

## Conduct of Operations—Implementation Matrix

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### Advanced Mixed Waste Treatment Project

Approved:

*(Signature on file. See DCR-6374.)*

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Operations Manager

05/01/08

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Date

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## 1.0 PURPOSE/SCOPE

The purpose of this document is to provide an implementation matrix listing used to document the Advanced Mixed Waste Treatment Project (AMWTP) Conduct of Operations Implementation Matrix. This matrix is used to document the applicability of DOE Order 5480.19, Conduct of Operations for DOE Facilities, to AMWTP's operations.

This document is applicable to all operational activities associated with AMWTP phase III operations including retrieval, characterization, treatment, shipping, and storage operations. Functional area and positional applicability and responsibilities to the individual requirements of DOE Order 5480.19 are defined herein and outlined in Section 4.0 of this procedure.

## 2.0 DISCUSSION

A graded approach was used in the application of the guidelines provided in DOE Order 5480.19, Attachment 1, to assure that the depth of detail required and the magnitude of resources expended for operations at the AMWTP are commensurate with the facility's programmatic importance and potential environmental, safety, and/or health impacts.

Conformance with each of the guidelines is documented in Section 3.0 of this procedure. Specifically, Section 3.0 indicates the following:

- Whether a specific guideline applies to the AMWTP
- Where and how each of the applicable guidelines of the Order are applied within the AMWTP's policies and procedures, and
- Identifies any deviations or exemptions and supplies the rationale for taking the deviation or exemption from the guidelines.

Section 4.0 summarizes the applicability of DOE Order 5480.19 guidelines to the AMWTP positions as defined in Section 5.0.

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### 3.0 CONDUCT OF OPERATIONS IMPLEMENTATION MATRIX

Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter I, Operations Organization and Administration</b>		
<i>Guideline C1 - Operations Policies</i>		
Procedures or other definitive documentation should specify policies that are to be applied for operations; these policies should specify goals and the means to achieve those goals. These documents should also provide for the types of controls necessary to implement policies as discussed in this and other chapters of the guidelines.	Yes	MP-COPS-9.2
Responsibilities for implementing these policies including the responsibility of shift personnel, if applicable should be clearly defined.	Yes	MP-COPS-9.2
Operations personnel should clearly understand their authority, responsibility, accountability, and interfaces with other groups.	Yes	MP-COPS-9.2
Physical security should be in accordance with DOE 5630.11.	Yes	DOE 5630.11 has been superseded by DOE O 470.4. DOE O 470.4 requirements for physical security are implemented at the AMWTP by PLN-SCTY-16.8.
<b>Chapter I, Operations Organization and Administration</b>		
<i>Guideline C2 - Resources</i>		
The operations supervisor for DOE facilities should be provided with sufficient resources in materials and personnel to accomplish assigned tasks without requiring excessive overtime by the operations staff. These resources should include technical personnel needed to support the operations.	Yes	MP-COPS-9.2
A long-range staffing plan that anticipates personnel losses should be developed and implemented.	Yes	MP-COPS-9.2 RPT-PEP-01
<b>Chapter I, Operations Organization and Administration</b>		
<i>Guideline C3 - Monitoring of Operating Performance</i>		
As described in Chapter VI, operating problems should be documented and evaluated. Based on assessments of these problems, corrective actions should be taken to improve the performance of the operations department performance.	Yes	INST-COPS-9.6.1 MP-M&IA-17.1 MP-Q&SI-5.3
Safety, Environment, and Operating goals should be used as a management tool for involving cognizant groups or individuals in improving operating performance and for measuring operating effectiveness.	Yes	MP-COPS-9.2

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<b>Guideline</b>	<b>Applicable</b>	<b>Implementation Document and/or Deviation or Exception Taken</b>
Operations goals in areas such-as the following should be established: minimizing the unavailability of safety systems; minimizing personnel errors; As-Low-As Reasonably-Achievable (ALARA); minimizing lost facility capability; minimizing the number of unscheduled facility shutdowns per year; timely completion of scheduled surveillance; minimizing the amount of overtime; achieving and maintaining complete staffing and training of shift positions; minimizing waste; and minimizing the number of lighted annunciators.	Yes	MP-COPS-9.2
Goals should be auditable, measurable, realistic, and challenging.	Yes	MP-COPS-9.2 RPT-PEP-01
Meeting goals should require a definite set of actions or an action plan. The action plan should be developed with input from personnel involved in conducting operations, reviewed by the operations supervisor at DOE facilities, and approved by management.	Yes	MP-COPS-9.2 RPT-PEP-01
The progress toward completing the action plan and achieving goals should be monitored periodically. If results show a significant variance from the desired progress in achieving goals, management should review the action plan to ensure that it is adequate and is being executed.	Yes	MP-M&IA-17.1 RPT-PEP-01
An audit of performance relative to operating goals should be provided to facility management and DOE. This summary should include an explanation of performance and actions planned to improve future performance.	Yes	MP-M&IA-17.1 Operations Management Group Management Assessment Schedule
Line managers and supervisors should perform routine observations of personnel performing operating activities. Deficiencies identified should be documented, trended, and corrected.	Yes	CTR-001 MP-M&IA-17.1 MP-Q&SI-5.3 Operations Management Group Management Assessment Schedule
Other groups, such as quality assurance personnel, should periodically review and assess operation performance.	Yes	MP-M&IA-17.2
<b>Chapter I, Operations Organization and Administration</b>		
<i>Guideline C4 —Accountability</i>		
Workers and their supervisors should be held accountable for operating performance.	Yes	MP-COPS-9.2
Personnel involved in significant or frequent violations of operating practices should be counseled, retrained, and disciplined, as appropriate.	Yes	MP-ADMN-1.4 MP-ADMN-1.5

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Supervisor performance appraisals and promotions should include an assessment of operating performance.	Yes	MP-ADMN-1.5
<b>Chapter I, Operations Organization and Administration</b>		
Guideline C5 — <i>Management Training</i>		
Formalized supervisory and management training should be incorporated into training programs.	Yes	MP-RTQP-14.1
<b>Chapter I, Operations Organization and Administration</b>		
Guideline C6 — <i>Planning for Safety</i>		
Facility guidance should exist which describes safety preplanning requirements for all operational activities. The guidance should explain the role of safety analysis reviews, job safety analyses, and the handling of safety matters.	Yes	INST-COPS-9.18.1 INST-COPS-9.18.2 INST-COPS-9.18.4 MP-COPS-9.29
All operations personnel should understand the safety planning requirements.	Yes	INST-COPS-9.18.1 INST-COPS-9.18.2 INST-COPS-9.18.4
<b>Chapter II, Shift Routines and Operating Practices</b>		
Guideline C1 — <i>Shift Status Practices</i>		
The operator responsible for the facility should be promptly notified of all changes in facility status, abnormalities, or difficulties encountered in performing assigned tasks. Similarly, the operator should notify the shift supervisor (or cognizant manager for research and test facilities) of any unexpected situations.	Yes	MP-COPS-9.3
<b>Chapter II, Shift Routines and Operating Practices</b>		
Guideline C2 — <i>Safety Practices</i>		
Operations personnel should adhere to the requirements of the facility industrial safety program.	Yes	INST-COPS-9.18.2 INST-COPS-9.18.4 PD-ISIH-01 <a href="#">MP-COPS-9.3</a>
Proper hearing, eye, head, foot, and respiratory protection should be worn in designated areas to reduce the potential for injury.	Yes	INST-COPS-9.18.1 <a href="#">MP-COPS-9.3</a> <a href="#">MP-ISIH-2.2</a> PD-ISIH-01
Similarly, ladders or other approved means should be used to access equipment located in the overhead when permanent steps or catwalks are not available.	Yes	INST-COPS-9.18.4 <a href="#">MP-ISIH-2.22</a> PD-ISIH-01

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Operators should exercise appropriate precautions when entering or working in or around energized panels or equipment. For example, operators should ensure that electrical panel closures are securely fastened prior to making the breakers operable to energize equipment.	Yes	MP-CMNT-10.9 PD-ISIH-01
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C3 — Operator Inspection Tours</i>		
Operator tours should be of sufficient detail to ensure that the status of equipment is known.	Yes	MP-COPS-9.3
Each operator should conduct a thorough tour of all areas within his/her responsibility, making appropriate equipment inspections at designated times at least once per shift.	Yes	MP-COPS-9.3
A tour normally should be made early in the shift, before the operator attends to other duties, so that he/she can become familiar with the condition and status of equipment for which he/she is responsible. During the tour, equipment should be inspected to ensure that it is operating properly or, in the case of standby equipment, that it is fully operable.	Yes	MP-COPS-9.3
The status of equipment (i.e., operating, standby, work in progress, or out-of-service) should be determined.	Yes	MP-COPS-9.3
Components, such as electrical panels, alarm panels, auto-start standby equipment, and breakers should be inspected for abnormal or unusual conditions.	Yes	MP-COPS-9.3
Unexpected conditions such as equipment vibrations, unusual noises or smells, or excessive temperatures should be reported to the control room.	Yes	MP-COPS-9.3
Equipment panel alarm light bulbs and annunciators should be periodically checked to ensure satisfactory operation of visual and audible abnormal condition indicators.	Yes	MP-COPS-9.3
Each operator should inspect all areas for which he/she is responsible and note any deficiencies that may be present. These deficiencies may include steam, oil, or water leaks; fire and safety hazards or radiological problems; seismic concerns such as open electrical panels and mobile objects; clogged floor drains; housekeeping or cleanliness problems; and building deficiencies such as inoperative lighting, roof leaks, or doors that do not close properly.	Yes	MP-COPS-9.3
Operators should take appropriate action to correct or report deficiencies noted during tours.	Yes	MP-COPS-9.3

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Equipment deficiencies should be documented in accordance with the facility maintenance work request system.	Yes	MP-COPS-9.3 MP-COPS-9.7 MP-Q&SI-5.4
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C4 —Round/Tours and Inspection Sheets</i>		
Round inspection sheets should be developed and approved by the operations supervisor (or cognizant managers for test and research facilities). They should include areas located within the particular shift position and important parameters for equipment.	Yes	MP-COPS-9.3
Where appropriate, equipment parameters should include maximum/minimum values or expected operating ranges.	Yes	MP-COPS-9.3
Safety limits derived from Technical Specifications or Operational Safety Requirements should be highlighted.	Yes	MP-COPS-9.3
Equipment should be listed on round sheets in the same order that it would be encountered during a normal tour of the operating station.	Yes	MP-COPS-9.3
Round sheets should include a narrative section	Yes	MP-COPS-9.3
Operators should use the narrative section to document evolutions, causes of abnormal conditions, and actions correct abnormal conditions.	Yes	MP-COPS-9.3
Data should be recorded on round sheets at the times specified by the operations supervisor.	Yes	MP-COPS-9.3
When round sheet data is not obtained within one hour of the specified time, the actual time the data was obtained should be noted on the round sheet.	Yes	MP-COPS-9.3
Parameters exceeding the specified maximum/minimum values should be circled or otherwise highlighted on the round sheet and promptly reported to the control room and/or the cognizant operations manager.	Yes	MP-COPS-9.3
The causes of abnormal indications should be promptly investigated with supervisors becoming involved as appropriate.	Yes	MP-COPS-9.3
The round sheet data should be reviewed by a supervisor each shift to identify trends or abnormal readings and to verify that data has been properly recorded.	Yes	MP-COPS-9.3
Operator rounds should be periodically monitored by supervisory personnel to ensure that comprehensive tours continue to be conducted, including, as necessary, periodic inspections of equipment and areas not listed on the round sheets.	Yes	MP-COPS-9.3

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<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C5 —Personnel Protection</i>		
Operations personnel should be appropriately qualified to follow good personnel protection practices to maintain personnel exposure as low as reasonably achievable (ALARA) to radiation (DOE 5480.11), chemicals, electromagnetic fields, toxic materials, or other personnel hazards.	Yes	INST-COPS-9.18.1 PD-ISIH-01 <a href="#">MP-RS&amp;C-6.3</a>
Operators should adhere to all posted personnel protection requirements and observe proper practices and precautions while in controlled areas.	Yes	<a href="#">MP-RS&amp;C-6.3</a> <a href="#">MP-ISIH-2.26</a> PD-ISIH-01
Operators should correctly utilize appropriate monitoring instruments when required.	Yes	<a href="#">MP-RS&amp;C-6.3</a> PD-ISIH-01
Operators should be cognizant of their own exposure levels and take appropriate action to minimize exposures.	Yes	MP-RS&C-6.3
Operators should be knowledgeable of the proper use of radiation work permits, safe work permits, or inhalation limits, where applicable.	Yes	INST-COPS-9.18.4 INST-COPS-9.18.1 INST-COPS-9.18.2 PD-ISIH-01
Operators should promptly report protection deficiencies and hazards to the control personnel and/or appropriate protection personnel. Operators should take appropriate immediate actions to reduce or correct the hazards.	Yes	INST-COPS-9.18.4 INST-COPS-9.18.1 INST-COPS-9.18.2 MP-COPS-9.3 MP-COPS-9.7 PD-ISIH-01
Appropriate protection personnel should be informed prior to evolutions or activities that have a potential to significantly change conditions in the facility.	Yes	INST-COPS-9.18.4 INST-COPS-9.18.1 INST-COPS-9.18.2 PD-COPS-9.18
Operations supervisory personnel should periodically review exposure trends of operating personnel under their supervision.	Yes	MP-RS&C-6.3
Emphasis should be placed on determining the adverse factors that contribute to personnel exposures and minimizing those factors to keep exposures as low as reasonably achievable.	Yes	MP-RS&C-6.3
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C6 —Response to Indications</i>		
Operators should believe instrument readings and treat them as accurate unless proven otherwise.	Yes	MP-COPS-9.3

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Operators should check other indications, if possible, when unexpected readings are observed.	Yes	MP-COPS-9.3
Prompt action should be taken to investigate the cause of abnormal or unexpected indications so that prompt corrective action can occur.	Yes	MP-COPS-9.3
When malfunctioning or inaccurate instruments are discovered, they should be appropriately identified to prevent subsequent confusion and instrument and control personnel should be notified to effect repairs.	Yes	MP-COPS-9.3 MP-COPS-9.32
In situations of operator doubt, operators should be instructed to achieve facility, personnel, and environmental safety above facility production.	Yes	MP-COPS-9.3
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C7 —Resetting Protective Devices</i>		
When protective devices trip (e.g., circuit breakers, fuses, reactor protection channels where multi-channel logic exists), an attempt should be made to understand the cause of the trip before the device is reset. Normally, before action is taken, an operator should ensure no abnormal condition exists that would preclude reset.	Yes	MP-COPS-9.3
The operations management should provide the appropriate guidance so that tripped protective devices will be properly addressed.	Yes	MP-COPS-9.3
Facility trips and unplanned forced shutdown require a thorough investigation in accordance with the guidance of Chapter VI.	Yes	MP-COPS-9.6 INST-COPS-9.6.1
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C8 —Load Changes</i>		
The shift supervisor, the control room lead operator, or the cognizant manager for a test and research facility should approve all power or process rate changes because these persons are held accountable for safe operation.	No	No power or process rate changes affect safety
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C9 —Authority to Operate Equipment</i>		
The overall operation of the facility should be directed by the operations supervisor for a large DOE facility and by the cognizant manager for a test and research facility.	Yes	MP-COPS-9.2
Operations management should ensure that only trained and qualified personnel operate plant equipment.	Yes	MP-COPS-9.3
In general, the operator and the operations supervisor should be aware of all activities affecting equipment.	Yes	MP-COPS-9.3

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The operations supervisor should specify those general activities that may normally be performed without informing the supervisor and should amplify these specifications as appropriate.	Yes	MP-COPS-9.3
Non-routine operation of controls should not be made without specific approval of the shift supervisor.	Yes	MP-COPS-9.3
During emergencies, operators may take necessary immediate actions required to ensure personnel, plant, and environmental safety without obtaining prior approval; however, appropriate supervisors should be promptly informed of these actions.	Yes	MP-COPS-9.2 MP-COPS-9.3 MP-COPS-9.28
Operators should be instructed that plant safety should be achieved over facility production for off normal and emergency facility conditions.	Yes	MP-COPS-9.3 MP-COPS-9.28
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C10 —Shift Operating Bases</i>		
An operating base should be established for each shift position.	Yes	MP-COPS-9.3
Each operating base should be equipped with appropriate office equipment for the operator to maintain necessary procedures and references and to conduct administrative duties, and necessary communication equipment should be available at the operating base.	Yes	MP-COPS-9.3
Shift turnovers should be conducted within those facility areas assigned to the operations department and typically at the operating base.	Yes	MP-COPS-9.3 MP-COPS-9.10
The operating bases should be located at a convenient place within the area of responsibility for that shift position.	Yes	MP-COPS-9.3
<b>Chapter II, Shift Routines and Operating Practices</b>		
<i>Guideline C11 —Potentially Distractive Written Material and Devices</i>		
Written material that does not relate to operation and entertainment devices (such as radios, televisions, tape players, and computer games) should be prohibited from use by on-duty operations personnel in order to minimize distractions from their responsibilities.	Yes	MP-COPS-9.3
Written material and entertainment devices should not be brought to work stations.	Yes	MP-COPS-9.3
The operations supervisor (or equivalent) should provide guidance to the shift crews for the use of potentially distractive materials and devices.	Yes	MP-COPS-9.3

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<b>Chapter III, Control Area Activities for DOE Facilities</b>		
Guideline C1 — <i>Control Area Activities</i>		
Control area access should be limited to those persons on official business only.	Yes	MP-COPS-9.4
Access to the “at-the-controls” area should be restricted to persons who need to be in the area. Entry into this area should be granted by designated individuals, and persons who might need to enter this area should know who can grant access.	Yes	MP-COPS-9.4
The “at-the-controls” area of the control room should be clearly identified, and its boundary should be understood by all persons who are granted access to the control room.	Yes	MP-COPS-9.4
<b>Chapter III, Control Area Activities for DOE Facilities</b>		
Guideline C2 — <i>Professional Behavior</i>		
Professional behavior should be displayed in the control area at all times.	Yes	MP-COPS-9.4
Only activities essential to supporting operation and activities authorized by management should be conducted in the control area.	Yes	MP-COPS-9.4
Potentially distracting activities (such as radio listening, game playing, and horseplay) should be prohibited.	Yes	MP-COPS-9.3 MP-COPS-9.4
Non- job-related discussions should be minimized so as not to interfere with conduct of the shift or monitoring of key parameters.	Yes	MP-COPS-9.4
<b>Chapter III, Control Area Activities for DOE Facilities</b>		
Guideline C3 — <i>Monitoring the Main Control Panels</i>		
Operators should be alert and attentive to control panel indications and alarms.	Yes	MP-COPS-9.3
Control panel indications should be monitored frequently, and prompt action should be taken to determine the cause of and correct abnormalities.	Yes	MP-COPS-9.3
Emphasis should be placed on closely monitoring and trending to detect problem situations early.	Yes	MP-COPS-9.3
Operator response to alarms should be timely, and actions should be taken to address and correct the alarm causes.	Yes	MP-COPS-9.3
All reasonable action should be taken to clear alarming conditions.	Yes	MP-COPS-9.3

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The number of evolutions affecting control panel indications that are performed concurrently should be limited so that the operators' ability to detect and respond to abnormal conditions will not be compromised.	Yes	MP-COPS-9.3
If computer or automated systems are in place, there should be an appropriate backup to those systems.	Yes	MP-COPS-9.3
<b>Chapter III, Control Area Activities for DOE Facilities</b>		
<i>Guideline C4—Control Operator Ancillary Duties</i>		
Duties assigned to operators should not interfere with their ability to monitor facility parameters.	Yes	MP-COPS-9.3
The administrative workload of operators responsible for monitoring and operating the control board should be minimized.	Yes	MP-COPS-9.3
<b>Chapter III, Control Area Activities for DOE Facilities</b>		
<i>Guideline C5—Operation of Control Area Equipment</i>		
Only persons specifically authorized by the administrative procedures of the operations department should operate control area equipment.	Yes	MP-COPS-9.4
When trainees operate this equipment, they should be supervised and controlled by the operator who normally would perform the operations.	Yes	MP-COPS-9.34 MP-RTQP-14.13
<b>Chapter IV, Communications</b>		
<i>Guideline C1—Emergency Communications Equipment</i>		
Methods should be implemented to ensure all facility personnel are promptly alerted to facility emergencies.	Yes	MP-COPS-9.5
When personnel are working in areas where the public address system or emergency signals cannot be heard, alternate methods for alerting these persons should be utilized.	Yes	MP-COPS-9.5
Emergency communications systems should be periodically tested to ensure that they are functional.	Yes	MP-COPS-9.5
Control areas should have the capability of overriding other users of the public address system for emergency announcements.	Yes	MP-COPS-9.5
<b>Chapter IV, Communications</b>		
<i>Guideline C2—Public Address Systems</i>		
Use of the facility public address system (page) should be administratively controlled to ensure it retains its effectiveness in contacting plant personnel.	Yes	MP-COPS-9.5

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Excessive use of the public address system for paging of personnel and unnecessary announcements should be avoided.	Yes	MP-COPS-9.5
Facility telephones and other point-to-point communications channels should be used in lieu of the public address system whenever practical.	Yes	MP-COPS-9.5
<b>Chapter IV, Communications</b> Guideline C3— <i>Contacting Operators</i>		
Methods should be implemented to ensure that control areas can quickly contact on-shift operators or supervisors.	Yes	MP-COPS-9.5
To avoid operator confusion, distinction should be made between a routine and emergency notification.	Yes	MP-COPS-9.5
<b>Chapter IV, Communications</b> Guideline C4— <i>Radios</i>		
Areas where radio use is prohibited should be delineated.	Yes	MP-COPS-9.5
Instructions regarding frequencies (channels) and postings should be provided.	Yes	MP-COPS-9.5
<b>Chapter IV, Communications</b> Guideline C5— <i>Abbreviations and Acronyms</i>		
Only abbreviations and acronyms obtained from an approved list should be used in facility communications. Both written and spoken terms should be prescribed in the list.	Yes	AMWTP will use written abbreviations and acronyms that are defined in facility, project, and other equipment documents or have previously been identified in logs rather than a published list of abbreviations and acronyms. Spoken abbreviations and acronyms will be prescribed by a list in accordance with MP-COPS-9.5
<b>Chapter IV, Communications</b> Guideline C6— <i>Oral Instructions and Information Communications</i>		
Oral instructions should be clear and concise.	Yes	MP-COPS-9.5
In all communications, the sender and intended receiver should be readily identifiable.	Yes	MP-COPS-9.5
Instructions involving the operation of equipment should be repeated by the receiver to the extent necessary for the sender to ensure the instructions are correctly understood.	Yes	MP-COPS-9.5

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<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C1—Adherence to Training Programs</i>		
The knowledge requirements for each item should be defined as well as what the trainee must do (perform, simulate, observe, or discuss).	Yes	MP-RTQP-14.4 MP-RTQP-14.7 MP-RTQP-14.9 MP-RTQP-14.11
<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C2—On Shift Instructor Qualification</i>		
On-shift training should be conducted by qualified operators.	Yes	MP-COPS-9.34 MP-RTQP-14.13
The on-shift instructors should be specifically selected, taking into account communication skills, technical knowledge, and ability to provide trainees with hands-on experience.	Yes	MP-RTQP-14.2 MP-RTQP-14.13
<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C3—Qualified Operator Supervision and Control of Trainees</i>		
Whenever trainees operate equipment, a qualified operator serving as an on-shift instructor should observe the trainee in order to ensure the trainee does not make an error that could adversely impact the facility.	Yes	MP-COPS-9.34 MP-RTQP-14.13
Until the trainee has demonstrated reasonable proficiency in an operation, he/she should discuss the procedure steps, cautions, and notes with the instructor.	Yes	MP-COPS-9.34
Trainees should also demonstrate actions to be performed by pointing to the control switch, valve, breaker, etc., that will be manipulated.	Yes	MP-COPS-9.34 MP-RTQP-14.13
The instructor should always monitor the trainee closely and remain in a position to intervene or assume control, if necessary.	Yes	MP-COPS-9.34 MP-RTQP-14.13
When trainees record equipment parameters on official round sheets (as opposed to practice round sheets) or logs, the on-shift instructor should verify that the recorded information is correct.	Yes	MP-COPS-9.3 MP-COPS-9.34
<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C4—Operator Qualification Program Approval</i>		
The operator qualification program should be approved by the operations supervisor, and changes to the program should be coordinated with the training department.	Yes	MP-COPS-9.34 MP-RTQP-14.4
For operating positions requiring certification, qualifications should be based on one-to-one instruction at that station.	Yes	MP-COPS-9.34 MP-RTQP-14.4

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C5—Training Documentation</i>		
Completion of the operator qualification program should be formally documented.	Yes	MP-RTQP-14.4
Classroom requirements should be documented by training department instructors.	Yes	MP-RTQP-14.11
Written exam results should be documented by training department instructors.	Yes	MP-RTQP-14.14
On-shift training and system checkouts should be documented by on-shift instructors.	Yes	MP-COPS-9.34 MP-RTQP-14.13
<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C6—Suspension of Training</i>		
Trainee operation of equipment should be immediately suspended during unanticipated or abnormal events, accident conditions, or whenever the operations personnel or on-shift instructor believes suspension is necessary to ensure safe and reliable facility operation.	Yes	MP-COPS-9.34 MP-RTQP-14.13
<b>Chapter V, Control of On-Shift Training</b>		
<i>Guideline C7—Maximum Number of Trainees</i>		
Shift supervisors should ensure that established limits are observed.	Yes	MP-COPS-9.34
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C1—Events Requiring Investigation</i>		
Events that occur in the facility and adversely affect operations, personnel safety, or DOE requirements (DOE 5000.3A) should receive a thorough investigation.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
The criteria for when to perform an event investigation should be clearly established.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
Specific events requiring investigation should be listed for supervisory use; along with criteria for use in deciding what “near miss” situations should receive review.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C2—Investigation Responsibility</i>		
The operations supervisor or another manager should be responsible for event investigations.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C3—Investigator Qualification</i>		
Investigators should be trained in facility systems and operations and other major disciplines appropriate for the event under investigation.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
Investigators should be trained in techniques for conducting an investigation.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1 MP-RTQP-14.6
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C4—Information to be Gathered</i>		
An individual should be assigned responsibility for collecting the required information and assembling the information for review.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
Information should be gathered in the following areas: a. Initial facility conditions. b. Statements of operators and personnel involved in the event (this should be permanently recorded). c. Pertinent computer printouts (post-trip log sequence of events) and strip charts. d. Pertinent documentation (such as operator logs, radiation work permits, chemistry logs, and radiological surveys) as required to establish conditions prior to and during the event.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
Event investigation-containing relevant information should be permanently recorded for future reference.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
The collection of data should not interfere with the continued operation of the facility.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C5—Event Investigation</i>		
Upon completion of the data collection, a structured review of the abnormal event should occur.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
The abnormal event should be reconstructed using the collected information.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
Once the facts of the event have been established, the event should be analyzed to determine the response of equipment and involved personnel.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
When available, the event should be compared with previous event investigations of similar events or transients.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
During the analysis, a safety evaluation should be performed to ascertain the proper response of equipment and to identify detrimental effects on facility equipment.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
The root cause of the event should be determined.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
Appropriate corrective action should be established for each event investigation, and specific personnel should be assigned responsibilities for the corrective action.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1 MP-Q&SI-5.3
The final approval for corrective action should be made by the facility manager.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1 MP-Q&SI-5.3
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C6—Investigative Report</i>		
An investigative report should be prepared in a timeframe determined by the responsible authority.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
The report should include a description of the event (including pertinent conditions), a discussion of the impact of the event, root cause, the lessons learned, and the proposed corrective action(s).	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
The report should include positive aspects of the event (such as particularly effective personnel responses).	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
The investigative report should be approved by the facility manager and reviewed by appropriate supervisors, managers, and the safety review committee.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1
Lessons learned from an event investigation should be shared with all appropriate personnel who could benefit from the lessons learned.	Yes	INST-COPS-9.6.1 MP-COPS-9.6 MP-Q&SI-5.1 MP-RTQP-14.17
<b>Chapter VI, Investigation of Abnormal Events</b>		
<i>Guideline C7—Event Training</i>		
In-house events should be evaluated by the operations supervisor to determine if the event should be included in the training program for operations personnel.	Yes	MP-Q&SI-5.1 MP-RTQP-14.9

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
A mechanism should exist-so that appropriate shift be immediately trained on an event when they work.	Yes	INST-COPS-9.6.1 MP-COPS-9.3 MP-Q&SI-5.1 MP-Q&SI-5.3 MP-RTQP-14.17
<b>Chapter VI, Investigation of Abnormal Events</b>		
Guideline C8— <i>Event Trending</i>		
Patterns of deficiencies such as operator errors or inadequate procedures should be trended.	Yes	INST-COPS-9.6.1 INST-Q&SI-5.1.1 MP-COPS-9.6 MP-Q&SI-5.1
A periodic summary report of events, causes, and trends should be submitted to department heads, the facility manager, and appropriate managers.	Yes	INST-Q&SI-5.1.1 MP-Q&SI-5.1
Department heads should ensure training programs include appropriate material from the summary report.	Yes	INST-COPS-9.6.1 MP-Q&SI-5.3 MP-RTQP-14.7 MP-RTQP-14.9
<b>Chapter VI, Investigation of Abnormal Events</b>		
Guideline C9— <i>Sabotage</i>		
If an act of sabotage is discovered or suspected, it is important to begin an investigation immediately and to accomplish the following: <ul style="list-style-type: none"> <li>a. Determine the condition of the affected system(s) and ensure the operability of all safety-related systems;</li> <li>b. Decide if continued operation is justified or if systems are available to support safe facility shutdown; and</li> <li>c. Minimize the impact of discovered acts of sabotage and deter future acts of sabotage.</li> </ul>	Yes	INST-COPS-9.6.1 MP-Q&SI-5.1
<b>Chapter VII, Notifications</b>		
Guideline C1— <i>Notification Procedures</i>		
Procedures should be developed to address appropriate notifications.	Yes	MP-COPS-9.6
Procedures should be developed to address specific responsibilities for notifications.	Yes	MP-COPS-9.6
Procedures should be developed to address identification of events and conditions requiring notifications.	Yes	MP-COPS-9.6

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Procedures should be developed to address identification of primary and alternate personnel to be notified for various situations.	Yes	MP-COPS-9.6
Procedures should be developed to address establishment of time requirements for notifications that are consistent with the facility emergency plan.	Yes	MP-COPS-9.6
Procedures should be developed to address definition of record keeping requirements that documents the reason for notifications, the time of notifications, and the person notified.	Yes	MP-COPS-9.6
<b>Chapter VII, Notifications</b>		
<i>Guideline C2—Notification Responsibility</i>		
The operations supervisor should ensure that all appropriate personnel receive notification when required.	Yes	MP-COPS-9.6
<b>Chapter VII, Notifications</b>		
<i>Guideline C3—Names and Phone Numbers</i>		
Names of primary and alternate contacts and current phone numbers and page codes should be readily available to the person assigned to make the notifications.	Yes	MP-COPS-9.6
<b>Chapter VII, Notifications</b>		
<i>Guideline C4—Documentation</i>		
All notifications should be documented.	Yes	MP-COPS-9.6
<b>Chapter VII, Notifications</b>		
<i>Guideline C5—Communication Equipment</i>		
Adequate communication equipment should be maintained in the main control area to meet the objectives of this chapter.	Yes	MP-COPS-9.5
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C1—Status Change Authorization and Reporting</i>		
The operations supervisor is responsible for maintaining proper configuration and should authorize status changes to major equipment and systems.	Yes	MP-COPS-9.7
The shift supervisor should be advised periodically of changes in status of equipment and systems.	Yes	MP-COPS-9.7
Changes in the status of facility equipment and systems should be reported to the governing stations (e.g., control area) or to the individual (or his relief) who authorized the change	Yes	MP-COPS-9.7

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Changes in status of safety-related equipment and systems should be authorized by the supervisor and reported to the control area.	Yes	MP-COPS-9.7
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C2—Equipment and System Alignment</i>		
Prior to first placing the equipment or system into operation, individual components-for facility equipment and system should be properly aligned or checked for proper alignment.	Yes	MP-COPS-9.7
Alignment checklists should be used to guide the operator in establishing the correct component positions. The alignment checklists should include provisions for equipment nomenclature that matches the nomenclature placed on the component, a location for individual documentation of the check of each component, the required alignment position for each component, and a location for annotating deviations from the required alignment.	Yes	MP-COPS-9.7
The supervisor should review and approve completed alignment checklists.	Yes	MP-COPS-9.7
Safety-related equipment and systems should be functionally tested in accordance with surveillance requirements in the technical specifications/operational safety requirements following maintenance and before the equipment or system is considered capable of performing its design function.	Yes	MP-CMNT-10.1 MP-COPS-9.7 MP-COPS-9.11
Records of equipment and system alignments should be retained for reference by the operating shift.	Yes	MP-COPS-9.7
Administrative controls that analyze and document deviations from the reference alignment should be established.	Yes	MP-COPS-9.7
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C3—Equipment Locking and Tagging</i>		
Locks and Tags should be used on those components that require special administrative control for safety or other reasons.	Yes	MP-COPS-9.7 MP-COPS-9.21
All personnel should receive training regarding their responsibilities concerning the manipulation of locked or tagged controls.	Yes	INST-COPS-9.18.3 MP-COPS-9.7 MP-COPS-9.21

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C4—Operational Limits Compliance</i>		
Administrative controls should be established to document compliance with requirements of operational limits (limiting conditions for operation).	Yes	MP-COPS-9.9 MP-COPS-9.10 MP-COPS-9.11
The operations supervisor should be cognizant of action taken to comply with operational limit requirements and should ensure that the actions taken are appropriate and correct or that they mitigate any adverse consequences to the facility.	Yes	MP-COPS-9.9 MP-COPS-9.10 MP-COPS-9.11
Logs, status sheets, turnover checklists, or other appropriate documentation should reflect the entry conditions and actions that are taken in response to operational limits requirements.	Yes	MP-COPS-9.9 MP-COPS-9.10 MP-COPS-9.11
Appropriate operating personnel should be apprised of limiting conditions for operations and actions for which they may be responsible.	Yes	MP-COPS-9.9 MP-COPS-9.10 MP-COPS-9.11 MP-COPS-9.14
Responsible personnel should periodically review the limiting conditions for operation and action statements in effect to ensure that the required actions are met.	Yes	MP-COPS-9.9 MP-COPS-9.10 MP-COPS-9.11 MP-COPS-9.14
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C5—Equipment Deficiency Identification and Documentation</i>		
Equipment deficiencies should be noted by facility operating personnel and identified in the work control system for correction.	Yes	MP-COPS-9.3 MP-COPS-9.7 PD-COPS-9.18
Methods that identify deficient equipment to operating personnel should be established.	Yes	MP-CMNT-10.1 MP-COPS-9.3 MP-COPS-9.7 MP-Q&SI-5.4
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C6—Work Authorization and Documentation</i>		
The operations supervisor or his/her designee should authorize all shift activities (including Maintenance) on equipment that is important to safety, that affects operations, or that changes control indications or alarms. This authorization should be in writing on the document controlling the work.	Yes	INST-COPS-9.18.2 MP-COPS-9.2 MP-COPS-9.3 MP-COPS-9.7

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Documentation of the status of work in progress should be available in the control area for review by operating personnel.	Yes	INST-COPS-9.18.2 MP-COPS-9.3 MP-COPS-9.7 MP-COPS-9.9
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C7—Equipment Post-Maintenance Testing and Return to Service</i>		
Equipment should be tested following maintenance to demonstrate that it is capable of performing its intended function.	Yes	MP-CMNT-10.1 MP-CMNT-10.19
Testing should include performance of all functions that may have been affected by the maintenance.	Yes	MP-CMNT-10.1 MP-CMNT-10.19
Testing should also verify that the maintenance performed served to correct the original problem and that no new problems were introduced.	Yes	MP-CMNT-10.1 MP-CMNT-10.19
Any testing following maintenance should be specified on the maintenance work order or accompanying documentation (e.g., maintenance procedure).	Yes	MP-CMNT-10.1 MP-CMNT-10.19
The operations supervisor should ensure that testing appropriately proves equipment operability.	Yes	MP-CMNT-10.1 MP-CMNT-10.19
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C8—Alarm Status</i>		
The status of control panel and/or local panel alarms should be readily available to appropriate operating personnel.	Yes	MP-COPS-9.3 MP-COPS-9.7 MP-COPS-9.9 MP-COPS-9.10
Appropriate actions should be taken to monitor equipment parameters for abnormal conditions that would be masked by deficient or non-reflashing alarms.	Yes	MP-COPS-9.3 MP-COPS-9.7 MP-COPS-9.9 MP-DOCS-18.6
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C9—Temporary Modification Control</i>		
Administrative control systems should be established for installation of temporary modifications.	Yes	INST-CD&M-11.1.2 INST-CD&M-11.2.6 INST-CMNT-10.1.8 MP-CD&M-11.1 MP-COPS-9.7

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<b>Guideline</b>	<b>Applicable</b>	<b>Implementation Document and/or Deviation or Exception Taken</b>
Controls should provide for communicating the installation of temporary modifications to the design authority to allow for technical oversight and an evaluation of the impact on current design activities, and approval of the design modification.	Yes	INST-CD&M-11.1.2 INST-CD&M-11.2.6 INST-CMNT-10.1.8 MP-CD&M-11.1 MP-COPS-9.7
These control systems should make provisions for safety reviews, installation approval, independent verification of correct installation and removal, documentation of the modification, update of operating procedures and documents, training, marking of installed modifications, and periodic audits of outstanding modifications.	Yes	INST-CD&M-11.1.2 INST-CD&M-11.2.6 INST-CMNT-10.1.8 MP-CD&M-11.1 MP-COPS-9.7
<b>Chapter VIII, Control of Equipment and Systems Status</b>		
<i>Guideline C10—Distribution and Control of Equipment and System Documents</i>		
A system should be established to ensure that the operations personnel receive and utilize the latest revisions of engineering drawings and specifications.	Yes	MP-CD&M-11.5 MP-COPS-9.7 MP-COPS-9.14 MP-DOCS-18.4
Operations personnel should be made aware of all changes to these documents.	Yes	MP-COPS-9.7 MP-COPS-9.14 MP-DOCS-18.4
The document distribution should include all operations related activities such as procedures review groups, maintenance groups, facility safety analysis groups, and testing groups.	Yes	MP-COPS-9.7 MP-COPS-9.14 MP-DOCS-18.4
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C1—Lockout/Tagout Use</i>		
Locks and tags should be placed on controls when safety or other special administrative reasons controls must be established.	Yes	INST-COPS-9.18.3
Tags should be placed on the control that is tagged out, or as close as possible to indicate clearly the condition.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C2—Lockout and Tagout Implementation</i>		
If a device (e.g., for energy or toxic material isolation) has the capability of being locked out, it should be locked out.	Yes	INST-COPS-9.18.3
If the isolating device cannot be locked out, it should be tagged out.	Yes	INST-COPS-9.18.3

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<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C3—Protective Materials and Hardware</i>		
Locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware should be provided for isolating, securing, or blocking machines or equipment from energy sources.	Yes	INST-COPS-9.18.3
Lockout and Tagout devices should be singularly identified (i.e., should be the only devices used for controlling energy and should not used for other purposes) and should meet the following requirements: durable, standardized, substantial, identifiable, and warning.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C4—Lockout/Tagout Program</i>		
A Lockout/Tagout program should be established consisting of procedures to control potentially hazardous energy and materials and personnel training. This program should ensure that potentially hazardous energy or toxic material sources are isolated and rendered inoperative during servicing or maintenance or in any case where unexpected energizing, startup, or release of stored energy or toxic material can cause injury.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C5—Procedures for Lockout/Tagout</i>		
Procedures should be developed, documented, validated, and utilized for control of potentially hazardous energy or material.	Yes	INST-COPS-9.18.3
Procedures should clearly and specifically state the scope, purpose, authorization, rules, and techniques of the Lockout/Tagout program.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C6—Application of Lockout/Tagout</i>		
The established procedure for the application of energy control (implementing lockout/tagout) should cover the elements and actions in the following sequence:  Preparation for shutdown, machine, or equipment shutdown, equipment isolation, stored energy, verification of installation, and release from lockout/tagout.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C7—Testing or Positioning of Equipment or Components</i>		
Temporary removal of lockout/tagout devices should be discouraged.	Yes	INST-COPS-9.18.3

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<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C8—Periodic Inspections</i>		
Periodic inspections should be conducted by authorized personnel, supervisor, or appropriate manager, to determine whether procedures are being followed and to correct any deviations or inadequacies observed.	Yes	INST-COPS-9.18.3 MP-M&IA-17.1 Operations Management Group Management Assessment Schedule
Inspections should include a review of the responsibilities of personnel and supervisors.	Yes	INST-COPS-9.18.3
The supervisor or appropriate manager should certify that the periodic inspections have been performed, documenting the equipment and procedures involved, dates of inspection, personnel participating in the inspections, and personnel performing the inspections.	Yes	INST-COPS-9.18.3 MP-M&IA-17.1
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C9—Caution Tags</i>		
Caution tags should not be used for personnel protection (i.e., caution tags should not be used where it is appropriate to use a Lockout or Tagout device).	Yes	MP-COPS-9.7
The use of caution tags should be restricted to those situations in which a component or system is functional, but when some precaution or item(s) of information is necessary prior to operation.	Yes	MP-COPS-9.7
Caution tags should be uniquely identifiable and different in appearance from other station tags.	Yes	MP-COPS-9.7 MP-COPS-9.32
The following information should be included on the tags as an aid in administer the program: caution tag number; component name and number; precaution or information applicable to the situation and/or component or system; and particular; signature of authorizing individual and organization.	Yes	MP-COPS-9.7 MP-COPS-9.32
The supervisor or manager should ensure that issuing a caution tag is necessary and that the tag is not being used in place of more appropriate administrative action (such as a temporary procedure change, placing an operator aide, use of the work control system, or issuance of a safety lockout or tagout).	Yes	MP-COPS-9.7 MP-COPS-9.32
A record of all active caution tags and associated amplifying information should be available to the appropriate personnel.	Yes	MP-COPS-9.7 MP-COPS-9.32

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<b>Guideline</b>	<b>Applicable</b>	<b>Implementation Document and/or Deviation or Exception Taken</b>
Record and associated tags should be reviewed periodically by qualified personnel. This review should verify the continued need and applicability for each caution tag and ensure that the caution tag index accurately reflects all active caution tags. This review should be documented.	Yes	MP-COPS-9.7 MP-COPS-9.32
Any caution tags remaining in an active status for extended periods (e.g., longer than three months, as appropriate) should be brought to the attention of the operations supervisor or manager.	Yes	MP-COPS-9.7 MP-COPS-9.32
The operations supervisor or manager should determine what action is needed to resolve the continued use of the caution tag.	Yes	MP-COPS-9.7 MP-COPS-9.32
Caution tags should be placed in such a way that they do not interfere with or obscure indications, switches, or other control devices but are readily apparent to an individual prior to the operation of the tagged device.	Yes	MP-COPS-9.7 MP-COPS-9.32
Placement of caution tags should be documented.	Yes	MP-COPS-9.7 MP-COPS-9.32
<b>Chapter IX, Lockout and Tagout</b>		
<i>Guideline C10—Training and Communication</i>		
Training should be provided and documentation ensure that the purpose and function of the Lockout/Tagout program is understood by all personnel and that they have the knowledge and skills required for safe application, use, and removal of lockouts and tagouts.	Yes	INST-COPS-9.18.3
When tagout systems are used, personnel should trained in the limitations of tags	Yes	INST-COPS-9.18.3
When lockout systems are used, personnel should be trained in the limitations of Locks, especially concerning the following:  (1) Operation of the facility may be hindered (this is significant when local component operations are necessary, such as remote shutdown or remote control).  (2) Locks and chains installed on small instrument line isolation valves can contribute to seismic loading and may not have been considered during safety analysis.	Yes	INST-COPS-9.18.3
Retraining should be provided for all authorized or affected personnel whenever there is a change in job, procedures, machines, equipment, or processes that present new hazards or periodic inspection determines it is needed.	Yes	INST-COPS-9.18.3

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter IX, Lockout and Tagout</b>		
Guideline C11— <i>Lockout or Tagout Implementation</i>		
Lockout or Tagout should only be accomplished by authorized, qualified personnel.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
Guideline C12— <i>Notification of Personnel</i>		
A supervisor or appropriate manager should notify affected personnel of the application and removal of Lockout/Tagout devices.	Yes	INST-COPS-9.18.3 MP-COPS-9.10 MP-COPS-9.9
Notification should be given before the devices are applied and after they are removed.	Yes	INST-COPS-9.18.3 MP-COPS-9.10 MP-COPS-9.9
<b>Chapter IX, Lockout and Tagout</b>		
Guideline C13— <i>Outside Contractors</i>		
Whenever outside servicing personnel are to be engaged in activities covered by the scope of the Lockout/Tagout program, the facility and the outside contractor should inform each other of their respective lockout/tagout procedures and should ensure that their personnel are aware of the changes.	Yes	INST-COPS-9.18.3 PD-COPS-9.18
<b>Chapter IX, Lockout and Tagout</b>		
Guideline C14— <i>Group Lockouts or Tagouts</i>		
When servicing or maintenance is performed by a crew, craft, department, or other group, they should utilize a procedure that will provide for equivalent safety provided by the personal Lockout or Tagout device.	Yes	INST-COPS-9.18.3
<b>Chapter IX, Lockout and Tagout</b>		
Guideline C15— <i>Shift or Personnel Changes</i>		
Specific procedures should be utilized during shift of personnel changes to ensure the continuity of lockout or tagout protection, including provision for the orderly transfer of lockout or tagout devices between personnel or shifts.	Yes	INST-COPS-9.18.3 MP-COPS-9.10 MP-COPS-9.9
<b>Chapter X, Independent Verification</b>		
Guideline C1— <i>Components Requiring Independent Verification</i>		
Components that are critical to ensure safe and reliable operation should receive an independent verification of their position when circumstances warrant.	Yes	MP-COPS-9.7 MP-COPS-9.11 <a href="#">MP-COPS-9.33</a>

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Each facility should use an accepted safety analysis method (e.g., fault-tree analysis, probability risk analysis) and/or expert opinion to determine its own facility specific list of systems and components, which should receive independent verification.	Yes	MP-COPS-9.7 MP-COPS-9.11 <a href="#">MP-COPS-9.33</a> RPT-DSA-02 RPT-TSR-03
<b>Chapter X, Independent Verification</b>		
<i>Guideline C2—Occasions Requiring Independent Verification</i>		
Components should receive independent verification when the equipment they serve must be available and when a reasonable possibility exists that the components might have been mis-positioned.	Yes	MP-COPS-9.7 MP-COPS-9.11 <a href="#">MP-COPS-9.33</a>
<b>Chapter X, Independent Verification</b>		
<i>Guideline C3—Verification Techniques</i>		
Operators should be trained in the appropriate techniques for verifying the positions of all facility components.	Yes	MP-COPS-9.7 MP-COPS-9.33 MP-RTQP-14.4
A reference document should be provided explaining what an operator should do when verifying a component position.	Yes	MP-COPS-9.7 MP-COPS-9.33
The instructions should describe the techniques for verifying manual valves, motor- and air-operated valves, solenoid operated valves, circuit breakers, blank flanges, removable links and fuses, and the availability of control power.	Yes	MP-COPS-9.33
Independent verifications should be conducted in a manner such that each check constitutes an actual identification of the component and a determination of both its required and actual positions.	Yes	MP-COPS-9.7 MP-COPS-9.11 MP-COPS-9.33
Independent verification should be performed locally unless ALARA or other overriding factors preclude.	Yes	MP-COPS-9.7 MP-COPS-9.11 MP-COPS-9.33
Process parameters normally should not be used as the only indication of a component's position.	Yes	MP-COPS-9.7 MP-COPS-9.11 MP-COPS-9.33
Facility procedures should specify where and when process parameters are acceptable indicators of component position.	Yes	MP-COPS-9.7 MP-COPS-9.11 MP-COPS-9.33
Position indicators, scribe marks, or other officially recognized and designated indicators should be used to determine throttled valve positions.	Yes	MP-COPS-9.7 MP-COPS-9.11 MP-COPS-9.33

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Surveillance testing should not be used as independent verification, unless it can be shown that the test conclusively proves the position of the components in question.	Yes	MP-COPS-9.11 MP-COPS-9.33
The applicability of surveillance testing to satisfy independent verification requirements should be approved beforehand by the operations supervisor.	Yes	MP-COPS-9.11 <a href="#">MP-COPS-9.33</a>
Programmatic operations appraisals should be independently conducted and/or verified to ensure that environment, safety, and health considerations, and operations functions (such as training) are being conducted in accordance with established operational criteria.	Yes	MP-M&IA-17.1 Operations Management Group Management Assessment Schedule MP-M&IA-17.2
<b>Chapter XI, Log Keeping</b>		
<i>Guideline C1—Establishment of Operating Logs</i>		
Narrative logs should be established at all key positions.	Yes	MP-COPS-9.9
For those shift positions that are manned on a part time basis, a log should be established to ensure that pertinent information is passed from operator to operator.	Yes	MP-COPS-9.9
A narrative section shall be provided on round sheets when a narrative log is not used for particular shift positions.	Yes	MP-COPS-9.3
<b>Chapter XI, Log Keeping</b>		
<i>Guideline C2—Timeliness of Recordings</i>		
Information should be promptly recorded in the logs.	Yes	MP-COPS-9.9
<b>Chapter XI, Log Keeping</b>		
<i>Guideline C3—Information to be Recorded</i>		
The Operations supervisor should provide written guidance to define thoroughly the type and scope of entries for each log and the format for making entries.	Yes	MP-COPS-9.9
The following information should be recorded in at least one station log although any one log might not contain all of these items: Facility mode or condition changes, criticality's and appropriate critical data, abnormal facility configurations, status changes to safety related and other major facility equipment, occurrence of any reportable events, initiation and completion of surveillance tests, entering and exiting operational limit actions, security incidents, out of specification chemistry or process results, and shift reliefs.	Yes	MP-COPS-9.9
Significant information should be logged during emergencies and abnormal or unexpected events.	Yes	MP-COPS-9.9

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XI, Log Keeping</b>		
Guideline C4— <i>Legibility</i>		
Log entries should be made in a manner such that they can be easily read and understood and readily reproducible.	Yes	MP-COPS-9.9
<b>Chapter XI, Log Keeping</b>		
Guideline C5— <i>Corrections</i>		
A standardized method for correcting any erroneous entries should be established that does not obscure the incorrect entry.	Yes	MP-COPS-9.9
Log entries should not be erased or covered up.	Yes	MP-COPS-9.9
All corrections should be initialed and dated.	Yes	MP-COPS-9.9
<b>Chapter XI, Log Keeping</b>		
Guideline C6— <i>Log Reviews</i>		
Control area logs should be reviewed periodically by the Operations Supervisor.	Yes	MP-COPS-9.9 MP-COPS-9.10
Logs kept by operators outside the control area should be reviewed by the control area operator or an appropriate supervisor; these reviews should ensure entries are accurate and adequate.	Yes	MP-COPS-9.3 MP-COPS-9.9 MP-COPS-9.10
<b>Chapter XI, Log Keeping</b>		
Guideline C7— <i>Care and Keeping of Logs</i>		
Management should provide written guidance on the disposition of completed logs; this guidance should address making logs available for review by operators after absences from their regular duties.	Yes	MP-COPS-9.9
Management should provide written guidance on the disposition of completed logs; this guidance should address storing completed logs for preservation of the expected life of the facility.	Yes	MP-COPS-9.9
Management should provide written guidance on the disposition of completed logs; this guidance should address retrieving stored logs should this become necessary.	Yes	MP-COPS-9.9
<b>Chapter XII, Operations Turnover</b>		
Guideline C1— <i>Turnover Checklists</i>		
As a minimum, supervisory positions should have a turnover checklist to be used in the turnover process.	Yes	MP-COPS-9.10

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Equipment operator checklists, or other formal documents, should provide for noting major components status (e.g., operating pumps, trains in service, etc.), abnormal lineups, valid alarms on all pertinent local control panels, and surveillances or evolutions planned or in progress.	Yes	MP-COPS-9.10 The Shift Team Leader's Turnover Checklist will be the document used at the AMWTP for providing this status information.
Provisions should also be made for documenting that a review of round sheets and narrative logs has been performed by the oncoming operator.	Yes	MP-COPS-9.3 MP-COPS-9.9 MP-COPS-9.10
Operator checklists or other documents reviewed at shift change should provide for recording vital information about the facility status.	Yes	MP-COPS-9.10
Each operator turnover checklist should be provided with enough space for the off-going operator to list other important information his relief should have.	Yes	MP-COPS-9.10
Operations supervisory checklists or other documents reviewed at shift change should provide vital information about facility status.	Yes	MP-COPS-9.10
Operations supervisory checklists should require documenting review of certain status documents.	Yes	MP-COPS-9.10
<b>Chapter XII, Operations Turnover</b>		
<i>Guideline C2—Document Review</i>		
Oncoming supervisors should review documents specified on their checklists prior to assuming responsibility for their shift position. Document review should be as intensive as necessary for the oncoming personnel to understand important history, present status, and planned events.	Yes	MP-COPS-9.10
Log entries for the previous 24-hour period or since his/her last shift should be reviewed.	Yes	MP-COPS-9.10
<b>Chapter XII, Operations Turnover</b>		
<i>Guideline C3—Control Panel Walkdowns</i>		
Walkdowns of appropriate control panels should be conducted by each shift watchstander.	Yes	MP-COPS-9.10
Oncoming operations supervisors should walk down the main control panels before, during, or shortly after shift turnover.	Yes	MP-COPS-9.10
Oncoming and offgoing control area operators should walk down their unit's main control panel together.	Yes	MP-COPS-9.10
Equipment operators should review all pertinent local control panels, (e.g., fuel supplies, lubrication levels, makeup water treatment, and ventilation) during their tour early in the shift.	Yes	MP-COPS-9.10

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XII, Operations Turnover</b>		
<i>Guideline C4—Discussion and Exchange of Responsibility</i>		
When all operations personnel are satisfied that the oncoming crew is fully cognizant of the plant conditions, the oncoming operators and supervisors should state that he/she is assuming responsibility for the shift position with an entry into the log.	Yes	MP-COPS-9.10
<b>Chapter XII, Operations Turnover</b>		
<i>Guideline C5—Shift Crew Briefing</i>		
Crew briefing should be conducted by the operations supervisor as required and may be conducted after he has accepted responsibility for the shift.	Yes	MP-COPS-9.10
Briefing should include a review of the status, problems with equipment, and evolutions in progress or planned during the shift.	Yes	MP-COPS-9.10
Personnel from support groups (e.g., contractors, vendors, and test groups) should also attend briefings when their activities can directly affect operations.	Yes	MP-COPS-9.10
<b>Chapter XII, Operation Turnover</b>		
<i>Guideline C6—Reliefs Occurring During the Shift</i>		
Reliefs occurring during the shift (e.g., exchange of control supervisory function) should have a turnover to ensure that the oncoming person is at least as knowledgeable of the conditions as he would have been had a complete shift turnover process been conducted. For example, control panel walkdowns and log reviews may or may not be necessary, depending on the oncoming person's familiarity with the current conditions	Yes	MP-COPS-9.10
<b>Chapter XIII, Operations Aspects of Chemistry &amp; Unique Processes</b>		
<i>Guideline C1—Operator Responsibilities</i>		
The operations supervisor should define each operator's specific responsibilities with respect to process control.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Operators should monitor chemistry or process parameters using control room instruments and other instruments related to equipment under operations control.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.
Operators should be able to recognize out-of-specification conditions or adverse trends and be familiar with corrective actions associated with chemistry or process problems.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.
Operators should consult and be advised by chemistry or technical process department personnel.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.
<b>Chapter XIII, Operations Aspects of Chemistry &amp; Unique Processes</b>		
Guideline C2— <i>Operator Knowledge</i>		
Operators should be knowledgeable about aspects of facility processes and safety that affect operation and should be able to analyze off-normal situations and take appropriate action to correct the cause(s) of problems.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.
<b>Chapter XIII, Operations Aspects of Chemistry &amp; Unique Processes</b>		
Guideline C3— <i>Operator Response to Process Problems</i>		
Each operator should be capable of correctly interpreting the chemistry or process parameters that he is responsible for and be able to provide appropriate, timely, corrective action when required.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XIII, Operations Aspects of Chemistry &amp; Unique Processes</b>		
<i>Guideline C4—Communication Between Operations and Process Personnel</i>		
Operators should inform appropriate process personnel prior to commencing evolutions that could potentially affect facility processes or required action from support technicians.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.
Operators should receive reports from the process department on key day-to-day process results and problems.	No	There are no unique processes or chemistry aspects of the AMWTP that will require additional controls beyond those established for normal operations. Additionally, there are no personnel who will perform any conduct of operations activities that are not controlled by the Shift Manager using approved management procedures and operating instructions.
<b>Chapter XIV, Required Reading</b>		
<i>Guideline C1—File Index</i>		
A list of the types of documents to be included in the required reading file should be maintained.	Yes	MP-COPS-9.12
The list of types of documents should include the following documents: Procedure changes, equipment design changes, related industry and in-house operating experience information, and other information necessary to keep operations department personnel aware of current facility activities.	Yes	MP-COPS-9.12
Reading material should be screened to ensure that only appropriate material is placed in the file.	Yes	MP-COPS-9.12
<b>Chapter XIV, Required Reading</b>		
<i>Guideline C2—Reading Assignments</i>		
A method should be in place to designate which documents need to be read by the individuals filling each position.	Yes	MP-COPS-9.12
The reading file should be readily available to those individuals who are required to read the designated documents.	Yes	MP-COPS-9.12
<b>Chapter XIV, Required Reading</b>		
<i>Guideline C3—Required Dates for Completion of Reading</i>		
A required completion date should be designated for reading each document.	Yes	MP-COPS-9.12

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Personnel should complete their reading assignments by the required date.	Yes	MP-COPS-9.12
Certain documents may be designated for “immediate reading.” These should be read before assuming responsibility for a shift position.	Yes	MP-COPS-9.12
<b>Chapter XIV, Required Reading</b> Guideline C4— <i>Documentation</i>		
Completion of reading should be documented, and the documentation should be retained.	Yes	MP-COPS-9.12
<b>Chapter XIV, Required Reading</b> Guideline C5— <i>Review</i>		
The reading file should be periodically reviewed to ensure that all department personnel complete readings by the required dates.	Yes	MP-COPS-9.12
Material that has been read by all appropriate personnel should be removed from the active file.	Yes	MP-COPS-9.12
<b>Chapter XV, Timely Orders to Operators</b> Guideline C1— <i>Content and Format</i>		
Orders should be clearly written, dated, and maintained in the control room.	Yes	MP-COPS-9.13
Information and policies intended as permanent should be incorporated into appropriate administrative procedures.	Yes	MP-COPS-9.13
The operator orders program should not be used to change operating procedures.	Yes	MP-COPS-9.13
<b>Chapter XV, Timely Orders to Operators</b> Guideline C2— <i>Issuing, Segregating, and Reviewing Orders</i>		
Operator orders should be issued by the operations supervisor or his/her designee whenever necessary to communicate instructions to the shift personnel.	Yes	MP-COPS-9.13
Operator orders should be segregated into daily and long-term orders in order to facilitate review by shift personnel.	Yes	MP-COPS-9.13
Daily orders that are postponed or prolonged should have daily review or updates.	Yes	MP-COPS-9.13
Reviews of long-term orders should be made periodically and when changes occur.	Yes	MP-COPS-9.13
Appropriate operations personnel should review the orders early in the shift and document their review by initialing the log or notebook.	Yes	MP-COPS-9.13

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<b>Chapter XV, Timely Orders to Operators</b>		
<i>Guideline C3—Removal of Orders</i>		
Orders that are no longer applicable or are outdated should be promptly removed or cancelled.	Yes	MP-COPS-9.13
The operations supervisor should periodically review the operator orders to ensure that only applicable and current orders remain effective.	Yes	MP-COPS-9.13
<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C1—Procedure Development</i>		
The methods for developing new procedures, including procedure formats, should be clearly defined.	Yes	MP-DOCS-18.1 MP-DOCS-18.3 MP-DOCS-18.4
Administrative procedures and/or writers' guides should direct the development and review process for procedures.	Yes	MP-DOCS-18.1 MP-DOCS-18.3 MP-DOCS-18.4
Procedures should be developed for all anticipated operations, evolutions, tests, and abnormal or emergency situations.	Yes	MP-COPS-9.14 MP-DOCS-18.6
Annunciator/alarm response procedures that guide the operator in verifying abnormal conditions or changes in plant status and provide the appropriate corrective action should be developed for all alarm panels.	Yes	MP-COPS-9.14 MP-DOCS-18.6
All procedures should provide administrative and technical direction to conduct the intent of the procedure effectively.	Yes	MP-COPS-9.14 MP-DOCS-18.1 MP-DOCS-18.3 MP-DOCS-18.6
The extent of detail in a procedure should depend on the complexity of the task, the experience and training of the user(s), the frequency of performance, and the significance of the consequences of error.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Procedure preparation, verification, and validation should receive high-level attention.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Qualifications for procedure writers should be considered, including operating organization and experience.	Yes	MP-COPS-9.14
Review, verification, and validation should be formalized for written and software procedures.	Yes	MP-COPS-9.14 MP-DOCS-18.4

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<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C2—Procedure Content</i>		
To provide uniformity in operations procedures, the content of procedures should conform to prescribed guidelines.	Yes	MP-DOCS-18.1 MP-DOCS-18.3
The scope and applicability of individual procedures should be readily apparent.	Yes	MP-DOCS-18.1 MP-DOCS-18.3 MP-DOCS-18.6
Procedures with single-unit applicability should be distinctively identified to avoid confusion with sister-unit procedures.	Yes	MP-COPS-9.14
Emergency procedures should be distinguishable from other procedures.	Yes	MP-COPS-9.14 MP-DOCS-18.6
Procedures should incorporate appropriate information from applicable source documents, such as the facility design documents, safety analysis documents, and vendor technical manuals.	Yes	MP-COPS-9.14 MP-DOCS-18.1 MP-DOCS-18.3
Prerequisites and initial conditions should be detailed consideration should be given to the location of this information within the procedure in order to help ensure that the intent of the procedure is understood.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Any hoses, tools, or other temporary testing equipment should be verified operable, calibrated, or inspected and in good condition where possible, before implementing any test procedure, to ensure that they function as expected during the test.	Yes	MP-COPS-9.14 MP-DOCS-18.1
“Hold” points (requiring independent verification and/or approval) should be clearly delineated.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Definitions used in the procedure should be explained.	Yes	MP-COPS-9.14 MP-DOCS-18.1 MP-DOCS-18.3
Procedures should be easily understood, and actions should be clearly stated.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Procedures should contain only one action per step.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Procedures should contain sufficient but not excessive detail.	Yes	MP-COPS-9.14 MP-DOCS-18.1
The skill level, experience, and training of the users should be considered.	Yes	MP-COPS-9.14 MP-DOCS-18.1

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Warnings, notes, and cautions should be easily identifiable and should not contain action statements.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Warnings and cautions should precede the step to which they apply.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Warnings, notes, and cautions should appear on the same page as the step to which they apply.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Procedures should incorporate appropriate information from applicable source documents, such as the facility design documents, safety analysis documents, and vendor technical manuals.	Yes	MP-COPS-9.14 MP-DOCS-18.1 MP-DOCS-18.3
Procedures should be technically and administratively accurate (i.e., the instructions and information should be correct; referenced documents should be correctly identified; and necessary instructions should represent to guide the user when transferring between procedures).	Yes	MP-COPS-9.14 MP-DOCS-18.1
Individual sign-offs should be provided for selected critical steps.	Yes	MP-DOCS-18.1
One sign-off should not be applied to more than one action.	Yes	MP-DOCS-18.1
Limits and/or tolerances for operating parameters should be specified and should be consistent with the readable accuracy of instrumentation.	Yes	MP-DOCS-18.1
Operators should not be required to perform mental arithmetic to determine if a specified parameter is acceptable.	Yes	MP-DOCS-18.1
Acceptance criteria for surveillance or test procedures should be easily discerned, including tolerances and units.	Yes	MP-COPS-9.14 MP-DOCS-18.1
If calculations are needed to compare data to acceptance criteria, the calculations should be clearly explained.	Yes	MP-DOCS-18.1
Sequence of procedural steps should conform to the normal or expected operational sequence.	Yes	MP-COPS-9.14 MP-DOCS-18.1
Procedures should be developed with consideration for the human-factor aspects of their intended use.	Yes	MP-DOCS-18.1
Emergency operating procedures should provide guidance in responding to single and multiple casualties.	Yes	MP-COPS-9.28 MP-DOCS-18.1 MP-DOCS-18.6
Portions or steps of other procedures that are used or referred to when performing a procedure should be specifically identified within the procedure so that operators will not be confused when transferring between procedures.	Yes	MP-COPS-9.14 MP-DOCS-18.1

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Component or system shutdown and restoration requirements following shutdown or a surveillance or test activity should be specific and controlled by the procedure.	Yes	MP-COPS-9.14
<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C3—Procedure Changes and Revisions</i>		
The review and approval process for each procedure change or revision should be documented.	Yes	<a href="#">MP-COPS-9.14</a> MP-DOCS-18.4
Procedure changes intended for use more than one time should be documented in a location readily available for operator reference.	Yes	MP-COPS-9.14 MP-DOCS-18.4
Appropriate procedure changes and revisions should be initiated when procedure inadequacies or errors are noted.	Yes	MP-COPS-9.14 MP-DOCS-18.4
Procedure revisions should be initiated when a change has been outstanding for an extended period (e.g., greater than 6 months) or when a procedure has been affected by several changes (e.g., more than five). All currently effective procedure changes should normally be incorporated when the procedure is revised.	Yes	MP-COPS-9.14 MP-DOCS-18.4
Procedure revisions should be implemented concurrently with modifications.	Yes	INST-CD&M-11.1.2 <a href="#">MP-COPS-9.7</a> MP-COPS-9.14
Procedure updates required by temporary modifications should be handled as procedure "change" and implemented concurrently with the temporary modification installation.	Yes	INST-CD&M-11.1.2 <a href="#">MP-COPS-9.7</a> MP-COPS-9.14 MP-DOCS-18.4
Important information regarding changed or revised procedures should be communicated to appropriate operations personnel via the required reading system, a pre-shift briefing, or a similar method.	Yes	MP-DOCS-18.4
Documentation of the reason for key procedure steps should be maintained and reviewed when implementing changes or revisions that alter these steps.	Yes	MP-DOCS-18.1 MP-DOCS-18.3
The review process should involve verification and validation of the procedure using walkthroughs or similar methods.	Yes	MP-COPS-9.14 MP-DOCS-18.4
<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C4—Procedure Approval</i>		
Operating procedures should be approved by the operations supervisor.	Yes	MP-DOCS-18.4

<b>AMWTP LIST</b>		
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<b>Conduct of Operations—Implementation Matrix</b>		

Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Procedures that affect safety-related equipment and emergency procedures should be reviewed by the facility safety review committee or by another appropriate review mechanism.	Yes	MP-DOCS-18.4 MP-NSPC-3.2
Procedure revisions should receive the same depth of review and level of approval as the initial versions.	Yes	MP-DOCS-18.4
New and revised procedures should be approved prior to use.	Yes	MP-DOCS-18.4
Changes in Operations procedure that do not affect the intent of operations procedure should be approved by two individuals; one should be a qualified operator, and the other should be a member of facility management. Within two weeks, these procedure changes should be concurred with by the individuals who would normally approve a revision or the initial version of the procedure.	Yes	MP-DOCS-18.4
Changes that alter the intent of a procedure should receive the same approval as a newer revised procedure.	Yes	MP-DOCS-18.4
<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C5—Procedure Review</i>		
New and revised operations procedures should be reviewed prior to issuance and at periodic intervals to ensure that the information and instructions are technically accurate and that appropriate human-factor considerations have been included.	Yes	MP-COPS-9.14 MP-DOCS-18.4
The frequency of subsequent reviews should be specified; it may vary with the type and complexity of the activity involved and with time as a given plant reaches operational maturity.	Yes	MP-COPS-9.14 MP-DOCS-18.4
Applicable procedures should be reviewed after an unusual incident (such as an accident, an unexpected transient, significant operator error, or equipment malfunction).	Yes	MP-COPS-9.6 MP-COPS-9.14 MP-DOCS-18.4
During reviews, procedures should be compared to source documents to verify their accuracy.	Yes	MP-COPS-9.14 MP-DOCS-18.4
New procedures should be validated by walkthroughs in the facility or by operation on a facility-specific simulator to ensure workability.	Yes	MP-COPS-9.14 MP-DOCS-18.4
<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C6—Procedure Availability</i>		
A controlled copy of all operations procedures should be maintained in the control area for operator reference, and selected controlled procedures should be maintained at other appropriate locations.	Yes	MP-COPS-9.14

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
Working copies of controlled procedures should be available for use during evolutions.	Yes	MP-COPS-9.14 A controlled copy or a working copy may be either a traditional "hard copy" paper reproduction of a controlled document or it may be a controlled electronic version accessed and used at a computer terminal.
Working copies should be controlled and a system should be in place to ensure that outdated procedures are not used by mistake and that working copies are replaced according to approved procedures.	Yes	MP-COPS-9.14 MP-DOCS-18.4 A controlled copy or a working copy may be either a traditional "hard copy" paper reproduction of a controlled document or it may be a controlled electronic version accessed and used at a computer terminal.
Controlled annunciator response procedure information should be easily accessible to the operators responsible for responding to alarms.	Yes	MP-COPS-9.14 A controlled copy or a working copy may be either a traditional "hard copy" paper reproduction of a controlled document or it may be a controlled electronic version accessed and used at a computer terminal.
Annunciator response procedures should be provided at an alternate location convenient to the equipment operator if the annunciator response procedures are not provided at local control panels.	Yes	MP-COPS-9.14
<b>Chapter XVI, Operations Procedures</b>		
<i>Guideline C7—Procedure Use</i>		
Facility operation should be conducted in accordance with applicable procedures that reflect the facility design basis.	Yes	MP-COPS-9.14
The requirements for use of procedures should be clearly defined and understood by all operators.	Yes	MP-COPS-9.14
If procedures are deficient, a procedure change should be initiated.	Yes	MP-COPS-9.14
Operators should have procedures with them and follow them in a step-by-step manner when the procedures contain sign-offs for the various activities.	Yes	MP-COPS-9.14
Procedures should be referenced during infrequent or unusual evolutions when the operator is not intimately familiar with the procedure requirements or when errors could cause significant adverse impact to the facility.	Yes	MP-COPS-9.14
Emergency procedure immediate action instructions should be reviewed after the actions are performed, thus verifying that all required actions have been taken.	Yes	MP-COPS-9.14

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XVII, Operator Aid Postings</b>		
Guideline C1— <i>Operator Aid Development</i>		
All facility personnel should be informed of the importance of controlling posted information and the procedure to be followed when posting information.	Yes	MP-COPS-9.8
<b>Chapter XVII, Operator Aid Postings</b>		
Guideline C2— <i>Approval</i>		
The operations supervisor, or a higher authority, should approve all operator aids.	Yes	MP-COPS-9.8
The person approving an operator aid should ensure that the aid is necessary and correct.	Yes	MP-COPS-9.8
Operator aids that alter procedures should not be approved; instead, appropriate procedures should be changed to incorporate the necessary information.	Yes	MP-COPS-9.8
<b>Chapter XVII, Operator Aid Postings</b>		
Guideline C3— <i>Posting</i>		
Operator aids should not be posted in such a way as to obscure instruments or controls.	Yes	MP-COPS-9.8
Operator aids should be located in close proximity to the area of their expected use.	Yes	MP-COPS-9.8
The operator aids should, when possible, be protected (laminated) and should be securely fastened to the equipment to which they refer.	Yes	MP-COPS-9.8
<b>Chapter XVII, Operator Aid Postings</b>		
Guideline C4— <i>Use of Operator Aids</i>		
Operator aids may supplement approved procedures, but they should not be used in lieu of approved procedures.	Yes	MP-COPS-9.8
<b>Chapter XVII, Operator Aid Postings</b>		
Guideline C5— <i>Documentation</i>		
A listing of all approved operator aids should be maintained along with a copy of each aid posted in the facility.	Yes	MP-COPS-9.8
The listing of all approved operator aids should be kept in the control area, the operations supervisor's office, or other appropriate location.	Yes	MP-COPS-9.8
References, from which operator aids were derived, control numbers (including revision), and dates of approval should be provided.	Yes	MP-COPS-9.8

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XVII, Operator Aid Postings</b>		
Guideline C6— <i>Review</i>		
The posted operator aid should be reviewed periodically to ensure they are still correct and necessary.	Yes	MP-COPS-9.8
An operator should audit the control area listing to ensure that only currently posted aids are recorded on the listing.	Yes	MP-COPS-9.8
Operator aids no longer posted should be removed from the listing, and missing aids should be replaced.	Yes	MP-COPS-9.8
Some operator aids are graphs, curves, or other portions of approved procedures. To help ensure that these types of operator aids are the most current versions, they should be updated when the “parent” procedure is revised.	Yes	MP-COPS-9.8
During routine facility inspections, operations personnel should review operator aids to ensure that they are approved.	Yes	MP-COPS-9.8
Unapproved postings should be submitted for approval or removed.	Yes	MP-COPS-9.8
<b>Chapter XVIII, Equipment and Piping Labeling</b>		
Guideline C1— <i>Components Requiring Labeling</i>		
The following components should be labeled: <ul style="list-style-type: none"> <li>• Valves;</li> <li>• Major equipment (e.g., tanks, pumps, and compressors);</li> <li>• Switches;</li> <li>• Circuit breakers (4.16KV, 480V, 120VAC/DC, etc.);</li> <li>• Fuse blocks or fuse locations;</li> <li>• Instruments and gauges;</li> <li>• Busses and motor control centers;</li> <li>• Cabinets (including internal components such as relays, terminals, etc.);</li> <li>• Room doors;</li> <li>• Emergency equipment (such as fire alarm stations, sound powered phone headsets, etc.); and</li> <li>• Fire protection systems.</li> </ul>	Yes	MP-COPS-9.15

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XVIII, Equipment and Piping Labeling</b>		
<i>Guideline C2—Label Information</i>		
Information on labels should be consistent with the information found in facility procedures, valve lineup sheets, and piping and instrument diagrams.	Yes	MP-COPS-9.15
Abbreviations and nomenclature used should be standardized and should be understood by facility personnel.	Yes	MP-COPS-9.15
Labels should be permanent, securely attached, and have distinguishable, easy-to-read information.	Yes	MP-COPS-9.15
Each component label should list a unique component number. The accompanying component noun name or description and power supply, if applicable, should also be provided.	Yes	MP-COPS-9.15
If color-coding is used the colors should be applied consistently and have only one meaning per color or combination.	Yes	MP-COPS-9.15
Piping should be labeled to indicate the fluid contained and the normal flow direction.	Yes	MP-COPS-9.15
Pipes containing potentially radioactive fluids, toxic fluids, or explosive gases should be uniquely marked.	Yes	MP-COPS-9.15
Labels should be made from materials that are compatible with their particular application.	Yes	MP-COPS-9.15
Adhesives used for label attachment should also be verified for compatibility.	Yes	MP-COPS-9.15
<b>Chapter XVIII, Equipment and Piping Labeling</b>		
<i>Guideline C3—Label Placement</i>		
Labels should be placed on or as near as practicable to the equipment to be labeled.	Yes	MP-COPS-9.15
The label should be oriented in a manner that is easy to read and so that the correct component is easy to identify.	Yes	MP-COPS-9.15
Label placement should not interfere with equipment operation or obscure indicators.	Yes	MP-COPS-9.15
<b>Chapter XVIII, Equipment and Piping Labeling</b>		
<i>Guideline C4—Replacing Labels</i>		
Procedures should be established to ensure that misplaced or damaged labels are replaced.	Yes	MP-COPS-9.15

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Guideline	Applicable	Implementation Document and/or Deviation or Exception Taken
<b>Chapter XVIII, Equipment and Piping Labeling</b>		
<i>Guideline C5—Providing New Labels</i>		
A temporary label should be attached to the component until the replacement label can be made.	Yes	MP-COPS-9.15
A temporary label should be attached to the component until the replacement label can be made.	Yes	MP-COPS-9.15
The replacement label should be approved by the operations supervisor (or higher authority).	Yes	MP-COPS-9.15
The attachment of temporary and/or replacement labels to correct components should be verified.	Yes	MP-COPS-9.15

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#### 4.0 POSITION DESCRIPTION APPLICABILITY MATRIX

	Operations	Administrative/Office	Technical	Implementing Procedure
Chapter I, Operations Organization and Administration	Yes	Yes	Yes	MP-COPS-9.2
Chapter II, Shift Routines and Operating Practices	Yes	No	Partial Guidelines C1, C2 and C5	MP-COPS-9.3
Chapter III, Control Area Activities	Yes	Partial Guidelines C1 and C2	Partial Guidelines C1 and C2	MP-COPS-9.4
Chapter IV, Operations Communication	Yes	Yes	Yes	MP-COPS-9.5
Chapter V, Control of On-Shift Training	Yes	No	Yes for technical staff who are qualified to give on-shift training; no for all others.	MP-COPS-9.3, MP-COPS-9.34 MP-RTQP-14.13, MP-RTQP-14.4
Chapters VI and VII, Event Investigation and Occurrence Reporting	Yes	Yes	Yes	MP-COPS-9.6
Chapter VIII, Control of Equipment and System Status	Yes	Partial Guideline C3	Yes	MP-COPS-9.7 MP-COPS-9.11 PD-COPS-9.18
Chapter IX, Lockouts and Tagouts	Yes for employees qualified LO/TO above affected employee. Guideline C12 applies for all others qualified as affected employee.	Partial Guideline C12 applies for affected employee.	Yes for employees qualified LO/TO above affected employee. Guideline C12 applies for all others qualified as affected employee.	PD-COPS-9.18 INST-COPS-9.18.3
Chapter X, Independent Verification	Yes	No	Yes	MP-COPS-9.11 MP-COPS-9.33
Chapter XI, Logkeeping	Yes	No	No	MP-COPS-9.9
Chapter XII, Operations Turnover	Yes	No	No	MP-COPS-9.10

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	<b>Operations</b>	<b>Administrative/Office</b>	<b>Technical</b>	<b>Implementing Procedure</b>
Chapter XIII, Operations Aspects of Facility Chemistry and Unique Processes	No	No	No	N/A
Chapter XIV, Required Reading	Yes	No	Yes	MP-COPS-9.12
Chapter XV, Timely Orders to Operators	Yes	No	Yes	MP-COPS-9.13
Chapter XVI, Operations Procedures	Yes	Partial Administrative/office personnel that are involved in development, change control and approval of operations instructions. For these personnel, guidelines C1, C2, C3, C4, and C5 apply.	Yes	MP-COPS-9.14
Chapter XVII, Operator Aids	Yes	Partial Guideline C1	Partial Guidelines C1, C2, and C3	MP-COPS-9.8
Chapter XVIII, Equipment and Piping Labeling	Yes	No	Yes	MP-COPS-9.15

## 5.0 DEFINITIONS

*Administrative/Office.* Administrative/office personnel are responsible for day-to-day support functions that do not directly interface with or impact the operation of a facility. Activities performed by administrative/office personnel are exclusively in an office environment. AMWTP personnel in this category include administrators, secretaries, custodians, administrative training personnel, and document control personnel.

*Operations.* Operations is the on-site organization responsible for operating the facility, including operations, maintenance and radiological technicians, supervisors, and managers, which may include off-site personnel who provide operational support. Any person who is qualified to operate equipment in production facilities are included in this group.

Operations and radiological technicians are defined as personnel responsible for performing operations associated with safety systems, operating support systems which could affect safety systems, manipulation of facility controls, monitoring of instrumentation or conducting activities with radioactive or hazardous materials.

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Maintenance technicians are defined as personnel responsible for the maintenance and repair of mechanical and electrical equipment. These technicians are responsible for specific maintenance and monitoring activities that include equipment maintenance, troubleshooting, repair, testing instrument calibration and inspection.

*Technical Staff.* Technical staff is responsible for supervision and performance of technical support functions for operations. Personnel involved in surveillance, testing, analyzing plant data, planning modifications, program review and technical problem resolution in their area of expertise. AMWTP personnel in this category include design, systems, project, criticality safety, industrial hygiene, and industrial safety radiological and environmental engineers. Also, included in this category is Quality Assurance, Operations Support personnel, technical trainers, Work Control personnel and Security personnel.

## **6.0 REFERENCES**

- (1) CTR-001, Charter for Operational Oversight
- (2) DOE O 470.4, Safeguards and Security Program
- (3) DOE O 5480.19, Change 2, 10/23/01, Conduct of Operations Requirements for DOE Facilities
- (4) INST-CD&M-11.1.2, Facility Modification Proposal Preparation
- (5) INST-CD&M-11.2.6, Temporary Software Override
- (6) INST-CMNT-10.1.8, Temporary Physical Changes
- (7) INST-COPS-9.6.1, Fact Finding Procedure
- (8) INST-COPS-9.18.1, Approved Method of Work
- (9) INST-COPS-9.18.2, Permit to Work
- (10) INST-COPS-9.18.3, Lockout/Tagout
- (11) INST-COPS-9.18.4, Hazard Assessment
- (12) INST-Q&SI-5.1.1, Trending
- (13) MP-ADMN-1.4, Employee Disciplinary Action
- (14) MP-CD&M-11.1, Change Control

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- (15) MP-CD&M-11.5, Drawing Control
- (16) MP-CMNT-10.1, Maintenance Management
- (17) MP-CMNT-10.19, Computerized Maintenance Management System
- (18) MP-COPS-9.2, Operations Organization Administration
- (19) MP-COPS-9.3, Conduct of Operations—Shift Routines and Operating Practices
- (20) MP-COPS-9.4, Conduct of Operations—Control Area Activities
- (21) MP-COPS-9.5, Communications
- (22) MP-COPS-9.6, Occurrence Reporting
- (23) MP-COPS-9.7, Conduct of Operations—Control of Equipment and System Status
- (24) MP-COPS-9.8, Operator Aid Postings
- (25) MP-COPS-9.9, Conduct of Operations—Log Keeping
- (26) MP-COPS-9.10, Conduct of Operations—Operations Turnover
- (27) MP-COPS-9.11, Conduct of Operations—Control of Safety Related Systems, Structures, Components and Operational Limits
- (28) MP-COPS-9.12, Conduct of Operations Required Reading
- (29) MP-COPS-9.13, Conduct of Operations Short Term Instructions
- (30) MP-COPS-9.14, Operations Procedures
- (31) MP-COPS-9.15, Equipment and Piping Labeling
- (32) MP-COPS-9.21, Control of Operational Locks
- (33) MP-COPS-9.28, Command and Control for Abnormal and Emergency Events
- (34) MP-COPS-9.29, Workers Rights and Responsibilities
- (35) MP-COPS-9.32, Warning Tags
- (36) MP-COPS-9.33, Conduct of Operations—Performing Independent Verification

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- (37) MP-COPS-9.34, Conduct of Operations Control of On-Shift Training
- (38) MP-DOCS-18.1, Developing Written Work Instructions
- (39) MP-DOCS-18.2, Records Management
- (40) MP-DOCS-18.3, Developing Management Procedures
- (41) MP-DOCS-18.4, Document Control
- (42) MP-DOCS-18.6, Developing Abnormal Operating Instructions
- (43) MP-M&IA-17.1, Management Assessment
- (44) MP-M&IA-17.2, Independent Assessment
- (45) MP-NSPC-3.2, Unreviewed Safety Question Process
- (46) MP-Q&SI-5.1, Investigation and Root Cause Analysis
- (47) MP-Q&SI-5.3, Corrective Action
- (48) MP-Q&SI-5.4, Identification of Nonconforming Conditions
- (49) MP-RS&C-6.3, ALARA Program
- (50) MP-RTQP-14.1, Preparation and Administration of Individual Training Plans
- (51) MP-RTQP-14.2, Training Staff Qualification
- (52) MP-RTQP-14.4, Personnel Qualification and Certification
- (53) MP-RTQP-14.6, Job Analysis
- (54) MP-RTQP-14.7, Designing Courses
- (55) MP-RTQP-14.9, Instructional Materials Development, Revision, and Control
- (56) MP-RTQP-14.11, Delivery of Training
- (57) MP-RTQP-14.13, Performance Assessments
- (58) MP-RTQP-14.14, Written Examinations

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- (59) MP-RTQP-14.17, Incorporating Change Actions and Lessons Learned into Training
- (60) PD-COPS-9.18, Work Control
- (61) PD-ISIH-01, Industrial Safety/Industrial Hygiene Program Description
- (62) PLN-SCTY-16.8, AMWTP Physical Security Plan
- (63) RPT-DSA-02, AMWTP Documented Safety Analysis
- (64) RPT-PEP-01, Project Execution Plan
- (65) RPT-TSR-03, Technical Safety Requirements

## 7.0 RECORDS

Records generated by this procedure shall be classified in accordance with the table below, and dispositioned in accordance with MP-DOCS-18.2, Records Management.

Record Description	Classification
MP-COPS-9.1, Case File	Facility Operating Record/ENV2-a-1-a/Destroy 5 years after Life of Facility

## 8.0 EXHIBITS

None

## 9.0 APPENDICES

None