

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
PERRY NUCLEAR POWER PLANT
SPECIAL PROJECT PLAN
1028
Fuel Load Achievement

REVISION: 2

EFFECTIVE DATE: November 20, 1985

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SPECIAL PROJECT PLAN 1028

FUEL LOAD ACHIEVEMENT

1.0 INTRODUCTION

The Manager, Nuclear Engineering Department has been designated Fuel Load Achievement Manager (FLAM). In this capacity the FLAM will advise the Vice President, Nuclear Operations Division, and initiate action to assure that existing organizations and programs achieve their objectives.

A working group with technical and management expertise in this area has been established to assist the Fuel Load Achievement Manager. Their charter is to accomplish the following:

- Create and maintain one list of completion items as a vehicle to drive to fuel load.

- Recommend a list of systems necessary for fuel load and identify potential deferral items.

- Provide positive assurance that systems, areas, and programs needed for fuel load are ready to fulfill their intended function.

- Provide recommendations to management for achieving fuel load.

- Recommend actions necessary to focus resources on priority areas and eliminate unnecessary and redundant efforts.

- See that action plans are developed and executed to achieve fuel load.

Fuel Load will be achieved by existing organizations using approved procedures and practices as described in the FSAR, the Quality Assurance Plan, and associated implementing documents.

2.0 PURPOSE

This plan describes the methods for focusing project resources to achieve Unit 1 initial fuel load and establishes a special organizational element to make recommendations and to monitor and report status.

3.0 SCOPE

This plan applies to activities and organizations contributing to the completion of systems, areas and programs necessary to achieve Unit 1 initial fuel load. Priorities will be recommended or concurred with by the Fuel Load Achievement Manager and communicated through existing planning and scheduling documents.

4.0 REFERENCES

- 4.1 Perry Operations Procedure 0502, "Special Project Plans."
- 4.2 Plant Administrative Procedure 0305, "Safety Evaluations."
- 4.3 PNPP Quality Assurance Plan.
- 4.4 Plant Administrative Procedure 0205, "Operability of Plant Systems."
- 4.5 Final Safety Analysis Report Section 14.2.10.

5.0 RESPONSIBILITIES

5.1 Fuel Load Achievement Manager (FLAM)

- . Monitor critical activity completion, set priorities and initiate actions through the existing project organization to assure fuel load is achieved on schedule.
- . Make recommendations to facilitate Fuel Load Achievement to the Project Managers.
- . Manage implementation of this Special Project Plan.
- . Provide overall direction to the Fuel Load Achievement working group.
- . Make decisions and facilitate resolution of problems experienced by the Fuel Load Achievement Working Group.

5.2 Fuel Load Achievement Group Chairman

- . Direct the day-to-day implementation of this special Project Plan.
- . Manage the Fuel Load Achievement Working Group.
- . Establish methods to provide Project management with status information that is complete, accurate and timely.

6.0 PLAN IMPLEMENTATION

The Fuel Load Achievement Special Project Plan will ensure the completion of: 1) plant systems; 2) plant areas; and, 3) programs necessary to achieve fuel load and support low power testing. To meet the objective of timely completion, the following actions will be initiated in each of the areas identified:

1. Identifying the systems, areas and programs which will be required at Fuel Load to meet Technical Specification operability requirements, meet regulatory requirements and support scheduled testing activities and operating conditions.

2. Determining the completion status of any remaining work associated with these priority systems, areas and programs.
3. Focusing management attention and project resources on the remaining work associated with these priority areas.
4. Providing systematic verification that the required work for each system, area and program is completed.
5. Recommending for PPOD/PPTD Managers' and PORC approval the work that may be deferred based on technical requirements and the potential impact on future work completion.

Final approval of systems, areas and programs required for fuel load and the deferral of any work associated with these items will be made by the Managers PPOD/PPTD with PORC concurrence on safety systems. The Nuclear Safety Review Committee will provide an independent overview of this process and, where necessary, provide recommendations to the FLAM. All other activities associated with this Special Project Plan will be accomplished using existing plant programs or additional controls which are established as management prerogative.

6.1 Systems Completion

Identification of the Systems needed to achieve fuel load will be accomplished as follows:

- 6.1.1 A list of systems required to be declared operable prior to fuel load will be prepared by the FLAM for the approval of the PPOD/PPTD Managers. This list will include all systems and subsystems required by the PNPP Technical Specifications to be operable for Fuel Load. This list will also identify those systems required by Technical Specifications to be operable for each facet of the subsequent low power testing. Safety systems required to support completion of scheduled testing activities but not required by Technical Specifications will also be identified. PORC concurrence with these listings will be required prior to fuel load.

Nonsafety systems required to support plant activities during and immediately subsequent to fuel load will also be identified and submitted for approval by the PPOD/PPTD Managers.

The FLAM will provide to the Vice President, Nuclear Operations Division, each of the plant system lists and make recommendations for adjustments to the plant completion priorities and schedules.

6.1.2 A System Operability Verification (SOV) checklist (Attachment 1) has been developed to provide for a systematic evaluation of a system's completion status in the following areas:

- a. Construction
- b. Testing
- c. Design/Licensing
- d. Procedures
- e. Programmatic Items
- f. Open Paperwork
- g. System Configuration

Completion of the SOV checklist will culminate in a declaration of system operability in accordance with PAP-0205, "Operability of Plant Systems." The PPOD/PPTD Managers will designate which systems will require completion of the SOV checklist. If a system is not so designated, only the requirements of PAP-0205 are applicable.

6.1.2.1 A Responsible Engineer (RE) will be assigned by the Managers PPTD/PPOD to complete the SOV checklist for each designated system. The FLAM will designate a responsible General Supervising Engineer who will countersign with each of the REs for completion of the section for which that GSE is responsible. The GSE signing for the section will designate the name or title of a cognizant engineer who will assist each of the REs in the area under his cognizance and who will countersign with RE for that step. The cognizant engineer will advise and assist each responsible engineer in verifying completion of each step in the SOV checklist.

6.1.2.2 The RE and Cognizant Engineer signatures for each section will indicate that the work identified on that section of the checklist has been completed or listed on the MDL with the appropriate restraint code in accordance with PAP-1103. The restraint code shall be determined by the RE subject to review by the FLAM.

6.1.2.3 The Responsible Engineer with the Section GSE's approval may make pen and ink additions, deletions or clarifications to any step in the

specific system's checklist. The reasons for the change will be made a permanent part of that system's checklist.

6.1.2.4 Disagreements between the RE and cognizant engineer will be resolved by the GSE responsible for the SOV checklist section. The FLAM will provide final resolution regarding completion of any step of the SOV checklist.

6.1.3 The RE will identify and list on the MDL all uncompleted work required to make his system operable as soon as possible after beginning the SOV checklist.

6.1.3.1 The RE will meet with personnel responsible for completing this work and obtain commitments for completion. The completion commitment date will be listed on the MDL if the item is required for fuel load.

6.1.3.2 The FLAM will provide guidance and assistance to the RE in establishing appropriate priorities for work completion.

6.1.3.3 The RE shall provide, or request assistance in obtaining, timely resolution of technical issues and clarification of regulatory requirements affecting his system. The RE shall request guidance/assistance from the FLAM or Managers PPOD/PPTD whenever necessary to meet scheduled completion of his system.

6.1.3.4 The FLAM or his designee shall periodically review each of the SOV checklists in progress to verify satisfactory progress in completion of the SOV and shall provide guidance and assistance where necessary.

6.1.4 The RE will maintain the SOV Checklist and use the MDL to track work required for fuel load and work being deferred past fuel load. Work may not be deferred if the deferral will prevent the system or subsystem from meeting the operability requirements of PAP-0205 as applied to the activities to be performed at the next milestone. The FLAM and RE will review the MDL prior to presentation to the Manager PPOD/PPTD for approval of the deferrals.

The FLAM may develop additional criteria to be used by the RE in determining which work items may be recommended for deferral. The FLAM or his designee will periodically review items being considered for deferral to ensure these criteria are being properly and consistently implemented.

- 6.1.5 The RE with the assistance of the cognizant engineers will provide justification to the Managers PPOD/PPTD for the items in each system which are being recommended for deferral. This will include the identification of the plant completion milestone which will require completion of the deferred work.
 - 6.1.5.1 Items being recommended to the PORC for deferral shall be evaluated in accordance with the requirements of PAP-0305. If a safety evaluation is required, the PORC review will be obtained during the review of the SOV checklist or earlier at the discretion of the FLAM.
 - 6.1.5.2 Each RE and GSE involved in completing system operability checklists will receive training and be designated to perform Safety Evaluations in accordance with the requirements of PAP-0305.
- 6.1.6 SOV Checklist Section VI, "Open Documentation," will be completed after Sections I, II, III, IV and V. The RE will sign this section based on his determination that all work required for fuel load is complete.
- 6.1.7 SOV Checklist Section VII, "System Configuration," will be completed by a Unit Supervisor or Shift Supervisor. The System Responsible Engineer's signature is not required in Section VII.
 - 6.1.7.1. The SOV Checklist may be approved by the Managers PPOD/PPTD in accordance with Sections 6.1.4 and 6.1.5 prior to the completion of Section VII of the checklist. However, the system will not be declared operable until the SS OR US completes Section VII and signs the SOV Checklist Coversheet.

6.2 Areas Completion

- 6.2.1 The FLAM shall identify appropriate criteria and develop a list of plant areas required to be complete to support fuel load and subsequent low power testing. This list shall be approved by the Managers PPOD/PPTD prior to fuel load.
- 6.2.2 An area readiness checklist (Attachment 2) has been developed to provide for a systematic evaluation of area completion in the following areas:
 - a. Fire Protection
 - b. Housekeeping
 - c. Area Deficiencies

This checklist will be expanded to include any special requirements of the particular area being made ready.

- 6.2.3 A responsible individual will be assigned to complete the area readiness checklist. This individual will have primary responsibility for ensuring all items on the checklist are verified and that any remaining work is completed. Operations and/or maintenance shall concur with area readiness prior to fuel load.

6.3 Programs Completion

Programs or activities of a programmatic nature with a potential for impacting fuel load shall be investigated and evaluated under the direction of the Fuel Load Achievement Manager. A list of these programs shall be compiled and the status updated in accordance with Section 7.0. Recommendations for improvement should be forwarded to the responsible manager or general supervisor.

7.0 STATUS REPORTING

7.1 Project Completion Status

Status lists of all activities, (such as outstanding commitments, open NRC findings, open nonconformance reports, etc.) shall be combined into one overall list that accurately depicts the status of work that must be performed before specified milestones (for example: fuel load, criticality, 5% power, completion of power ascension, or first refueling outage). This list should be updated weekly, or more frequently if required. The FLAM will provide status lists to appropriate project management.

7.2 System, Area, Program Status

The status of system, area and program completion should be reported to the Fuel Load Achievement Group Chairman on a routine basis and compared to projected schedules and objectives. Any activity behind schedule should be investigated and corrective actions taken.

8.0 REVISIONS

Revisions to this special project plan shall be prepared, reviewed, approved, and distributed in the same manner as the original plan. Revisions to the system operability verification checklist and the area completion checklist may be performed as described in Step 6.1.2.3.

9.0 QUALITY ASSURANCE AUDITS

This special project plan monitors, coordinates and reports upon line programs which contain quality verification; therefore, quality assurance audits of this plan are not required.

10.0 TRAINING

Responsible Engineers, Responsible GSEs and assigned cognizant engineers and other personnel designated by the Fuel Load Achievement Manager should be trained in the following:

- Responsibilities
- Reporting Requirements
- Methods for resolving conflicts
- Overview of plan
- PAP-0205, "Operability of Plant Systems"
- PAP-0305, "Safety Evaluations"
- Guidelines for Work Deferral

11.0 PLAN TERMINATION

This special project plan will terminate on a system basis after declaration of system operability or when directed by the Vice President, Nuclear Operations Division. Specific work items coordinated and tracked by this plan will continue to completion in accordance with the approved procedure for that activity. These items will be tracked to completion.

Documentation compiled to support recommendations to PORC, as part of this special project plan, shall be forwarded to and retained by PORC in accordance with approved procedures for PORC activities.

12.0 ATTACHMENTS

1. System Operability Checklist, Revision 0.
2. Area Completion Checklist, Revision 0.

ATTACHMENT 1
SPECIAL PROJECT PLAN 1028
FUEL LOAD ACHIEVEMENT

SYSTEM OPERABILITY VERIFICATION CHECKLIST

_____ : _____
System Name

The outstanding work associated with this system has been identified and is listed on the Master Deficiency List. Deferral of this work until the scheduled completion milestone has been evaluated and found acceptable.

Manager, PPOD

Manager, PPTD

System has been declared operable in accordance with the requirements of PAP-0205.

Unit Supervisor

System Operability Verification Checklist

System: _____:

The System Responsible Engineer and the assigned Cognizant Engineer for each of the areas listed below have verified completion of work on system listed above. Work on this system which has not been completed is identified on a list attached to this checklist. These items have been scheduled for completion prior to the plant completion milestone identified next to each item and are recommended for deferral until that time. Work items being recommended for deferral have been reviewed in accordance with PAP-0305, "Safety Evaluations."

System Responsible Engineer*

<u>Completion Area</u>	<u>General Supervising Engineer</u>
I. Construction	_____
II. Testing	_____
III. Design/Licensing	_____
IV. System Procedures	_____
V. Programmatic Items	_____
VI. Open Documentation	_____

* PPTD Technical Section

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ :

System RE Cognizant*
Engineer

I. Construction Completion:

1. Construction Turnover exceptions which are specific to this system have been completed or are listed on the MDL with the appropriate restraint code. _____
2. N-5 Packages for Piping systems have been completed or are listed on the MDL with the appropriate restraint code. _____
3. N-5 Packages for Hangers have been completed or are listed on the MDL with the appropriate restraint code. _____
4. DELETED - Bulletin 79-14 evaluations have been completed.

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ :

	System RE	Cognizant* Engineer
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II. Testing Completion:

- | | | |
|--|-------|-------------|
| 1. Test Program Review Committee (TPRC) results approval has been obtained for the following: | | |
| a. Preoperational/Acceptance Tests | _____ | _____ (STE) |
| b. Completed Test exceptions and addenda | _____ | _____ (STE) |
| c. Test exceptions and addendum not completed are listed on the MDL with the appropriate restraint code. | _____ | _____ (STE) |
| 2. Management Procedure Review Team follow-up actions completed or are listed on the MDL with the appropriate restraint code. | _____ | _____ |
| 3. Commitments identified during commitment search (DG-33) are satisfied or listed on the MDL with the appropriate restraint code. | _____ | _____ |
| 4. Nuclear Test Section Field Questions have been answered or listed on the MDL with the appropriate restraint code. | _____ | _____ (STE) |
| 5. Required System As-Built composite drawings have been approved and issued or are listed on the MDL with the appropriate restraint code. | _____ | _____ |

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____:

System RE

Cognizant*
Engineer

II. Testing Completion (Continued):

6. Setpoint Methodology Program - the effect of instrument accuracy on acceptance criteria has been evaluated and required actions completed or listed on the MDL with the appropriate restraint code.

7. IC&R Testing has been completed or listed on the MDL with the appropriate restraint code.

(STE)

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ :

	System RE	Cognizant* Engineer
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III. Design/Licensing:

1. Human Factors evaluations (HED) specific to this system have been completed. Required actions completed or listed on the MDL with the appropriate restraint code.
2. NRR Issues specific to this system are resolved and required actions completed or listed on the MDL with the appropriate restraint code.
3. Commitment Tracking System open items have been reviewed by the System Engineer. Completed commitments closed and required actions completed or listed on the MDL with the appropriate restraint code.
4. DELETED - Remaining Bulletins and Circulars are tracked on the Regional Enforcement Action/Concern Tracking System.
5. DELETED - Remaining IE Items are tracked on Regional Enforcement Action/Concern Tracking System.
6. Open Deficiency Analysis Reports (DAR) have been evaluated and corrective actions affecting this system have been completed or listed on the appropriate restraint code.
7. Open Engineering Design Deficiency Reports (EDDR) evaluated for impact on this system. Open EDDRs affecting this system are listed on the MDL with the appropriate restraint code.

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____:

System RE	Cognizant* Engineer
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III. Design/Licensing (Continued):

- | | | |
|--|-------|-------|
| 8.a All required design data and subsequent change documents (ECNs, FVAs, FDIs, and FDDR), required for this system have been issued and completed or are listed on the MDL with the appropriate restraint code. | _____ | _____ |
| 8.b FCRs and DCPs required for this system have been issued and completed or are listed on the MDL with the appropriate restraint code. | _____ | _____ |
| 9. Fire Protection issues specific to this system have been resolved and work completed or listed on the MDL with the appropriate restraint code. | _____ | _____ |
| 10. DELETED - Nuclear Safety Review Committee items are covered elsewhere on this checklist. | | |

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ :

System RE

Cognizant*
Engineer

IV. System Procedures:

1. System Operating Instructions are approved, available and reflect current plant configuration.
 - a. SOI
 - b. ELI
 - c. VLI
 - d. ONI
 - e. ARI
2. Periodic Test Instructions available and current or listed on the MDL with the appropriate restraint code.
3. Surveillance Instructions available and current or listed on the MDL with the appropriate restraint code.
4. Special Project Plan 501 - Procedure review for commitments has been completed for the procedures required for this system. Commitments have been verified as incorporated or listed on the Commitment Tracking System.

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ :

System RE	Cognizant* Engineer
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V. Programmatic Items:

1. System Calibrations Complete per the NTS/PPD Program and the Instrument Calibration Program has been reviewed by the System Engineer and is in effect for this system.
2. DELETED - Completion of required surveillance testing is covered by SOV Checklist Item VII.6.
3. Repetitive Planned Maintenance Program for this system has been reviewed by the System Engineer and is in effect.
4. DELETED - PPMIS review is now SOV Checklist Item VI.2.
5. Vendor advisories affecting this system have been evaluated and required actions completed or listed on the MDL with the appropriate restraint code.
6. Outstanding Set Point Change Requests have been resolved or listed on the MDL with the appropriate restraint code.
7. Outstanding Nonconformance Reports affecting this system have been closed or listed on the MDL with the appropriate restraint code.
8. Outstanding Condition Reports affecting this system have been closed or listed on the MDL with the appropriate restraint code.

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ :

System RE

VI. Open Documentation:

1. SOV Checklist Sections I, II, III, IV and V have been completed. The attached MDL identifies remaining work items affecting this system. These MDL Items have been evaluated per SPP 1028 Sections 6.1.4 and 6.1.5; have been assigned appropriate restraint codes; and are being recommended to PORC for deferral.
2. PPMIS has been reviewed for maintenance/repair items. Items which could effect system operability have been closed.

System RE

System RE

* Designated by the Responsible GSE for this Section.

SYSTEM OPERABILITY VERIFICATION CHECKLIST

System: _____ : _____ :
Shift Supervisor or
Unit Supervisor

VII. System Configuration:

1. Material Foreign Item and Lifted Leads
and Jumpers:

a. Log reviewed and unnecessary
items removed. _____

b. Operations Program approval for
MFI/LL&J items to remain in
system. Includes review for
operational impact. _____

c. Tag Audit/System search for
orphan tags. _____

d. Temporary Power removed or
included in the LL&J Program. _____

3. Safety (Danger) Tags:

a. Logs reviewed and unnecessary
tagouts removed. _____

b. Remaining tags approved under
operating program. _____

c. Tag audit. _____

4. Electrical and Valve lineups have
been completed. (Required by PAP-0205,
Section 6) _____

5. Technical Specification Limiting
Condition for Operations Log
reviewed. _____

* Designated by the Responsible GSE for this Section.

ATTACHMENT 2
SPECIAL PROJECT PLAN 1028
FUEL LOAD ACHIEVEMENT

AREA READINESS CHECKLIST

Area: _____

Manager, PPOD

Manager, PPTD

AREA READINESS CHECKLISTI. HOUSEKEEPING

Responsible Engineer

1. Temporary Equipment Protection removed (last). _____
2. Temporary Equipment (scaffolding, tools, hoses, cables, etc.) removed unless identified with a current orange tag. _____
3. Area posted (Cleanliness Zone and requirements) in accordance with PAP-0204. _____
4. Area cleared of debris, equipment wiped down and swept. _____
5. Floor drains clear and strainers in place. _____

II. FIRE PROTECTION

1. Fire doors installed and labeled. _____
2. Manual firefighting equipment is in fire stations and extinguishers are in place. _____
3. Fire seals are completed. _____
4. Fire walls are complete. _____
5. Pyrocrete complete. _____
6. Appendix R work is complete in the area. _____

III. HARDWARE

1. Seismic Clearance Violations
 - a. Completed--Deficiencies corrected or included on the attached list and recommended for deferral. Work being deferred has been evaluated for potential impact on cost/schedule. _____

AREA READINESS CHECKLISTResponsible Engineer

2. Raceway Spacing Violations

- a. Completed--Deficiencies corrected or included on the attached list and recommended for deferral. Work being deferred has been evaluated for potential impact on cost/schedule.

3. LCK REAP

- a. Completed--Deficiencies corrected or included on the attached list and recommended for deferral.

4. Area Completion List/Structural MDL items completed. List exceptions on attached sheet.

5. Complete following items:

- a. Architectural Finish work (ceiling tile, wallboard, etc.)

b. Painting

1. Nuclear coatings completed (Y/N)

2. OSHA painting

3. Architectural painting complete.

6. Groundstraps installed (equipment, cable trays, and conduit).

7. Insulation completed.

8. System preoperational/acceptance tests of:

- a. Airlocks

- b. Emergency lighting

M E M O R A N D U M

TO V. Concel
System RE

ROOM

FROM F. R. Stead *FRS*
PHONE 5267 ROOM E210
SUBJECT Deferral Criteria

DATE November 27, 1985

Special Project Plan 1028, "Fuel Load Achievement", Sections 6.1.3 and 6.1.4 state that the Fuel Load Achievement Manager "will provide guidance and assistance to the RE in establishing appropriate priorities for work completion". In addition, the FLAM "may develop additional criteria to be used by the RE in determining which work items may be recommended for deferral".

The guidelines listed in this memo are to be used for setting priorities and selecting work items to be deferred past each completion milestone. In accordance with SPP 1028, deferral items are subject to review by the FLAM and approval by the PORC.

Systems required to be operable for fuel load (mode 5), initial criticality (mode 2) and prior to exceeding 5% power have been identified (Memo: From: M. D. Lyster/J. J. Waldron, To: All Managers, Dated: November 11, 1985). This list of required systems was based upon Surveillance Test Requirements, Periodic Test Requirements, Security Surveillance requirements, Technical Specification Requirements or the need for the system to support a required system. Where this list identifies partial system requirements, the System Engineer should use the guidelines in this memo to help determine which items are required and which may be deferred.

All preoperational test activities which may be deferred past fuel load and the required completion milestone have been identified. These items include system deferrals in the October 11 letter to the NRC, test exceptions listed in the November 2, 1985 letter to the NRC, and Test Exception MDL items as discussed with the NRC resident inspector. A list of the test items approved for deferral is available from the NTS Admin. Group.

The following guidelines are to be used to select work items to be completed prior to and after fuel load and to select the appropriate completion milestone. The guidelines are applicable to all plant systems, areas and programs:

I. An item must be completed if:

- a) Required to make the system operable in accordance with the definition of operability in PAP-0205; or,
- b) Required by Technical Specifications (Unless a Tech Spec exemption has been obtained from the NRC based upon unique conditions associated with power ascension testing); or,
- c) Required to successfully complete Surveillance or Periodic Test Requirements; or,
- d) Required to meet regulatory requirements such as fire protection, equipment qualification, seismic design criteria, etc., for a required system or component, unless an exemption has not been obtained; or,
- e) Required to be operable to support the operation of a required system or to support fuel load, scheduled testing or other scheduled plant evolution during or immediately following fuel load.

II. An item may be deferred if:

- a) Not needed due to plant conditions prior to the completion milestone (e.g. no fission product activity or decay heat); or,
- b) Not required to meet regulatory requirements prior to the completion milestone; or,
- c) Not required to make the system operate as designed or to meet Technical Specification requirements; and,
- d) Cannot be performed because necessary conditions can be established only later in the power ascension program; or,
- e) Deferral does not pose a safety hazard to personnel or equipment.

III. Deferred work activities shall:

- a) Be achievable prior to the proposed completion milestone; and,
- b) Be listed on the MDL with the appropriate restraining code; and,
- c) Be evaluated for the need for compensatory action with all compensatory actions listed on the MDL with the appropriate restraint code; and,
- d) Be evaluated for the cost/schedule impact of completing work prior to versus after the proposed milestone.

Special Project Plan 1028, Section 6.1.5.1 requires that items being recommended to PORC for deferral shall be evaluated in accordance with the requirements of PAP-0305. This is not intended to require that an individual PAP-0305, "Applicability Check" be completed for each MDL item. Items may be grouped at the discretion of the system engineer and a single "applicability check" performed. If a safety evaluation is required for any item included in the group, a separate safety evaluation should be performed for each item, or logical grouping of items.

cc: Site Managers
All GSO/CSEs
FLAG Members