Efficiency Bulletin: 16-31
Pre-Approval Criteria for Work Execution

Work disciplines are normally required to coordinate with and obtain approval from the work control center or control room to start work, including work activities that have limited control room or plant impact. Using an appropriate level of control, pre-approval of work activities can provide workers the opportunity to be dispatched more promptly to the field, improving efficiencies and productivity.

Addressees: Chief nuclear officers, NEI APCs and INPO APCs

Issue: WM-P-12, Pre-approval Criteria for Execution

Summary of Efficiency Opportunity

- Desired end-state—Operations personnel will review, identify and pre-approve scheduled work that has limited control room or plant impact. For example, once systems or equipment are taken out of service and isolated through a clearance and tagging boundary, workers can go directly to the field and start work without further approval from the work execution center/control room.
- Pre-approval should initially occur during the work screening process and additionally during the T-Week preparation process or by other processes designated by the station. Preauthorized work should be appropriately annotated in the work schedule.
- A graded approach to pre-approving work should be used. For example, some work can be pre-approved with no required communications with operations. Other work may require contacting the work execution center senior reactor operator via phone prior to work start, contacting the control room at a designated point in the job or face-to-face authorization.
• Value proposition (vision of excellence)—Removing unnecessary approvals and delays will help eliminate distractions and allow workers to get to work more efficiently, increasing the potential to perform more work. Additionally, pre-approving work activities allows operations personnel in the work execution center and control room to focus on those work activities that are more important and that have greater impact.

• Maximum benefit is obtained when this efficiency opportunity is implemented in conjunction with efficiency bulletins EB 16-13, “Perform Self-Briefs for Low Radiological Risk Activities,” and EB 16-15a, “Work Screening Process.”

• Why is it important?—Overall, reducing the burden and inefficiencies associated with obtaining operations approval prior to starting work on certain activities will improve craft efficiency resources and productivity. Additionally, this initiative will reduce plant operator distractions, improving their ability to focus on more important and impactful activities.

• Industry benchmark value(s)—Critical and noncritical maintenance backlogs are reduced or maintained at industry best performance levels. Weekly schedule completion is maintained at current performance and safety-system outage performance does not degrade.

• Measure of effectiveness—An increase in work activities pre-approved as compared to current baseline number of pre-approved activities. Additionally, supervisor and worker time spent waiting for work approval at the work execution center or control room is reduced. Stations should screen all scheduled work for pre-approval and strive to achieve a goal of approximately 60 percent pre-approved.

Relevant Standards

• Performance Objectives and Criteria (INPO) WM.1, Work activities are managed during both on-line and outage periods to support safe and reliable operation.

• INPO document 15-002 “Conduct of Operations,” the shift manager or licensed designee authorizes all maintenance and testing activities on equipment important to safety that affects plant operations or that changes control room indications or alarms.

Guidance

• INPO—Industry Cumulative Impact Short-Term Actions, November 2013, HU-1. This document recommends the industry streamline the activities and time it takes for supervisors to prepare workers for the day’s activities and to assess opportunities to pre-approve more activities.

• AP-928, Work Management Process Description, Revision 4, re-emphasizes the need for operations to identify work that can be pre-released.

• Work Management White Paper, Work Screening, Work Management Working Group, dated April 5, 2016 (white paper is posted on the INPO Member website under Work Management).

Recommended Industry Actions

• Implement guidance on the use of work pre-approvals as identified in the short-term actions for HU-1 in the Cumulative Impact Short-Term Actions, dated November 2013, and AP-928, Work Management Process,

Key to Color Codes:

Red: NSIAIC initiative - full participation required for viability
Blue: Action expected at all sites, but is not needed for broad industry viability
Green: Utility discretion to implement, consistent with its business environment
Revision 4. The guidance should not be limited to a list of work activities that can be pre-authorized, as this may limit the ability of operations to pre-approve tasks based on limited control room and plant impact. (The decision to pre-approve work must be based on a technical and risk-based review by appropriate operations personnel against a set of pre-established considerations for allowing pre-authorization).

**Change Management Considerations**

**Industry Activities**
- Industry webinar to provide background for initiative, INPO discussion, and an open forum to clarify expectations and ask questions. Webinar information can be found at the following site: https://web.inpo.org/Pages/Nuclear-Promise-Issues.aspx.
- Discuss at regional MA, WM, and Operations meetings and routine industry conference calls.

**Company Actions**
- Implement guidance on the use of work pre-approvals as identified in short term actions for HU-1 in the Cumulative Impact Short-Term Actions, dated November 2013, and AP-928, Work Management Process, Revision 4. Use a change management plan that communicates with intent, the desired outcome and purpose of the initiative.

**Guiderails**
- Stay within pre-established criteria for work pre-approvals using guidance in HU-1 “Getting Work to the Field,” Attachment 2, “Activities That Should Be Performed without a Formal Briefing,” from the Cumulative Impact Short-Term Actions dated November 2013.
- Monitor for inadequate coordination and communications between operations and maintenance which could result in plant transients or consequential events, configuration control issues, equipment damage, increased rework, or reduced work effectiveness and efficiency.

**Report Your Site’s Results**

Please report your company’s implementation of this improvement opportunity, including the date of completion. Send this information along with your company point of contact to EfficiencyBulletin@NEI.org.

**Industry Contacts**
- Industry champion for this issue: Brandon Shultz, 315-349-7012, brandon.shultz@exeloncorp.com and Robert Tremayne, 623-393-7122, Robert.tremayne@aps.com
- EPRI Contact: Rick Pepin, 704-595-2889, rpepin@epri.com
- NEI Contact: Jim Riley, 202-739-8137, jhr@nei.org
- On the web: www.nei.org/bulletin1631

**Industry Approval:**

Dennis Koehl, CNO Lead
David P. Igyarto, Institute of Nuclear Power Operations

Anthony R. Pietrangelo, Nuclear Energy Institute