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DATE 2020-08-24	DATE 2020-08-24	DATE 2020-08-25

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FCA PROTECTION	ALARA REVIEW NO	SUPERSEDES KGH-004 Rev 4 dd. 2017-07-26 FULL REVIEW
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1.0 PURPOSE

- 1.1 To describe the process that the Radiation Protection Group will implement to manage the Operating Experience Feedback.

2.0 SCOPE

- 2.1 To assess all Operating Experience Feedback that has radiological implications.
- 2.2 To comply with WANO and station expectations that each Line Group should have an OE Representative, and that all OE must be reviewed to:
- assess the applicability to Koeberg;
 - assess the possibility of a similar event occurring at Koeberg or within the specific discipline;
 - assess methods of preventing a similar event;
 - identify corrective action(s) to correct or prevent an occurrence;
 - ensure close out of the corrective action(s);
 - assess the effectiveness of the corrective actions;
 - link applicable OE to relevant tasks;
 - conduct investigations as required.

3.0 DEFINITIONS AND ABBREVIATIONS

3.1 Definitions

- 3.1.1 **Action** – Any requirement stipulated in a Condition report with a due date that must be completed before the Condition report may be closed out.
- 3.1.2 **Assessments** – Actions from visits, inspections and evaluations by WANO, INPO, NNR, Self, NSA, QA, QC, SRM etc.
- 3.1.3 **Industry Event** – Any industry event, external to Koeberg Nuclear Power Station, noted by KIT as an event. These are recorded as a type WE on Devonway and assigned a lead person in accordance with procedure KAA-688.
- 3.1.4 **Lessons Learned** – Any action or steps of events from which Koeberg Nuclear Power Station can learn and implement or take note of in order to avoid similar events from occurring at Koeberg.
- 3.1.5 **Station Event** – Any event within Koeberg for which a CR has been raised.

3.2 Abbreviations

- 3.2.1 **AnP** – EdF Analyses Parc
- 3.2.2 **AP** – EdF Affaires Parc
- 3.2.3 **CA** – Corrective Action
- 3.2.4 **CAP** – Corrective Action Program
- 3.2.5 **CR** – Condition Report
- 3.2.6 **DevonWay** – CAP Database
- 3.2.7 **GA** – General Action
- 3.2.8 **KIT** – Koeberg Integrated Team
- 3.2.9 **OE** – Operating Experience
- 3.2.10 **RP** – Radiation Protection
- 3.2.11 **RPC** – Radiation Protection Certificate
- 3.2.12 **SAC** – Station ALARA Committee
- 3.2.13 **WE** – World Experience

4.0 REFERENCES

4.1 Referenced Documents

- 4.1.1 238-36, Rev 0a: Operational Radiation Protection Requirements
- 4.1.2 238-54, Rev 0: Radiological Protection Licensing Requirements for Koeberg Nuclear Power Station
- 4.1.3 335-2, Rev 5: Koeberg Nuclear Power Station Management Manual
- 4.1.4 KAA-500, Rev 13: The Process for Controlled Documents
- 4.1.5 KAD-025, Rev 2: Processing of Operating Experience
- 4.1.6 KSA-011, Rev 14: The Requirements for Controlled Documents
- 4.1.7 KSH-008, Rev 10: Radiation Protection Records, Data and Information Management

4.2 Applicable Documents

- 4.2.1 KAA-688: The Corrective Action Process
- 4.2.2 KGA-035: Processing of Experience Feedback Received through the EdF Co-operation Agreement
- 4.2.4 KGA-094: Event Investigators Guide

5.0 DESCRIPTION

- 5.1 Appendix 1 is the Flow of the RP OE process.
- 5.2 An appointed OE Co-ordinator from the RP Department will function as the OE Representative and attend scheduled station OE meetings.
- 5.3 All copies of significant and appropriate RP pre/post-job briefs, pre/post-ALARA reviews, lessons learnt, near miss incidents, Outage lessons learnt and any other source of OE, are submitted by all sections to the OE Co-ordinator for screening. This includes the external OE submitted by the OE group.
- 5.4 The OE Co-ordinator allocates a reference number to newly listed OE and the electronic register is updated accordingly.
- 5.5 The OE co-ordinator performs a screening review of the OE. All OE screened as "N/A" is archived and the "applicable" OE saved.
- 5.6 The submitted OE is circulated with an attached briefing note by the OE Co-ordinator to the relevant RP sections. All completed staff briefs (with signatures) are sent back to the OE Co-ordinator for safe keeping or retained in a file in the relevant sections. Alternatively, OE will be sent electronically to the relevant sections and saved on the G drive.
- 5.7 An assessment is performed at the Head of Sections meeting on the "applicable" OE for the consideration of an investigation and the OE Co-ordinator updates the electronic register accordingly.
- 5.8 If any of the criteria for an investigation (e.g. direct impact on the RP group's performance, a conventional safety or radiological consequence) exists, then a qualified investigator is assigned. (Refer to KGA-094)
- 5.9 Where formal investigations have been done, a detailed report is compiled by the investigator and reviewed for accuracy. (Refer to KGA-094)
- 5.10 All formal investigation reports are presented to the Head of Sections meeting for acceptance and authorised by the RP manager.

- 5.11 All CAs and GAs are entered onto Devonway and tracked to completion by the OE Co-ordinator.
- 5.12 All CAs and GAs approaching expiry are to be identified and followed up at Head of sections meeting.
- 5.13 Where OE did not meet the criteria for a full investigation but has some significance or relevance, the OE Co-ordinator adds the OE reference but not limited to a pre/ post-job brief, pre/post ALARA review, Master RPC and procedures. The OE register is updated with corresponding reference no. e.g., RPC no., work order no.
- 5.14 Whenever jobs are being done for the very first time the supervisor consults the OE Co-ordinator for the appropriate OE to be used. Alternatively, international requests may be initiated via the CAP group. Searches can also be made via WANO, IAEA web sites CAP group, RP group and e-mails.
- 5.15 OE is tracked and linked to specific jobs where appropriate, by the OE Co-ordinator or any RPM or above when generating an RPC.
- 5.16 OE requiring strategy and direction may be channelled via the SAC.
- 5.17 RP supervisors request the OE Co-ordinator to screen the archived OE for applicability.
- 5.18 The RP ALARA Planning function should take cognisance of forthcoming RP work scheduled in order to link relevant OE to RP activities.
- 5.19 The DevonWay system is the formal mechanism of maintaining a record of all Formal Corrective Actions and their close-outs.

6.0 ATTACHMENTS

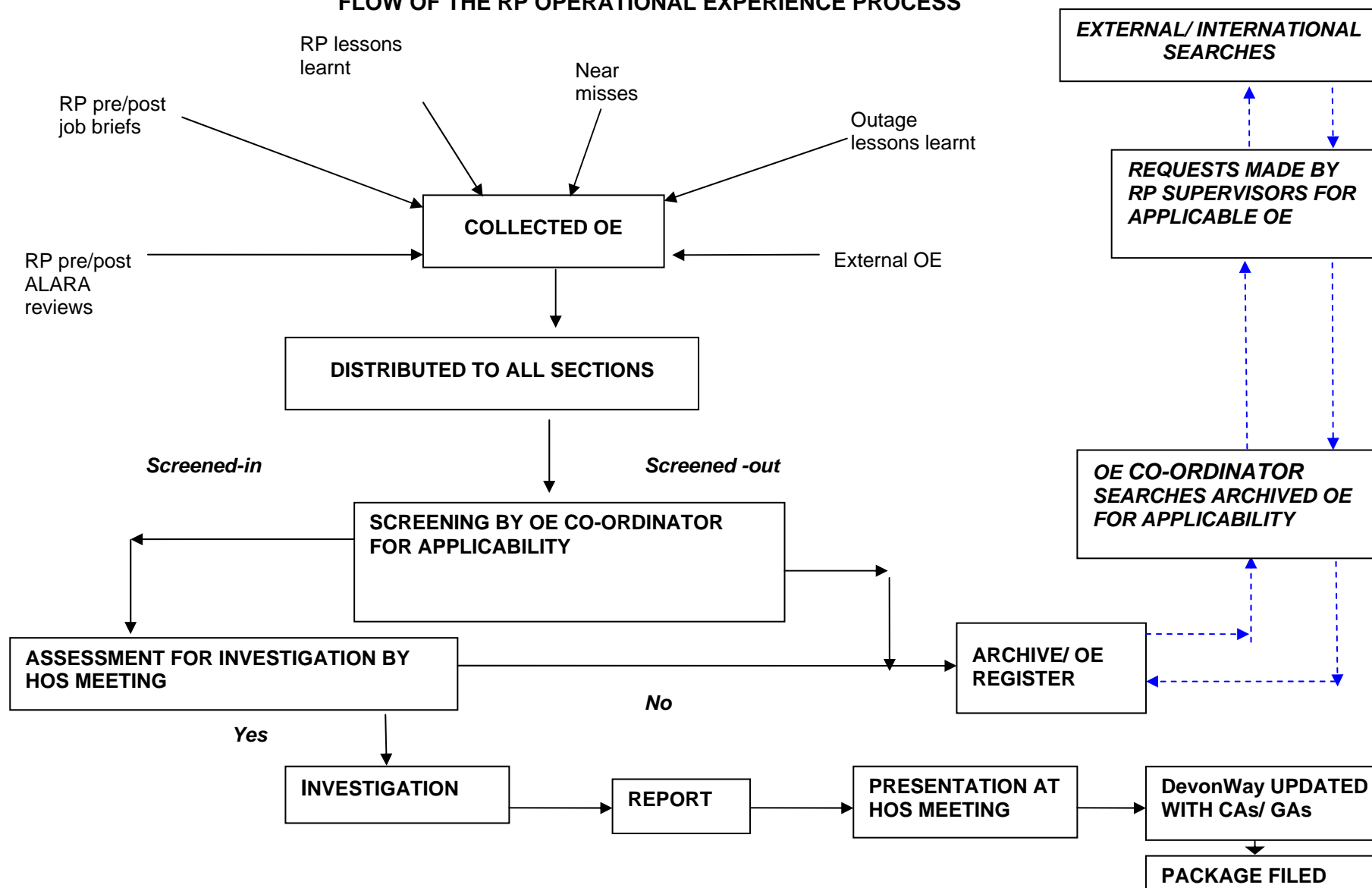
Appendix 1 – Flow of the RP Operational Experience Process

Appendix 2 – International and Local OE Definitions

Appendix 3 – Justification

APPENDIX 1

FLOW OF THE RP OPERATIONAL EXPERIENCE PROCESS



APPENDIX 2

INTERNATIONAL AND LOCAL OE DEFINITIONS

(A) INTERNATIONAL

EdF-Affaires Parc – Opened on request from the Technical Operating Committee (CTE) if a potentially generic event that requires the input from a multi-disciplinary Working Group, which is affecting safety, plant reliability / availability and costs, are identified. Recommendations issued through the AP are applicable to all the French units using the same equipment or process. AP normally require more in depth evaluation. KIT filter these for applicability.

EdF-Analyse Parc – Are opened on request from the National Operating Experience Committee (CID) if an event is potentially of a generic nature, but does not require a multi-disciplinary Working Group. Recommendations issued through the AnP are applicable to all the French units using the same equipment or process.

EdF-ORIGINE or SAPHIR Reports – These are a selected number of events analysed by the CID in the framework of the EdF operating experience programme. These events are distributed to all French plants and Koeberg. Each Site takes into account the events in their own environment and decides on a course of action. KIT evaluates these events for Koeberg, in accordance with KGA-035.

INPO-OE Reports – Similar to WANO-OE Reports.

INPO / WANO (Just-in-Time Report) – Information on events with lessons learned which should be used during Job Planning and / or Pre-job Briefings, usually associated with specific activities.

NRC (Nuclear Regulatory Commission USA) Information Notices – Distributed to utilities for review, evaluation of own processes and implementation of corrective actions as necessary.

OEM – Important practice changes, events etc, from FRDS, AREVA, ALSTHOM.

Overseas Visits – Good practices from workshops or visits documented in a report.

WANO-EAR (Event Analysis Report) – Single events are investigated and analysed.

WANO-ETR (Event Topic Report) – This report covers a summary of similar events, the recurring problems are identified and analysed, recommendations are presented for review and implementation.

APPENDIX 2 (continued)**INTERNATIONAL AND LOCAL OE DEFINITIONS**

WANO-Flash – Identifies events where no significant consequence was evident, however where the potential does exist (Early Warning).

WANO OE – Annual Report

WANO-OE Reports – General report, reviewers are to identify potential lessons learned and initiate corrective actions, as appropriate.

WANO-Prevent Events – Identify questions against SER and SEN events, which should be used during Pre-job Briefings, Training, Planning or other situations where performance can be improved.

WANO-SEN (Significant Event Notification) – Primarily a first notification of an event and can be followed by a SER.

WANO-SER (Significant Event Report) – The report covers a single significant event. Formal corrective actions are not raised as a rule, and WANO members must evaluate and implement if deemed applicable / appropriate. “Prevent Events” are provided for discussions during pre-job briefings / work team sessions.

WANO-SOER (Significant Operating Event Report) – This report covers a number of similar events with generic problems being identified.

Corrective Actions are identified and WANO members are expected to implement, and are audited during the Peer review programmes.

It is expected that each recommendation defined in the SOER, be evaluated. If it is not deemed appropriate to Koeberg, then a sound technical justification must be provided, to CAPOE.

All actions taken, or actions that are planned, must be documented.

The CAPOE will serve as the quality control and will only close a SOER recommendation once all actions have been thoroughly implemented.

(B) NATIONAL / LOCAL

Eskom Events – Koeberg must evaluate. If possible impact to Koeberg existing corrective actions must be identified and implemented.

Koeberg Condition Report Events.

Outage Lessons Learnt.

RP Lessons Learnt.

APPENDIX 3

JUSTIFICATION

Revision 4

1. Full review.
2. ALARA review changed from YES to NO as per KAA-632.

Revision 5

1. Full review.