



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

NRC INSPECTION MANUAL

LPEB

INSPECTION PROCEDURE 71715

SUSTAINED CONTROL ROOM AND PLANT OBSERVATION

PROGRAM APPLICABILITY: 2515

71715-01 INSPECTION OBJECTIVES

01.01 To provide an opportunity for the resident inspector, an offsite inspector or regional management to evaluate a licensee's control room and plant performance over a sustained period. The resident inspector should gain new insight from the sustained control room observation and the offsite inspector's independent view (if an offsite inspector is used).

01.02 This procedure has been established to permit long-term, continuous observation of control room activities. More than one inspector is generally required for this type of sustained observation. However, due to varying circumstances, it may be more appropriate for regional management to assign the task to a single inspector, in which case the direction regarding two or more inspectors is inapplicable.

71715-02 INSPECTION REQUIREMENTS

02.01 Inspectors. This inspection shall be conducted by the senior resident inspector, resident inspector, region-based inspector, or an offsite inspector designated by management for this purpose. Management may choose to represent the second inspector.

Inspectors who are not part of the site resident staff should become familiar with control room protocol regarding access and administrative controls prior to the initiation of the inspection.

02.02 Inspection Items. For a period of time determined to be appropriate by regional management, observe operational activities conducted by the licensee. The inspector should obtain the licensed operators' views on what detracts from their ability to monitor and operate the plant. The inspector should evaluate the following conditions or practices as appropriate.

- a. Operators are attentive and responsive to plant parameters and conditions. Operators are aware of the reasons for annunciators that are in the alarm condition.

- b. Plant evolutions and testing are planned and properly authorized. When a more complex special evolution or non-routine evolution takes place, a pre-evolution briefing of the shift crew and other personnel affected by the evolution may be appropriate.
- c. Procedures are used and followed as required by plant policy.
- d. Equipment status changes are appropriately documented and communicated to appropriate shift personnel, when they occur.
- e. The operating conditions of plant equipment are effectively monitored, and appropriate corrective action is initiated when required.
- f. Backup instrumentation, measurements, and readings are used as appropriate when normal instrumentation is found to be defective or out of tolerance. Equipment out of service controls are adequate.
- g. Logkeeping is timely, accurate, and adequately reflects plant activities and status.
- h. Operators follow good operating practices and maintain shift professionalism in conducting plant operations. Operators are aware of ongoing plant activities and surveillance testing. Administrative controls are adequate to ensure in-plant work activities are being performed with the knowledge of control room personnel.
- i. The control room environment is adequate for conduct of duties; i.e. lighting, noise levels, traffic volume, number of alarms, ventilation, heating and cooling are acceptable.
- j. Communication between workers and first line supervisors, as well as interdepartmental communications, are appropriate and follow any plant specific communications procedures.
- k. Shift turnovers are professional and provide the oncoming shift an adequate update from the last time they were on shift.
- l. Blocking/tagging and valve lineups are conducted in accordance with plant procedures and are adequate to provide isolation or proper system lineup for existing plant conditions.
- m. The administrative burden on the control room supervisor does not prevent adequate supervision of shift activities.
- n. Manipulation of plant controls that may effect reactivity changes is performed by licensed operators, or by individuals enrolled in an approved operator licensing training program who are under the direction and in the presence of a license operator.
- o. Overall material condition of the plant does not hinder the effectiveness of the operators in conducting normal plant evolutions as well as non-routine evolutions.
- p. Technical Specification limiting conditions for operation are satisfied. Entry into LCO action statements are controlled and tracked. Additional surveillance activities required by action statements are performed and tracked.

- q. Abnormal conditions and equipment problems are evaluated promptly to determine the impact on plant safety, equipment operability, and reportability. Plant management is informed of abnormal conditions as required by plant policies.

71715-03 INSPECTION GUIDANCE

General Guidance

This procedure is intended to be used when regional management determines that as a result of plant events or poor licensee performance it is necessary to conduct a continuous surveillance of licensee performance. This procedure was developed based on the assumption that the inspection would continue for approximately 72 hours; however, other factors may indicate that a shorter or longer surveillance period is required. Regional management can use this procedure to allow one resident to participate in the inspection of another facility thereby enhancing the inspection techniques of both residents. Management participation in the implementation of this procedure is left to the discretion of regional management.

Specific Guidance

03.01 Inspection Requirements 02.01. If the inspection period is of short duration, both inspectors should be present during the period. If the period is greater than four hours, the inspectors should divide the observation period so that at least one inspector is observing plant activities during the entire period.

03.02 Inspection Requirement 02.02. The criteria listed in this section provides only broad guidance for evaluating operational activities. The inspectors should pay particular attention to the performance of licensed and non-licensed (auxiliary) operators. Approximately 25 percent of the observation time should be spent observing operator performance outside the control room. Backshift observations should be included as feasible, depending on the duration of the inspection. The regions should modify these criteria as necessary.

03.02.a No inspection guidance.

03.02.b Inspection Requirement 02.02b. When evaluating complex or non-routine evolutions, the inspector may consider the following supporting activities:

- Effectiveness of written communications, such as daily orders or special orders, in directing plant operations.
- Adequacy of management involvement during the evolution.
- Appropriateness of any risk assessment to understand the risk associated with the activity.

03.02.c-q No inspection guidance.

71715-04 RESOURCE ESTIMATE

On the average, about 72 hours of direct inspection are needed to accomplish the inspection requirements of this inspection procedure.

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