

Activity Plant System Operations (System Status)

1.0 Purpose This guideline provides a method to evaluate a plant section's practices for maintaining control of the operational status of critical systems.

2.0 Scope This guideline has been developed for use in the review and evaluation of the following areas:

- Maintenance of the system status file and configuration log (where applicable).
- Performance of second person verification required for safety-related systems.
- Controls for critical valves in safety-related systems.

References

1. Technical Specifications (Plant Specific).
2. Administrative Procedures (Plant Specific).
3. Operational Directives (Plant Specific).
4. INPO Good Practice OP-3, "Plant Status Controls."

3.0 Guidelines

3.1 In preparation for and during the conduct of this surveillance

- Obtain and review implementing procedures, instructions, and drawings governing this activity.
- Prepare a guide or checklist using the selected items from this guideline.
- Review past surveys, audits, surveillances, and other evaluations/assessments.
- Ensure that checklists include, where applicable, actual observations of performance, general plant conditions, radiological work practices, housekeeping, work document controls and use, and safety practices.

Note: Refer to Chapter 1 for specific details on the attributes listed above.

3.2 Select a representative sample of operations personnel (i.e., supervisors, SROs, ROs) and conduct interviews to determine the effectiveness of the current system for maintaining status of critical systems. Specifically review and discuss the following areas:

- A. The accuracy and timeliness of updates to the system status file, which occur due to design changes, clearance, and temporary alterations (if applicable), and changing plant conditions.
- B. The adequacy, usefulness, problems, and recommended improvements of the current system for maintaining status.
- C. The reactor operator's knowledge of system status requirements and their discipline and performance in meeting these requirements.

- 3.3 Review the system status files to ensure that plant instructions are implemented for maintenance of system status.
- A. Verify that system checklists in the file are reviewed versus the latest system flow diagram and system operating procedure for the applicable mode, and are the latest approved checklists.
 - B. Verify that system status is maintained on all safety-related systems.
 - C. Verify that off-normal valve positions (except those specified by an approved instruction) shall be documented and placed in the system status file and appropriate log as required by procedure.
 - D. Verify that for those inoperable systems due to major maintenance or modification, appropriate information is placed in the system status folder indicating system inoperability.
 - E. Verify that for those inoperable systems, the appropriate technical specification actions have been taken and LCO(s) have been entered.
 - F. Verify that the required double-person verification is being performed for those safety-related systems identified by plant instructions.
- 3.4 Review the critical valve summary checklist for each safety-related system to verify that daily checks are completed and documented. This verification may be determined by remote indication, status file, or a visual check of the valve off normal.
- 3.5 Verify that the control room operator (RO) and shift supervisor (SRO) review the safety-related systems checklists, journal entries, logged activities on clearances and temporary activities, and summary checklists (where applicable) during each operating shift.
- 3.6 Perform a walkdown of one or more major safety-related systems using the latest approved system checklists. Compare system alignments with the alignments in the system status file and configuration log (if applicable). It is preferable to perform walkdowns with an operations representative in order to properly verify valve positions.
- 3.7 Verify by a sampling method that manually operated valves which are required to be in a specified position for proper operation of engineered safety features are administratively controlled and physically locked in the required position. This may be performed in conjunction with step 3.6.

4.0 Other Guidelines for Consideration

- 4.1 See Chapter 1, "General Quality Surveillance Guidance."