

From: "Flentje, Fritzie" <Fritzie.Flentje@nmcco.com>
To: <KGO@nrc.gov> Kenneth O'Brien, RTH
Date: 12/9/02 2:03PM
Subject: AFW Corrective Actions

Hi Ken,

Per our conversation a short time ago, here are the following documents:

Status Updated dated 12/05/02
Spreadsheet of Open Issues
Charter for Effectiveness Review
Charter for AFW Design Basis Revalidation

I've sent the documents as pdf files to enable you reviewing them without converting them to WordPerfect.

Please feel free to contact me or Tom Webb if you need additional information. My phone is 920/755-6221.

<<AFW-RemainingActions.pdf>> <<NPM 2002-0642.pdf>> <<Point Beach Auxiliary Feedwater Plan.pdf>> <<Point Beach Auxiliary Feedwater Review Team Charter.pdf>> <<Organization Assess Charter.pdf>>

A1359

OPEN ISSUES	WHO	WHEN	COMMENTS
Incident Investigation	S. Thomas	11/21/2002	CA026962 - completed 11/20/02
On-Line Work Risk Management NP 10.3.7, Unplanned Yellow Actions	J. Anderson R. Wood	Ongoing Ongoing	CA026958 - Charter task Ref CA27023 and CAP30052/Mod required for green
Interim Corrective Actions Charter Tracking Item	D. Schoon	11/27/2002	CA026908 - closed Ref CAP029999/CA026986- Trng Needs Analysis is completed
Training Needs Analysis and Related Actions	P. Smith	2/2/2003	Ref CAP029999/CE10848
Condition Evaluation/further enhancements	M. Schug	12/6/2002	Ref CAP029999/CE10848
Independent Evaluation of Procedure changes	D. Schoon	11/27/2002	Ref CA026909 - completed
Independent Evaluation of briefings & training	D. Schoon	11/27/2002	Ref CA026910 - completed
Engineering Resolution Team and RCE Conduct Root Cause Evaluation - Draft Report Conduct Root Cause Evaluation - Final Report	R. Fleasner R. Fleasner	11/18/2002 12/4/2002	Ref RCE0000181 - first draft issued Final requires PSA inputs
PRA/risk significance evaluation	J. Mastermark	1/29/2003	Ref CA026900/Also requires PI inputs
Hydraulic system response	T. Kendall	12/16/2002	CA026911- PI final report expected 12/20/02
Develop a test plan	T. Kendall	TBD	CA026912 - PI/PSA/Engr considerations - Not assigned
Analyze corrosion products	B. Zipp	1/20/2003	CA026913- PI final report expected 12/20/02
AFW sources and quantity of corrosion products	B. Zipp	1/20/2003	CA026914 - PI final report expected 12/20/02
Modifications to orifice design	J. McNamara	12/13/2002	Ref CA026918
Fabrication	J. McNamara	12/17/2002	6 weeks from 11/12 is December 17
Testing	J. McNamara	TBD	Coordination
Installation	J. McNamara	TBD	Planning for
Coordination of work schedule with station	J. McNamara	TBD	13 week schedule process - input
OPR00031 Part B/Schedule for correction due	J. McNamara	11/27/2002	Complete Part II of OD 31
NEW - Electrical design modifications	M. Roseau	TBD	Scope, schedule, etc (Clint Drescher as designer)

Regulatory Response
TBD
Net CAP030178 - DFRS - Red vs orange - CAP1128
due 3/10/03
Ref CAP030208, CD Rev 4 D01 Power Supply

INTERNAL
CORRESPONDENCE

NPM 2002 -0642

To: A. J. Cayia
From: Ken Peveler
Date: December 5, 2002
Subject: UPDATE ON POTENTIAL AFW COMMON MODE FAILURE EVENT
RESOLUTION TEAM ACTIONS

Ref: CAP029952

Copy To: File

The purpose of this message is to provide an update on the subject team actions, to recommend adjustments at this time due to progress made and to address organizational changes. Overall, my recommendation is that this team be dissolved and the remaining actions remain with the responsible organizations and processes.

First, an update on the specific group tasks:

~~Issue~~ Incident Investigation - Stu Thomas - Task completed

~~Issue~~ On-line Work Risk Management - John Anderson - This task is completed relative to AFW in-plant work activities impacting the schedule beyond the impacts of the potential common mode plugging issue (i.e., condensate storage tank inspection, service water system flush, AFW and recirculation orifice inspections completed, and AFW returned to service with compensatory actions in place). This places the station in a base level of risk of low "yellow" due to the AFW recirculation line remaining in a degraded condition due to the orifice design. Orifice design activities are in progress for replacement. In the mean time, plant risk assessment continues to manage station work while in this yellow condition. Resolution of this issue is expected to be extended into January, when the newly designed orifices will be available for installation and return the station to a "green" base line.

~~Issue~~ Interim Corrective Actions - Duane Schoon - Task completed.

~~Issue~~ Issue Resolution Team and Root Cause Evaluation - Jim Freels - Issues remain open in this area. Rich Flessner continues to work on the root cause under the management sponsorship of Jim Freels. Input from PII and PSA is required to complete the root cause. At this time, most if not all of the facts of the situation have been gathered and the first drafts of the root cause have been submitted for comment. Design resolution and risk assessment activities remain open (See attached).

At this time, I am recommending that I be relieved of my team leadership responsibilities for the AFW Common Mode Failure Event Resolution Team and the remaining activities be pursued in accordance with our normal processes. This will support my return to Nuclear Oversight and support preparations for my transition to Engineering Programs at Point Beach in January of 2003. Risk management and design resolution activities require close attention.

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December 5, 2002
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Attached is an update of the Charter and an action matrix to reflect status and remaining activities. Specific areas for attention going forward include:

1. Coordination of design and installation activities for the new orifices, including coordination of other AFW work to minimize unavailability time.
2. Resolution of newly identified electrical design issues on AFW due to new CAP 's
3. Completion of risk analysis work at PII
4. A decision on whether to perform testing on an orifice
5. Completion of the root cause
6. Response to regulatory issues

/bjo

Attachments:

1. Team Charter, with status
2. Action matrix

Point Beach Auxiliary Feedwater Plan

Action:

Review NUREG 1022 for reportability potential	Webb
Review licensing and design basis information for previous communication with NRC about Auxiliary Feedwater System	Webb/Kendall
Independently verify power supplies and instrumentation failure matrix	Miller
Verify Control Room tags are reviewed and revised as necessary	Schoon
Review and revise operational guidance as necessary	Schoon
Provide plan and basis for cross-connecting GO3/GO4 should one EDG become inoperable	Wood
Review PRA model to determine if impact of loss of D01 and D02 correct	Wood
Construct Auxiliary Feedwater assessment plan	Freels
Verify actuation time of 30 minutes is sat with Westinghouse	Kendall
What impact of manual actuation for SW from HEP perspective	Masterlark

Point Beach Auxiliary Feedwater Review Team Charter

Purpose: The purpose of the Point Beach Auxiliary Feedwater Review Team is to systematically investigate the design and licensing bases of the Auxiliary Feedwater System and to verify the as-built and tested conditions of the system satisfy those bases.

Objectives: The objectives of this review team are to revalidate the design bases by:

- ?? Determining if the Auxiliary Feedwater System is currently designed, constructed, operated, maintained and tested to meet the requirements of the design and licensing bases
- ?? Documenting any identified discrepancies in the corrective action program
- ?? Facilitating the resolution to any identified discrepancies
- ?? Ensuring the design bases documents accurately reflect their conclusions.

Scope: The scope of this review is to include, but not limited to, the Point Beach Operating License and Attachments, Updated Final Safety Analysis Report, applicable regulatory commitments and correspondence, applicable plant drawings, design bases documents, installed and pending system modifications, Operability Determinations, applicable normal operating and emergency procedures, component setpoints and bases, preventive/predictive maintenance task scope and frequency, system parameter monitoring and trending activities and bases, applicable maintenance and testing procedures, quality assurance requirements, applicable training lesson plans and simulator scenarios.

Deliverables: Deliverables from this team to include:

- ?? Identification and documentation of discrepancies via the corrective action program
- ?? Generation of Operability Determinations as applicable
- ?? Identification of Limiting system margin components and scenarios
- ?? Updated design bases documents
- ?? Revision packages to correct document weaknesses
- ?? Appropriateness of safety analysis assumptions and identification of margin in these analyses
- ?? Comprehensive report detailing team activities, findings and recommendations

Team Composition:

TBD based on final charter

Schedule:

Charter Approval:

A.J. Cayia
Site Vice President

Date

**Point Beach Nuclear Power Plant
Organizational Assessment Charter**

Purpose

The purpose of this assessment is to identify processes, procedures, and organizational dynamics that have resulted in continued issues with Operational and Engineering performances at Point Beach Nuclear Power Plant (PBNPP) and barriers to improving plant and personnel performance.

Background

The success and long term viability of Point Beach Nuclear Power Plant is dependent on the ability of the organization to identify issues and resolve them effectively to insure safe, reliable, cost effective operation.

Previous events at PBNPP indicate the organization has not been fully effective in timely resolution of plant issues. Although the station has run well and performance has improved, the pace of improvement is not sufficient to achieve Excellence in the time frame consistent with other NMC plants. Recent examples have occurred in several areas. The trend in maintenance and engineering related backlogs indicate progress has been lagging. Causes of equipment issues in the Spring 2002 Refueling Outage, related to human performance, have been evident in subsequent issues. Overall these are indications of a need to fully understand the processes and interactions that have hindered improvements.

The most recent PBNPP red finding on the Auxiliary Feedwater System identified similar potential problems. Resolution of this old design issue required the station to reevaluate the way previous portions of the system were treated. Subsequently Point Beach identified another potential failure mechanism on this system involving the same recirculation path. The issues associated with these modifications indicate insufficient Engineering rigor and Operational oversight. The processes, procedures and organizational dynamics leading to the recent issue need to be understood and a plan put in place for effective resolution.

The assessment team will accomplish this based on a review of procedures, processes, oversight committees, external communications, interviews with personnel and observation of station activities.

Scope

The scope of this assessment will include a review of a broad spectrum of processes that have the potential for identifying process and organizational weaknesses. In addition, to ensure a thorough understanding of past decisions and their completeness and impact on current plant operation several specific area reviews will be conducted. The following list of items will be included for review/observation.

SPECIFIC ANALYSIS AND REVIEW

Overall AFW System Adequacy – Identify and evaluate limiting performance areas

Modifications performed on AFW (Safety and Non-Safety) - Past 10 years

Modifications on other Safety Systems whether the modifications were safety related or not – Past 5 years

Previous 50.59s and 50.59 screenings – Past 5 years

Past MSS minutes – Past 5 years

Plant and Site Oversight Committee Minutes – Past 5 years

CAP/Action Requests - Past 5 years – non-lower level items that are system/problem related

Performance Indicators performance – persistent areas of slow improvement

Regulatory Submittals – Past 5 years

NRC Inspection Reports – Past 5 years

Last 3 INPO evaluations

Excellence Plan Action Areas and Completeness

DECISION MAKING AND PROCESS IMPLEMENTATION

Organizational Dynamics	Work Planning/Scheduling process
- Accountability methods	
- Culture Survey	Operability Determinations
- Teamwork methods	
	Modification Process
CAP Process	Temporary Modification Process
Root Cause Process	MSS Process
System Related Health Reporting	
50.59 Process/50.59 Screening process	

Deliverable

The deliverable for this review will be a document that provides weaknesses and strengths identified during the review and will specifically evaluate the Auxiliary Feedwater System adequacy. From this input, the information will be overall Streamed and the Excellence Plan will be updated to provide the overall guidance for Station improvement

Point Beach Assessment and Organizational Assistance Team – General Areas for Review

Team Lead and Coordinator – Gary Van Middlesworth
 Engineering/Regulatory Areas – Jim Taylor
 Regulatory – Ed Weinkam
 Operations and Organization – Warren Fujimoto
 Culture Survey -Synergy (John Guibert)
 Organization/Excellence Plan – Doug Cooper
 Technical & Engineering – Mano Nazar
 Operations/Work Planning – Jack Purkis
 Technical and Engineering – Mark Reddemann
 Organizational Dynamics – Dan and Beth Nilsson (Tall People)
 Licensing/Root Cause/Oper ability Determination – Keith Young/Ed Weinkam
 Lori Armstrong - Observer
 Mentor – John Holden
 INPO -TBD

DECISION MAKING AND PROCESS IMPLEMENTATION

Organizational Dynamics – Doug Cooper
Warren Fujimoto
Nilsson 's

- Accountability methods
- Culture Survey – John Guibert
- Teamwork Methods

CAP Process – Jim Taylor & Mano Nazar

Root Cause Process – Keith Young

System related health reporting – Jim Taylor & Mano Nazar

MSS Process – Warren Fujimoto & Gary Van Middlesworth

50.59 Process/50/59 Screening process – Ed Weinkam

Modification Process – Mano Nazar

Temp Mod Process – Jack Purkis

Work Planning/Scheduling process – Jack Purkis

SPECIFIC ANALYSIS AND REVIEW AREAS

Overall AFW System Adequacy – Mano Nazar & Mark Reddemann

Modifications on AFW, Safety and non-safety – Jim Taylor & Mark Reddemann

Modifications, Safety Systems – Mano Nazar & Mark Reddemann

50.59's and 50.59 screenings – Ed Weinkam & Keith Young

MSS minutes – Warren Fujimoto & Gary Van Middlesworth

Plant and Site Oversight Committee Minutes – Jim Taylor

CAP/Action Requests – Warren Fujimoto, INPO

Performance Indicators – Doug Cooper & Gary Van Middlesworth

Regulatory Submittals – Ed Weinkam & Keith Young

NRC Inspection reports – Jack Purkis

Last 3 INPO Evals – Warren Fujimoto

Excellence Plan – Doug Cooper & Mano Nazar