

**Appendix to**

**Nuclear Regulatory Commission Report on**

**Results of 95003 Supplemental Inspection**

**Conducted at Cooper Nuclear Station**

**NRC Inspection Report 50-298/02-07**

## APPENDIX A

### PARTIAL LIST OF PERSONS CONTACTED

#### Licensee

D. Anno, EBS  
T. Barker, Quality Assurance  
R. Beilke, DED Senior Staff Engineer  
J. Bess, Security Services Supervisor  
K. Billesbach, Quality Assurance  
T. Black, Fuels and Reactor Engineering  
T. Boring, NIS, Computer Technician  
M. Boyce, Senior Manager, Technical Services  
D. Buman, Assistant DED Manager  
G. Casto, Emergency Preparedness Manager  
T. Chard, Chemistry/Radiation Protection Manager  
J. Charterina, ECCS Supervisor, Plant Engineering Department  
J. Christensen, Training Manager  
D. Cook, Senior Manager, Emergency Preparedness  
M. Coyle, Site Vice President  
J. DeBartolo, ECP Coordinator  
L. Dewhirst, Quality Assurance Audit Supervisor  
F. Diya, Manager, Plant Engineering  
P. Donahue, STE, Operations  
A. Dostal, NPPD  
R. Drier, Performance Assessment Department  
R. Estrada, PAD Manager  
B. Fehrman, Vice President - Energy Supply  
C. Fidler, Assistant ESD Manager  
J. Fix, Outage Manager  
J. Flaherty, Site Regulatory Liaison  
P. Fleming, Licensing Manager  
W. Frewin, DED Supervisor  
J. Gadsman, Principle Engineer  
R. Gardner, Operations Manager  
M. Gillan, Assistant to the Plant Manager  
D. Gottula, Quality Inspector, Material Services  
R. Grazio, Sequoia Consulting  
P. Gritton, Budget Specialist, Business Services  
A. Hasanat, Senior Mechanical Engineer  
B. Heidzig, Maintenance  
J. Hernandez, Mechanic  
T. Hottovy, Assistant Manager, Plant Engineering Department  
T. Hough, ESD  
J. Hutton, Plant Manager  
A. Jacobs, NSAG/PAD  
D. Johnson, NMC  
K. Jones, Manager, Design Engineering  
D. Kimball, Assistant Radiation Manager

K. Kreifels, Project Supervisor, Maintenance  
L. Kube, Kube Consulting  
D. Kunsemiller, Manager, Risk and Regulatory Affairs  
K. Lane, WHSE  
J. Lechner, Project Manager, Plant Engineering Department  
J. Lewis, Fuel & Reactor Engineering Manager  
D. Linnen, TIP  
T. McClure, Civil Supervisor, DED  
T. McConnell, Polestar Applied Technology  
J. McMahan, Work Control Supervisor  
W. Macecevic, Work Control Manager  
R. Maine, IMC Supervisor, Maintenance  
L. Martin, Senior Consultant  
D. Montgomery, Human Performance  
O. Olson, RRA  
D. Pease, Assistant Operations Manager  
C. Pelchat, Metrologist, Plant Performance  
T. Poindexter, Attorney, Winston & Strawn  
J. Ranalli, Senior Manager of Engineering  
D. Robinson, Senior Manager of Quality Assurance  
J. Rush, Supervisor, Outage  
G. Sawtelle, Risk Management  
L. Schilling, Administrative Services Manager  
D. Skillman, 95003 Team  
J. Smith, Supervisor, Maintenance  
T. Stevens, Mechanical Engineering Supervisor  
S. Stiers, Project Manager, 95003 Team  
J. Sumpter, Project Manager, Licensing  
K. Sutton, Risk Management Supervisor  
K. Thomas, ESD Mechanical Programs Supervisor  
B. Toline, 95003 Project Manager  
G. Troester, Communications  
C. Warren, Chief Operating Officer, Utility Services Alliance  
M. Walley, NMC, LLC  
D. Werner, Training  
N. Wetherell, Maintenance Manager  
D. Wilson, Vice President - Nuclear  
L. Young, Consulting Engineer, ESD

## APPENDIX B

### PARTIAL LIST OF DOCUMENTS REVIEWED

The Strategic Improvement Plan, Revision 1 and Supporting Work Breakdown System (WBS) Folders.

Listing of procedures in work inventory for both Engineering and Maintenance that are being revised as of 6/26/2002

All Outstanding Procedure Change Requests (PCRs) as of 6/26/2002

All Currently Existing Operations Desktop Guides as of 5/24/2002

Generic Lessons Learned From Refueling Outage RE18

Copy of CAP items for clearance orders since June 2000, and listing of SCR

<u>Procedures/Guides</u>	<u>Description</u>	<u>Revision</u>
0-CNS-01	Core Leadership Development Program	6
0-CNS-07	Management Field Observations	4
0-CNS-12	CNS Program Administration	2
0-CNS-23	Contractor Control	0
0-CNS-24	CNS Standards and Expectations	2
0-CNS-25	Self Assessment	6 and 7
0-CNS-31	Clearance Order Accountability	1
0-CNS-59	Event Review Board	6
0-EP-01	Emergency Response Organization Responsibilities	2
0-FFD-01	NPG Fitness for Duty Program	7
0.4	Procedure Change Process	32
0.4A	Procedure Change Process Supplement	7
0.5 CAER	Corrective Action Effectiveness Review	3
0.5 NAIT	Corrective Action Implementation and Nuclear Action Item Tracking	11
0.5.OPS	Operations Review of Notifications/Operability Determination	10C1
0.5 SCR	Preparation of Significant Condition Reports	
0.9	Tagout	30

0.10	Operating Experience Program	9
0.17	Selection and Training of Station Personnel	37
0.26	Surveillance Program	41
0.31	Equipment Status Control	11
0.40	Work Control Program	25
0.40.1	12 Week Work Control Process	8
0.50	Outage Management Program	14C2
2.0.1	Plant Operations Policy	45
2.0.2	Operations Logs and Reports	62C1
2.0.3	Conduct of Operations	32C1
2.0.4	Relief Personnel and Shift Turnover	12
2.0.12	Operator Challenges	2C1
2.1.20	RPV Refueling Preparation, Attachment 2, "Inspection of Sand Pocket Drains"	49
2.3.1	General Alarm Procedure	32
3.4	Configuration Change Control	33
3.4.1	Part Evaluation	0
3.4.4	Temporary Configuration Change	0
3.4.5	Engineering Evaluations	4
3.4.7	Design Calculations	19
3.4.8	Design Verification	11
3.7	Drawing Change Notice	25
3.28.3	BWR VIP Program (Draft)	0
6.FP.604	Fire Door Annual Examination	8
6.HPCI.703	HPCI Supervisory Alarm Actuation Timer Channel Functional Test	1
6.1RPS.307	Reactor vessel Low-High Water Level Channel Calibration (Division 1)	10

6.2EE.302	4160V Bus 1G Undervoltage Relay and Relay Timer Functional Test (Div 2)	7
6.2HPCI.302	HPCI Steam Line Low Pressure Channel Calibration (Div 2)	6
6.2RHR.101	RHR Test Mode Surveillance Operation (IST) (Division 2)	13C1
7.0.2	Preventive Maintenance Process	5
7.0.3	Maintenance Rework	1
7.0.4	Conduct of Maintenance	20
7.0.5	Post-Maintenance Testing	19
7.3.50.3	SW 89A\B Minimum Flow Adjustment	6
12.5	CNS QC Functions	18
14.11.3	L & N Recorder SpeedoMax 165 and 250 Calibration and Maintenance	12
ESDP-13	PSA model Maintenance and Update Procedure	2
ESDP-14	PSA Application	2
OTP806	Conduct of Simulator Training and Evaluation	0
CNS Radiation Protection Shop Guide 48C	Radiological Protection Shop Guide -- Condensate and RWCU Filter Performance Guidance	5/16/02
	Emergency Plan	39
Nuclear Training Procedure 6.3	Self-Assessment	8
Training Program Guide 101	Emergency Response Organization	4
Maintenance Work Practice 5.0.7	Pre-Job Briefs/Post-Job Critiques	4 and 5
Maintenance Work Practice 5.0.8	Maintenance Ownership	0
Nuclear Quality Procedure 2.7	Quality Assurance Escalation Process	3
	Maintenance Department Principles and Standards	2

	Project Management Desktop Guide	0
CAP Deskguide 5	Corrective Action Program Self Assessment Guideline	2
OER Desktop Guide 1	Industry Operating Experience Review Process Guideline	4
OER Desktop Guide 5	Guideline for the Communication of Industry Operating Experience to CNS	5
	Self Assessment of the Radiological Programs, "Self Assessment Shop Guide"	3
System Engineering Desk Top Guide, Section 15	Safety System Assessments	1
	Corrective Action Program Procedures and Desk Top Guides	

#### Assessments

Chung Chiu Common Cause Analysis (1993)  
Strategic Plan for Performance Improvement (1993)  
Enforcement Issue Investigation Team (1993)  
Enercon Performance Assessment Report (1993)  
Corrective Action Program Self-Assessment Report (1993)  
Near Term Integrated Enhancement Program (1994)  
Diagnostic Self-Assessment Team (DSAT) (1994)  
Special Evaluation Team (SET) (1994)  
Phase 1 Performance Improvement Plan (1994)  
Phase 2/3 Performance Improvement Plan (1995)  
Phase 3 Performance Improvement Plan (1996)  
Engineering Self-Assessment (1996)  
NRC Common Cause Analysis (1997)  
Site Wide Self-Assessment (1998)

Summary and Evaluation of Cooper Nuclear Station Self-Assessment of Performance Related to INPO Performance objects and Previous Findings (1998)

Strategy for Achieving Engineering Excellence (1998)

Engineering Self-Assessment (1999)

Team Exploration and Enhancement Final Report - Operations and Maintenance Department (1999)

Maintenance Performance Improvement Plan (1999)

Work Management Self-Assessment (2000)

Technical Training Self-Assessment (2000)

RP Self-Assessment (2000)

Site Wide Self-Assessment (2001)

Maintenance Department Plan (2001)

Operations Training Self-Assessment (2001)

CNS Unplanned LCO Action Statement Entry and Equipment Reliability Review (2001)

Corrective Action Program Self-Assessment (2001)

RE 20 Outage Critique (2002)

Internal Evaluation of Assessments Performed at Cooper Nuclear Station (2002)

The Strategic Improvement Plan Revision 0 (2002)

Cooper Nuclear Station Assessment Report

April 26,  
2002

SA-02-012 Design Modifications Self-Assessment

SA-01-077 Program Implementation Review Project (PIRP)

SA-01-085 EQ Program Interface Assessment

BWROG/PSA Cooper PRA Peer Review Report  
2001-02

SA-01-082 AOV Program Self-Assessment

SA-01-006 MOV Program Self-Assessment

SA-01-005 IST Program Self-Assessment

SA-01-004	ISI Program Self-Assessment	
122-00-27.R01	Fire Protection Program Self-Assessment	
SA-01-007	Circuit Breaker Program Self-Assessment	
SA-01-058	CNS Maintenance Rule Program	
SA-02-012	Design Modification Self-Assessment	
SA-02-029	BWR Vessel and Internals Project Program	
Assessment 082001	Cooper Nuclear Station Emergency Preparedness Program Assessment	
	Quality Assurance Audit Report 01-11	RE20 Outage
	Maintenance Rule Periodic Assessment for the Period 12/17/98 Through 12/16/00	
	Quality Assurance Audit Reports for Emergency Preparedness written in 2001 and 2002	
	2001 and 2002 Quarterly Self-Assessments and Quarterly Roll-Ups	
QA Audit Report 01-06	Continuous Improvement Program	
QA Audit Report 02-06	Continuous Improvement Program	
	QA Field Observation Report FO 01-17	
QA Surveillance Report S408- 0101	QA Review of CNS Corrective Actions	
QA Surveillance Report S408- 0102	Continuous Improvement Program	

Miscellaneous Documents

SAP code Ce01052 CNS Programs Improvement Project  
(E/606)

ESD-DTG-02	Program Health Monitoring and Reporting	0
	EQ Improvement Project, Project Plan	1
	Top Ten Equipment Issues List	May 13, 2002
CED 2001-0020	CNS-2-HPCI-15CV Replacement	
CED 6008866	Replace Motor for Diesel Fuel Oil Transfer Pump	
CED 6005622	Portable Diesel Generators for Emergency Operations Facility (EOF) & the Technical Support Center (TSC)	
	Cooper Nuclear Station Vessel Internals Program	0
	BWR Vessel Internals Data Base	
	CNS Cornerstone Report	May 2002
	Reactor Oversight Program Index Performance Indicators	May 2002
	Regulatory/Licensing Performance Indicators	May 2002
	Training Performance Indicators	May 2002
	Operations Performance Indicators	May 2002
	ESP Generic Topic Continuing Training completed year-to-date	June 2002
	ESP Position-Specific Continuing Training completed year-to-date	June 2002
	ESP Position-Specific Continuing Training proposed through end of 2002	June 2002
	Listing of all hanging Plant Deficiency Tags	June 26, 2002
	2001 Radiological Effluents Release Report	May 2002
	List of current Operator Work-Arounds and Operator Concerns	June 26, 2002
	List of all Operations Human Performance Clock Resets to date	June 26, 2002
	Emergency Response Organization Roster	July 26, 2002

Instructions to Complete the EP Department Performance Indicators	10
Emergency Preparedness Departmental Performance Indicators	January 2000 - May 2002
Nuclear Concerns Tracking Program, Emergency Preparedness	February 2002 Update
Post Work-Week Critiques	2001-2002
Preventive Maintenance Deferral List (72 items)	July 15, 2002
1998 Maintenance Improvement Plan Action Status	Sept. 29, 1998
Surveillance Test Backlog	July 12, 2002
Corrective Maintenance Backlog	May 2002
Preventive Maintenance Backlog	May 2002
Contractor Control Issues	
Maintenance, Outage, and Work Control Performance Indicators and Goals	May 2002

Problem Identification and Resolution Documents

Notifications pertaining to outstanding Control Room Deficiencies as of 6/26/2002

Notifications and work orders generated since 7/1/2002, that did not receive an Operations review as of 7/24/2002

Notifications pertaining to human performance, procedure, communications, and training issues in Operations and Maintenance from 1/1/2001 to 5/24/2002

Notifications initiated after January 1, 2001, involving issues in the following areas: corrective action program; performance measures; organizational effectiveness; management oversight; utilization of industry information; quality assurance activities; and utilization of onsite and offsite review committees

Problem Identification Reports initiated from November 2001 to July 2002 related to equipment rework

Problem Identification Reports initiated from 1998 to 2002 related to equipment parts

Notifications

10121041	10143372	10154921
10178056	101785282	10175283
10175407	10133627	10117697

Condition Reports

RCR98-0152	RCR98-1092	RCR2001-0888
RCR2001-0969	RCR2001-1056	RCR2001-1108
RCR2001-1226	RCR2001-1263	RCR2001-1468
RCR2001-1571	RCR2001-1599	RCR2001-1632
RCR2002-0001	RCR2002-0095	RCR2002-0109
RCR2002-0269	RCR2002-0286	RCR2002-0459
RCR2002-0504	RCR2002-0516	RCR2002-0548
RCR2002-0770	RCR2002-0953	RCR2002-0969
SCR98-1164	SCR99-0465	SCR2001-0849
SCR2001-1161	SCR2002-0001	SCAQ96-0363
SCR 99-0061		

Work Orders

4207483	4211070	4210846
4160040	4215116	4215278
4217623	4217858	4326707
4250515	4251417	4188803
4203287	4211305	4215858
4209991	4217764	4217790
4217769	4212793	4203365
4252056	4236967	4216375
4233326		

Meetings

CARB Routing Sheet, June 28, 2002  
Instant Procedure Changes, SORC Meeting S2002, June 25, 2002  
SORC Meeting Minutes S2002-048, June 25, 2002  
SRAB Engineering Meeting Minutes, May 24, 2000  
SRAB Meetings 218, 219, 220, and 221 Minutes

Memoranda/Letters

CNS Letter, dated May 12, 1987, "NPPD Response to Generic Letter 87-05"

CNS Memorandum, dated January 18, 1989, "AEOD Case Study Report - Operational Experience Involving Losses of Electrical Inverters"

CNS Letter, dated February 20, 1989, "Response to Generic Letter 88-14"

CNS Letter, dated February 7, 1990, "Follow-up Response to Generic Letter 88-14"

CNS Letter, dated March 15, 1990, "Final Response to Generic Letter 88-14"

CNS Memorandum, dated February 26, 1991, "Information Notice 91-06, 'Lock-Up of Emergency Diesel Generator and Load Sequencer Control Circuits Preventing Restart of Tripped Emergency Diesel Generator'"

CNS Letter, dated September 9, 1994, "Generic Letter 94-02"

QA Escalation Memorandum, dated April 23, 2001, "Escalation - Failure to Resolve Emergency Preparedness Audit Findings"

QA Escalation Memorandum, dated April 1, 2002, "Escalation - Failure to Resolve Long-Standing Meteorological System Issues"

Letter from M.T. Coyle to CNS Managers, "Change Management," June 20, 2002

Various Letters from M.T. Coyle to the Cooper Team, May - June 2002

Miscellaneous

Design Calculation NEDC 92-175, "Actuator Sizing Verification for RW-AOV-AO82, AO83, AO94, and AO95"

Generic Letter 87-05, "Request for Additional Information Assessment of Licensee Measures to Mitigate and/or Identify Potential Degradation of Mark I Drywells"

Information Notice 87-24, "Operational Experience Involving Losses of Electrical Inverters"

Generic Letter 88-14, "Instrument Air Supply Problems Affecting Safety-Related Equipment"

Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors"

Information Notice 91-06, "Lock-Up of Emergency Diesel Generator and Load Sequencer Control Circuits Preventing Restart of Tripped Emergency Diesel Generator"

Information Notice 92-33, "Increased Instrument Response Time When Pressure Dampening Devices Are Installed"

Information Notice 94-24, "Inadequate Maintenance of Uninterruptible Power Supplies and Inverters"

Cooper Nuclear Station, Nebraska Public Power District, 2001-2005 Business Plan, March 30, 1999

Cooper Nuclear Station, Nebraska Public Power District, 2001-2006 Strategic Plan, January 16, 2000

Cooper Nuclear Station, Nebraska Public Power District, 2001-2006 Strategic Plan, November 22, 2000

Current Performance Indicators associated with Action Plans

List of Quality Assurance Auditors and Areas of Expertise/Experience

2002 Regulatory Issue Summary, Information Notices, and Vendor Information related to BWRs - Requested Notification, OER Screen, and OER Reply

## APPENDIX C

### LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
CNS	Cooper Nuclear Station
EQ	environmental qualification
ERO	emergency response organization
HPCI	high pressure coolant injection
LCO	limiting condition for operation
NRC	U.S. Nuclear Regulatory Commission
PM	preventive maintenance
PMIS	plant monitoring and information system
QC	quality control
RCR	resolve condition report
RFO	refueling outage
SCR	significant condition report
STE	shift technical advisor
TIP	The Strategic Improvement Plan
WBS	work breakdown structure

APPENDIX D

ACTION PLAN REVIEW CRITERIA TABLES

<b>ACTION PLAN NUMBER - 5.1.1.1</b>	
<b>ACTION PLAN TITLE - Organizational Alignment</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The plan referenced WBS 1.1.1 and 1.1.2 inputs.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	<p>The WBS extent of condition did not identify all the important individual issues. The team identified three more specific problems associated with Organizational Alignment. The specific problems were (in order of the frequency of appearance):</p> <ol style="list-style-type: none"> <li>1. Failure of the station management to establish and enforce standards and priorities.</li> <li>2. Failure of the station personnel to adhere to written plans, procedures, and guides.</li> <li>3. Failure of the station management to provide congruent policies, goals and priorities among the various departments.</li> </ol>
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were appropriately aligned. However, the Action Plan was not complete based on the WBS not identifying all of the important issues (see Review Criteria 2 above).
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	<p>The Action Plan steps did not address the entire extent of condition, including the three additional problems missed as part of the WBS extent of condition development. Two of eight examples are included:</p> <ol style="list-style-type: none"> <li>1. There was no implementation guide for writing departmental expectations and standards in support of the station procedure.</li> <li>2. The plant had not issued a directive to assure that station personnel comply with 0-CNS-24, "CNS Standards and Expectations," even though the WBS extent of condition and Action Plan described this problem.</li> </ol>

<p>5. Action Plan steps provide sufficient detail to define action to be taken.</p>	<p>The Action Plan steps did not contain sufficient detail for the described actions. For example:</p> <p>Training for implementing the "new process" had not been incorporated into the Action plan. No technical assistance staff had been designated to help departments ensure that departmental guidance was consistent with the station expectations and standards.</p> <p>Procedure 0-CNS-24 needed to be upgraded. The Action Plan owner indicated it was their intent to do bench marking visits at other plants and upgrade the procedure based on their findings. This was not in the plan.</p> <p>The licensee intended to gather information from other plants, but that is not in the Action Plan.</p>
<p>6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)</p>	<p>The deliverables were adequately defined to determine the results of the action taken.</p>
<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>There was no direct link between the performance indicators and the actions. The behaviors required by personnel to assure consistency among the standards and expectations were not being monitored by the plan. The metrics in the plan (outage milestones, management changes, online schedule stability, etc.) measured potential outcomes of failures in maintaining congruent standards and expectations.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169817</p>

<b>ACTION PLAN NUMBER - 5.1.1.2</b>	
<b>ACTION PLAN TITLE - Accountability</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan referenced WBS 1.1.1 and 1.1.3.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The extent of condition and database information cited the primary problem in this area as weak leadership; however, accountability was not specifically referenced and this was/is a problem at the site. The Action Plan owner was not involved in the development of the WBS or in the development of the Action Plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were appropriately aligned.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	<p>Two problem areas identified in the WBS were not included in the Action Plan actions:</p> <ol style="list-style-type: none"> <li>1. Management provided inconsistent support for station activities.</li> <li>2. Roles and responsibilities are not consistently established for personnel at the site. Specifically, there was not a station procedure, policy statement, or directive that established the expected roles and responsibilities.</li> </ol> <p>Three additional areas identified in the WBS, dealing with management observations were not included in Action Plan 5.1.1.2, but were covered by Action Plan 5.1.1.5. However, there was nothing in the WBS that linked Action Plan 5.1.1.5 to the WBS areas of concern.</p> <p>Nothing in the problem statement or the causal factors identified specific accountability behaviors that were missing from the organization.</p>
5. Action Plan steps provide sufficient detail to define action to be taken.	The steps provided insufficient detail. In particular, Action 3 was to train all station personnel on accountability behaviors in accordance with "OZ" training; however, no attempt was made to ensure the "OZ" behaviors were consistent with those behaviors outlined during a series of management meetings (Action Plan Action 1).
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	The deliverable statements were adequate for the actions defined in the plan.

7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	The Action plan actions contained no criteria or process for monitoring the effectiveness of the implementation of the accountability behaviors taught in the training program. The specified means for monitoring was a self-assessment scheduled for first quarter 2003. No specific measurement criteria were included in the self-assessment action. The listed performance indicators may provide an indirect measurement of changes to accountability behavior.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169824

<b>ACTION PLAN NUMBER - 5.1.1.3</b>	
<b>ACTION PLAN TITLE - Prioritization &amp; Planning</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	WBS folders 2.3.1 and 2.3.2 were not referenced in the action plan. However, the action plan owner was aware of the issues and the items were appropriately addressed.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The items within the action plan were appropriately aligned. However, the action plan owner was relying on the satisfactory completion of other action plans in Revision 1 of the TIP. The additional action plans were not aligned with Action Plan 5.1.1.3.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The action plan did not include corrective actions to address the development, coordination, and prioritization of departmental priorities. The action plan owner was not aware of any other action plan that would address this issue.
5. Action Plan steps provide sufficient detail to define action to be taken.	Steps 2 through 7 did not include sufficient detail to evaluate. Specifically, no documented instructions had been developed for the use of the site wide schedule by station personnel. A benchmark site had not been determined nor had the expectations for the benchmark been developed. In addition, the station resource utilization process and the resource planning process had not been developed.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Step 3 required the completion of a benchmark trip. The associated deliverable was to complete the trip and develop a report. The actual deliverable should involve accomplishment of the benchmark trip objectives. Step 5 required a review of the integrated sitewide schedule. The associated deliverable was a completed self assessment. The actual deliverable should involve accomplishment of the review objectives.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	<p>The performance indicators associated with the action plan did not adequately assess the effectiveness of the planned corrective actions or causal factors. Specifically, an assessment of the development and integration of priorities would need to be performed.</p> <p>Step 1, which involved the preparation of briefing paper on the station work prioritization process procedure, was statused as complete. An e-mail was sent to station personnel on May 7, 2002, which included the briefing paper. There was no required response to indicate that the material had been read and understood.</p>
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169799

<b>ACTION PLAN NUMBER - 5.1.1.4</b>	
<b>ACTION PLAN TITLE - Organizational/Human Behaviors</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan referenced WBS 1.2.1, 1.2.2, 1.2.3, and 1.2.4.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review appropriately identified the areas of concern.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The problem statement emphasized behaviors that need to be changed at the site including "lack of trust, lack of pride, poor communication, and weak teamwork." The causal factors listed did not include any reference to those specific behaviors.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The action plan did not address all of the identified areas of concern. Specifically: <ol style="list-style-type: none"> <li>1. The action plan objective focused attention on measuring the organizational culture/climate. The Action Plan actions did not address any changes to be made in the individual behaviors.</li> <li>2. Current station expectations and standards for human behavior were not included in station written requirements. Behaviors identified as critical to operation were not identified by the Action plan and were not to be included, based on the TIP action plan actions. There was no cascaded set of written procedures, instructions or guides within the functional departments to capture the implementation of appropriate human behaviors. The TIP action plan did not identify specific human behaviors that were critical to plant operation and did not include a means for identifying those specific behaviors in the future.</li> </ol>
5. Action Plan steps provide sufficient detail to define action to be taken.	The Action Plan steps did not provide sufficient detail to ensure the desired action is completed. For example: <ol style="list-style-type: none"> <li>1. There was no requirement in the Action Plan actions to distribute information to station personnel about the "new" required behaviors.</li> <li>2. The Action plan owner stated that training will be needed to implement the "new" behavior expectations and that training is not included in the TIP actions.</li> </ol>
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	The deliverable statements were adequate for the actions defined in the plan.

<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>The performance indicators used did not measure directly the use of the "new" behaviors. The indicators used in the plan are NRC allegation, turnover rate, management changes. Per the site human resource representative, the turnover rate at the plant was currently about 7percent annually. It was driven predominantly by market conditions in the local area and not by plant culture. There was no behavior change metric included in the performance measures - behavior observations. There was no accountability measure built into the Action plan for human behaviors.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169821</p>

<b>ACTION PLAN NUMBER - 5.1.1.5</b>	
<b>ACTION PLAN TITLE - Management Observation Program</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	WBS folders 2.4.3 and 3.3.1 were not reviewed prior to the action plan being approved. The action plan owners did not know the WBS folders existed. However, they were reviewed following approval of the action plan and the issues had been fortuitously addressed.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The action plan owners indicated that they were crediting action items in Action Plans 5.1.4.1 and 5.2.6.2. However, no link between the action plans was provided.  Action items were not linked to the specific causal factors.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The action plan steps appropriately addressed the problem statement, causal factors, and WBS extent of condition.
5. Action Plan steps provide sufficient detail to define action to be taken.	Steps 5, 6, 7, and 8 did not provide sufficient detail. A decision had not been made on which facility to benchmark, the benchmark objectives were not developed, the methodology for the self assessment was not determined, and a self assessment plan was not been developed.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Step 8 indicated that the deliverable was a notification to change processes and procedures if necessary. The deliverable should be the actual procedure change and not an item to perform a procedure change. Step 5 indicated that the deliverable for the benchmark trip was a benchmark report. The deliverable should be a statement of what the benchmark trip is intended to accomplish. Step 6 indicated that the deliverable for the self assessment was a self assessment report. The deliverable should be a statement of what the assessment is intended to accomplish.

<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>Performance indicators involved the number and quality of observations. Given the low number of required observations (1 per month for 80 of the 130 supervisors and managers on site), the performance indicators may not be useful in improving human performance. In addition, the performance indicator monitored the total number of observations performed (mandatory and non-mandatory participants) but did not assess the completion rate of those required to participate.</p> <p>The quality index was not formalized in Procedure 0-CNS-07, "Management Field Observations." Therefore a meaningful interpretation of the data was questionable. One individual in the performance analysis department was responsible for assigning a subjective value of 1 to 5 (not at all useful to meets all requirements) for each observation. No requirement existed to provide feedback to individuals completing unsatisfactory observations.</p> <p>Trending of negative observations was not established. For example, of the 272 negative observations in 2002 (Jan-May), 31 involved housekeeping issues and 27 involved communication of roles and responsibilities. However, no review for a potential trend had been completed.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169803</p>

<b>ACTION PLAN NUMBER - 5.1.1.6</b>	
<b>ACTION PLAN TITLE - Performance Monitoring</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	WBS 2.4.3 was not referenced in the action plan. The action plan owner had not reviewed WBS 2.4.3 or 1.1.1 prior to approval of the action plan. As of June 27, 2002, the action plan owner had not reviewed WBS 2.4.3 and 1.1.1. The action plan owner indicated that he was familiar with performance monitoring issues and was able to develop the plan without reviewing the WBS folders. In addition, the action plan owner indicated that the plans would be reviewed before Revision 2 was issued.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Causal factors were not linked to the action items. There was no link to the accountability improvements described in Action Plan 5.1.1.2.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The action plan did not address weaknesses in the development, use, and accountability of departmental performance indicators.
5. Action Plan steps provide sufficient detail to define the action to be taken.	Step 6 required a revision to Procedure 0-PI-01, "Performance Indicator Program." However, the details associated with the revision were under development as of June 24, 2002.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Deliverable statements were appropriate.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Performance measures to monitor improvement do not address the quality of performance indicators. No effectiveness reviews were identified to determine if appropriate performance indicators were developed.  Step 1 as stated as complete even though performance indicators were under development.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169801

<b>ACTION PLAN NUMBER - 5.1.1.7</b>	
<b>ACTION PLAN TITLE - Succession Planning</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The Action Plan referenced WBS 1.1.4.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The issues were appropriately characterized in the WBS extent of condition review. The Action Plan owner was not involved in the development of the WBS. As part of the Action Plan development, the Action Plan owner stated that no systematic attempt was made to correlate the information. The Action Plan was developed based on his prior knowledge of the problem and the succession planning process procedure.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were properly aligned.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The Action Plan steps adequately addressed the Problem Statement, Causal Factors, and extent of condition.
5. Action Plan steps provide sufficient detail to define action to be taken.	All actions contained sufficient detail to define the action(s) to be taken.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	The deliverables were well defined and indicated a thoroughly developed plan.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Yes. The performance indicators (employee turnover rate, number of key management positions filled in accordance with succession plan, and successful completion of development plans) were effective measures of desired performance.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169813

<b>ACTION PLAN NUMBER - 5.1.1.8</b>	
<b>ACTION PLAN TITLE - Learning Organization and Industry Participation</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The Action Plan referenced WBS 3.3.1 and 3.3.2
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern. The Action Plan owner did not participate in the develop of the WBS or the Action Plan. In addition, he did not review the WBS as part of his review of the Action Plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were appropriately aligned.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Two examples were identified where the Action Plan steps did not address all of the issues:  1. The WBS and the Action Plan objective implied accountability was an issue in not getting self-assessment accomplished and recommended self-assessment findings and recommendations implemented. However, the Action Plan did not address accountability. The licensee indicated that accountability was addressed by Action Plan 5.1.1.2, but Action Plan 5.1.1.2 is not linked to this plan.  2. Causal Factor 1 indicated that self-assessment findings and recommendation were not being consistently entered into the corrective action program (CAP). There were no steps in the Action Plan to verify that issues identified during self-assessments were being entered into the CAP and effectively resolved.
5. Action Plan steps provide sufficient detail to define action to be taken.	Steps 2, 3, and 4 did not have sufficient detail to determine the scope of the action. In particular, step 3 stated that benchmarking will be conducted. There were no details as to how the plants will be selected; how many plants will be visited; and, how will the self-assessment programs be evaluated.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Deliverable statements do not always state the desired outcome. For example, Action 5 specified conducting a semi-annual assessment of the self-assessment program with the deliverable being the assessment report. The deliverable should also include using the results of the assessment to effect change.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	The two current performance indicators (new as of February 2002) did not provide an adequate measure of improved performance. The indicators looked at numbers of open self-assessment actions and average age of the open items. The indicators did not measure quality of the assessment and implementation of findings/recommendations.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169822

<b>ACTION PLAN NUMBER - 5.1.1.9</b>	
<b>ACTION PLAN TITLE - Program Management</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The Action Plan referenced WBS 3.4.4, but did not reference WBS 3.4.2. WBS 3.4.2 cross referenced Action Plan 5.1.1.9.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern. The Action Plan owner was not involved in the development of the WBS extent of condition. He utilized the WBS as part of the Action Plan development.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were appropriately aligned.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The Action Plan steps addressed the Problem Statement, Causal Factors, and extent of condition.
5. Action Plan steps provide sufficient detail to define action to be taken.	The Action Plan steps had sufficient detail to define the actions necessary to implement the steps, with the exception of Step 7. Step 7 simply stated "Conduct Effectiveness Review." The step provided no details as to how the evaluation would be conducted or what to consider.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Deliverable statement does not always state the desired outcome. Steps 2, 3, and 7 did not discuss verifying changes in behavior as a desired outcome. The steps focused only on the procedural or program aspect and not verifying that actual performance was changed. For Step 6, the deliverable was "Completion of Action Plan 5.1.1.4," but that plan did not reference Action Plan 5.1.1.9.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	The two performance indicators did not provide an adequate measure of improved performance. The first indicator, "Completion of Schedule Milestones for Each Program Plan," was simply a completion date schedule - nothing to do with measuring change in performance. The other indicator, "CNS Program Health Indicators," was a qualitative report with no defined criteria for measuring program performance. The report is developed by the program owner, every 2 years, and has no ongoing performance indicators. The team reviewed several reports and determined that they were snap-shots of current program performance based on the program owner's opinion (little or no value for determining trends in program performance). In addition, the deliverables were not defined; therefore, the team was unable to determine if licensee could measure changes in the effectiveness of program management and performance.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169820

<b>ACTION PLAN NUMBER - 5.1.2.1</b>	
<b>ACTION PLAN TITLE - Programmatic/Process Changes</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The Action Plan referenced WBS 1.3.2 and 1.4.2.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern. The Action plan owner was not involved in the development of the WBS and did not use the WBS as in input into the Action Plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	There was no problem statement dealing with the causal factor of ineffective internal communication. This was a failure to integrate all of the causes identified with the problem statement.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The planned actions did not address the full range of the problems identified in the causal factors, the extent of condition reviews, and the WBS. There was no accountability in the Action Plan actions for implementing the change management process. The licensee has change management guidance and it was not being used by site personnel. The Action Plan did not require the use of the guidance.
5. Action Plan steps provide sufficient detail to define action to be taken.	The Action Plan steps lacked detail. For example: <ul style="list-style-type: none"> <li>1. Technical assistance for implementing the change management process was not established in the Action Plan actions.</li> <li>2. Station management has not specified in the Action Plan the breadth and depth of the information searches required for changes.</li> <li>3. Action Plan Step 3 specified that the management guidance be proceduralized; however, the current guidance had significant short comings and a revision to the guidance was not included in the plan.</li> </ul>
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Steps 5, 6, and 7 did not provide sufficient detail. A decision had not been made on which facility to benchmark; the benchmark objectives were not developed; the methodology for the self assessment was not determined; and a self-assessment plan was not developed. For instance: Step 5 indicated that the deliverable for the benchmark trip was a benchmark report. The deliverable should be a statement of what the benchmark trip is intended to accomplish.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	This plan had no current performance indicators and none were planned.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169825

<b>ACTION PLAN NUMBER - 5.1.3.1</b>	
<b>ACTION PLAN TITLE -External Communications</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	WBS 1.3.1 suggests that there is a general lack of understanding of the regulatory process with respect to two-way communications. The existing causal factors do not seem to cover this. Additionally, the action plan objective does not discuss external communications issues with outside organizations other than the NRC, yet this was an issue discussed in the WBS.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The action plan steps are largely a series of procedural enhancements followed by some form of assessment. From the WBS, however, much of the problem seems to revolve around the "siloing effect" amongst the workgroups involved. This is not addressed in the action plan. However, the licensee did self-identify this issue as a generic problem prior to the team's arrival on site, and intends to create an additional action plan (5.1.4.3, "Teamwork") to address the issue.
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	The deliverables for Steps 11, 12, and 13 are vague. The actual scope of the documents to be revised and implemented is not specified. The target date for completion of these steps is listed as "TBD."
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Performance Indicators for this action plan are still in the very early stages of development.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10165879

<b>ACTION PLAN NUMBER - 5.1.4.1</b>	
<b>ACTION PLAN TITLE - Pride/Excellence</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Not in all cases. The action plan provided a good outline but some steps lack detail. For example, step 1 included benchmarking to <u>define</u> a standard of excellence. Subsequent steps develop those standards into procedures, present it to personnel, and monitor its effectiveness. Without knowing the results of step 1, it is difficult to include detail in the subsequent steps. Another example is step 12 which develops a peer observation program. It does not describe what steps were necessary to complete this action, such as, to whom the program would apply, what observations would be included, what training would be necessary, what actions would be taken based on the observations, or how the observations would be tracked and trended procedure development.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	The PIs and their thresholds have not been fully developed. Additionally, action plan step 10 references analyzing plant data such as management observations, self-assessments, CAP data, etc., while the PIs selected to monitor overall plan performance measure something else.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169819

<b>ACTION PLAN NUMBER - 5.1.4.2</b>	
<b>ACTION PLAN TITLE - Trust/Culture</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	WBS 1.2.4 was not referenced.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Not in all cases. Causal Factor 1 is addressed in Action Plan 5.1.1.5; however, that action plan lacks sufficient detail to verify that it directly address the problem stated in the causal factor. The problem stated is that managers lack visibility with the workforce. Action Plan 5.1.1.5 develops the observation program but does not contain detail regarding the number of required observations, ie., the number of times management will be required to be in the plant. The licensee's intent is to significantly increase the number of required observations, which will address this problem.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Not completely. 1) Steps 1 & 2 collect data and Steps 3 & 4 revise policies and processes, however, neither Step 3 or 4 indicate that the info collected in Steps 1 & 2 would be used. 2) There is no step to present the changes made in step 3 to the employees, even though this is already underway to some degree. 3) Step 3 does not include actions to include the findings from this step into a policy. Discussions with action plan owner indicated that he intended to revise the policy that is being developed in step 2 once the info is gathered.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	No, the PI section indicated that an Employee Concerns PI would be used. In fact, there is no PI, however, there are survey results. The action plan owner identified this during discussions with inspector. Also, the action plan owner indicated that they might use "self-identified notifications" as an indicator for this action plan. The PIs are still being developed.
8. Has a notification been written to enter Action Plan in CAP?	Notifications 10169910 and 10169918

<b>ACTION PLAN NUMBER - 5.1.5.1</b>	
<b>ACTION PLAN TITLE - Oversight and Assessment</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The Action Plan referenced WBS 3.3.1 and 3.3.2.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition identified the significant areas of concern. The Action Plan owner was not involved in the development of the WBS or the Action Plan and did not review the WBS as part of his review of the Action Plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan objective discussed defining individual roles and responsibilities and holding those individuals accountable for self-assessments; however, nothing in the Problem Statement or Causal Factors discussed accountability.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The Action Plan steps did not address two of the issues identified in the Problem Statement, Causal Factors, and extent of condition. Specifically: <ol style="list-style-type: none"> <li>1. Causal Factor 1 dealt with not consistently entering self-assessment findings into the corrective action program (CAP). The program was modified to require entering items into CAP, but did not have the licensee actually verify that the self-assessment findings are being entered into CAP.</li> <li>2. The WBS did not specifically state that the self-assessment process lacked accountability, but it implied that it lacked accountability. The lack of accountability is not addressed in the Action Plan.</li> </ol>
5. Action Plan steps provide sufficient detail to define action to be taken.	Steps 2, 3, and 4 did not contain sufficient detail to define the action to be taken. As an example, step 3, "Initiate engagement with departmental Self-assessment coordinators and establish roles and responsibilities," did not contain any details as to how this is to be accomplished and what is to be discussed.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Deliverable did not always state the desired outcome. Steps 3, 4, 5, and 7-11 did not discuss verifying changes in behavior as a desired outcome. The steps focused only on the procedural or program aspect and not verifying that actual performance was changed.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	The Action Plan listed two current performance indicators and three additional performance indicators under consideration for development. Neither of the current performance indicators measured changed performance. Additionally, the current performance indicators did not specify the actions to be taken when thresholds were crossed.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169827

<b>ACTION PLAN NUMBER - 5.2.1.1</b>	
<b>ACTION PLAN TITLE - Create an Operationally Focused and Aligned Organizational Culture</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	No, It should have referenced 3.4.2 and 3.4.3
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	No. The causal factor states that Operations leadership is lacking, however, the Focus Area and Problem Statement considers the problem to be site-wide.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Not completely. The lack of operational focus was identified as being exhibited site-wide; however, the majority of the action plan steps were focused primarily in the Operations Department.
5. Action Plan steps provide sufficient detail to define action to be taken.	No, detail is lacking in most steps. For example; Step 1.1 does not discuss how this step will be completed, if it involves procedure changes, training, benchmarking, etc.; Step 1.3 doesn't discuss where the problem lies, how it will be fixed, any training needed or procedure changes needed, etc. Nor does it address any other organizations outside of Operations. Step 1.4 gives no detail and provides no plan as to how the step is to be accomplished. Step 3.2 similarly provides no plan for completion.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No. Step 1.2 is vague in that it simply states that an "enhanced" process will be provided. Step 1.4 requires a review to be conducted but doesn't actually reduce any of the workarounds. Step 3.2 only requires that a charter and schedule be developed. It provides no details as to who the team will consist of, what the charter will be, what their purpose is, etc.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	No. The licensee identified 14 PIs which collectively could provide some indication that the action plan was not successful. However, there is no direct tie between the indicators and the action plan performance. Most of the PIs are in the process of being revised. Definitions for the indicators and thresholds do not exist in many cases.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169831

<b>ACTION PLAN NUMBER - 5.2.2.1</b>	
<b>ACTION PLAN TITLE - Emergency Response</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan references WBS 3.5.1, "Emergency Preparedness."
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	<p>The specific technical database issues associated with WBS 3.5.1 are not directly addressed in the WBS characterization of problems, and the characterizations are themselves high-level, general, and not well focused. Each of the database issues can be indirectly correlated or associated with one or more of the of problems characterized in WBS 3.5.1.</p> <p>The licensee identified only 8 technical issues with applicability to WBS 3.5.1. This small sample size does not provide sufficient information to support a useful extent of condition determination. Because the licensee did not believe they had an adequate root or common cause analysis of emergency preparedness problems, the characterization of issues in WBS 3.5.1 was largely based on WBS 3.4.4.</p> <p>WBS 3.5.1 concludes that: "The CNS EP program has exhibited multiple symptoms of declining performance over an extended period of time." The "Assessment Results" section of WBS 3.5.1 fails to clearly identify or describe these symptoms, and fails to relate them to the identified problems.</p>
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	<p>The Action Plan 5.2.2.1 Objective is not consistent with the Problem Statement in that an emergency response organization whose performance is inconsistent, not at highest standards, and is occasionally ineffective, is not the stated problem intended to be addressed by the Action Plan.</p> <p>The problem identified in the problem statement is that management failed to recognize and correct declining performance. Causal Factors 2 and 4 have strong linkages to this problem, Causal Factors 1 and 3 have weak linkages, and Casual Factor 5 does not appear to be associated with the problem statement.</p> <p>A strong linkage exists between the Objective and Causal Factor 1. A clear but weaker linkage exists between the Objective and Causal Factor 4. There is no apparent linkage between the Objective and the remaining Causal Factors.</p>

<p>4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.</p>	<p>The steps in Action Plan 5.2.2.1 have only an indirect linkage to the technical issues identified in the issues database.</p> <p>9 of 40 steps in Action Plan 5.2.2.1 have strong and direct linkage to the action plan Problem Statement. Although some of the remaining steps have weak or indirect linkage to the Problem Statement, most have no apparent linkage. 13 of 40 steps have strong and direct linkage to the stated action plan Objective. 18 of 40 steps do not appear to be associated with any of the listed Causal Factors.</p>
<p>5. Action Plan steps provide sufficient detail to define action to be taken.</p>	<p>The steps in Action Plan 5.2.2.1 generally provide good levels of detail to define the actions to be taken.</p>
<p>6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined.?)</p>	<p>The identified deliverables for the steps in Action Plan 5.2.2.1 are generally well defined and consistent with the action being taken. However, the deliverables for many steps contain words such as "fully functional," and "acceptable," which are not defined in the Action Plan.</p>
<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>The performance measures did not provide a direct measure of the effectiveness of the action plan steps. The three performance indicators measured the ERO performance and aligned closely with the action plan objective; however, no specific performance measures were developed for the steps related to maintaining and upgrading emergency preparedness equipment. The performance indicator "ERO Staffing (Vacancies)," intended to measure whether the overall ERO was fully staffed, was not an effective measure because the input parameters were poorly defined and the red threshold could not be exceeded regardless of the number of vacancies in some emergency response positions. Also, the licensee had not proceduralized definitions and calculational methods for any of the performance indicators intended to measure the effectiveness of the action plan.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169823</p>

<b>ACTION PLAN NUMBER - 5.2.3.1</b>	
<b>ACTION PLAN TITLE - Outage Management</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	WBS 2.4.2 is not listed in the action plan.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Yes
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169838

<b>ACTION PLAN NUMBER - 5.2.3.2</b>	
<b>ACTION PLAN TITLE - Planning/Timeliness</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan references WBS 1.1.1 and 1.1.3.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	No. Issues involving rework and human performance errors impacting the outage schedule that were identified in the RFO 20 Outage Critique, RCR 2002-0051, were not characterized in the WBS. After additional review and interviews with the Action Plan Owner a determination was made that the Work Package Development focus area, specifically Action Plan 5.2.5.2, and TIP Human Performance Action Plan, 5.1.4.1, had actions that would address the human performance issues.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Some of the deliverables lack definition. For example, several are just a re-statement of the action plan step and do not discuss the specifics or quality of the completed product. Steps lacking definition included Steps 4, 5, and 7.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	One of the performance indicators, "Pre-outage Milestone Schedule Adherence," was reviewed and determined to be adequate. However, the performance indicator to track outage scope growth had not yet been developed.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169837

<b>ACTION PLAN NUMBER - 5.2.3.3</b>	
<b>ACTION PLAN TITLE - Scheduling/Monitoring</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan references WBS 1.1.1 and 1.1.3
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Yes
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169846

<b>ACTION PLAN NUMBER - 5.2.4.3</b>	
<b>ACTION PLAN TITLE - Monitoring</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes, with the exception of 2.4.3
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The extent of condition review for outage monitoring did not reflect the issues that were identified in the WBS 2.4.3 issues database. The issues that were identified, eight total, were problems relating to the engineering department and had nothing to do with management monitoring of outages. Following interviews, it was found that the licensee had used corrective action program documentation to conceptually validate the need for the action plan. The WBS extent of condition review was developed based on the need for the action plan rather than having been developed based on issues identified in the issues database. It was determined that this was an example of the licensee not following an established process for TIP development in that site knowledge was used to identify the problem and then develop the extent of condition.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The issues in the WBS database are specific to Engineering. There were a total of 8 issues, one of which had to do with quality and timeliness of engineering support for plant activities. There are no specific causal factors or actions in this action plan to fix the Engineering problems identified in the WBS issues database. All of the issues that were listed in the WBS issues database were covered by other action plans, particularly plan 5.2.6.3.
5. Action Plan steps provide sufficient detail to define action to be taken.	No.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No, terms such as identify and establish are used for the action items.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	There were no performance indicators identified.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169851

<b>ACTION PLAN NUMBER - 5.2.4.4</b>	
<b>ACTION PLAN TITLE - Contract Administration</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	WBS 2.4.4 extent of condition review did not identify the performance issues related to human performance errors that were identified in the WBS issues database. However, Action Plan 5.2.5.2, Action Plan, 5.1.4.1, had actions that addressed human performance errors. However, Action Plan 5.2.4.4 did not reference these other action plans.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No, deliverables for steps 1, 3, and 4 were not well defined.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	No, performance indicators had not yet been developed.
8. Has a notification been written to enter Action Plan in CAP?	Notification10169876

<b>ACTION PLAN NUMBER - 5.2.5.1</b>	
<b>ACTION PLAN TITLE - Purpose/Accountability</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	<p>WBS 2.1.1, Accountability/Purpose, was only assigned to this action plan. A review of the database generated for this WBS indicated that there were several (2 Pages) of issues that were failures to follow/ failure to implement or adhere to procedures. The failure of the worker to follow procedures does not show up in the characterization of the issues. These performance issues were addressed by Action Plan 5.1.4.1.</p> <p>During the review of the applicable WBS folders, it was identified that two folders, WBS 2.1.3, Teamwork and WBS 2.2.4, Technical Support, were not referenced appropriately by any of the action plans for this focus area. Consequently, issues identified during the extent of condition reviews that were applicable to this focus area were not characterized in the causal factors for the action plans reviewed. Specifically, WBS 2.1.3 identified weaknesses associated with Teamwork in that scheduling and coordination problems frequently existed but were not effectively identified and communicated, management/supervision did not establish and reinforce expectations, and there was a lack of ownership and accountability in unit organizations. The licensee had identified this prior to the team's on-site inspection and they stated that the issues identified in WBS 2.1.3 would be addressed by the development of Action Plan 5.1.4.3, Teamwork, for Revision 2 of TIP. Also, WBS 2.2.4 identified numerous issues associated with the lack of engineering support during the work package planning process. Upon further review of the action plans in this focus area and interviews with the Action Plan Owner, the team determined that this issue was addressed by step 4 in Action Plan 5.2.5.1. Action 4 addresses the definition of the roles and responsibilities of various individuals/groups involved in the development of work packages.</p>
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes

<p>5. Action Plan steps provide sufficient detail to define action to be taken.</p>	<p>Sufficient detail was not provided. The ability to determine whether the actions will correct the problems identified in the causal factors cannot be concluded since the actions are not specific. For example:</p> <p>Action 1. This action was to develop controls to implement the 12 week Rolling system window scheduling process which was already in place. The deliverable was to revise procedure 0.40.1. It was not known what the controls would be. Note: 0.40.1 procedure appeared to have well defined controls when reviewed.</p> <p>Action 2. Appropriate procedures will have to be revised to define single point accountability of work packages - appropriate is not defined.</p> <p>Action 3. Ensure roles and responsibilities of various individuals/group are defined was too general. The deliverable was to generate a weekly report.</p> <p>Action 4. Review work week director roles and responsibilities and revise appropriate procedures was too general.</p> <p>Action 5. Develop prioritization and decision making tool. Revise appropriate procedures was too general.</p> <p>Action 6. Develop modify performance indicators thresholds, data gathering, frequency, actions was too general.</p>
<p>6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)</p>	<p>The deliverable statements for Steps 1, 2, 4, 5, 6, 7, and 10 used the same terminology as the action steps, which was vague. Step 3 was to ensure roles and responsibilities of various individuals/group were defined, however the deliverable was to generate a weekly report.</p>
<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>The performance indicators were not completely developed.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169913.</p>

<b>ACTION PLAN NUMBER - 5.2.5.2</b>	
<b>ACTION PLAN TITLE - Completeness/Accuracy/Timeliness</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes. However WBS 2.2.4 was not referenced anywhere, but has issues associated with this action plan.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	<p>No. Issues identified in the extent of condition review were not tied to the action plan. First, WBS 2.1.2 states that work packages need to include assessments of potential unknowns, alternative plans, options, lessons learned, and pre-walkdown requirements. The action plan only has actions to address pre-walkdown requirements by establishing clear standards for when the planner needs to perform a walkdown jointly with the craft and/or engineer. Upon further review and discussion with the Action Plan Owner, it was determined that Action Plan 5.2.5.1 had steps that addressed these remaining issues. However, there was no clear tie between the action plan causal factors and the steps that addressed the issues. Following discussion with the licensee, they stated that this problem would be evaluated for TIP Revision 2.</p> <p>And second, WBS 2.2.4 has numerous issues associated with the lack of engineering support during the work package planning process. However, there are no actions in the plan to correct this weakness. Upon further review of the action plans in this focus area and interviews with the Action Plan Owner, the team determined that this issue was addressed by step 4 in Action Plan 5.2.5.1. Action 4 addresses the definition of the roles and responsibilities of various individuals/groups involved in the development of work packages.</p> <p>The plan indicated that Steps 4 and 6 addressed Causal Factor 2. However, these steps did not address Causal Factor 2. Upon further review and discussion with the Action Plan Owner, it was determined that Action Plan 5.2.5.1 had steps that addressed this issue. However, there was no clear tie between Causal Factor 2 and the steps in Action Plan 5.2.5.1 that address this problem.</p>
5. Action Plan steps provide sufficient detail to define action to be taken.	No. Seven out of the nine actions specified are very general. It is difficult to assess whether the actions correct the problems identified in the causal factors. Steps 1-7 lacked detail.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes

7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Performance indicators had not yet been developed.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169916.

<b>ACTION PLAN NUMBER - 5.2.6.1</b>	
<b>ACTION PLAN TITLE - Work Practices</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The causal factors do not clearly address the WBS issues. The causal factors states that management oversight has not been effective in addressing improper work practices. The WBS discussed the 1994 CNS Diagnostic Self-Assessment identification of what improper (poor) work practices were defined to be. They were identified as industrial safety issues, inappropriate implementation of procedures, improper or unsuccessful repairs to equipment, low housekeeping standards, and an unacceptable level of human performance errors. Because the causal factors did not break down what improper work practices were defined to be, no actions are identified in the action plan to correct the specific problem areas of improper work practices (defined in the 1994 CNS Diagnostic Self-Assessment). Two specific problems that do not have actions are improper or unsuccessful repairs to equipment and human performance errors. The other problems that are listed will be addressed either directly or indirectly by an action to review the maintenance principles and standards. Upon further review of TIP it was determined by the team that Action Plan 5.2.5.2, Completeness/Accuracy/Timeliness, and Action Plan 5.1.4.1, Human Performance, had actions that addressed these performance issues. However, the Work Practice action plan did not provide any cross reference to the other action plans.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The steps do not address two of the problems that were defined to be examples of poor work practices. The two specific problems that do not have actions are improper or unsuccessful repairs to equipment and human performance errors.
5. Action Plan steps provide sufficient detail to define action to be taken.	Steps 1 and 8 lack detail.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No, the deliverables restate what the actions are going to be, for example revise procedures as necessary. Steps 1, 2, and 7 are not well defined.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan?	Yes.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169918

<b>ACTION PLAN NUMBER - 5.2.6.2</b>	
<b>ACTION PLAN TITLE - First Line Supervision</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	Steps 4, 6, and 7 lacked sufficient detail.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan?	No. Performance indicators had not yet been developed.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169867

<b>ACTION PLAN NUMBER - 5.2.6.3</b>	
<b>ACTION PLAN TITLE - Technical Support/Lessons Learned</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The problem statement only discusses technical support issues which is inconsistent with the action plan title (Technical Support/Lessons Learned).
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	No. Causal Factor 1 discusses the problem of consistently capturing "Lessons Learned" to improve future performance. There are numerous methods that the licensee currently has and can implement to capture lessons learned such as the work week critique, CAP, NRC inspection reports, post job critiques, etc. The action plan only considers one aspect of capturing lessons learned by improving the feedback form used in post job critiques. Other sources of lessons learned were not addressed.  Causal Factor 2 lists actions to "establish" engineering expectations. No actions address communicating the standards and expectations, which is a historical weakness as described in this causal factor, extent of conditions, and assessment issues database.
5. Action Plan steps provide sufficient detail to define action to be taken.	No. Four out of eight actions lacked the details necessary to assess the ability of the actions to correct the problems specified in the causal factors.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No. Deliverables are too general to determine end product.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	No. PIs were not fully developed.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169870

<b>ACTION PLAN NUMBER - 5.2.7.1</b>	
<b>ACTION PLAN TITLE - Improve Reinforcement of CAP Standards and Expectations</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan referenced WBS 3.1.1, 3.1.3, and 3.1.4.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern. The action plan owner was actively involved during the development of the WBS extent of condition and the action plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were appropriately aligned.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Action items did not address a causal factor involving ineffective trending of performance issues. The action plan addressed improvement of corrective action program database trending but did not address improved trending of equipment reliability issues identified in the work item database.
5. Action Plan steps provide sufficient detail to define action to be taken.	The action plan owner had already developed and implemented some of the action items. Therefore sufficient detail to assess the item was provided in the supporting documentation. For example, step 2 involved a revision to the corrective action review board (CARB) charter. The details of the revision were not included in the action plan; however, the procedure had been revised and the charter had been modified.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Deliverables do not state the desired outcome. For example, step 2 specified that the deliverable was a revised CARB charter. In actuality, the deliverable is improved CARB oversight of the corrective action program processes.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	<p>The root cause quality index performance indicator monitored the as-left, performance analysis department corrected version of the root cause analysis. The team determined that unsatisfactory root cause analyses continued to be submitted. However, the performance indicator for root cause analysis quality specified positive results.</p> <p>The significant condition report recurrence indicator did not include items which repeated on multiple occasions. For example, there were three recurrences of a significant condition report involving the corrective action program in the previous 36 months. However, the indicator only reflected one of the recurrences because the "same issue" was repeated.</p> <p>The corrective action program indicators reported the 12-month rolling average value. This method of data reporting normalizes the data and may disguise adverse/positive results for a given month. Consequently, corrective actions may not be taken to investigate a negative result.</p>
8. Has a notification been written to enter Action Plan in CAP?	Notifications 10169881 and 10169811.



<b>ACTION PLAN NUMBER - 5.2.7.2</b>	
<b>ACTION PLAN TITLE - Root Cause</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The action plan did not reference WBS 3.1.3 and 3.1.4. The action plan owner had reviewed the packages as part of the action plan development.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern. The action plan owner was actively involved during the development of the WBS extent of condition and the action plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Action Plan Objective, Problem Statement, and Causal Factors were appropriately aligned.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.
5. Action Plan steps provide sufficient detail to define action to be taken.	The action plan owner had already developed and implemented some of the action items. Therefore sufficient detail to assess the item was provided in the supporting documentation. For example, there were no specific items to address improvements in apparent cause analysis. However, the revised corrective action program training included a discussion on apparent cause analysis.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Deliverables do not state the desired outcome. For example, the deliverable for reducing root cause investigators from 200 to 50 was to establish and maintain a list of 50 root cause evaluators. The actual desired outcome was to improve the quality of root cause analysts by limiting the number of certified individuals and increasing the frequency of the task.

<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>The root cause quality index performance indicator monitored the as-left, performance analysis department corrected version of the root cause analysis. The team determined that unsatisfactory root cause analyses continued to be submitted. However, the performance indicator for root cause analysis quality specified positive results.</p> <p>The significant condition report recurrence indicator did not include items which repeated on multiple occasions. For example, there were three recurrences of a significant condition report involving the corrective action program in the previous 36 months. However, the indicator only reflected one of the recurrences because the "same issue" was repeated.</p> <p>The corrective action program indicators reported the 12 month rolling average value. This method of data reporting normalizes the data and may disguise adverse/positive results for a given month. Consequently, corrective actions may not taken to investigate a negative result. Item 1, which reduced root cause investigators from 200 to 50, was stasured as complete in January 2002. However, the quality of root cause analyses was not improved. In addition, the licensee had not implemented interim corrective actions to monitor the quality of the newly selected analysts. Interim actions were not implemented even though the licensee indicated that they expected the quality of root cause analyses to decrease following the selection of the 50 analysts.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notifications 10169881 and 10169811.</p>

<b>ACTION PLAN NUMBER - 5.2.7.3</b>	
<b>ACTION PLAN TITLE - Improved Utilization of OER</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	The Action Plan referenced WBS 3.5.2.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	The WBS extent of condition review identified the significant areas of concern. The Action Plan owner was not involved in the development of the WBS, but did review the WBS as part of his review and development of the Action Plan.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	The Problem Statement discussed line supervision and workers not using operating experience, but the causal factors focused only line management. The workers not using operating experience was not addressed in the Causal Factors.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	<p>Two of the conclusions in the extent of condition were not covered in the Action Plan. Specifically:</p> <ol style="list-style-type: none"> <li>1. Not sharing in-house lessons learned with the industry</li> <li>2. Weaknesses in the internal dissemination and feedback loop for industry OE, caused inconsistent implementation.</li> </ol> <p>The Action Plan owner stated that both of these items were appropriately addressed previously, but no reviews were done to verify the effectiveness of the corrective actions. In addition, for Example 2, the team did an independent extent of condition and determined that three NRC issued generic letters and/or information notices were not properly addressed. The licensee did not conduct an independent assessment of previously addressed operating experience information to ensure actions taken addressed those concerns.</p>
5. Action Plan steps provide sufficient detail to define action to be taken.	The Action Plan Steps were not sufficiently detailed. Steps 2 and 3 discussed doing observations of prejob briefs, work planning, and job performance, but the steps did not indicate how many observations per department would meet the necessary observations. Step 5 discussed benchmarking. Again, no details as to which plants meet the criteria for good OER programs; the criteria to be used to evaluate the plants selected; and, the step did not indicate how many plants need to be benchmarked.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	The deliverables do not measure changes in performance as based on the actions taken. For instance, Step 5, benchmarking, specified the deliverable as a completed trip report. This will not do anything to change performance. Changes to the operating experience program/process as a result of the evaluation of the benchmarking activity should be the deliverable.

7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	There was no current performance indicator for this program. The licensee was working on developing an indicator, "Number of observations of OER use in the field performed per quarter." The team was not able to determine how this indicator might indicate improved use of operating experience.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169892

<b>ACTION PLAN NUMBER - 5.2.8.1</b>	
<b>ACTION PLAN TITLE - Vendor Manual Upgrade Program</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	No
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes
5. Action Plan steps provide sufficient detail to define action to be taken.	No. Steps were general in nature and lacked sufficient detail.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No. All of the deliverables are re-statements of the action plan steps and do not discuss the specifics or quality of the completed product.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Performance indicators had not yet been developed
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169911

<b>ACTION PLAN NUMBER - 5.2.8.3</b>	
<b>ACTION PLAN TITLE - Procedure Change Process</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	No
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	No. The WBS identified the procedure change process to be cumbersome and non-responsive in addressing needed changes or enhancements. The action plan only addresses the implementation of an Independent Qualified Reviewer/Approver process, which will reduce the procedure review approval burden of SORC. The inspectors determined that there was not a single process for revising procedures, but that each department used their own informal method. The inspectors identified that pending procedure revisions were not tracked as to when the request was received, whether the change warranted a high priority, what procedure was involved, or when the change would be incorporated. Additionally, significance determinations were not found for many of the pending changes.
5. Action Plan steps provide sufficient detail to define action to be taken.	Step 9 requires follow-on assessments. However, there is no detail as to what the assessment objectives will be, who will perform the assessment, which departments would be involved in the assessment, etc.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	No, the PI's only address the performance of the procedure change process after a change is delivered to the site procedures group. It does not address the period of time from submittal of the change request until final approval.
8. Has a notification been written to enter Action Plan in CAP?	Notification10169904

<b>ACTION PLAN NUMBER - 5.3.1.1</b>	
<b>ACTION PLAN TITLE - System/Equipment Performance</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	No. The extent of condition discusses some of the current long-term equipment reliability issues. A more complete list is available in the 2002 "CNS Unplanned LCO Action Statement Entry and Equipment Reliability Review." The extent of condition does not develop the specific longstanding equipment reliability issues facing the station, but rather focuses on the cultural aspects that caused the station to fail to correct them over prolonged periods. The TIP does not include actions to actually correct the long list of specific equipment reliability issues that have caused frequent diversion of significant attention and resources away from planned work to correct emergent work when problems recur.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	No. The objective to complete "ongoing activities in support of achieving an improved level of equipment reliability" does not specify which activities are encompassed. The problem statement focused on failure to proactively address equipment issues, and did not address correcting existing issues. The causal factor statements were more complete, but still did not address fixing existing equipment reliability issues or obsolescence issues.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The extent of condition mentions, but does not develop, a list of longstanding equipment reliability issues. The action plan addresses improving the organizational infrastructure to improve how the station handles future equipment reliability issues and to identify them before they become larger problems. However, the TIP does not address actually correcting the long list of known equipment reliability issues. These equipment issues must be corrected if the station is to avoid challenging itself and diverting resources when problems recur.
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes.

<p>6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as “effective” and “reduced to minimal” defined?)</p>	<p>Action 1.1 to review the PM change process for improvement did not specify the form of the product.</p> <p>Action 1.3 to “minimize the preventive maintenance closeout backlog” was unclear on what level of backlog was acceptable.</p> <p>Action 1.4 to “develop a PM feedback process” was not specific as to what form the process would be (i.e. a station procedure?).</p> <p>Action 3.2 specified performing a gap analysis between station practices and industry standards. The deliverable statement did not specify how the identified gaps would be captured (i.e. in the corrective actions process, a self-assessment document, etc.).</p> <p>The same was true for Action 4.1, which specified identifying obsolescence issues.</p>
<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>The PIs specified provide a good measure of the impacts to the site due to equipment reliability problems. They do not, however, provide clear information about whether actions to address issues were effective.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169914.</p>

<b>ACTION PLAN NUMBER - 5.3.2.1</b>	
<b>ACTION PLAN TITLE - Programs</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	No. The WBS did not discuss each program in any level of detail. The limited extent of condition discussed issues thought to be common to all programs. The action plan caused self-assessments and interface assessments to be performed in order to actually develop the full extent of condition.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	No. The objectives did not fully address all the issues identified in the problem statement nor all of the casual factors listed. The objective did not actually list any performance improvements or define a level of improvement to be achieved. With the exception of upgrading Procedure 0-CNS-12, the objectives only implemented program improvement activities which were in progress at the time the action plan was developed.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	No. The action plan steps were written to align with the plan objectives. Twelve of the fourteen steps were intended to implement program improvement activities which were already in progress at the time the action plan was developed. The action plan steps did not address the problem statement issues of lack of commitment to program implementation and lack of organizational depth.  Steps 3 through 6 were intended to implement the previously existing Program Improvement Project (PIP) which addressed programs classified Category A and B per procedure 0-CNS-12. However, the scope of the PIP and the action plan did not include the Probabilistic Risk Assessment Program which was a Category B program per 0-CNS-12.  The action plan steps did not fully address Casual Factor 1 concerning ownership of programs. The roles and responsibilities for program implementation are documented in program notebooks. The program notebooks are informal documents developed by the program owners. The notebooks are not available to the whole station, do not require concurrence of the other organizations involved and do not require compliance as would formal procedures.
5. Action Plan steps provide sufficient detail to define action to be taken.	No. Steps 3 through 6 required a series of self-assessments and interface assessments to be performed for the individual Category A and B programs. The action plan was not sufficiently detailed to define the scope of the assessments. Many of the program owners did not have significant industry involvement outside of CNS, which would assist in establishing a performance level reference. None of the program owners planned external benchmarking to identify the industry standards and practices.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	No. Steps 3 through 6 required a series of self-assessments and interface assessments to be performed. The deliverables did not develop formal action plans, define goals for improved performance or establish effectiveness measurements to improve individual programs. The PIP Project Charter included the concept of preparing "Programs Improvement Action Plans" which were "Required to provide clear documentation and prioritization of actions to be taken to resolve assessments deficiencies." This concept was not implemented by the PIP or incorporated into the TIP action plan.

<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>No. The performance indicators did not provide an effective or timely means of monitoring program health or changes in performance for individual programs. The CNS Program Cumulative Health Indicator listed was not adequate to trend the performance of the individual programs being addressed because the health of each program was only required to be assessed once every two years. This indicator was not sufficiently sensitive because it numerically averaged 7 attributes in each of the 16 programs into one overall rating. The other indicators listed only monitor the schedule and costs for implementing breaker refurbishment programs and performing MOV calculations. The indicators listed would not allow assessment of the effectiveness of the action plan steps or measure actual performance improvements in individual programs.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notification 10169884.</p>

<b>ACTION PLAN NUMBER - 5.3.3.1, 5.3.3.2, and 5.3.3.3</b>	
<b>ACTION PLAN TITLE - “Design Basis Information/Licensing Basis Information Translation Project,” “Offsite Power Reliability Improvement - Phase 1,” and “Unauthorized Modification Followup Project”</b>	
<b>FOCUS AREA - Key Modifications and projects; Configuration</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plans reference WBS inputs.	No. Action plans 5.3.3.2 and 5.3.3.3 contained no reference to a WBS, although both were intended to reference WBS 3.4.1.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	<p>No. The extent of condition for issues associated with design basis/license basis information and offsite power reliability were not developed in the WBS. The causal factors developed were also incomplete. The team could not assess the completeness of the action plan steps without an accurate characterization of the extent of condition. In the case of offsite power reliability, the action plan was for Phase 1 of the project, with additional phases undeveloped. It was unclear if any additional phases would be appropriate for inclusion in the TIP. In the case of design/license basis problems, the lack of development of the issue in the extent of condition review caused development of incomplete actions, discussed below.</p> <p>The WBS also did not document the extent of condition or causal factors associated with unauthorized modifications issues. However, this project has been ongoing since 1996 and is well-documented on the docket.</p>
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	<p>No. The combination of the three action plan problem statements and causal factors did not address the full scope of the problems identified in the extent of condition review. Specifically, problems relating to the quality of calculations, evaluations, analyses, and plant changes were not addressed by action plans.</p> <p>The problem statement and causal factor listed in the action plan for Offsite Power Reliability Improvement did not have clear ties to issues, findings, or the discussion of extent of condition in the WBS. The team noted numerous examples in NRC inspection findings which should have been identified during the extent of condition review. This issue was appropriately included in the TIP, but the team was unable to determine the completeness of actions because the licensee did not develop the extent of condition - it was listed as Phase 1 without future phases being scoped. Also, this action plan appropriately addressed industry experience and recommendations, but this aspect was not addressed in the problem statement or causal factors.</p> <p>Action plan 5.3.3.3 did not develop the problems, causes, or objectives associated with unauthorized modifications. The WBS also did not document the extent of condition or causal factors for this issue. The stated objective of the action plan was to track completion of actions in the existing project.</p>

<p>4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.</p>	<p>No. The characterization section of WBS 3.4.1, "Key Modifications and Projects Configuration," identified that process, programmatic or organizational deficiencies contributing to discrepancies between design/license basis information and actual configuration of the plant needed to be addressed. However, this issue was not addressed by an action plan. The licensee inappropriately decided not to include this issue in the TIP because these issues had recently been addressed by implementing a significant change to the configuration control process procedures by revising the Engineering Procedure 3.4 series documents. WBS 3.4.1, "Key Modifications and Projects Configuration," stated that an effectiveness review needed to be completed following RE21 to identify and correct any problems experienced. However, no action plan addressed these actions.</p> <p>Action plan steps to address improving engineering training was not fully developed, so the team was unable to assess it for completeness.</p>
<p>5. Action Plan steps provide sufficient detail to define action to be taken.</p>	<p>Yes. However, the Project Plan for the Design/License Basis Translation Project stated that validation efforts were intended to provide reasonable assurance that design basis information was consistently reflected in the physical plant and the controlled documents used to support plant operations. The licensee's plan did not include actions to validate the physical plant.</p>
<p>6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)</p>	<p>Yes.</p>
<p>7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?</p>	<p>No. Action Plans 5.3.3.1 and 5.3.3.3 listed only TIP schedule adherence as performance indicators. These were not expected to provide a valid indication of the effectiveness to improvement efforts in this focus area. As noted above, the focus area was much more broad than the three action plans addressed. The performance indicators for the offsite power reliability action plan appeared to adequately measure performance in the area of concern. The combined PIs of the three action plans in this focus area did not address the full scope of the focus area, as described above.</p>
<p>8. Has a notification been written to enter Action Plan in CAP?</p>	<p>Notifications 10169889, 10169908, and 10169887.</p>

<b>ACTION PLAN NUMBER - 5.4.1.1</b>	
<b>ACTION PLAN TITLE - Management Ownership of Training</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	One objective refers to a decline in station human performance errors. This is not consistent with the problem statement for this action plan, in that, the problem statement does not indicate that human performance errors have resulted from inadequate training.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes.
5. Action Plan steps provide sufficient detail to define action to be taken.	Yes.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	For Step 2, the process to be used lacks detail. For Step 4, "effective corrective action" is not defined.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Not in all cases. The team identified an issue with one indicator which tracked the number of instances where individuals were utilized to perform work tasks for which they were not qualified. The thresholds associated with this indicator were set such that one instance of an unqualified person performing a work activity per quarter, or as many as four such instances per year, would indicate acceptable performance. In theory, this rate of unqualified personnel performing work could continue on indefinitely without the performance indicator triggering any corrective action. When the team brought this to the attention of the licensee, they entered the issue into their corrective action program and immediately revised the indicator's acceptability thresholds. (This is the same comment as for Action Plan 5.4.1.2)
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169893

<b>ACTION PLAN NUMBER - 5.4.1.2</b>	
<b>ACTION PLAN TITLE -Training Program -- Evaluation and Qualification of Personnel</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes, however, several of the causal factors are addressed in other action plans. For example, Causal Factor 3 is addressed in Action Plan 5.1.1.2. However, the steps in Action Plan 5.1.1.2 lack detail regarding <u>specific</u> applicability to Action Plan 5.4.1.2. This is because Action Plan 5.1.1.2 addresses the issue of Accountability site-wide and, therefore, should be applicable to the Training department.
5. Action Plan steps provide sufficient detail to define action to be taken.	Action Plan step 3 lacks detail regarding implementation.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	Yes.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Not in all cases. The team identified an issue with one indicator which tracked the number of instances where individuals were utilized to perform work tasks for which they were not qualified. The thresholds associated with this indicator were set such that one instance of an unqualified person performing a work activity per quarter, or as many as four such instances per year, would indicate acceptable performance. In theory, this rate of unqualified personnel performing work could continue on indefinitely without the performance indicator triggering any corrective action. When the team brought this to the attention of the licensee, they entered the issue into their corrective action program and immediately revised the indicator's acceptability thresholds.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169912

<b>ACTION PLAN NUMBER - 5.4.1.3</b>	
<b>ACTION PLAN TITLE -Training Program -- Organizational Effectiveness</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	Yes.
5. Action Plan steps provide sufficient detail to define action to be taken.	Action Plan step 3 regarding the Training Program Effectiveness Scorecard lacks detail.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	The Deliverable for step 4 lacked detail in that it only requires that training be attended, which in and of itself is not a measure of the success of a training issue. The action plan step will provide training to instructors for the purpose of improving exam development and quality of task analysis. However, these details are not captured completely in the deliverable.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Yes.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169906

<b>ACTION PLAN NUMBER - 5.4.1.4</b>	
<b>ACTION PLAN TITLE -Training Program -- Process Enhancements</b>	
<b>REVIEW CRITERIA</b>	<b>OBSERVATION</b>
1. Action Plan references WBS inputs.	Yes.
2. Characterization of issues in WBS are adequate to address individual issues from database included in the extent of condition review for that WBS.	Yes.
3. Action Plan Objective, Problem Statement, and Causal Factors are appropriately aligned.	Yes, however, all of the causal factors are addressed entirely by other action plans. This is because the training programs have declined due to ownership, lack of self-assessments, etc. The objective of this action plan addresses restoring the programs to a satisfactory condition.
4. Action Plan steps address the Problem Statement, Causal Factors, and extent of condition described in WBS package.	The Action Plan steps are programmatic upgrades only. The causes of the problems are addressed entirely in other action plans.
5. Action Plan steps provide sufficient detail to define action to be taken.	The steps lack detail regarding "material development and revision" for program upgrades.
6. Deliverable identified for Action Plan steps are well defined and consistent with the action being taken. (Are words such as "effective" and "reduced to minimal" defined?)	"Industry Guidelines" is stated in almost every Deliverable. As it is used, the term is undefined.
7. Do the performance indicators provide an adequate measure of performance as it relates to the objectives for improved performance in the Action Plan? Are the thresholds in the performance indicators appropriate?	Yes.
8. Has a notification been written to enter Action Plan in CAP?	Notification 10169906