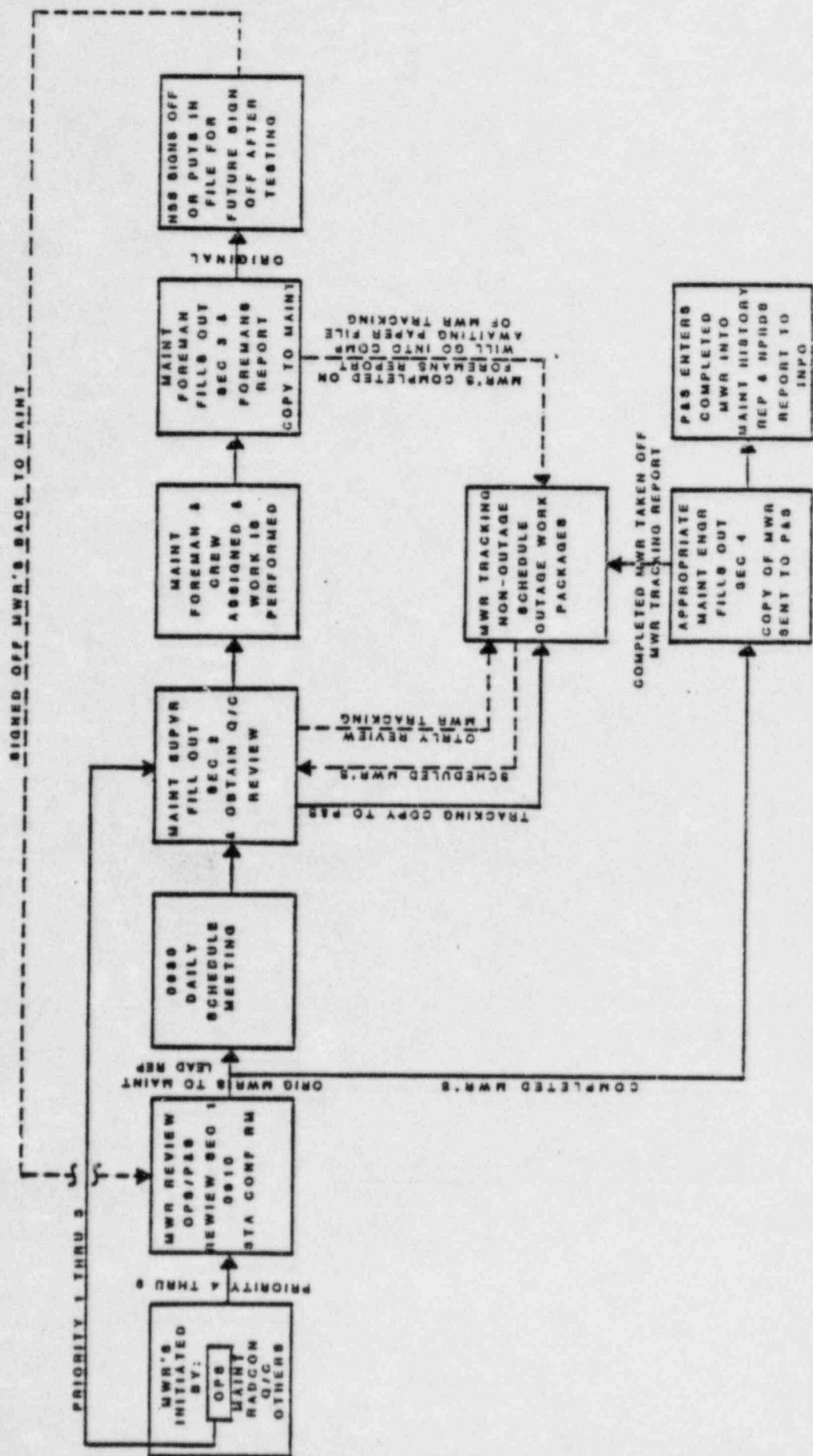


FIGURE 1

BEAVER VALLEY POWER STATION MAINTENANCE WORK REQUEST AND FAILURE REPORT

Section 1 - Originator

Key Punch Use Only		Equipment Mark No.		Equipment Functional Description		QA	
Card	2	Unit	System	Mo.	Day	Year	Ch.
7-8	10	11	13	26	36	40	69
10							

Request No.		Tech. Spec. Date if Req'd		Plant		OPS Failure Action	
Mo.	Day	Year	Hour	Min.	Mo.	Day	Year
26	36	40	42	44	32	58	59

Status at Time of Failure (Select 1)		Initial Problem Or Failure Description		Location:		Post Maintenance Test	
X10 Loss of System Function	X11 Degraded System Oper.	X12 Loss of Redundancy	X13 Loss of Subsystem/Chan.	X14 Insignificant Effect	X15 Prevents Comp. Oper.	X16 Other System Degraded	X17 Comp. Oper. Degraded
X18 Reduced Power Operation	X19 Valve Off-Line	X20 Reactor Trip	X21 Personnel Injury	X22 Excess Off-Site Radiation	X23 Damage to Other Equip.	X24 Significant Effect	X25 Operational Abnormality
X26 Inservice Inspection	X27 Surveillance Testing	X28 Preventive Maintenance	X29 Special Inspection	X30 Audio Alarm	X31 Visual Alarm	X32 Routine Surveillance	X33 Incidental Operation
X34 Other (Explain)	X35 Corrective Maintenance	X36 Sys. in Serv. (Over/Under)	X37 System in Test	X38 System in Maintenance	X39 System Out of Service	X40 Subsys./Chan. in Service	X41 Subsys./Chan. in Test
X42 Subsys./Chan. in Maint.	X43 Subsys./Chan. Out of Serv.						

Section 2 - Maintenance		Budget Account		Procedures and Tests Required:		Employee No.	
Lead	10	11	12	13			
Group:	Elec	Mech	I&C	Other	J0	or C0	

Additional Work Instructions:		Maintenance Supervision		Date	

Section 3 - Work Party		Actual Manhours*		Shift Supervisor (Authorization to do work)		Date	
Mo.	Day	Year	Hour	Min.	Mo.	Day	Year
10	12	14	16	18	34	38	42

Cause and Corrective Action:		Clearance No.		Clearance Date		Matl. Req. No.		Matl. Req. No.		Matl. Req. No.		Matl. Req. No.	

BEAVER VALLEY POWER STATION

Section 4 - Maintenance Review

MAINTENANCE WORK REQUEST AND FAILURE REPORT

Card	1. Is a design change indicated by this request?	2. Is a failure indicated by this request?	Yes	No	Initial Prob. or Failure Description
33					
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35					
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Type of follow-up action and/or reviewer's comments:

4. Was the "Effect of Failure on System" (Side 1) "Loss of Sys. Func.?" ☐ Yes ☐ No

5. Was the "Effect of Failure on Plant" (Side 1) "Damaged to Other Equipment?" ☐ Yes ☐ No

6. Was the "NPRD Comp. Code" given as PIPEXX? ☐ Yes ☐ No

7. Is follow-up action indicated? ☐ Yes ☐ No

If yes, a "Report of Failure (Form NPRD-4)" must be hand submitted for the system.

If yes, a maintenance work request form must be completed for the other component(s) if it is in the scope of NPRD.

If yes, determine if a "Report of Engineering Data (Form NPRD-3)" was submitted for that pipe. If not, fill out an NPRD-2.

If yes, originate a new maintenance work request from the information on this work request, unless a design change is required. Leave "Failure Ended" (date and time) blank unless "NPRD Report Required" is yes.

Enter all 9's in Failure Ended if "NPRD Report Required" is yes.

Maintenance Engineer _____ Date _____

Maintenance Supt. (Review) _____ Date _____

Review _____ Date _____

Review _____ Date _____

FIGURE 3

APPENDIX A - DETAILED INSTRUCTIONS

SECTION 1 - ORIGINATOR (SIDE 1)CARD 10

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
10	Transaction	Leave blank, this space will be filled in when the computerized history file is updated at later date.
11, 12	Unit	Enter the number one (01) to identify Beaver Valley Power Station Unit 1.
13, 14, 15	System No.	Enter the system Chapter Number so that the Number is in columns 13 and 14, and the Chapter Subdivisions are in column 15. (Example: 05A)
		NOTE: For computerized filing purposes, the <u>only</u> Chapter Subdivisions used are <u>05A</u> and <u>05B</u> .
16 thru 28	Equipment Mark No.	Refer to the Master Equipment List (MEL) and enter the mark number of the equipment to be worked on, (not for the larger piece of equipment with which it may be associated.) For instance, an MWR was written identifying <u>AS-E-1A</u> (1A AUX BOILER), problem; sightglass leaking. The MWR should have been written for <u>LG-AS201A</u> (1A AUX BLR WATER DRUM LEVEL).

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
16 thru 28	Equipment Mark No.	<p>Maintenance History Tracking and Reliability Data Reporting are dependent upon the specific Mark No. for each component in DLC computer programs. If an inaccurate Mark No. is given as above, this tracking and reporting ability is lost unless valuable time is expended to go back and research the proper equipment mark number.</p> <p>This field must never have more than one piece of equipment identified. If work is to be performed on two like pieces of equipment, having different mark numbers, a separate work request must be prepared for each. An Equipment Mark No. of N/A or MISC should be used <u>only</u> when the item to be worked on has no Equipment Mark No.</p>
29 thru 68	Equipment Functional	<p>Enter the name of the equipment or describe the equipment, if unnamed. The MEL should be used as a reference.</p>
69	QA Cat.	<p>Enter the Quality Assurance category of the equipment as indicated in the MEL.</p> <p>NOTE: If the Equipment Mark No. is N/A or MISC use QA3.</p>
<u>CARD 11</u>		
10 thru 15	Request No.	<p>MWR identification number (to be entered by the Maintenance Clerk).</p>

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
16 thru 25	Request Date	Enter the date and time the request is initiated (Always use the 24 hour clock for time 0000 thru 2359).
26 thru 35	Failure Started	Enter the <u>date and time</u> the problem was <u>first noticed</u> .
36 thru 45	Tech. Spec. Date if Required	If applicable enter the <u>date and time</u> in which the work must be completed to preclude violating a Tech. Spec. response time requirement. If not applicable mark "N/A".
46 thru 51		These columns have intentionally been deleted.
52 thru 57	Design Change No.	If applicable, enter the engineering Technical Evaluation Report (TER), Station Modification Request (SMR), or Design Change (DCP) number related to the work to be performed. (To be completed by the Senior Engineer at a later date.) If not applicable, mark N/A.
58	Priority Code	Enter one of the following code numbers, as applicable: 1. <u>CRITICAL ITEM</u> - Items in this category will be expedited at the expense of items in all other categories. Failure to complete a priority No. 1 item will result in a Tech. Spec. Limit Violation.

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
58	Priority Code	<ol style="list-style-type: none">2. <u>DEMANDS IMMEDIATE ATTENTION</u> - Failure to complete creates a safety hazard or could damage plant equipment.3. <u>COMPLETE AS QUICKLY AS POSSIBLE</u> - Failure to complete will restrain imminent Start-up.4. <u>COMPLETE WITHIN SEVEN DAYS</u> - Affects power generation which could result in reduced power or in plant shutdown.5. <u>COMPLETE WITHIN 30 DAYS</u> - Failure to complete could result in loss of system operation.6. <u>COMPLETE WITHIN 60 DAYS</u> - Failure to complete could result in loss of system redundancy.7. <u>COMPLETE WITHIN 90 DAYS</u> - Reduces the efficiency of the system involved.8. <u>COMPLETE BEFORE THE NEXT CHANGE OF SEASONS</u> - Affects the operation of the system only during the seasons it is used in.9. <u>COMPLETE AS MANPOWER AND MATERIALS ARE AVAILABLE AFTER HIGHER PRIORITY JOBS ARE COMPLETED</u>

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
39	Plant Mode	<p>Enter the plant mode during which the work could be performed. (Choose One)</p> <ol style="list-style-type: none"> 1. <u>POWER OPERATION</u> 2. <u>STARTUP</u> 3. <u>HOT STANDBY</u> 4. <u>HOT SHUTDOWN</u> 5. <u>COLD SHUTDOWN</u> 6. <u>REFUELING</u> 7. <u>ALL MODES</u> 8. <u>PRE-REFUELING</u>
No Column Number	OPS Failure Action	<p>If applicable, operations may identify any tags or stickers which are to be removed upon completion of the work (eg., Jumper/Lifted Lead Tags, O.O.S stickers, etc.) If no action mark N/A.</p>
<u>CARD 12</u>		<p>Mark the codes by blacking in the X:</p>
10 thru 17	Effect of Failure System	<p>Mark the code(s) which best describes the full effect this failure had on the system(s).</p>
18 thru 24	Effect of Failure Plant	<p>Mark the code(s) which best describes the full effect this failure had on the plant.</p>
25 thru 35	Failure Detection	<p>Mark the code(s) which identifies how the fault was found.</p>
36 thru 43	Status	<p>Mark the code which best describes the status at the time of failure. Where the system and subsystem status codes both apply, use the subsystem code.</p>

ColumnsField NameInstructionsNO CARD NUMBER

Initial Problem -
or Failure Description

Fully describe the problem or failure which prompted the generation of the Work Request. This information will not be entered into the computer program; however, it will be used as supplementary information for completing cards 33 thru 36 (Reverse side of Form 100) for input to the NP&E System.

Location

Describe the location of the equipment/component.

Post Maintenance
Test

Identify any post maintenance test(s) required. If none are applicable, mark N/A.

CARD 13

10 thru 49

Task Description

Briefly describe, for tracking purposes, the problem or failure which prompted the request.

Originating Supervisor

Signature of the originator. By his signature the originator verifies that the MWR was initiated in compliance with this procedure and that all information entered by him is correct. A review of the form and the preceding instructions is MANDATORY prior to signing.

SECTION 2 - MAINTENANCE (SIDE 1)CARD 14

10 thru 13

Lead Group

Mark the applicable box to indicate the group responsible for the work.

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
No Column Number	Budget Account	If applicable, circle JO (Job Order) or CO (Construction Order) as directed by the Budget Group. If not applicable, mark N/A.
No Column Number	Procedures and Tests Required	Insert the number(s) of the procedure, test or other documents which will be used in the performance of the work. If not applicable, mark N/A.
Additional Work Instructions		Insert any additional instructions necessary to supplement the specific maintenance procedures, tests, etc. which will aid the person performing the work. Reference appropriate sections of the Maintenance Manual, DLC Accident Prevention Manual, etc. This section may be left blank, or it may be extended by attaching an additional sheet.
Maintenance Supervision/Date		Maintenance Supervision shall review and verify the validity of the request by signing and dating it prior to submitting it for further processing.

SECTION 3 - WORK PARTY (SIDE 1)CARD 16

10 thru 19	Start Work	Insert the <u>date and time</u> the work effort was begun.
20 thru 29	Completion Date	Enter the <u>date and time</u> the work was actually completed.

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
30 thru 45	Actual Manhours	Enter the total number of <u>manhours</u> (to the nearest hour, 1 hour minimum) expended to complete the work. If more than one maintenance discipline is required in completing the work enter the manhours expended for each discipline. All entries should be made using four digits. For example: if two manhours were required by the Electricians and sixteen by the Mechanics the entries would be 0002 in columns 30 thru 33, and 0016 in columns 34 thru 34.

CARD 17

10 thru 27	Clearance No.	Enter the Equipment Clearance Number(s), as applicable. If not applicable mark N/A.
28 thru 39	Matl. Req. No.	Enter the Material Requisition Number(s), as applicable, for any material, spare parts, etc. which was required to complete the work. If not applicable mark N/A.

NO CARD NUMBER

Rad Work Permit No.

If a Radiation Work Permit is required in order to perform the work, record the permit number in this section. If not applicable mark N/A.

Cause and Corrective Action

Write a brief, concise description of the cause and the corrective action taken to complete the work generated by the Work Request. Additionally, list the I.D. No. and calibration dates for any controlled measuring devices used (if not already listed on data sheets as an attachment to the MWR).

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
Shift Supervisor/Date (Authorization to do work)		If not marked N/A in the MWR Review meeting, the Nuclear Shift Supervisor (NSS) shall sign and date this block to authorize work to begin. By his signature he verifies that the equipment to be worked on is in a safe condition from an operational standpoint (eg: breakers are open and tagged, valves are isolated and tagged, etc.). In those cases where the NSOS or designee has indicated "N/A" and has initialed and dated the block, no signature is required.
Leadman/Date		The person in charge of the work party will sign and date the request upon completion of the work.
Maintenance Foreman/Date		The lead craft foreman will review Section 3 of the form for completion of appropriate entries and signify and dating the request.
Shift Supervisor/Date (Satisfactory Completion of work)		<p>If not marked N/A in the MWR Review meeting, the NSS shall sign and date this block after all required tests are performed and the equipment has been restored to his satisfaction.</p> <p>If the "Shift Supervisor (Authorization to do work)" block was marked N/A by the NSOS or designee, (SRO) then the cognizant supervision (the originator or his designee) shall sign and date the "Shift Supervisor (Satisfactory Completion of Work)" block.</p>

SECTION 4 - MAINTENANCE REVIEW (REVERSE SIDE 2)

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
<u>NO CARD NUMBER</u>		
Question 1		Insert an "X" in the <u>Yes</u> box if the Work Request is a result of a change in design or indicates a change in design. If not, place an "X" in the <u>No</u> box.
Question 2		Insert an "X" in the <u>Yes</u> box if the Work Request indicates that a System or a component has failed. If not, place an "X" in the <u>No</u> box.
<u>CARDS 33 Thru 36</u>		
10 thru 51	Failure Description	The applicable Maintenance Personnel will enter an abbreviated description of the problem or failure from information obtained from Side 1, Section 1, "Initial Problem or Failure Description". This description must be concise and complete since it will be used for entering into the computerized Nuclear Plant Reliability Data System (NPRD).
<u>CARDS 37 Thru 40</u>		
10 thru 51	Cause of Failure	The applicable Maintenance Personnel will enter a brief concise description as to the cause of the failure. Utilize information recorded on Side 1, Section 3 "Cause and Corrective Action".

CARDS 41 Thru 44

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
10 thru 51	Corrective Action	The applicable Maintenance Personnel will enter a brief concise description as to the action taken to correct the problem. Utilize information recorded on Side 1, Section 3 "Cause and Corrective Action".

CARD 45

		Mark the codes by blacking in the "X":
10 thru 15	Type of Failure	Mark the applicable code(s) to characterize the type of failure.
18 thru 30	Cause of Failure Category	Mark the applicable code(s) which characterizes the cause of the failure.
33 thru 60	Cause of Failure Description	Mark the applicable code(s) which best describes the cause of the failure.

CARD 46

10 thru 29	Mode of Failure	Mark the applicable code which best describes the mode of failure.
32 thru 47	Action Taken - Corrective	Mark the applicable code(s) which describes actions taken to correct the failure event.
50 thru 58	Action Taken - Documentation/Followup	Mark the applicable code(s) which describes other records which may be available for study or those forwarded to others for assistance in evaluation.

CARD 48

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
10 and 11	Question 3	Place an "X" in the <u>YES</u> box if an NPRD Report is required, if not "X" in the <u>NO</u> box. NOTE: If an NPRD Report is required, the darkly outlined codes on lines 12, 45 and 46 should not be used.
12 thru 21	Failure Ended	Enter the <u>date and time</u> of the actual end of the failure. Normally this will be the work completion date shown in Section 3 of the form; however, in some cases completion of the work will not necessarily signify the failure has ended. For example, if a temporary repair were made the failure ended date would be left blank.
22 thru 27	NPRD Component Code	Enter the appropriate code per Appendix I, attached.
28 thru 33	Licensee Event Report	Enter the date when a Licensee Event Report is submitted, when applicable.
<u>NO CARD NUMBER</u>		
Questions 4, 5, 6 and 7		Place an "X" in either the <u>Yes</u> or <u>No</u> box, as applicable.
Type of Follow-up Action and/or Reviewers Comments		Write in any required follow-up action necessary and any comments pertinent to the work performed.
Maintenance Engineer/Date		Sign and date the form to indicate completion.

<u>Columns</u>	<u>Field Name</u>	<u>Instructions</u>
Maintenance Supv. Review/Date		The Maintenance Supervisor or designee will review the completed Work Request and signify his concurrence by signing and dating the form.
Review/Date		The two additional review spaces provided on the form shall be used for sign off by other departments whenever deemed necessary by the Maintenance Supervisor.

DUQUESNE LIGHT COMPANY
Nuclear Division
Nuclear Support Services Department

Budget, Planning & Scheduling Manual

CHAPTER 23

Nuclear Plant Reliability Data System

I PURPOSE

The purpose of this procedure is to provide general information for the use and administration of the Nuclear Plant Reliability Data (NPRD) System.

II APPLICABILITY

The NPRD System is applicable to the following guides or standards:

- A. ANS Trial-Use Guide: Nuclear Safety Criteria for the Design of Stationary Boiling Water Reactor Plants, N212-1973 (ANS-22).
- B. American National Standard Nuclear Safety Criteria for the Design of Stationary Pressurized Water Reactor Plants, ANSI N18.2-1973.
- C. ANS Trial-Use Guide: Nuclear Safety Criteria for the Design of Stationary Gas Cooled Reactor Plants, N213 (ANS-23).
- D. IEEE Std. 380-1975: Definition of Terms used in IEEE Standards on Nuclear Power Generating Stations.

III DEFINITIONS

Not applicable to this procedure.

IV SCOPE

The NPRD System produces reliability and failure statistics on components and systems related to nuclear safety and balance-of-plant systems. Such statistics are for use in deriving reliability data of interest to operators and designers of nuclear power plant reactor manufacturers, architect-engineering and constructor firms and regulatory agencies.

IV SCOPE (Continued)

The scope of reportable items under the NPRD system, in general, includes those systems and components necessary for keeping balance-of-plant and nuclear safety. Some types of systems and components designated in Safety Class 1 or 2 are excluded from the NPRD system scope of reportable items for pressurized water reactor type units. These are:

- A. Spent fuel storage systems and components.
- B. Reactor pressure vessel internals.
- C. Structures and components for structures.
- D. Piping, fittings and valves in pressurized water reactor systems one (1) inch or less, nominal pipe size.

For guidance, the following types of systems, and components within these systems important to nuclear safety and balance-of-plant, are included in the NPRDS reportable scope:

- A. Reactor coolant systems including pressure vessels.
- B. Emergency core cooling systems.
- C. Decay heat removal systems.
- D. Reactor protection systems.
- E. Reactor containment and pressure suppression systems.
- F. Reactor containment isolation systems.
- G. Reactor containment emergency cooling systems.
- H. Reactor containment spray systems.
- I. Reactor containment hydrogen control systems.
- J. Those components of control rod systems which are necessary to render the reactor subcritical.
- K. Initiating systems required to accomplish safety functions, including emergency core initiating systems and containment isolation initiating systems.

IV SCOPE (Continued)

- L. Condensate
- M. Feedwater
- N. Main Steam
- O. Diesel Support Systems
- P. More I&C Equipment (switches, relays, etc.)

V RESPONSIBILITIES

The Associate Engineer is responsible for reviewing all Maintenance Work Requests (MWRs) and Licensee Event Reports (LERs) for inclusion in the reportable failure data as defined by the NPRDS Reportable Scope Guidelines. The Associate Engineer is responsible for obtaining the NPRDS Reportable Failure Data from the Maintenance History Program and submitting the information to the NPRDS Contractor. The Associate Engineer is also responsible for receiving and maintaining the reports from the NPRDS contractor and will maintain liaison with the DLC Data Processing Department and the NPRDS contractor.

VI INSTRUCTIONSA. General Implementation

When the corrective maintenance requested by the MWR is complete and the Maintenance Department submits the completed MWR copy to the Associate Engineer, the Associate Engineer will review the MWR for inclusion in the NPRDS Reportable Failure Data and the information is keypunched and submitted to the Maintenance Historical System. As a result of the input to the MHS, if the failure is NPRD reportable, i.e., the failure is within the scope of that listed in Step III of this procedure, the Maintenance History System prints out the NPRD Report of Failure. An NPRD Report of Failure Form (NPRD-4) is filled out from the information given and keypunched. The cards and subsequent edit report are then sent by mail to the NPRDS contractor. The information supplied to the NPRDS contractor is combined with information submitted from other operating nuclear power stations and reports are issued by mail to the Associate Engineer from the NPRDS contractor. See Figure 23.1 for a flow diagram of the NPRD System.

VI INSTRUCTIONS (Continued)

Routine inputs to the NPRDS contractor are as follows:

1. Quarterly Operating Reports (QOR) - As the name implies, the QOR is submitted by the Associate Engineer to the NPRDS contractor quarterly, within 30 days after the end of the reporting quarter. The report includes unit service-hour information and is used to update the service-hour base for the systems and components contained in the data base. The QOR is based on the Operating Data portion of the Monthly Operating Report to the NRC.
2. Failure Reports - As noted above, primary input to the NPRDS is the information supplied on the MWR. From this information, reports are generated by the Maintenance History System in the format required by the NPRD contractor. The reports contain information with regard to a description of the failure, cause of the failure, failure type, corrective action, etc. If the component failure also results in a system failure (recognized by the inability of the system to perform one or more of its required safety functions), then a Report of the Failure for the system is submitted as well as a Report of Failure for the component. The failure data cards together with the Edit Report for the cards, are submitted to the NPRDS contractor by the Associate Engineer within 30 days of the end of the month in which a failure occurs. However, when information is incomplete or uncertain, the report may be delayed until the information required to accurately complete the report is available. Reports may also be revised if more information becomes available after an original report is submitted.

B. Data File Maintenance

Data file maintenance is performed routinely by the NPRD system contractor. Computer routines are provided to allow addition, replacement, correction, expansion, or deletion of any record in the main file, including reports of failure.

Each participating utility is sent a listing of its submitted system and component descriptive engineering data, for each reporting unit, after such data have been entered into the NPRD system data file.

Input source documents are retained on file by the NPRD system contractor.

VI INSTRUCTIONS (Continued)C. System Output

1. Routine Output Reports

The following reports are prepared by the NPRDS contractor and distributed to program participants.

- a. Quarterly Report of Engineering Data for Individual Reporting Organizations (NPRD Report Q01)
- b. Quarterly System and Component Failure Listing (NPRD Report Q02)
- c. Quarterly System and Component Failure Listing for Individual Units (NPRD Report Q03)
- d. Quarterly Report of Component Failure Summary (NPRD Report Q04)
- e. Annual Report of System Reliability for Individual Reporting Organizations (NPRD Report A01)
- f. Annual Report of System Reliability (NPRD Report A02)
- g. Annual Report of Component Reliability (NPRD Report A03)
- h. Annual Report of Cumulative Component Reliability for Individual Reporting Units (NPRD Report A05)

2. Special Requests

Upon request, reports involving extraction or analysis of data from the NPRDS data base may be prepared. Information is retrievable on subsets of the data based on combinations of the engineering data, failure data, and control data fields, and on selected portions of these fields.

Typical analyses can provide:

- a. Mean time between failures
- b. Failure rates
- c. Average failure outage duration

VI INSTRUCTIONS (Continued)C. System Output (Continued)

2. Special Requests (Continued)

It is the responsibility of the person requesting the report to define the analyses to be performed. The NPRDS contractor is responsible for translating approved requests into appropriate computer programs to generate the required output reports.

All reports received from the NPRDS contractor are kept on file by the Associate Engineer for the review by Company personnel.

VII RECORDS

- A. All records are maintained by the NPRDS contractor.
- B. The NSSD Planning & Scheduling Group receives a copy of the reports (from the NPRDS contractor) listed in Step V.C of this procedure and maintains a file of them.

VIII REFERENCES

- A. Reporting Procedures Manual for the Nuclear Plant Reliability Data System. (Prepared by Southwest Research Institute per ANSI Subcommittee N18-20)
- B. NPRDS Reportable System and Component Scope Manual

IX FIGURES AND ATTACHMENTS

Figure 23.1, NPRD Information Flow Path

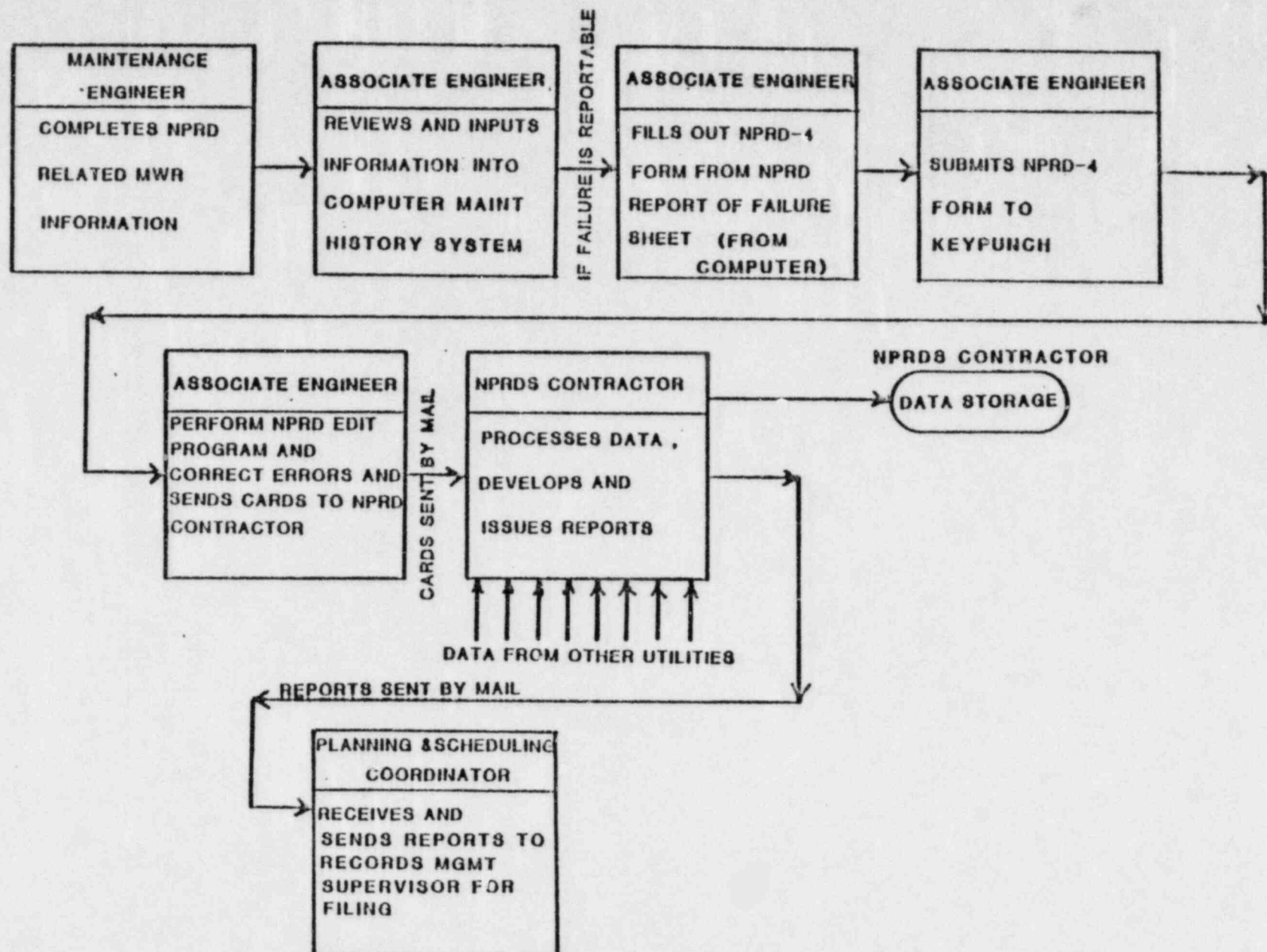


FIGURE 23.1
NPRDS INFORMATION FLOW PATH

3. Other Vendors

Each utility should continue to seek assistance and ETI from other safety-related equipment vendors when the utility's evaluation of an equipment or ETI problem concludes that such direct interaction is necessary or would be beneficial. These programs and those of lesser significance will continue to be reported by means of the NPRDS and/or the SEE-IN programs.

Response: BVPS-1 will continue to seek assistance and Equipment Technical Information (ETI) from vendors when necessary or beneficial. Correspondence providing ETI from vendors will be evaluated and resolved in the same manner as other ETI by the Nuclear Engineering and Construction Unit. A Nuclear Group Directive (NGD) on Correspondence Control administratively controls this activity. The NGD on correspondence control is being reviewed and will be forwarded upon approval.

4. Internal Handling of Equipment Technical Information

The utility should process incoming ETI so the objectives noted below are achieved.

-- Administrative procedures should provide control of incoming ETI whether it arrives directly from the vendor or from other industry or regulatory sources (i.e., NUCLEAR NETWORK, NPRDS, SEE-IN, NRC bulletins, etc.), so it receives the appropriate engineering/technical review, evaluation, and distribution for the following:

- prompt warnings to key personnel
- timely incorporation into maintenance or operating procedures, equipment data/purchasing records, and training programs
- future procedure review and revision cycles
- notification on NUCLEAR NETWORK of significant ETI

The incorporation of such safety-related information (or changes) remains within the scope of the utility's review and approval requirements.

Response: A Nuclear Group Directive (NGD) on Correspondence Control assigns responsibility to the appropriate group or section for engineering/technical review, evaluation and resolution of incoming Equipment Technical Information (ETI). The NGD also requires each group or section to develop procedures to provide tracking and dispositioning of ETI received as well as:

- prompt warnings to key personnel
- timely incorporation of pertinent ETI into procedures
- notification to the Nuclear Engineering and Construction Unit for revision of equipment technical manuals; and notification to Training for possible changes to the training program
- notification to the appropriate section head of recommendations to improve the safety or efficiency of plant operations

A Site Administrative Procedure (SAP) defines the flow path of ETI received and the content of group procedures on review and resolution of ETI. The SAP ensures consistent and controlled disposition of ETI. This SAP will be forwarded with the Nuclear Group Directive on correspondence control following their review and approval.

-- The administrative program should require that maintenance or operating procedures cite appropriate ETI in the reference section of the procedure.

Response: Procedures have been revised to instruct the procedures group to reference appropriate ETI when an Operational Surveillance Test, Maintenance Surveillance Procedure, Preventive Maintenance Procedure, Corrective Maintenance Procedure, or Calibration Procedure is changed.

-- Within the performance section of the procedure, appropriate ETI should be incorporated and approved in the engineering, technical and quality review of the safety-related procedure.

Response: All operating and maintenance procedures performed on QA Category I components are reviewed by the OSC for unresolved safety issues and approved by the Station Superintendent.

5. Internal Handling of Vendor Service

The vendor, contractor, or technical representative who will perform safety-related services should be a QA approved/qualified supplier of such nuclear safety-related services. Furthermore, the services should be specified in the procurement documentation so that a combination of procedural and QA/QC controls are established.

A vendor service may be performed using utility procedures. If so, the procurement documentation should specify that the service is performed using utility procedures that have been approved after a technical and quality review cycle typical for other utility service, maintenance, repair, or operating procedures. As an alternative, the service may be performed using vendor or contractor procedures. In this case, the documentation should specify that the service is performed using vendor, contractor, or technical representative procedures that have been reviewed and approved in accordance with the utility procurement program, QA program, and administrative review program. This is to ensure that their documents are processed and approved in a manner equivalent to the utility procedures concerning similar activities.

In addition to specifying the procedures that will be used, the QA/QC program to be used should also be specified. The utility QA/QC program may be used. In this case, the procurement documentation should specify that the activity will be performed under the cognizance of the utility QA/QC program. Alternately, the vendor or contractor QA/QC program may be used. In this case, the documentation should specify that the activity will be performed under the cognizance of the vendor, contractor, or technical representative QA/QC program that has been reviewed separately and approved in accordance with the utility QA program. In addition, during the performance of the service, the utility QA program will monitor the effectiveness of their performance and compliance with its approved program by suitable surveillance, inspection, and audit.

Response: The onsite review of procedures prepared to address this issue has identified that additional administrative controls will be necessary due in part to a management reorganization which was made effective May 1, 1984. We will forward the revised procedures upon completion of the Onsite Safety Committee review of these documents.

6. Enhanced Programs

NPRDS:

Each utility should incorporate the enhancements to the NPRDS recommended in Section 3.2. This could involve revisions to existing administrative programs or procedures. It also could require revised training or other actions needed to ensure a meaningful and effective implementation of the NPRDS program enhancements.

SEE-IN:

Each utility should incorporate the enhancements to the SEE-IN program recommended in Section 3.2. As in the NPRDS program, this could involve revisions to the existing administrative programs or procedures or to the training or other activities so the data reported to the SEE-IN program is complete and detailed enough to support the system enhancements being undertaken by INPO.

Response: BVPS-1 will work with the NPRDS user's group and INPO to achieve the goal of implementing the NPRDS and SEE-IN program enhancements.