

MEETING ATTENDANCE SHEETTYPE OF MEETING: WED LESSONS LEARNED PUBLIC MEETINGDATE: 2-28-00

Name	Title/Department	Phone Number
Jennifer Peters	Licensing - ONS	5117
Larry L. Mueller	Perfor & Strategy - GO	563-5357
NORIEL STEPHAN	Neel. Design Supervisor	5909
R.A. REXBARD	SENIOR STAFF ELECT. / AED	5296
A. SKILSK	SYSTEMS ENGINEER	2833
Terri Ann Glenn	Coop Engineering	2721
Michael Mansueti	PEO BOP Supervisor	2838
Elden Pletner, Jr	Eng Training Adm.	5860
LWAnn Bray	Licensing Specialist	5587
Kevin Jones.	Design Engineering	5128
Pete Dyalak	ESD	2963
LANNY BUCKLEHART	NEL / NAR	(301) 415-3053
Tim McLEAVE	ENRUBERING - OSD	462875-5174
Paul Sharns	Engr / Licensing	5815
Ed McQuibban	Engr / Licensing	2307
MARCO R. PUNO	ENOR	5841

MEETING ATTENDANCE SHEETTYPE OF MEETING: NOED Lessons Learned - Public MeetingDATE: 2-28-00

Name	Title/Department	Phone Number
LAWRENCE J. DUBGER	ACTING Manager, Engineering Support - CNS	402 825-5170
David E. Lorton	Consultant - Kestrel Group	402 825-5494
Charles Munschall	Chief, Project Branch C Div of Research Project, NRC R10	817 960-8185
R.K. Thorsen	WEM	825-2803
J.E. LECHNER	ENS PROGRAMS SUPERVISOR ESD/CNS	402 825-5686
R.A. Radloff	Eng. / Licensing	402 825-5304
BRUCE RASH	SR ENS MGR / ENS	402 825-2943
R.A. Sessions	SR MGR QA	825-5858
Jim Flaherty	Asst. DED Mgr.	825-5420
Paul Gritton	Public Relations	825-5768
John Swales	VP Nuclear Energy	825-5148
Sharon Mahler	Assistant Licensing Manager / Licensing	825-5236
Norena Robinson	Lic. Specialist	825-5691

MEETING ATTENDANCE SHEET

TYPE OF MEETING:

Need Lessons Learned Fabric/MtgDATE: 2.28.00

Name	Title/Department	Phone Number
Mike Hale	Subgr Site Spnd	5216
Ken Brockman	Dir, DRP, NRC	817/860-8248
Michael Hy	Resident Inspector	5659
Jeff Clark	Sr. Resident Inspector	5759
Mike Boyce	Plant Engr. Mgr	5100
John McDonald	PLANT MGR	5233
David Nelson Madson	Licensing Engineer / Licensing	5817
JEFF ARCEVEBAUX	ENGINEERING	5142
Stan Domicki	Pressure Relieving Supv	5732
Steve Nelson	ENGINEER	5058
WILLIAM MACEE WIZEN	OPERATION	5325
David Van Der Kerk	Ops	2904

ENCLOSURE 2

NRC/CNS

Notice of Enforcement Discretion Communication Lessons Learned

Brownville, NE

February 28, 2000

Agenda

- I. Opening Remarks
- II. Time Line of REC
- III. Reactor Equipment Coolant
Amendment Request
- IV. Notice of Enforcement Discretion
Request

Agenda (continued)

V. Subsequent Communications
Regarding NOED

VI. Common Themes

VII. Corrective Actions

VIII. Closing Remarks

Opening Remarks

- Introduction of Attendees
- Review of Agenda
- Recognition That Performance on These Issues Doesn't Meet Our Standards
- Problem Facing CNS Management Is Inconsistent Performance

Opening Remarks (continued)

- Inconsistent Management and Supervisory Oversight
- Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication
- Inconsistent Application of Formal Communication Processes With NRC
- Inconsistent Accountability Related to Procedural Adherence and Implementation of Fundamental Standards

Time Line

6/15/99	12/30/99	12/31/99	1/1/00	1/2/00	1/3/00
REC Amendment Request	<p><u>Morning</u> Indications of Increased REC Leakage</p> <p><u>Early Afternoon</u> CNS Discussions of Alternatives if REC Leakage Exceeds Limits</p> <p><u>4:00 pm</u> REC Declared Inoperable</p> <p><u>Approx 5:00 pm</u> NRC SRI & PM Notified of NOED Intent</p> <p><u>Approx 8:00 pm</u> SORC Approved NOED Request</p> <p><u>Approx 9:30 pm</u> NRC verbally grants NOED</p> <p><u>Approx 10:00 pm</u> Inappropriately Declared REC Operable</p>	<p><u>Morning</u> Contacted PM to confirm actions</p>	<p><u>Early Morning</u> Determined Sketch not to be Complete/Clear</p> <p><u>1:46 am</u> Declared REC Inoperable</p> <p><u>Approx 3:00 am</u> Call to NRC Regarding Sketch</p> <p><u>Afternoon</u> Call with NRC to Answer Questions</p> <p><u>Late Evening</u> Formal NOED & Answers to Questions Submitted</p>	<p><u>Daytime</u> CNS Discussion Re Shutdown Based on Trend and Gentleman Station Outage</p>	<p><u>Daytime</u> Contact with SRI</p> <p><u>Daytime</u> CNS Management Meeting Relative to Shutdown</p>

Time Line (continued)

1/4/00	1/5/00	1/6/00	1/7/00	1/8/00
<p><u>Morning</u> NRC Requests Phone Call</p>	<p><u>Morning</u> Phone Call with NRC</p>	<p><u>Daytime</u> Phone Call w/NRR (11 Questions)</p>	<p><u>Approx 7:00 am</u> Level Increase in Surge Tank Noticed</p>	<p><u>2:00 am</u> Drywell Entry to Investigate Leakage</p>
<p>NRC Letter Issued Formally Granting NOED</p>			<p><u>Approx 10:00 am</u> Based on Losing Trend Data, 0800 8hr Drywell Floor Drain Leak Rate, and Discussions with Mgt, Controlled Shutdown & De-inerting Directed</p>	<p><u>11:52 am</u> Entered Mode 3</p>

Reactor Equipment Coolant (REC) Amendment Request

- June 15, 1999 REC Amendment Request Information Not Clear and Complete
- Significant Condition Report Investigation Conducted
- Root Cause Was "Inadequate Articulation and Reinforcement of Standards and Expectations"

Notice of Enforcement Discretion Request

- REC Declared Inoperable Based on Procedural Requirements
- NOED Request Based Largely on Submitted License Amendment Request
- NOEDs Not Commonplace and No Specific CNS Process or Procedure Exists

Notice of Enforcement Discretion Request (continued)

- NRC Part 9900 and Existing CNS Correspondence Procedure Used As Guidance
- NOED Request Prepared and Internally Approved in Approximately 6 Hours
- Three-way Communication Not Practiced Relative to Exactly What the NOED Approval Meant
- Post Call Meeting Not Held to Ensure Actions Were Assigned

Subsequent Communication Regarding NOED

- Inconsistent Application of Fundamental Engineering Standards and Management Practices
- Inadequate Treatment of Key Technical Issues
- Inadequate Preparation for Conduct of Communications With NRC
- Inconsistent Supervisory and Management Oversight

Common Themes

- Inconsistent Management and Supervisory Oversight
- Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication
- Inconsistent Application of Formal Communication Processes With NRC
- Inconsistent Accountability Related to Procedural Adherence and Implementation of Fundamental Standards

Common Themes (continued)

Inconsistent Management and Supervisory Oversight (Examples of Poor Recognition and Response to Error Likely Situations)

- Turnover in Licensing and Engineering Persons Responsible for Amendment Request
- Turnover in Licensing Leadership Position
- NOED Infrequent Activity
- Extended Work Hours and Perceived Schedule Pressure
- Timeliness and Quality of Responses to Emergent Resident Issues

Common Themes (continued)

Inconsistent Management and Supervisory Oversight (continued) (Examples of Poor Work Management)

- Inconsistent Use of Fundamental Project Management Tools
- Failure to Promptly Mobilize Sufficient Engineering Manpower to Adequately Respond to the NOED and Forced Outage
- Personal Involvement of Key Managers in Work Details Subsequent to NOED
- Failure to Implement Forced Outage Procedure

Common Themes (continued)

Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication (Examples)

- Engineering Department Input to Amendment Request Limited
- Technical Contact and Licensing Contact Effectively Same Person
- Verification and Validation (V&V) Requirements Not Met
- Sound Basis for Measurement Uncertainty Not Communicated
- Understanding of Leakage Graph Correlation Not Communicated
- Fire Protection 4 Hour Report Not Clear and Complete

Common Themes (continued)

Inconsistent Application of Formal Communication Processes With NRC (Examples)

- NRC Communication Guideline Not Used
- V&V Requirements Not Met
- Formal NOED Procedure Does Not Exist
- Formal Guidance for Communication With Resident Does Not Exist
- Response to Amendment Request "11 Questions" Not Timely
- Communication Regarding Fitness for Duty Report Not Clear

Common Themes (continued)

Inconsistent Accountability Related to Procedural Adherence and Implementation of Fundamental Standards (Examples)

- Licensing Procedure 0.42, “NRC Correspondence Control
- Forced Outage Procedure

Corrective Actions

Inconsistent Management and Supervisory Oversight

- Management Expectations for Technical Involvement and Verification and Validation (V&V) Articulated and Will Be Incorporated In Procedures
- Individual Lessons Learned
- Common Themes and Corrective Actions Will Be Shared With Management Team
- Continued Focus on Staff Stability, Training, and Management Succession Planning

Corrective Actions (continued)

Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication

- Telephone Communications Guidelines Revised and on Licensing Web Page
- Management Expectations for Technical Involvement and V&V Articulated and Will Be Incorporated in Procedures
- Engineering Support Personnel Training on Roles and Responsibilities for Regulatory Submittals Will Be Conducted
- Conduct of Engineering Procedure Use Will Continue to Be Reinforced

Corrective Actions (continued)

Inconsistent Application of Formal Communication Processes With NRC

- Revised Telephone Communications Guidelines and Put on Licensing Web Page
- Management Expectations for Technical Involvement and V&V Articulated and Will Be Incorporated Into Procedures
- Memo to Supervisors on the Importance of Accurate Communication
- Licensing Rapid Response Notebook Developed

Corrective Actions (continued)

Inconsistent Application of Formal Communication Processes With NRC (continued)

- NOED Procedure Will Be Developed
- Engineering Support Personnel Training on Roles and Responsibilities for Regulatory Submittals Will Be Conducted
- Needs for Other Site Personnel Being Trained on Roles and Responsibilities for Regulatory Submittals Will Be Evaluated
- Guideline for Resident Communication Will Be Evaluated

Corrective Actions (continued)

Lack of Accountability Related to Procedural Adherence and Implementation of Fundamental Standards

- CNS Strategic Plan Identifies As a Site Wide Priority

Closing Remarks