

**ComEd**

Nuclear  
Generation  
Group

# Corrective Action Program



**NRC Presentation**  
**June 15, 2000**

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## **Corrective Action Program (CAP)**

**June 15, 2000**

# Corrective Action Program

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- Importance of CAP
  - Reliance on CAP
  - Line management ownership of corrective actions
  - Support move toward risk informed decision making
- Rollout in Progress
- Executive/Senior Management Commitment

# Overview

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- Case For Change (What, Why, How)
- Change Strategy
- CAP Process and Key Process Changes
- CAP Rollout
- CAP Procedure and Handbooks
- Changes to Root Cause/ACE Methodology
- Software Changes
- Integration of CAP As a Line Function
- Conclusion

# What Are We Changing

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- Corrective Action Program (CAP)
  - More emphasis on our corrective action program
  - Find and correct our own problems
  - Identify improvements

# Why Are We Changing

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- Multi-Site CAP Assessment Results
  - Management Expectation for:
    - ◆ Root cause report quality
    - ◆ Effectiveness reviews
    - ◆ Use of root cause checklist
    - ◆ Use of ACE checklist

# Why Are We Changing (cont'd)

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- Improve CAP Efficiency
  - More line involvement and ownership
  - Better reporting of low level human performance non-consequential events
  - Supervisor's ability to closeout minor conditions
  - Improved CAP trend coding and trend analysis

# How Are We Changing

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- Line Management Involvement (CRG/MRC)
- Distribution of Administrative Function Throughout the Organization
  - Department CAP Coordinators
- Program Improvements
  - Senior management involvement prioritized to the more significant issues
  - Supervisor closing out low level issues
  - Minor issues dispositioned without unnecessary Shift involvement

# Change Strategy

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- INPO & Industry Participation
- Benchmarked Other Utilities
- Multi-Discipline, Multi-Site CAP Improvement Team
  - All sites presented
  - Bargaining unit involved
  - Implementation of High Impact Team (HIT)
- Survey from and Interviews with Employees
- Review with Site Executive Staffs

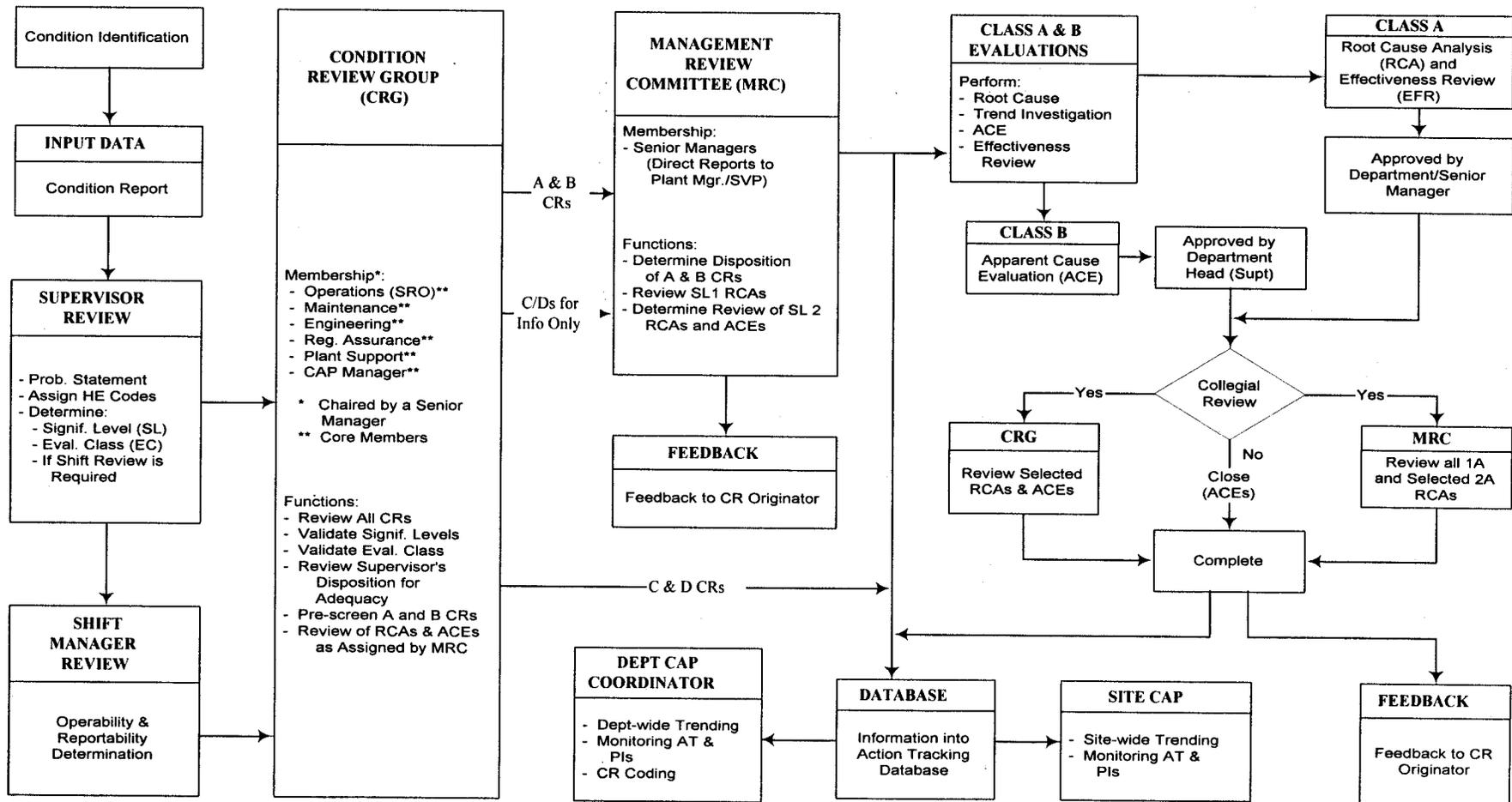
# Change Strategy (cont'd)

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- Rollout At Sites
  - Designed “Event” based on Fermi model
  - Involve department CAP coordinators to facilitate the Event
  - Involve other site representatives
  - Orient all site employees
  - Monitor implementation of enhanced CAP

# CAP Process

## Proposed Enhanced CAP Process Flowchart



# Key Process Changes

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- New Name (PIF to CR)
- Supervisor Review - Expanded Scope
  - Conduct a preliminary evaluation to determine the Condition Statement
  - Determine the Significance Level & Evaluation Class
  - Assign a precursor and barrier code for human performance related conditions
  - Decide if shift review is required
  - Evaluate extent of condition
  - Identify actions required for closure

# Key Process Changes (cont'd)

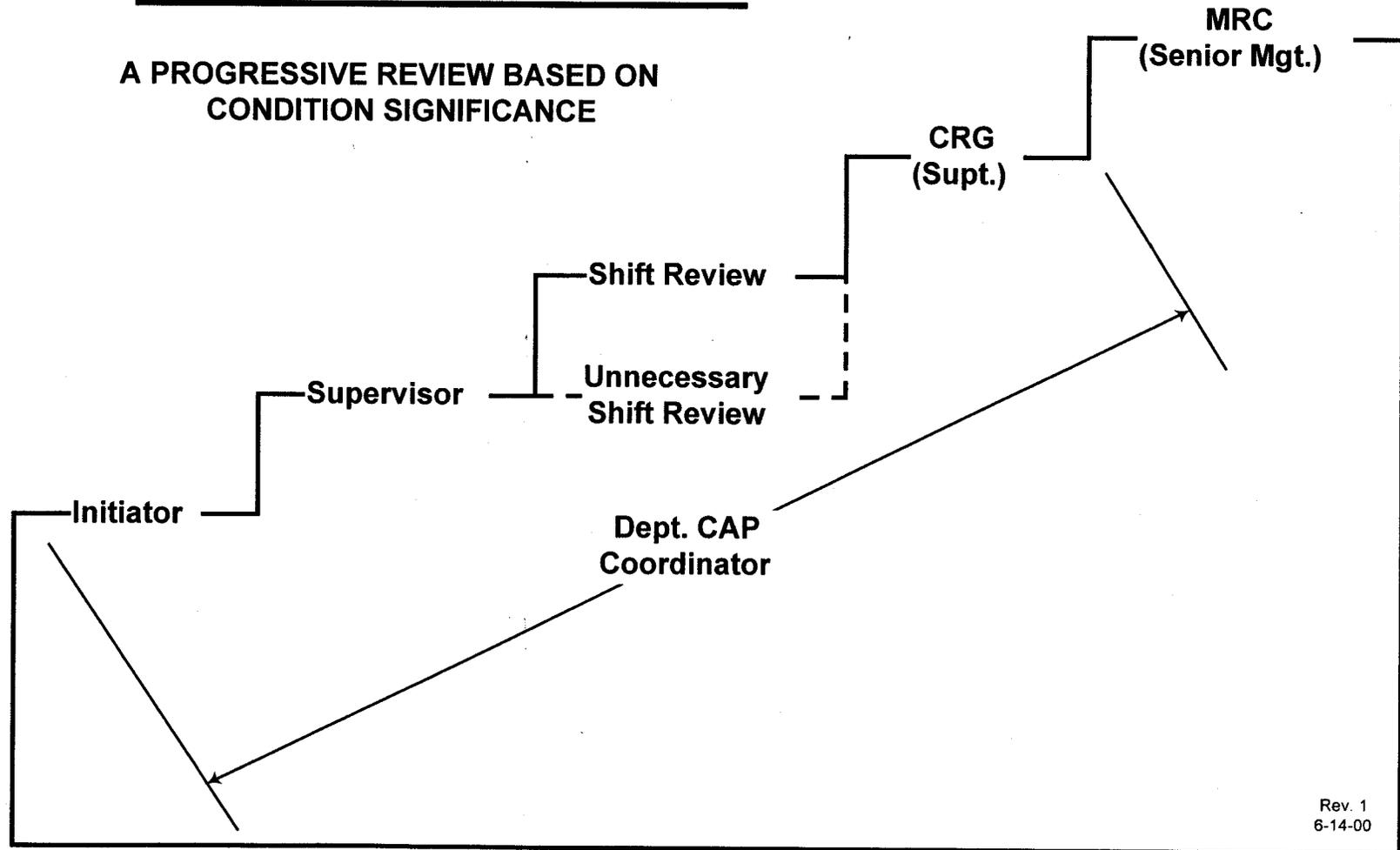
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- Condition Review Group (CRG)
  - Department Head/Superintendent level
- Management Review Committee (MRC)
  - Department/Senior Manager level
- Department CAP Coordinator
- Significance Level
- Evaluation Class

# Key Process Changes (cont'd)

## STEPS TO SUCCESS

A PROGRESSIVE REVIEW BASED ON  
CONDITION SIGNIFICANCE



# CAP Rollout

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- Rollout Schedule (June 5 to August 11)
- One Week Rollout at each Site
- Use Department CAP Coordinator to Facilitate
- Train the Trainer “Department CAP Coordinator” Prior to Rollout (1 day class)
- Department CAP Coordinator Will Train People Who Miss Rollout Event

# CAP Procedure and Handbooks

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- AD-AA-106, The CAP Procedure
- CAP Handbooks:
  - Root Cause Investigation & Report
  - Common Cause Analysis
  - Effectiveness Reviews
  - Coding & Trending
  - PassPort AT Record Retention
  - Apparent Cause Evaluation
  - CAP Process Instructions
  - CAP Process Expectations

# Changes to Root Cause/ACE Methodology

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- Interim Changes
  - Corporate collegial review of selected root cause reports
  - Performed root cause analysis on root cause quality
  - Conducted root cause workshop for Nuclear Oversight Managers
  - Develop short term action plan to address identified root cause deficiencies
  - Conduct workshop for root cause analysts from all sites

# Changes to Root Cause/ACE Methodology (cont'd)

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- Root Cause Evaluations
  - Revised criteria for initiating root cause evaluation
  - Established criteria for root cause analysis quality
  - Timeliness criteria revised based on significance
  - Review/Approval based on significance
  - Improved causal factor chart
    - ◆ Based on TapRoot technology
    - ◆ Consistent evaluation results using chart

# Changes to Root Cause/ACE Methodology (cont'd)

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- Apparent Cause Evaluations (ACE)
  - Revised criteria for initiating an ACE
  - ACE quality criteria defined
  - Timeliness criteria revised based on significance
    - ◆ Shorter time to conduct an ACE for relatively more significant issues
  - Review/Approval based on significance
    - ◆ CRG review of ACEs for relatively more significant issues

# Changes to Computer Software

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## Current Phase

- What Changed:
  - CAPSYS (Data Entry Software)
  - CAP Admin (Reporting Software)
- Why:
  - Consistent with new process
  - Ensure consistency among sites
  - Common trend codes
  - Streamline reporting and data

# Changes to Computer Software (cont'd)

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## Next Phase

- What Will Change:
  - Implement action tracking (AT) to replace CAPSYS
  - Consolidate data from all sites
- Why:
  - Increase speed (Access-based CAPSYS too slow)
  - Enhance search/trend capabilities
  - Streamline reporting

# Integration of CAP as a Line Function

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- Site CAP - Move to Regulatory Assurance
- Establish Department CAP Coordinators
- Department CAP Coordinators Responsible for:
  - Change agent
  - Department coding & trending
  - Pre-screening
  - Action tracking creation and administration
  - Root cause expert
  - Human performance 'one-on-one' observations

# Conclusion

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- New Name (PIF to CR)
- Focus on Low Level Reporting
- Maximize Line Engagement
- CAP Function Distributed Across Organization
- Improved Problem Solving/Condition Resolution
- Enhanced Department Trending
- Progressive Review Based on Significance
- Improved Software

## CAP Improvement Project Roll-Out Event Milestones

Milestone	Resource	Braidwood	Byron	Dresden	Quad Cities	LaSalle
Vice President's Workshop	Station & N.O. Personnel	5-18				
Site Senior Managers Presentation	Site & DG N.O. Personnel	5-19	5-17	TBD	TBD	5-23
Dept. CAP Coordinator Orientation (Technical & Facilitation Skills)	Site CAP Manager & Consultant	5-16	5-17	5-18	5-19	Will Attend Session at Dresden
Dept. CAP Coordinator "OJT" (During the Roll-Out Week)	Site CAP Personnel	Wk of 6-5	Wk of 6-19	Wk of 7-10	Wk of 7-24	Wk of 8-7
Site CAP Personnel Orientation	Site CAP Manager	5-16 Plus On-Going	5-17 Plus On-Going	5-18 Plus On-Going	5-19 Plus On-Going	5-18 Plus On-Going
Roll-Out Event Dry Run	Site N.O. Personnel	Wk of 5-29	Wk of 6-12	Wk of 7-3	Wk of 7-17	Wk of 7-31
Refresher Root Cause (E&CF Charting) Workshop	DG CAP Personnel	6-6 & 6-7	6-20 & 6-21	7-11 & 7-12	7-25 & 7-26	8-8 & 8-9
Roll-Out Event	Dept. CAP Coordinators; Site, Other Sites & DG CAP Personnel; & Consultant	Wk of 6-5	Wk of 6-19	Wk of 7-10	Wk of 7-24	Wk of 8-7
All Hands - First Two Hours						
Supervisors - Third Hour						
CRG / MRC Members - Fourth Hour						
Site CAP Turn-on	Site CAP & IS	6-12	6-26	7-17	7-31	8-14