



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

OCT - 2 2000

Garry L. Randolph, Vice President and
Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, Missouri 65251

Dear Mr. Randolph:

This refers to the meeting conducted in the Region IV office on September 26, 2000. This meeting related to the reorganization of the Callaway Plant's Quality Assurance Department.

AmerenUE personnel presented the organizational changes and program updates outlined in Enclosure 2. This meeting was informative and very useful because of the interactive discussions between attendees.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

William D. Johnson, Chief
Project Branch B
Division of Reactor Projects

Docket No.: 50-483
License No.: NPF-30

Enclosures:

1. Attendance List
2. Licensee Presentation

Union Electric Company

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cc w/enclosures:

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RIV:C:DRP/B				
WDJohnson;tbf;dlf				
10/2/00				

OFFICIAL RECORD COPY

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MEETING ATTENDANCE

LICENSEE	Union Electric Company
DATE/TIME	September 26, 2000 / 1:00 p.m. (CDT)
CONFERENCE LOCATION	Training Conference Room Region IV Office, Arlington, Texas

NAME (PLEASE PRINT)	ORGANIZATION	TITLE
J. Laux	AMEREN UE	Manager, Quality Assurance
J. Schnack	AMEREN UE	Supervising Engineer QA Corrective Action Group
M. Reidmeyer	AMEREN UE	Regional Regulatory Affairs Supervisor, QA Regulatory Support
W. Johnson	NRC	Chief, Project Branch B Division of Reactor Projects (DRP)
D. Powers	NRC	Senior Technical Analyst Division of Reactor Safety (DRS)
J. Pellet	NRC	Chief, Operations Branch, DRS
C. Paulk	NRC	Acting Chief, Engineering & Maintenance Branch, DRS
R. Kopriva	NRC	Senior Project Engineer, DRS
R. Azua	NRC	Project Engineer, DRS



**Callaway Plant
Quality Assurance Department
Reorganization**

**NRC Region IV
September 26, 2000**



AGENDA

- Purpose of Meeting
- Summary of QA Organization Changes
- QA Audit Process
- Callaway Self-Assessment changes
- Corrective Action Program focus
- Questions/Closing Remarks



Summary of QA Organization Changes

- **QC Group transferred to Work Control**
- **One group assigned to perform the regulatory required audits**
- **Some resources shifted to Self-Assessment coordination in QA and directly into some line departments**
- **Added staff and focus to Corrective Action Program performance**
- **Added staff and focus to implement the new NRC Reactor Oversight Process, including PIs, and Inspection Interface**

Quality Assurance Organization
(Effective January 1, 2000)

Callaway Plant

Manager,
Quality Assurance

Audit Group

- Regulatory required audit program
- Lead auditor qualification program
- Vendor Audit Program
- Morning meeting participation

Self-Assessment Group

- Division SA program owner
- Facilitation and coordination of Division SAs
- Integrated SA schedule
- Training of SA team members and leaders
- External Tech Specialist exchange coordination
- QA Training Coordination
- Budget

Regulatory Support Group

- NRC Region IV interface
- Inspection coordination and responses
- Revised Regulatory Oversight Process coordination
- Coordination of NRC PIs
- RUG IV member
- OQAM

Corrective Action Group

- Division CA program owner
- CA document administration
- Facilitate ERTs
- Formal root cause evaluations
- CA trend analysis
- SCAC coordination
- Coordinate CAP interface with Human Performance initiatives
- Reportability/ LERs
- Monthly reports/PI
- CTS

Nuclear Safety (ISEG) Group

- Assessments of nuclear safety
- Administer OE program
- Provide STA support to Operations
- INPO/WANO coordination/ PIs
- Maintain STA qual program.
- NSRB support
- SAMG training support
- ORC member

All Groups:

- Self-evaluation of their group
- Routine reports to managers
- PIs for each area
- Action plans for immediate implementation
- Definition/scope of the above responsible areas
- Procedures as assigned.



QA Audit Process

(Prior to 1/1/00)

- **3 Assessment Groups**
- **Conducted Discrete OQAM Required Audits, Surveillances and Assessments**
- **21 Functional Areas for audits**
- **20 Functional Area QA Auditors**
- **Limited Line Department Involvement**
- **Detailed Audit Reports**



Reasons for Change

- Industry Benchmarking
- New NRC Oversight Process
- Increased Self-Assessment Efforts
- Increased Corrective Action Efforts
- Better Utilization of Resources
- Better Audit Flexibility



New QA Optimized Audit Process (Effective 1/1/00)

- **1 Audit Group**
- **Audit Group Size = 9 auditors (7 Certified Lead Auditors)**
- **Audit Group has Experienced Technical Staff**
- **Increased use of Technical Specialists**
- **Continue with Regulatory Required Audits**
- **Audit Attributes considered the NRC Oversight Process**
- **More Focused and Risk Informed Audits**
- **Less Detailed Quarterly Audit Reports**
- **Audit Group Separate from Self-Assessment Effort**
- **No change to OQAM Audit Requirements**



Self-Assessment Program

(prior to 2000)

- **Majority of Self-Assessment had been conducted by QA audit groups under QA audit and surveillance processes.**
 - ▶ **Approximately 12-15 audits per year**
 - ▶ **Approximately 100 surveillances per year**

- **Self-Assessment Program defined in a policy document**



Self-Assessment Program

(prior to 2000)

- **Line Self-Assessments had been done sporadically with main reliance on QA to do bulk of assessment effort**
- **March 1999 INPO E&A assessment and industry benchmarking Self-Assessment findings identified line departments at Callaway needed to become more self-critical.**



Self-Assessment Program

(Changes since 1/1/00)

- **Personnel resources dedicated to the Self-Assessment program**
 - ▶ **Supervising engineer and two engineers in QA to administer and facilitate program.**
 - ▶ **14 department Self-Assessment coordinators to facilitate implementation in individual departments.**
- **Administrative procedure describing program elements and direction issued**



Self-Assessment Program

(Changes since 1/1/00)

- **Integrated schedule implemented detailing all assessment activities**
 - ▶ Includes QA Audits, Self-Assessments, INPO Assessments and NRC Inspections.

- **Routine communication of program changes and results provided to senior management and division personnel**



Self-Assessment Program Metrics (Year 2000 data through 9/20/00)

- **Year to date, line departments have performed 44 focused Self-Assessments.**
 - ▶ Topics have included reviews of I&C and Operations department activities, HP ALARA and WPA programs

- **Findings from Self-Assessments are being captured in plant's corrective action program**
 - ▶ 172 SOSs issued to date from formal Self-Assessments
- (58 occurrences and 114 recommendations for improvement)

 - ▶ 686 SOSs issued related to ongoing Self-Assessment activities.
- (366 occurrences and 320 recommendations, 31 of which related to industry benchmarking)



Self-Assessment Program Metrics (Year 2000 data through 9/20/00)

- **Have had excellent participation from ALL levels of the organization on formal Self Assessment activities**
 - ▶ More than 75 division employees have participated on at least one formal Self Assessment thus far this year.
 - ▶ More than 40 industry peers used on these Self Assessments to provide broader industry perspectives.

- **Callaway Plant's implementation of an annunciator windows process (based on INPO Principles document) has been identified by industry peers as a 'best of kind' approach to assessing overall program effectiveness**



SUMMARY OF CAP INITIATIVES

- Strategic Priority at Callaway
- Focus Organization on Root Cause Analysis
- Implement Screening Committee
- Increase Line Department Ownership
- Improve Corrective Action Effectiveness Reviews
- Improvements in the Use of Trend Data
- Software Re-Design



**ACTIONS TAKEN TO
ADDRESS
CALLAWAY CAP
INSPECTION RESULTS**



Threshold for identification of conditions adverse to quality

- **The threshold for the use of SOSs is inconsistent between departments and may not meet management expectations**
 - ▶ **Continual Management reinforcement of Threshold Level**
 - ▶ **New Software being developed which makes entry easier. Merges several systems into one.**



Prioritization of Identified Issues

- **Numerous issues and priorities may be spreading plant resources too thin. Undermines the prioritization process and may challenge the successful efforts on larger issues**
 - ▶ Screening Committee assigns Significance/Priority
 - ▶ Allow apparent cause on lower significance items
 - ▶ Increases resources available for more significant issues



Effectiveness of Corrective Actions and Timeliness of Resolution

- **Frequent extensions of deadlines are made based on unavailability of resources.**
- **Lack of timely root cause analysis and corrective actions inhibit our ability to prevent recurrences**
 - ▶ **Root Cause Analysis support from Line Departments**
 - ▶ **Revise program to better focus resources on more significant issues**
 - ▶ **Effectiveness reviews for more significant issues**



Program Metrics and Trending

- There has been an increasing trend in recurring issues the last 1½ years.
- Human performance issues have been identified and are being pursued. However, the adverse trend and error rate has not yet been turned around.
 - ▶ Push trending to line departments and factor into Self Assessments
 - ▶ Provide better tool to retrieve and trend data



Identification and Resolution of Repetitive Issues

- **Program does identify repetitive issues. However, lack of timely root cause analysis and corrective actions inhibit our ability to prevent recurrences**
 - ▶ Improve use of trend data by line departments
 - ▶ Allow apparent cause on lower significance items
 - ▶ Increases resources available for more significant issues, including repetitive issues



Questions and Closing Remarks