

TABLE OF WHERE REGULATORY GUIDE 1.33 REV. 2 AND ANSI N18.7-1979 REQUIREMENTS ARE
ADDRESSED BY NQA-1-1994 STANDARDS AND/OR THE NEI 06-14 QAPD
DRAFT NEI RESPONSES TO NRC STAFF COMMENTS/ RECOMMENDATIONS
For discussion April 27, 2010

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)	NRC STAFF COMMENTS/ RECOMMENDATIONS And DRAFT NEI Responses
2. Definitions		
2.1 Limitations.		
emergency procedures. Written procedures which specify actions, including manipulation of plant controls, to reduce the consequence of an accident or potentially hazardous condition which has already occurred, to implement the emergency plan, or to prepare for possible hazardous natural occurrences.	QAPD, Part V, Section 3 Comments: The intent of the definition is met by the description of the emergency procedures in the QAPD.	1. The term “emergency procedures” is not defined in the QAPD. The intent of the definition maybe met by the description under "Emergency Operating Procedures" and "Emergency Plan Implementing Procedures" found in the QAPD, Part V, Section 3. Therefore recommend that the statement under the “Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)” be revised to state: <i>“The intent of the definition is met by the description of the Emergency Operating Procedures and Emergency Plan Implementing Procedures in the QAPD”</i> 2. “Emergency Operating Procedures” Part V Section 3.2 of the QAPD is not IAW RG 1.33 in which there is a “Should” statement that must be changed to “Shall.” Therefore recommend QAPD Part V Section 3.2 under Emergency Operating Procedures be revised to state: <i>These documents contain instructions for response to potential emergencies so that a trained operator will</i>

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		<i>know in advance the expected course of events that will identify an emergency and the immediate actions that should shall be taken in response. Format and content of emergency procedures are based on regulatory and Owner's Group(s) guidance that identify potential emergency conditions and generally require such procedures to include a title, symptoms to aid in identification of the nature of the emergency, automatic actions to be expected from protective systems, immediate operator actions for operation of controls or confirmation of automatic actions, and subsequent operator actions to return the reactor to a normal condition or provide for a safe extended shutdown period under abnormal or emergency conditions.</i> NEI Response: The table included in the QAPD update has the corresponding comment modified to include the Emergency Operating Procedures and the Emergency Plan Implementing Procedures. The paragraph describing Emergency Operating Procedures in Part V, Section 3.2 of the QAPD is revised to change the term should to shall.
independent review. Review completed by personnel not having direct responsibility for the work function under review regardless of whether they operate as a part of an	QAPD, Part II, Section 2.7 Comments: The process is described in	<i>The term "independent review" as defined in N18.7 is partially found in Part V section 2.2 rather than Part II, section 2.7, of the QAPD.</i>

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organizational unit or as individual staff members (see review).	the QAPD section rather than a definition.	Recommend the definition of “Independent Review” as described in N18.7 be added to Part V section 1 of the QAPD and correctly referenced under the “Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD).” NEI Response: The table included in the QAPD update is changed to reference QAPD Part V, Section 1 and the comment is deleted. The QAPD, Part V, Section 1 definitions are updated to include a definition for independent review.
off-normal condition procedures. Written procedures which specify operator actions for restoring an operating variable to its normal controlled value when it departs from its range or to restore normal operating conditions following a perturbation. Such actions are invoked following an operator observation or an annunciator alarm indicating a condition which, if not corrected, could degenerate into a condition requiring action under an emergency procedure.	QAPD, Part V, Section 4	N18.7 criteria for “off-normal condition procedures” is not found in Part V of the QAPD. Please include in Part V of the QAPD NEI Response: The QAPD, Part V, Section 3 is revised to include the criteria for off-normal condition procedures to the descriptions of system procedures.
owner organization. The organization, including the onsite operating organization, which has overall legal, financial and technical responsibility for the operation of one or more nuclear power plants.	QAPD, Part IV (by commitment to Reg. Guide 1.8 and ANS-3.1)	“owner organization” as described in N18.7 is found in part II section 1 and NQA-1 Basic Requirement 2 section 1. Recommend “Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)” be corrected to reflect accurate

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		references: NEI Response: The table included in the QAPD update is changed to include reference to NQA-1, Basic Requirement 2 and the QAPD reference is changed to Part II, Section 1
shall, should and may. The word “shall” is used to denote a requirement; the word, “should” to denote a recommendation; and the word “may” to denote permission, neither a requirement nor a recommendation.	NQA-1, Introduction to Part I (as part of the definition of guideline) Comments: Defined in ANS-3.1	The word "may", as defined in N18.7, is not recognized in NQA-1 Recommend “Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)” include the following comment: <i>The word "may" is not recognized in NQA-1 or RG 1.33.</i> NEI Response: The table included in the QAPD update is changed to include the explanation that the word may is not recognized in NQA-1 or Regulatory Guide 1.33. The note in the comments column is clarified to indicate that “these words are also defined in ANS-3.1.”
3. Owner Organization		
3.1 General.		
The owner organization shall establish an administrative controls and quality assurance program which complies with this Standard. The program shall be in effect at all times	QAPD Policy Statement; QAPD Part II, Sections 1.0 and 2.0	The N18.7 description is also found in NQA-1, Basic Requirement 2, Section 1.

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during the operational phase to assure that operational phase activities are carried out without undue risk to the health and safety of the public. The program shall require that decisions affecting safety are made at the proper level of responsibility and with the necessary technical advice and review. The owner organization may delegate to other organizations the work of establishing and executing the administrative controls and quality assurance program or any part thereof, in accordance with this Standard, but shall retain responsibility therefor.		Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate references. NEI Response: The table included in the QAPD update is changed to include the reference to NQA-1, Basic Requirement 2.
3.4.2 Requirements for the Onsite Operating Organization.		
The onsite operating organization shall include one or more individuals knowledgeable in the following fields: nuclear power plant operation; nuclear power plant mechanical, electrical and electronic systems; nuclear engineering; chemistry and radiochemistry; radiation protection; and quality assurance.	QAPD, Part II, Section 1	N18.7 criteria for "off-normal condition procedures" is not found in Part II of the QAPD. Please include in Part II, Section 1 of the QAPD NEI Response: Clarification of this comment is needed to ascertain the intent. If the comment is actually directed toward including the fields in the organization section, then the QAPD will be revised to include a note that the described onsite operating organization needs to include one or more individuals with the listed knowledge.
The Plant Manager shall have overall responsibility for the execution of the administrative controls and quality assurance program at the plant to assure safety. An individual or organizational unit knowledgeable and experienced in nuclear power plant operational phase activities and quality assurance	NQA-1, Basic Requirement 1 and Supplement 1S-1 QAPD, Part II, Section 1 QAPD, Part II, Section 18 for assessing and reporting on the effectiveness of the	1. The N18.7 description is also in NQA-1, Basic Requirement 2 and Supplement 2S-3. Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to

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practices shall be designated and assigned the responsibility to verify that the program is being effectively implemented. Depending on the organizational structure, the individual or organizational unit may report functionally to onsite plant management or an offsite organization (see also 3.2). Reporting to onsite plant management is preferable since such an arrangement usually results in improved communications in identifying problems and initiating corrective action. The individual or organizational unit in this case may receive technical guidance from offsite support groups. This individual's or organizational unit's duties and responsibilities shall be such that the required attention can be devoted, as required, to verifying that the program is being effectively executed. The individual or organizational unit shall report on the effectiveness of the program to the Plant Manager and to other cognizant management as may be designated. Their activities shall be periodically audited by designated offsite personnel.	QA program implementation	reflect accurate references. 2. The relationship between the Vice President-Projects and nuclear plant general manager is not described in the QAPD. Recommend the following statement be added to Part II, section 1.5.1 Vice President – Projects of the QAPD. <i>The Vice President-Project directs the nuclear plant general manager (NPGM) and the nuclear support general manager (NSGM) for each respective plant. Depending on the organizational structure, the individual or organizational unit may report functionally to onsite plant management or an offsite organization. Reporting to onsite plant management is preferable since such an arrangement usually results in improved communications in identifying problems and initiating corrective action. The individual or organizational unit in this case may receive technical guidance from offsite support groups.</i> NEI Response: The table included in the QAPD update is changed to include the reference to NQA-1, Basic Requirement 2 and Supplement 2S-3. The QAPD is revised to include wording similar to the suggested text as a note in the

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		sample organization description.
4.5 Audit Program		
Audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of all safety-related functions is completed within a period of two years. Audits shall include as a minimum verification of compliance and effectiveness of implementation of internal rules, procedures (for example, operating, design, procurement, maintenance, modification, refueling, surveillance, test, security and radiation control procedures and the emergency plan), regulations and license provisions; programs for training, retraining, qualification and performance of operating staff; corrective actions taken following abnormal occurrences; and observation of performance of operating, refueling, maintenance and modification activities, including associated record keeping. Reg. Guide 1.33 – C. Regulatory Position 4. Section 4.5, "Audit Program," of ANSI N18.7-1976/ANS-3.2 states that audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to ensure that an audit of all safety-related functions is completed within a period of 2 years. In amplification of this requirement, the following program elements should be audited at the indicated frequencies:	QAPD, Part II, Section 18 Comments: The utilities' have modified their audit programs over the years to include risk-informed scheduling and controlling the scope of the audits as alternate methods of satisfying the amplified requirements stated in RG 1.33 for specific elements to be audited more frequently than every two years.	Recommend reference to RG 1.33 to be placed at end of 4.3.4 of "American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions" to avoid confusion between RG 1.33 and N18.7 NEI Response: The subject Regulatory Position is specific to Section 4.5, it doesn't seem appropriate to place it at the end of section 4.3.4. A formatting change is made throughout the updated table to isolate the Reg. Guide 1.33 text from the ANSI N18.7 text.

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a. The results of actions taken to correct deficiencies that affect nuclear safety and occur in facility equipment, structures, systems, or method of operation-at least once per 6 months. b. The conformance of facility operation to provisions contained within the technical specifications and applicable license conditions-at least once per 12 months. c. The performance, training, and qualifications of the facility staff-at least once per 12 months.		
5.2.2 Procedure Adherence.		
When entry into a closed system is required, control measures shall be established to prevent entry of extraneous material and to assure that foreign material is removed before the system is reclosed.	NQA-1, Subpart 2.3 QAPD, Part II, Section 13.1 and	The N18.7 description is found in Part V, section 4, of the QAPD. Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate reference. NEI Response: The table included in the QAPD update includes the reference to Part V, Section 4.
Procedures shall also provide for the identification of items which have satisfactorily passed required inspections and tests, where necessary to preclude inadvertent bypassing of such inspections and tests. In cases where required documentary evidence is not available, the associated equipment or materials must be considered nonconforming in accordance with Section 5.2.14. Until suitable documentary evidence is available to show the equipment or material is in conformance,	NQA-1, Basic Requirement 14	The N18.7 description is also found in Part II, section 14, of the QAPD. Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate reference. NEI Response: The table included in the

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affected systems shall be considered to be inoperable and reliance shall not be placed on such systems to fulfill their intended safety functions.		QAPD update is changed to include the recommended reference.
When equipment is ready to be returned to service, operating personnel shall place the equipment in operation and verify and document its functional acceptability. Attention shall be given to restoration of normal conditions, such as removal of jumpers or signals used in maintenance or testing or such as returning valves, breakers or switches to proper start-up or operating positions from "test" or "manual" positions. When placed into service, the equipment should receive additional surveillance during the run-in period.	NQA-1, Basic Requirement 14, and Subpart 18, Section 2.2 QAPD, Part V, Section 4	The N18.7 description is found in NQA-1 subpart 2.18 rather than subpart 18. Recommend "Applicable Section of NQA-1- 1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate references. NEI Response: The table included in the QAPD update is revised to correct the omission of the 2 in Subpart 2.18.
5.2.7 Maintenance and Modifications.		
Maintenance or modifications which may affect functioning of safety-related structures, systems, or components shall be performed in a manner to ensure quality at least equivalent to that specified in original design bases and requirements, materials specifications and inspection requirements. A suitable level of confidence in structures, systems, or components on which maintenance or modifications have been performed shall be attained by appropriate inspection and performance testing (see also 5.2.17 and 5.3.5).	NQA-1, Introduction to Part II, and Subpart 2.18	The N18.7 description is found in Part V, Section 5 of the QAPD. Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate references. NEI Response: The table included in the QAPD update is changed to include the recommended reference.
5.2.13.4 Handling, Storage and Shipping.		
Measures shall be provided to control handling, storage and shipping, including cleaning, packaging and preservation of material and equipment in accordance with established	NQA-1, Basic Requirement 13, Supplement 13S-1, Section 2	The N18.7 description is found in NQA-1 section 3.1 rather than section 2. Recommend "Applicable Section of NQA-1-1994 or NEI

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instructions, procedures or drawings, to prevent damage, deterioration and loss. When necessary for particular items, special coverings, special equipment and special protective environments, such as inert gas atmosphere, specific moisture content levels and temperature levels shall be specified, provided, and their existence verified.		06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate references. NEI Response: The table included in the QAPD update is changed to delete the second sentence in the table row since it is also contained in the next table row with the correct reference.
When necessary for particular items, special coverings, special equipment and special protective environments, such as inert gas atmosphere, specific moisture content levels and temperature levels shall be specified, provided, and their existence verified.	NQA-1, Supplement 13S-1, Section 3.1	N18.7 description is repeated in previous cell recommend deletion of row. NEI Response: The table included in the QAPD update addresses the substance of this comment through deletion of the duplicate information in the previous table row.
Special handling tools and equipment <u>should</u> be provided and controlled as necessary to ensure safe and adequate handling. Reg. Guide 1.33 – C. Regulatory Position 5.e. The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard: e. Section 5.2.13.4–The guideline concerning special handling tools and equipment. [NOTE: The affected “should” word is underlined in the N18.7 excerpt above.]	NQA-1, Supplement 13S-1, Section 3.3	Recommend RG 1.33 to be placed at end of 5.2.13.4 of “American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions” to avoid confusion between RG 1.33 and N18.7 NEI Response: The table included in the QAPD update is modified to make the text from Reg. Guide 1.33 more distinct from the ANSI N18.7 text.

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5.2.14 Nonconforming Items.		
These procedures shall include as appropriate, instructions for identification, documentation, segregation, disposition and notification to affected organizations.	NQA-1, Basic Requirement 15, and Subpart 2.18, Section 4	Subpart 2.18, Section 4 not applicable to N18.7 description. The N18.7 description is also found in Section 15 of the QAPD. Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate references. NEI Response: The table included in the QAPD update is revised to remove the NQA-1 Subpart 2.18 reference and include a reference to the QAPD, Part II, Section 15.
5.2.17 Inspections.		
Such inspections shall be performed by qualified individuals other than those who performed or directly supervised the activity being inspected. Inspection of operating activities (work functions associated with normal operation of the plant, routine maintenance, and certain technical services routinely assigned to the onsite operating organization) may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. These independent inspections, i.e., those performed by individuals not assigned first-line supervisory responsibility for the conduct of the work, are not intended to dilute or replace the clear responsibility of first-line supervisors for the quality of work performed under their supervision.	NQA-1 Basic Requirement 10, and Supplement 10S-1 QAPD, Part II, Section 10	NQA-1 and QAPD has no guidance on first-line/second-line supervisory responsibility description as stated in N18.7 Recommend "Note Exemption" in comments from QAPD Part II, Section 10 to be placed in "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" NEI Response: The table included in the QAPD update is revised to include a note regarding the exemption in QAPD Part II, Section 10.

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When inspection techniques require specialized qualifications or skills, personnel performing the inspection shall meet applicable licensing requirements, codes, and standards appropriate to the discipline involved (see also Sections 5.2.7, 5.2.6 and 5.3.10).	NQA-1, Supplement 10S-1, Section 3.2; Supplements 2S-1 and 2S-2	The N18.7 description is also found in 2S-3 of NQA-1. Recommend "Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)" be corrected to reflect accurate references. NEI Response: The statement from ANSI N18.7 is directed toward the inspection function. NQA-1, Supplement 2S-3 is specific to the audit function. No changes to the table included in the QAPD update is necessary for this comment.
5.3 Preparation of Instructions and Procedures. The administrative controls and quality assurance program shall be carried out throughout plant life in accordance with written procedures. Activities affecting safety at nuclear power plants shall be described by written procedures of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions and procedures. Reg. Guide 1.33 – Regulatory Position C, Item 1 ANSI N18.7-1976/ANS-3.2 requires the preparation of many procedures to carry out an effective quality assurance program. Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," to this regulatory guide should be used as guidance to ensure minimum procedural coverage for plant operating activities, including related maintenance activities. Appendix A lists typical safety-related activities that should be covered by written procedures but	NQA-1, Basic Requirement 5 QAPD, Part II, Section 5; Part V, Section 3	Recommend RG 1.33 to be placed at end of 5.3 of "American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions" to avoid confusion between RG 1.33 and N18.7 NEI Response: The table included in the QAPD update is modified to make the text from Reg. Guide 1.33 more distinct from the ANSI N18.7 text.

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does not provide a complete listing of needed procedures. Many other activities carried out during the operation phase of a nuclear power plant require written procedures not included in Appendix A. Appendix A may also contain procedures that are not applicable to an applicant because of the configuration of the nuclear power plant. The procedures listed in Appendix A may be combined, separated, or deleted to conform to the applicant's procedures plan.		
5.3.9.1 Emergency Procedure Format and Content.		
Emergency procedures shall include, as appropriate, the following elements: (1) Title. The title <u>should</u> be descriptive of the emergency for which the procedure is provided. (2) Symptoms. Symptoms <u>should</u> be included to aid in the identification of the emergency. They should include alarms, operating conditions and probable magnitudes of parameter changes. If a condition is peculiar only to the emergency under consideration, it should be listed first. (3) Automatic Actions. The automatic actions that will probably occur as a result of the emergency <u>should</u> be identified. (4) Immediate Operator Actions. These steps <u>should</u> specify immediate actions for operation of controls or confirmation of automatic actions that are required to stop the degradation of conditions and mitigate their consequences. Examples include the following: (a) The verification of automatic actions. This step is based on equipment operating as designed and the sequence of events	QAPD, Part V, Section 3.2 Comments: Requirements for Emergency Procedures have been updated through the years through industry initiatives and lessons learned.	QAPD not as detailed as N18.7 on the description of "Emergency Procedure Format and Content" Recommend statement placed N18.7 at the end of QAPD, Part V, Section 3.1: <i>Emergency procedures shall include, as appropriate, the following elements:</i> <i>(1) Title. The title <u>shall</u> be descriptive of the emergency for which the procedure is provided.</i> <i>(2) Symptoms. Symptoms <u>shall</u> be included to aid in the identification of the emergency. They should include alarms, operating conditions and probable magnitudes of parameter changes. If a condition is peculiar only to the emergency under consideration, it should be listed first.</i> <i>(3) Automatic Actions. The automatic actions</i>

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For discussion April 27, 2010

American National Standard N18.7-1976/ANS-3.2 Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants / Regulatory Guide 1.33, Rev. 2 Regulatory Positions	Applicable Section of NQA-1-1994 or NEI 06-14 Quality Assurance Program Description (QAPD)	NRC STAFF COMMENTS/ RECOMMENDATIONS And DRAFT NEI Responses
following an expected course. Since variations from the expected course may occur, operators should be prepared to manipulate controls as necessary to cope with the problem. However, the procedure should caution the operator not to place systems in "manual" unless misoperation in "automatic" is apparent, and should require him to make frequent checks for proper operation of systems placed in manual control. (b) Assurance that reactor is in a safe condition. This step usually means shutdown of the reactor with sufficient reactivity margin and establishment of required core cooling. (c) Notification to plant personnel of the nature of the emergency. (d) Determination that the reactor coolant system pressure boundary is intact. (e) Confirmation of the availability of adequate power sources. (f) Confirmation that containment and exhaust systems are operating properly in order to prevent uncontrolled release of radioactivity. (5) Subsequent Operator Actions. Steps <u>should</u> be included to return the reactor to a normal condition or to provide for a safe extended shutdown period under abnormal or emergency conditions. Reg. Guide 1.33 – C. Regulatory Position 5.j. The guidelines (indicated by the verb "should") of ANSI N18.7-1976/ANS-3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb "shall") of the standard: j. Section 5.3.9.1–The guidelines that describe the content		<i>that will probably occur as a result of the emergency shall be identified.</i> <i>(4) Immediate Operator Actions. These steps shall specify immediate actions for operation of controls or confirmation of automatic actions that are required to stop the degradation of conditions and mitigate their consequences. Examples include the following:</i> <i>(a) The verification of automatic actions. This step is based on equipment operating as designed and the sequence of events following an expected course. Since variations from the expected course may occur, operators should be prepared to manipulate controls as necessary to cope with the problem. However, the procedure should caution the operator not to place systems in "manual" unless misoperation in "automatic" is apparent, and should require him to make frequent checks for proper operation of systems placed in manual control.</i> <i>(b) Assurance that reactor is in a safe condition. This step usually means shutdown of the reactor with sufficient reactivity margin and establishment of required core cooling.</i> <i>(c) Notification to plant personnel of the nature of the emergency.</i> <i>(d) Determination that the reactor coolant</i>

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(excluding format) for: the title in Section 5.3.9.1(1); the inclusion of symptoms to aid in identification in Section 5.3.9.1(2); automatic actions in Section 5.3.9.1(3); immediate operator action, excluding those guidelines contained in the examples, in Section 5.3.9.1(4); and subsequent operator actions in Section 5.3.9.1(5). [NOTE: The affected “should” words are underlined in the N18.7 excerpt above.]		<i>system pressure boundary is intact.</i> <i>(e) Confirmation of the availability of</i> <i>adequate power sources.</i> <i>(f) Confirmation that containment and exhaust</i> <i>systems are operating properly in order to</i> <i>prevent uncontrolled release of radioactivity.</i> <i>(5) Subsequent Operator Actions. Steps <u>shall</u></i> <i>be included to return the reactor to a normal</i> <i>condition or to provide for a safe extended</i> <i>shutdown period under abnormal or</i> <i>emergency conditions.</i> NEI Response: The QAPD, Part V paragraph on emergency operating procedures will be revised to change the term should to shall (as noted for a previous comment), remove the term “generally”, and include the list of examples of immediate operator actions.