



January 25, 2002

Re:

Indian Point Unit 2 Docket No. 50-247 NL-02-015

Mr. Hubert J. Miller Regional Administrator - Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406-1498

Subject:

2002 Fundamentals Improvement Plan

Dear Mr. Miller:

Attached please find the Fundamentals Improvement Plan for Indian Point Unit 2. This plan is being provided in fulfillment of the commitment made by Entergy Nuclear Operations Inc. at the public meeting with you and your staff to discuss plant performance on December 20, 2001, in Verplanck, New York.

The purpose of the Fundamentals Improvement Plan is to identify those specific actions and monitoring metrics that are needed to improve plant performance in several of the cross cutting issues that support the cornerstones described in the NRC Regulatory Oversight Program (ROP). These actions are a sub-set of the overall Entergy 2002 business plan and are focused primarily on the ROP cornerstones in order to provide a consistent, common frame of reference between Entergy and the NRC on cornerstone improvement initiatives. The actions planned are based on the results of several significant internal and external evaluations of station performance, which include the self assessment performed by Entergy in November, 2001 and NRC inspection number 2001-02 performed pursuant to inspection procedure 95003. The plan is designed to improve in the five key areas of human performance, maintenance of the licensing and design basis, equipment performance, problem identification and resolution, and licensed operator performance. The plan also includes performance indicators that will be used to evaluate the effectiveness of the actions. It should be noted that the indicators emphasize the results achieved. Since it is the effective results of the actions that are significant rather than mere completion of the actions themselves, the action plan will be revised as needed to achieve the desired results.

Since the information contained within the attachment to this letter will be made available to the public, Entergy has omitted individual names and approval signatures. This information will be available onsite for NRC review.

Should you have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety and Licensing at (914) 734-5074.

Sincerely,

Fred Dacimo Vice President - Operations Indian Point 2

Attachment

CC: U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Mail Station O-P1-17 Washington, DC 20555-0001

> Mr. Patrick D. Milano, Senior Project Manager Project Directorate I-1 Division of Licensing Project Management U.S. Nuclear Regulatory Commission Mail Stop 0-8-C2 Washington, DC 20555

Senior Resident Inspector U.S. Nuclear Regulatory Commission P.O. Box 38 Buchanan, NY 10511

Mr. Paul Eddy NYS Department of Public Service 3 Empire Plaza Albany, NY 12223

Attachment

Fundamentals Improvement Plan

Entergy Nuclear Operations, Inc.
Indian Point Unit 2
Docket No. 50-247

Fundamentals Improvement Plan



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INTRODUCTION

The purpose of the Fundamentals Improvement Plan is to identify those specific actions and monitoring metrics that are needed to improve plant performance in several of the cross cutting issues that support the cornerstones described in the NRC Regulatory Oversight Program (ROP). These actions are a sub-set of the overall Entergy 2002 business plan and are focused primarily on the ROP cornerstones in order to provide a consistent, common frame of reference between Entergy and the NRC on cornerstone improvement initiatives. The actions planned are based on the results of several significant internal and external evaluations of station performance, which include the self assessment performed by Entergy in November, 2001 and NRC inspection number 2001-02 performed pursuant to inspection procedure 95003. The plan is designed to improve five key areas: human performance, maintenance of the licensing and design bases, equipment performance, problem identification and resolution, and licensed operator performance. The plan also includes performance indicators that will be used to evaluate the effectiveness of the actions. It should be noted that the indicators emphasize the results achieved. Since it is the effective results of the actions that are significant rather than mere completion of the actions themselves, the action plan will be revised as needed to achieve the desired results. The table shows the quarter the individual actions are scheduled to be completed.



		2002	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
u(b) (migenzangen = ditons					
.1. Establish a site Human Performance Coordinator	С				Complete
.2. Upgrade the Human Performance Program	Х				
.3. Establish the site Human Performance Team (assign departmental HP coordinators)	С				Complete
.4. Train site personnel in Human Performance Fundamentals				Х	
.5. Develop departmental event free clocks		X			
.6. Design and develop a human performance laboratory			X		
.7. Train managers and supervisors in observation, coaching, and intervention skills			X		



		2002	Farget	S	
Strategies	Q1	Q2	Q3	Q4	Comments
20 Sinos managamente arsenada es coccumidabliss his	· ·				
.1. Conducting a seminar with managers to establish expectations and examples of peer checking and holding each other accountable		Х			
.2. Conducting 2Cs meetings (compliments and concerns) with representative groups of station employees				Х	
siv i <u>kiegitii (iit. korteipe o andeitiis gesomasiille</u> Li <u>veideneme</u> da	(V * \$ () * (V \$ ())	^{(††} }ધન <u>ા</u> મું(૬	: (<u>(1.</u>) (1. 98))	ntigera idija te	บางเครากับไปใ
.1. Republishing and discussing with department managers, supervisors, and workers the Maintenance Department standards and expectations	x				
.2. Implementing employee development assignments	х				



				2002 Targets					
Strategies		Q1	Q2	Q3	Q4	Comments			
	gave spesitions, or management doseratio	g of taken	<u> </u>	Teach North		100 100 100 100 100 100 100 100 100 100			
.1.	Maintenance will implement actions to reduce the administrative burden on managers and supervisors	X							
.2.	Training managers and supervisors to improve effectiveness of observations for enhancing worker performance	X							
.3.	Enforcing the requirement that prejob briefings include specific work performance enhancing elements	X							
.4.	Maintenance will conduct self-assessment of prejob briefings	Х							
3(I) 1 <u>111</u>	pana die addioend Sport Cropedie								
.1.	Develop and publish clear Industrial Safety Expectations for employees and supervisors.	Х			,				
.2.	Establish a safety orientation program for new Entergy and Contract staff.		X						



		2002	Target	ts	
Strategies	Q1	Q2	Q3	Q4	Comments
.3. Develop Industrial Safety Program Manual for Indian Point 2 Energy Center.	X				
.4. Develop a Job Hazard Assessment/Hazard Control process	Х	-			
.5. Align management observation program with general industrial safety issues to increase focus on safety issues when performing plant observations.	Х				
.6. Develop additional safety program performance indicators.	х				



KEY RESULTS AREA—II DESIGN CONTROL/LICENSING BASIS

			2002 '	Targe	ts	
Strategies		ies Q1 Q2		Q3	3 Q4	Comments
	ынке Тиме энцеский панедами)ektélestét	or Herite	1911 (17		
.1. Issue the IP2 De	sign Basis Initiatives (DBI) fer to plan on IP2 U-drive)	С				Complete
Multi-Year Impi in 2001 Enginee	ns of the Engineering DB/LB rovement Projects as indicated ring Business Plan (refer to ag Business Plan on IP2 U-	С				See 2001 project list Complete
.3. Issue monthly properts on each	rogress report which quantifies helement of the IP2 DBI	Х				10 th working day of each month, commencing February
ongoing training	logy and implement plan for g for IP2 personnel on DB/LB etronic databases use	X				

¹ The percentage completion of each separate project may be found in the IP2 Engineering Department 2001 Business Plan Performance Indicator Report. At the end of November, all projects were expected to be greater than 95% complete (against the portion of the project that was to have been completed in 2001) and in some cases well over 100% (greater progress than planned).

KEY RESULTS AREA—II DESIGN CONTROL/LICENSING BASIS

		2002	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
.5. Determine the future of the various electronic design basis databases such as the Component Function Database that were created during the 50.54f project. This assessment will take into account Entergy Nuclear Northeast fleetwide initiatives in design information electronic databases. Issue a report to the Director of Engineering with recommended future course of action.	х				
.6. Develop Effectiveness Review strategy and issue in a formal Document for IP2 Design Basis Initiatives Project			X		
.7. Perform Effectiveness Review of IP2 Design Basis Initiatives Project				X	



KEY RESULTS AREA—II DESIGN CONTROL/LICENSING BASIS

			2002	Farget	S	
Strategies	Q1	Q2 Q3		Q4	Comments	
indiana.	andia madesting or composite analysis dimine	niso, saskija	(સુલ <i>ને</i>) ફુક્ક પ્રત્	<u> </u>	enne idéles	orgeszagraet ill es
	Obtain approval and implement SAO- 120 Change Management Plan to transfer ownership	С				Complete
.2.	Develop a workdown curve and a table which includes information on TFC description, owner, etc. ²	С				Complete
.3.	Revise and implement SAO-206 improvements related to TFCs	Х				
.4.	Prepare a tailgate discussion to be presented to plant management to highlight awareness of the deleterious effect of a high number of TFCs on operations.	Х				
.5.	Perform an effectiveness review to ensure the revised procedure SAO-206 is effective, the plant operators are not overly burdened by outstanding temporary facility changes, and the workdown curve is on schedule			X		

Baseline table and workdown curve are attached and will be updated in weekly meetings led by TFC Project Manager . Entergy

		2002	Target	:S]
Strategies	Q1	Q2	Q3	Q4	Comments
LO linguedas aanki miningement				200	VIT - NOT A SECOND FOR THE PROPERTY OF THE PRO
.1. Establish corrective maintenance backlog reduction goal of less than 200 items to be achieved by end of 2R15 outage	С				Complete
.2. Fill work control section manager position with an experienced Operations Shift Manager	С				Complete
.3. Establish standards for the maximum number of control room activities to be scheduled in parallel to reduce work activity delays associated with control room access.	С				Complete
.4. Establish staggered control room briefing times to reduce delays	С				Complete
.5. Establish 21-day clock for resolution of control room deficiencies	С		†		Complete
.6. Establish 7-day clock for locked in control room alarms.	С		,		Complete



		2002	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
.7. Assign experienced Operations Shift Manager to the FIN Team.	С				Complete
.8. Implement Rapid Response Team led by Work Week Manager to improve off-hours support	С				Complete
.9. Establish work-down curves for preventative maintenance items currently in grace or overdue		Х			
.10. Support MAXIMO project implementation to address current limitations with current work management system		Х			
.11. Conduct work management self-assessment to evaluate corrective action effectiveness			X		
ZiV limpkore szors proparation or					202.36
.1. Reinforce work group work package walk down standards and expectations for support of 12-week process.	Х		1		



		2002	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
.2. Adjust focus/resources as needed to resolve leading causes of inadequate work preparation that result in attrition of 12-week schedule activities between T12 and T6.	Х				
.3. Establish standards and expectations for surveillance test walk downs consistent with standards established for work package walk downs for surveillances with testing intervals of quarterly or greater.	Х				
.4. Implement corrective actions to resolve timely issuance of surveillance tests to support upgraded surveillance test walk down requirements.	X				
.5. Establish 12-week process milestones for planners to identify engineering support needs, (e.g. T-11), to support engineering resolution by T6.	Х		1		



	2002	Farget :	S	
Q1	Q2	Q3	Q4	Comments
X				
X				
X	X	X	X	Ongoing
	Q1 x	Q1 Q2 x x	Q1 Q2 Q3 x x x x	X



		2002 '	Target	is	
Strategies	Q1	Q2	Q3	Q4	Comments
TO Maproys Houslinger a spectrum to mailtas diagonales de	aને ર ્યાસકાર	2 (* £ *)			
.1. Establish mini-team to resolve frequently performed preventive maintenance tasks (6 month or less frequency) material issues.	С				Complete
.2. Develop and provide MP&C a comprehensive material list for frequently performed preventive maintenance items.	С				Complete
.3. Complete conversion of preventive maintenance database to MAXIMO by 3/31/02. In support of this objective start conversion of PMs into Maximo in January. Implementation of MAXIMO will provide for auto generation of preventive maintenance repetitive tasks.	X				



		2002	Target	ts	
Strategies	Q1	Q2	Q3	Q4	Comments
.1. Establish and populate a plant equipment database that stores and trends predictive maintenance data and is available to all station personnel.	С				Complete
.2. Expand the scope of the current program to include more equipment and to incorporate other predictive technologies.	х				
.3. Develop procedures for predictive maintenance activities.	С				Complete
.4. Upgrade software for vibration data and thermographic image analysis.	С				Complete
.5. Establish an in-house oil analysis program.	X				
.6. Provide training for predictive maintenance technologies.	х				
500 (Olombie: He Pressential Weibusunger Proposition)	έλγε,		ŧ,		



		2002 '	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
.1. Performing a systematic review of PM tasks using EPRI-NMAC templates, equipment history, predictive maintenance data, operating experience, etc., and revising PM tasks for 15 systems	х				
.2. Continuing systematic review and revising PM tasks for additional systems IAW the Design Basis Project Plan				X	
.3. Establishing a systematic review of corrective maintenance for potential changes in the PM tasks and frequencies	X				
.4. Establish and implement a plan to widely communicate the purpose and goals of a living PM program to station personnel.	С				Complete
.5. Establish a database for the creation and storage of preventive maintenance tasks and technical bases	С				Complete



		2002 '	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
.6. Reinforce and monitor the expectations for maintenance workers to document the asfound equipment condition and the specific work performed during preventive and corrective maintenance, and develop a method to routinely distribute this information to engineering for the evaluation of PM adequacy.	х				
.7. Establish a systematic review of corrective maintenance for potential changes in the PM task and frequencies.	X				
.8. Perform a systematic review of PM tasks utilizing EPRI-NMAC templates, equipment history, predictive maintenance, OE, etc. Populate PM database with revised/reviewed PM tasks for additional systems. (refer to Design Basis Initiatives Project Plan)			,	X	
.9. Perform an Effectiveness Review of actions taken to Optimize the Preventive Maintenance Program				X	



		2002 '	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
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.1. Reviewing historical shutdown and unplanned power reductions to ensure action plans address significant equipment issues	X				
.2. Developing system health rollup to ensure cross-cutting equipment issues are identified and addressed	Х				
·····································					
.1. Designating a Maintenance Department rework program administrator to instill ownership and continuity	С				Complete
.2. Developing a rework program improvement plan	X				
.3. Using the condition reporting process to identify rework and trends, and needed actions	х	х	X	Х	On-going



		2002	Target	ts	
Strategies	Q1	Q2	Q3	Q4	Comments
.4. Implementing a mechanism for communicating rework performance to craft personnel on a regular basis	Х				
ne e Mir Amorose enemerenes o vascina desperie no .					
.1. Assigning a station M&TE Program administrator	С				Complete
.2. Developing a plan for consolidating all M&TE on site into one program	Х				
QQ Amperias (1877) percentiles mailtannages by					
.1. Completing the I&C PM Project, including development of I&C PM task sheets, per the established schedule and procedure upgrades for eight (8) systems				X	Multi-year effort



		2002	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
.2. Eliminating the backlog of overdue I&by augmenting I&C resources, realign crews, implementing a workoff curve, reviewing the I&C PM backlog in the "pick" meetings for inclusion in upcon work cycles	ing field and weekly	х			
.3. Revising associated procedures to clar responsibilities and expectations, and affected personnel on these changes	-	Х			
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.1. Develop IP2 SSC Long-Range Strateg Planning Standard	gie X				
.2. Develop proactive obsolescence progr geared towards a prioritized and focus replacement strategy		X			
.3. Produce Long-Range Strategic Plan for Level 1 System	or each			Х	



		2002	Farget	S	
Strategies	Q1	Q2	Q3	Q4	Comments
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.1. Establish Equipment Reliability Group	С				Complete
.2. Establish Engineering portion of new Equipment Reliability Group to support Equipment Reliability initiatives: Unit Performance Valve Programs PDM/PM Programs	С				Complete
.3. Establish Technician portion of new Equipment Reliability Group to be comprised of: Supervisor of Technicians Technicians (transferred from former Test & Performance Section)	С		1		Complete
.4. Develop and perform effectiveness review of Equipment Reliability and the actions of this Action Plan.	х				



		2002	Target	S	
Strategies	Q1	Q2	Q3	Q4	Comments
The Constitute	સ્પ્ર <u>ાં</u> ક્ષિક માર્ચ	(a) (4) 642-111	ple amini	indk (O)	क (चर्चा(भारू मा गाँग(क्विमी)
.1. Develop and implement top technical issue list to focus station resources on resolving equipment issues.	С				Complete
.2. Develop and implement equipment status reports to communicate equipment trends and status.	С				Complete
.3. Develop Maintenance Rule SSC's status report and indicators.	С				Complete
.4. Establish indicator that monitors unplanned entries in LCO conditions.	С				Complete
.5. Establish station observation program to ensure managers and supervisors are observing field activities.	С		,		Complete
.6. Evaluate utilizing equipment failure analysis techniques and implement as appropriate		X			



KEY RESULTS AREA—IV PROBLEM IDENTIFICATION AND RESOLUTION

	2002	Targe	ets		
Strategies	Q1	Q2	Q3	Q4	Comments
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.1. Performing effectiveness reviews of all SL-2 CRs and selected SL-3 CRs after completion of actions	Х				
.2. Identifying and prioritizing backlogged actions for more timely accomplishment in individual action plans	X				
.3. Requiring general manager or vice president approval for extensions to SL-2 CR due dates	С				Complete
.4. Reviewing timeliness of CR closeout weekly with the management team	х	Х	X	Х	Ongoing (began in Nov 2001
The property of monthly represented the contraction of the contraction	ndefittefike	14(<u>28)</u> (6)(1);	s. Pers Phys	- <u>- 1831</u> (1) (1)	ane महासर् रशिक्तान्त्रविधिः
.1. Develop and implement PI's for each department	X			1	



KEY RESULTS AREA—IV PROBLEM IDENTIFICATION AND RESOLUTION

	2002	2 Targ	ets		
Strategies	Q1	Q2	Q3	Q4	Comments
3)(f) !mij)મું પ્રત્ય (તાલુવાના તાલુવાના) જ અન્યતિનો કે જિલ્લા (સાંકો છે!	n dielennierwie	ilis HKBAS AV	<u> </u>		ប្រាស្ត្រមហ្គមពេលទេនៅជីវិ
.1. Improving the experience level of assessors through benchmarking				X	
.2. Providing training for assessors that will reinforce management's expectations for indepth, performance-based assessments, that includes review lessons learned from recent NQA misses; and that will improve their basic assessment skills	c		x		
.3. Addressing assessor resource issues, including staffing and performance of line responsibilities	g X				
.4. Using additional measures to implement an accountability plan for meeting assessment standards as well as increasing the effectiveness of assessor feedback on timely and accurate problem identification		x			
.5. Establishing a line rotation plan to QA			X		



KEY RESULTS AREA—IV PROBLEM IDENTIFICATION AND RESOLUTION

	2002	2 Targ			
Strategies	Q1	Q2	Q3	Q4	Comments
.6. Conducting follow-up performance-based assessments for 12 issues identified by NQA in the past	, X				
.7. Developing a performance indicator to track NQA's ability to identify and communicate problems to senior management		х			



			2002	Carget	S	
Strate	egies	Q1	Q2	Q3	Q4	Comments
ાઇ હોય		milon				
	Increase management observations of training	X				
.2.	Develop staffing/rotation plan inject additional operations expertise into training organization	. X				
.3.	Require review of examination materials by qualified/formerly qualified operators	· X				
.4.	Increase operations manager interaction with training organization to ensure reinforcement of standards in training	Х				
W une	o. Ožože itie ossenilomality on machidus redictin	· ikiliye	ija Verijke	ing kigo	errya <u>n</u> tan	ACCESSAGE ACCESSAGE ACCESSAGE
.1.	Conduct "high intensity" training to upgrade knowledge and performance of licensed operators		X			
.2.	Increase the number of operations instructors to 4 who have IP2 or similar operating experience	Х				



		-	2002 '	Target	c]
Strategies		Q1	Q2	Q3	Q4	Comments
.3. Develop	an operations training staffing plan to hat sufficient expertise is maintained		х			
	afritise gjige graviter errgjaftega fisje vill gige gjitt gjett fra sykargytur	li syrjetëtejeç	r oger Badere	2 - 3 2 2 3 14 18 2 2 18	mestante di	्रहे ्र स्ट्रेस्ट्रिक् र ्क्ष
.1. Pilot and reference	i implement the use of closed te questions in licensed operator ing training				Х	
_	ent Entergy Nuclear Northeast dized training processes			X		
.3. Revise t	he annual operating examination			X		
_	rate the use of oral boards into initial r training				X	
AND REGISERAL	MEDIERAH (MI)				+	
.1. Conduc	t corporate assessment of reactivity ment at Entergy Nuclear Northeast	С				Complete



		2002	Target	ts	
Strategies	Q1	Q2	Q3	Q4	Comments
.2. Strengthen controls for reactivity management		X			
.3. Conducting prebriefings on all planned reactivity changes	Х	х	Х	X	On-going
.4. Provide additional reactivity management training for all operators		Х			
.5. Training on responsibilities regarding reactivity issue identification		Х			
SV Siinevalammen ami Sunan sene Landelson					2007
.1. Assign mentors to Shift Managers	X				
.2. Specifically selected managers conduct infield, control room, and simulator observations	X				
and thing shows Coursely will a marrianing mail diffe	រុទ្ធ <u>ស្</u> រួម				A STATE OF THE STA
.1. Perform additional independent verifications	x				
.2. Conduct focused observations of field activities for error-reduction techniques	Х				



		2002	Targe	ts	
Strategies	Q1	Q2	Q3	Q4	Comments
.3. Upgrade operations valve checkoff lists to include full power valve alignments				X	
to garage of <mark>it is know</mark> to stading a					
.1. Develop and implement a combined Unit 1/ Unit 2 plant labeling program				X	
.2. Align operations procedures to single database of valve names/numbers			Х		



Key Performance Indicators for Fundamentals Improvement Plan



Key Performance Indicators (1-16-02)

Human Performance

- a) Human Performance Error Rate
- b) Industrial Safety Accident Rate
- c) Station Event Free Clock Resets

Design Control/Licensing Basis Initiatives *

a) Number of Temporary Facility Changes

Equipment Performance/Work Management

- a) Maintenance Work Order Backlog
- b) Preventive Maintenance in Grace
- c) Unplanned Entries into Limiting Condition of Operation
- d) Number of Central Control Room Deficiencies
- e) Repeat Maintenance Frequency
- Operator Work Around

Problem Identification & Resolution

- a) Open Condition Reports
- b) Age of Open Corrective Actions
- c) Repeat Events

Licensed Operator Performance

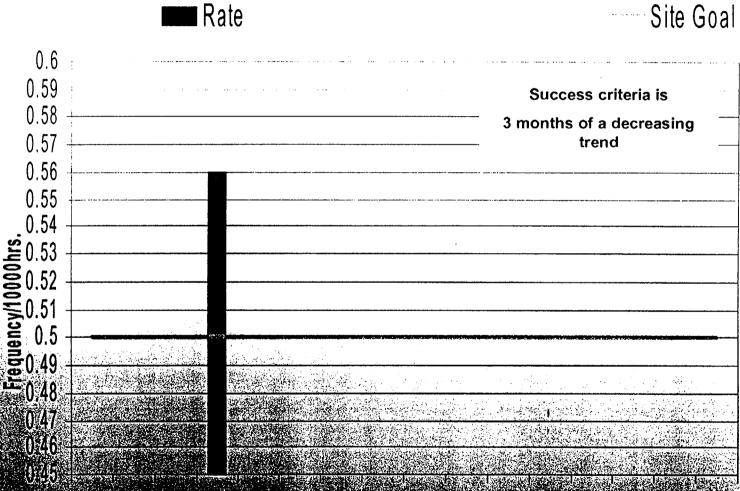
- a) Number of Mispositionings
- Licensed Operator Re-qualification Success Index
- DePlane Backlog
- (6), 18 ober 18 de die von de grand 18 de 18 ang 18 de 18 de

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OBEST BOS Indiance (No dice) BUING CONCEDIO CONTROL



Human Performance P.I.

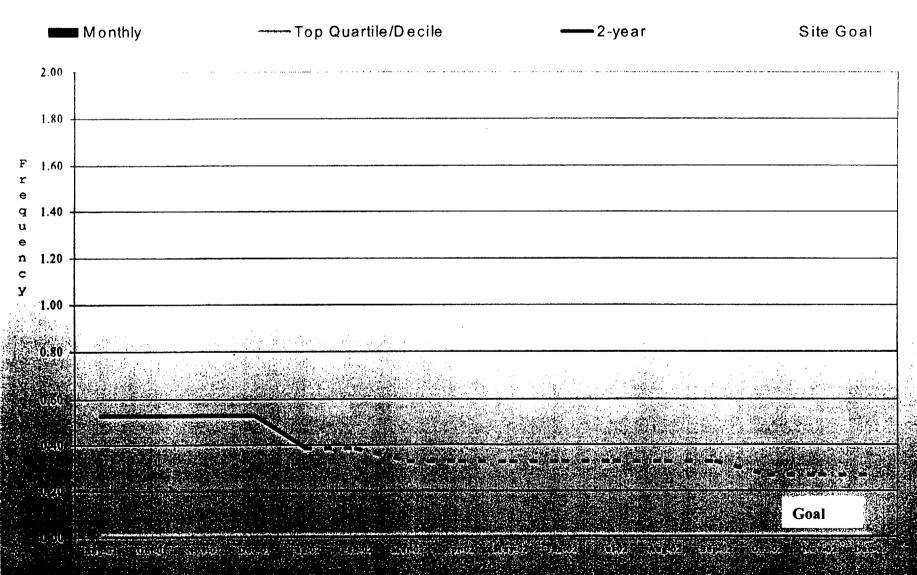


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Industrial Safety Accident Rate

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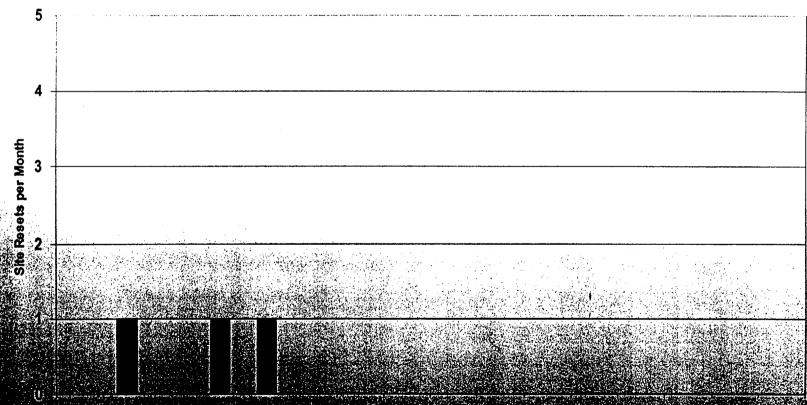






Station Event Free Clock

Goal < 5 resets in 2002

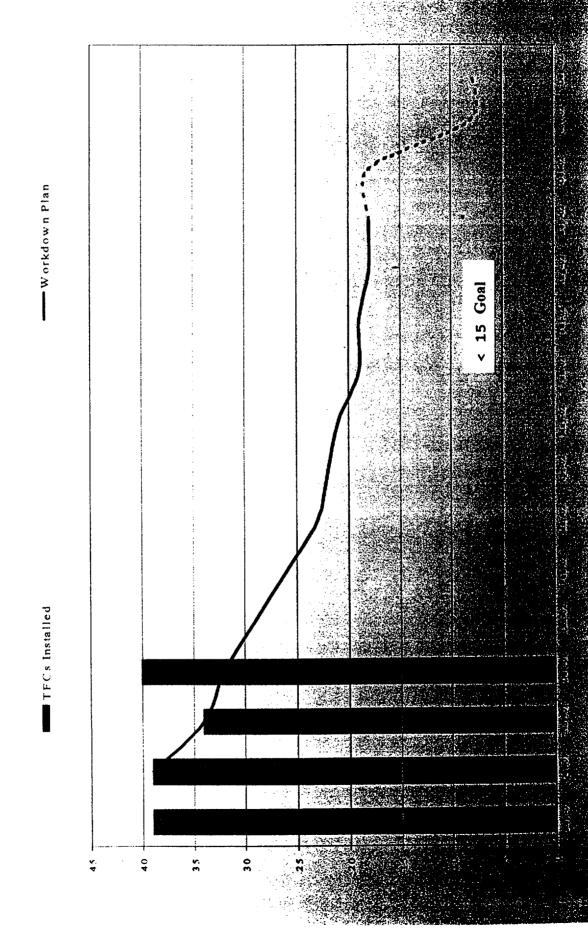


عياها العظما المعاماة العاملة المستلا المامان الللمان المامان المامان



Design Control/Licensing Basis Initiatives

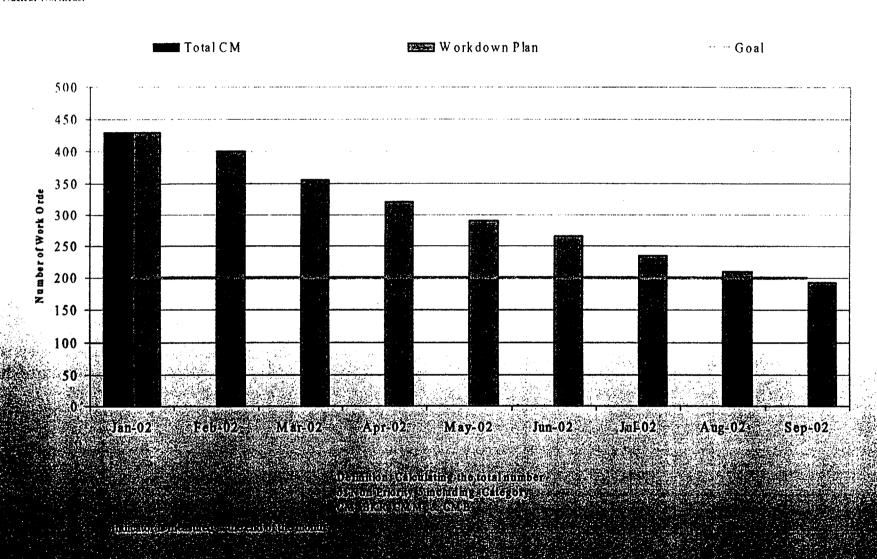
Temporary Facility Change



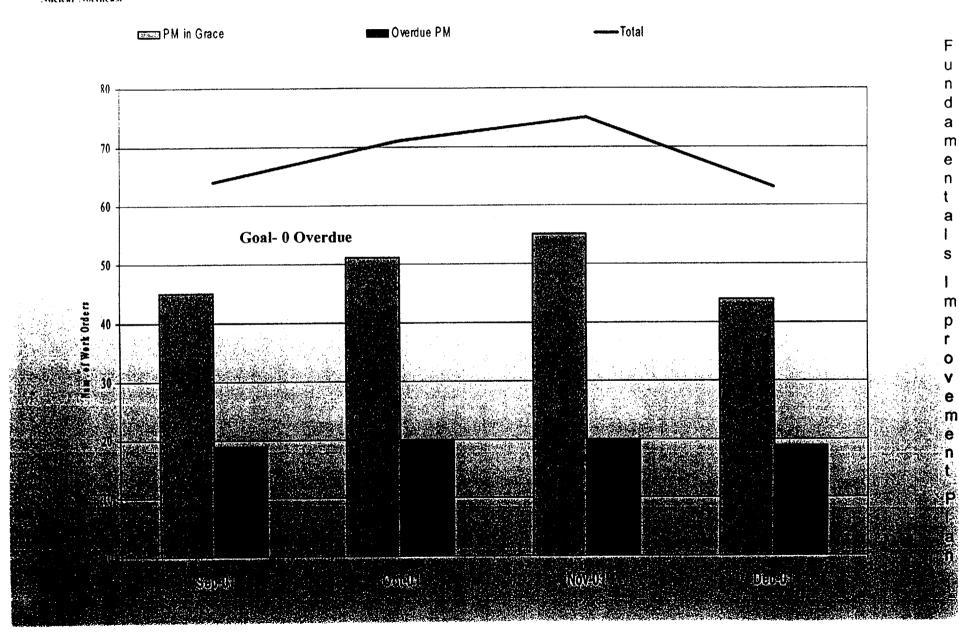


Equipment Performance/Work Management

Corrective Maintenance Backlog

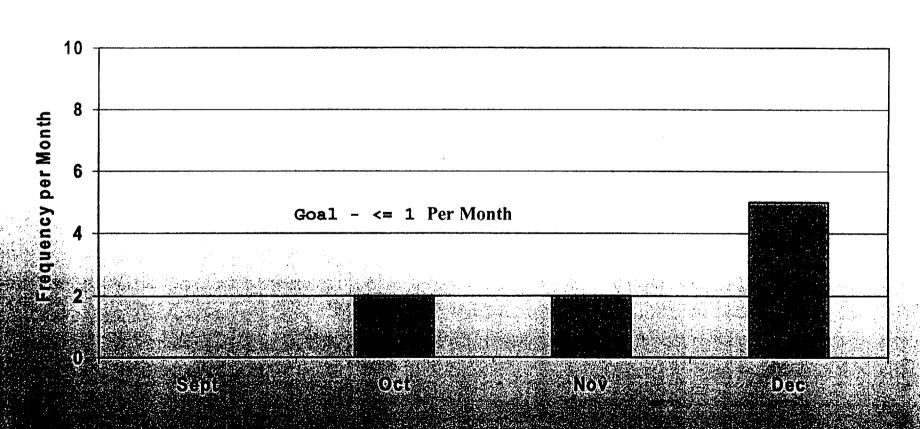


Preventive Maintenance Items In Grace



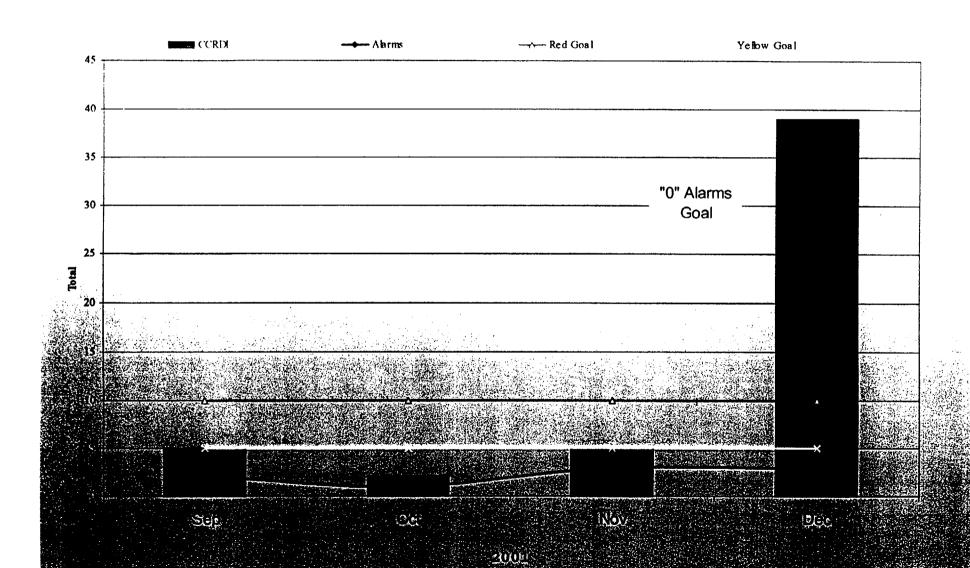
Unplanned Equipment Entries Into Limiting Conditions of Operation

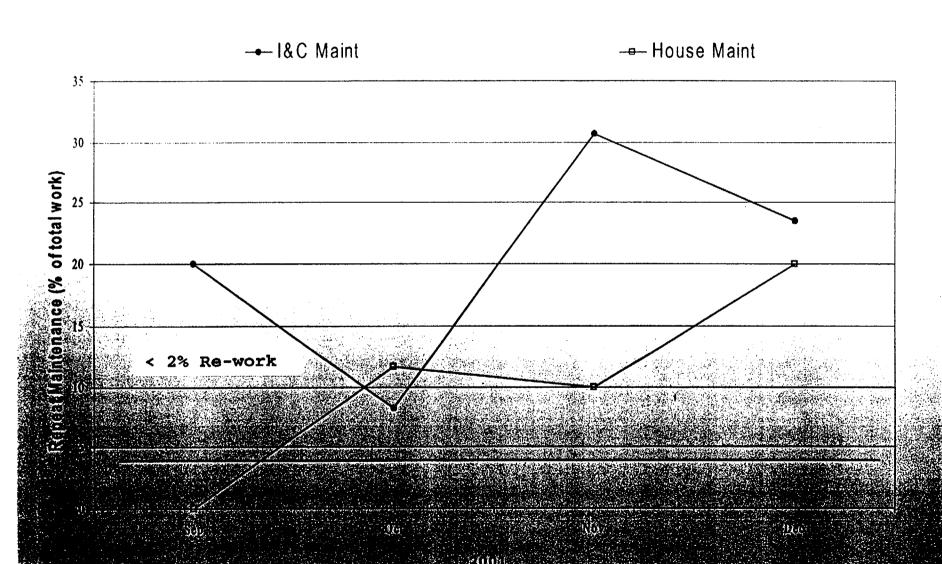
■ Equip Shutdown LCOs



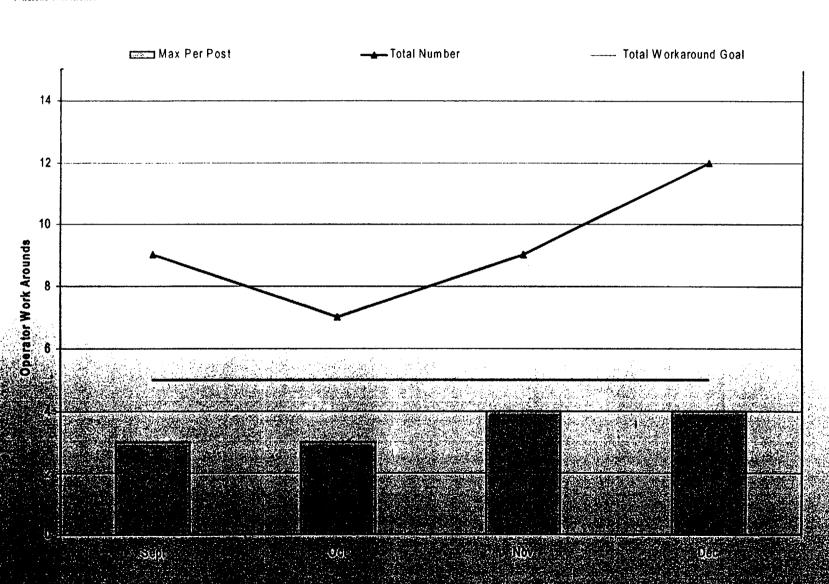


Enlergy Central Control Room CCRDI's and Alarms





Operator Work Arounds





Problem Identification

&

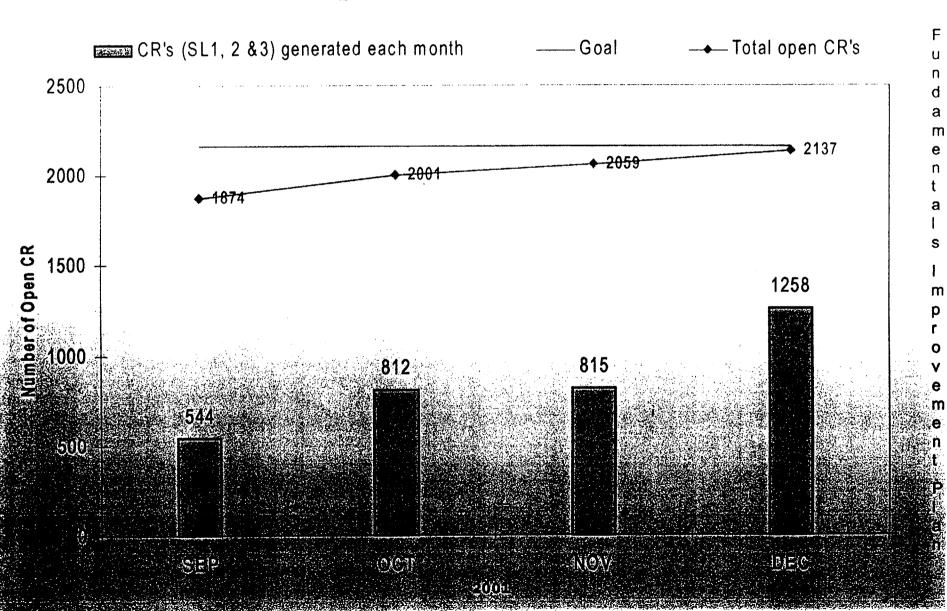
Resolution



Open Condition Reports

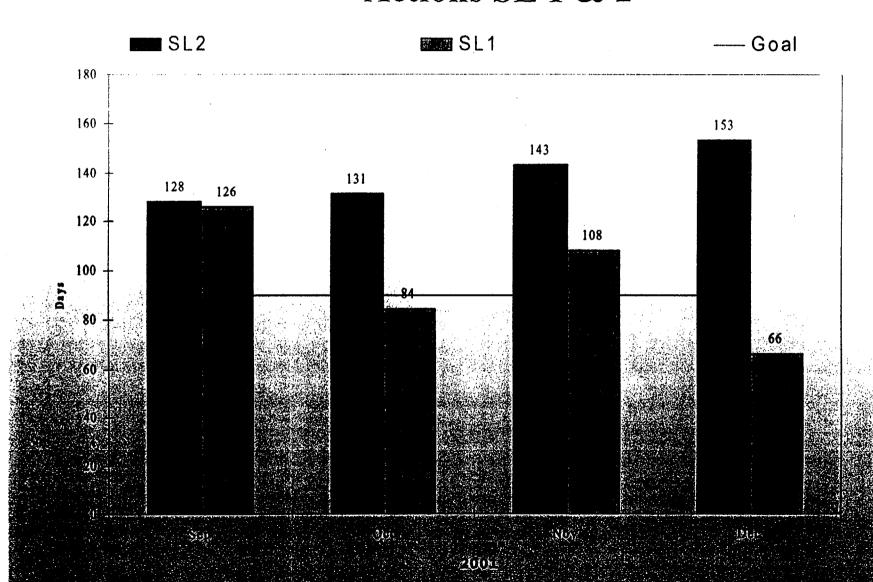
I

P



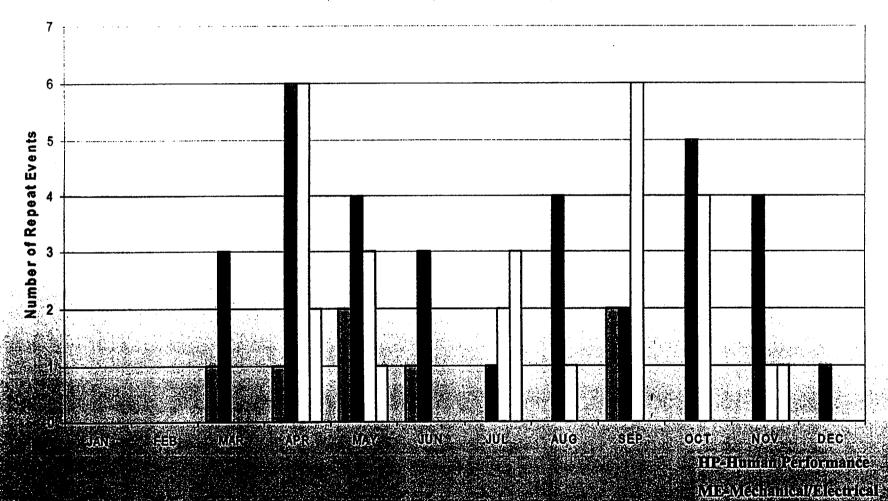


Average Age of Open Corrective Actions SL 1 & 2



Total Repeat Events

☐ HP Repeat ■ ME Repeat ☐ PRG Repeat ☐ MAN Repeat



(1)(1)

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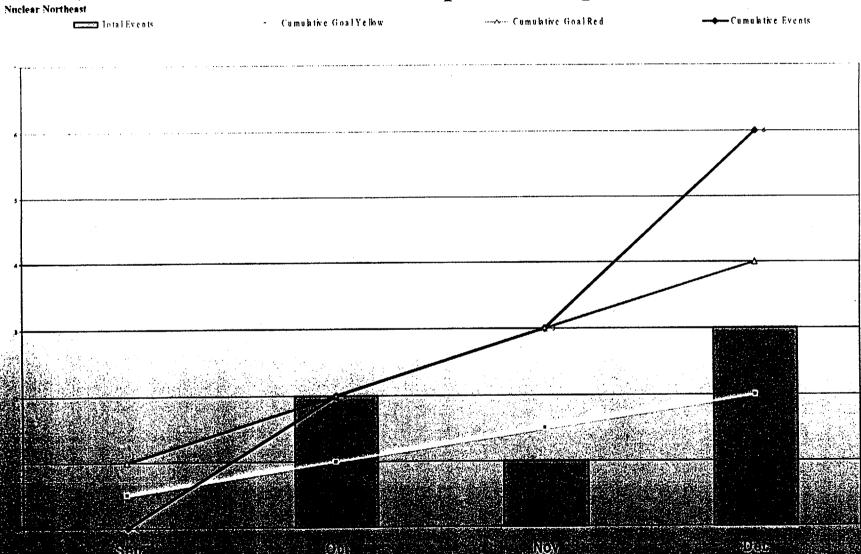
m

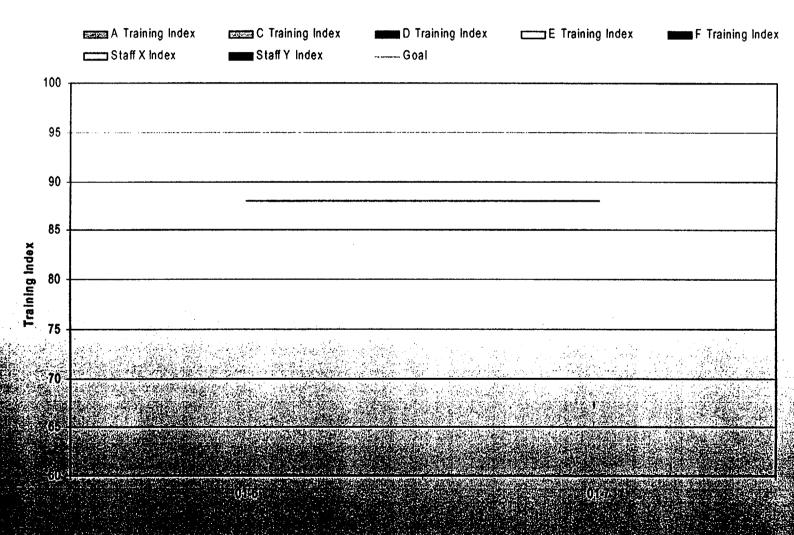


Licensed Operator Performance



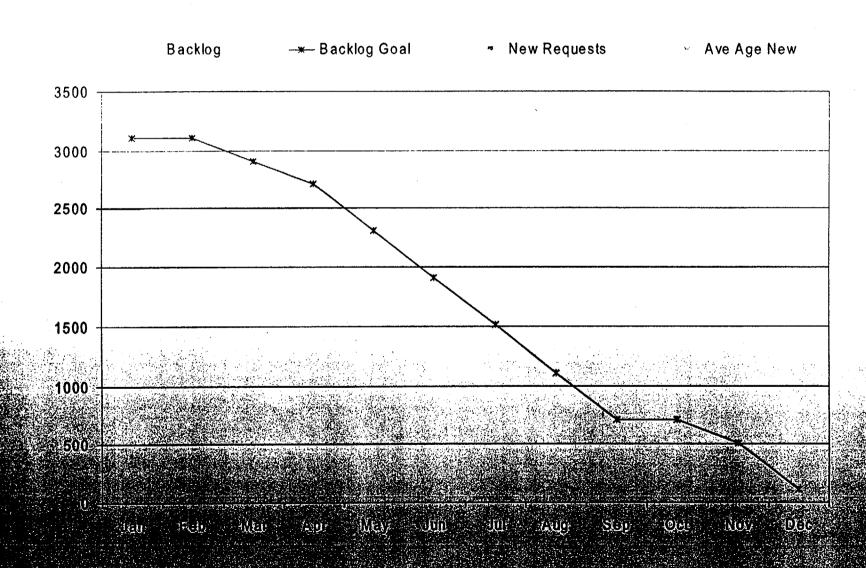
Number of Mispositionings





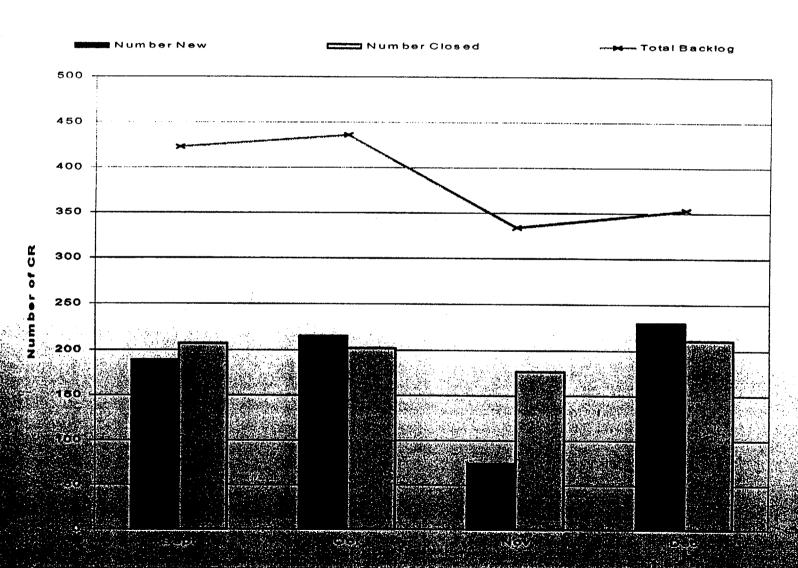


Plant Labeling Request Backlog





Procedure Feedback



AOI Procedure Upgrade

