

MEMORANDUM TO: Chairman Meserve
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
Commissioner Merrifield

May 24, 2000

FROM: William D. Travers */RA/*
Executive Director for Operations

SUBJECT: MINUTES OF THE NRC SENIOR MANAGEMENT MEETING
HELD MAY 10-11, 2000

The purpose of this memorandum is to provide to the Commission a summary of the discussions held at the May 10-11, 2000, NRC Senior Management Meeting (SMM). As the Commission is aware, NRC senior managers have met periodically to review the performance of operating nuclear power plants and materials facilities licensed by the NRC. Prior to 1999, the SMM was conducted twice each year. In SECY-99-086, "Recommendations Regarding the Senior Management Meeting Process and Ongoing Improvements to Existing Licensee Performance Assessment Processes," dated March 23, 1999, the staff recommended changes to the SMM and the Systematic Assessment of Licensee Performance (SALP). The Commission approved changes that included suspension of SALP, transitioning to the new Reactor Oversight Process (ROP) and implementation of an annual SMM cycle. The staff's detailed proposal to transition from the former assessment process into the ROP was provided in SECY-00-0049, "Results of the Revised Reactor Oversight Process Pilot Program," dated February 24, 2000. Specifically, Attachment 12 to SECY-00-0049 provided a transition plan that identifies the May 2000 meeting as the final SMM. In May 2001 and subsequent years, senior members of the staff will meet to discuss plant performance in the new ROP's Agency Action Review meeting. Following that review, the Commission will be briefed on the assessment results. The staff's proposals in SECY-00-0049 have not been approved by a Commission SRM. In an SRM dated March 29, 2000, the Commission did direct the staff to commence initial implementation of the ROP on April 2, 2000.

During the April 1999 SMM, plants were discussed to determine whether their performance warranted routine oversight, regional-focus, or agency-focus. The terms routine oversight, regional-focus, and agency-focus were developed during the April 1999 SMM. Routine oversight refers to oversight in accordance with the NRC's Inspection program prior to implementation of the ROP. Regional-focus refers to oversight that warrants the direct attention and/or involvement of the Regional Administrator and agency-focus refers to oversight that warrants the direct attention and/or involvement of the Executive Director for Operations and/or the Commission. These characterizations reflected the appropriate level of attention and involvement that the staff considered necessary to coordinate NRC resources and maintain

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cognizance of licensee performance. During the May 2000 SMM, consistent with SECY-99-086 and Attachment 12 of SECY-00-0049, the use of the term regional-focus has been eliminated and only those plants warranting agency level attention have been identified. Included in this category of plants warranting agency-level action would be any ROP pilot plants that were forwarded to the Agency Action Review Meeting based on the ROP Action Matrix. For the May 2000 SMM, there were no pilot plants that fell into this category.

During the May 2000 SMM, the senior managers continued their efforts to use objective performance indicators and risk information. Additionally, continued emphasis was placed on obtaining and integrating the views of each senior manager and focusing on the information summaries (pro/con charts and evaluation matrices) to facilitate the discussions related to determining the appropriate level of agency attention.

Consistent with SECY-99-086 and SECY-00-0049, the attached performance discussions focus on those plants identified during the May 2000 SMM that warrant agency-level attention, as well as updating discussions on those plants that received special NRC attention as a result of the April 1999 SMM. The staff will utilize this information to outline its views on the status of these facilities during the Commission meeting scheduled for May 25, 2000. During that meeting, the staff intends to include each agency-focus plant's current status, the staff's planned response, and the rationale for future agency action.

As indicated earlier in this paper, after the May 2000 SMM and resultant Commission briefing, use of the SMM process will be discontinued. Assessment activities for all operating reactors will be conducted under the ROP as described in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program." With implementation of the ROP, the term agency-focus will no longer be used, and the level of regulatory oversight and agency actions will be as described in IMC 0305 and the ROP Action Matrix. D.C. Cook will continue to receive oversight in accordance with IMC 0350, "Staff Guidance for Restart Approval," until its ROP transition plan is effected.

In summary, the SMM was conducted to develop senior management consensus on the appropriate regulatory approach for those plants whose safety performance warrants application of agency-level resources and ensure that coordinated courses of action are developed and implemented. The recommendations from this meeting reflect the emphasis that the NRC places on the staff's current assessment of plant safety performance as opposed to licensee plans and projections.

On May 23, 2000, the staff took the following actions. These actions were timed to give licensee management an opportunity to attend the May 25, 2000, Commission Meeting.

- The Regional Administrators (RAs) placed a telephone call to the licensee of each plant designated as an agency-focus facility. In addition, Regional Administrators placed a call to the licensee of each plant that received NRC action as a result of the April 1999 SMM. The RAs informed those licensees of the staff's assessment of their plants, and the basis for the conclusions made by the NRC senior managers; and

- The staff transmitted (by facsimile) letters documenting the results of the SMM and acknowledging the transition in plant characterization to the Chief Executive Officer for the aforementioned plants.

Attachment 2 is a summary of the May 2000 SMM. Copies of the evaluation matrices are provided in Attachment 3 and a list of attendees is provided in Attachment 4.

Please note that the information contained with this memorandum is PREDECISIONAL and will be first discussed publicly at the May 25, 2000, Commission Meeting. Following the meeting, letters to licensees will be placed in the Public Document Room.

Attachments:

1. Senior Management Meeting Related Letters to Licensees
2. Senior Management Meeting Summary
3. Senior Management Meeting Pro/Con Chart and Evaluation Matrices
4. List of Attendees

cc:w/attachments

SECY

OGC

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ATTACHMENT 1

Senior Management Meeting Related Letters to Licensees

<u>Licensee</u>	<u>Adams Accession Number</u>
Millstone 2	ML003717539
Millstone 3	ML003717523
Clinton	ML003717512
Indian Point 2	ML003717529
DC Cook	ML003717489

ATTACHMENT 2

**NRC Senior Management Meeting Summary
May 10-11, 2000
Region I**

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Background

Following the June 1985 loss of feedwater event at Davis-Besse, one resulting NRC action was that senior NRC managers periodically meet to discuss the plants of greatest concern to the agency and to plan a coordinated course of action. The NRC senior managers held their twenty-seventh such meeting in Region I on May 10-11, 2000. The previous meeting was held in Region IV on April 20-21, 1999. This most recent meeting was structured to review the status of the agency or regional-focus plants identified at the last meeting and to review the performance of other plants to determine those facilities warranting agency-focus monitoring by the NRC.

In preparation for the meeting, the Office of Nuclear Reactor Regulation; in conjunction with the Offices of Enforcement, Investigations, Research, and the four regional offices; prepared background documents on the plants to be discussed. Inputs for each operating reactor plant included a summary of the most recent Plant Performance Review, a discussion of current operating experience and licensee performance, current NRC and licensee activities, performance indicator data, risk insights, and enforcement, allegation, and investigation information. In addition, the Reactor Oversight Process (ROP) pilot plants were assessed under the new program, culminating in the Agency Action Review Meeting.

During the SMM, the senior managers continued their efforts to use objective performance indicators and risk information. Additionally, continued emphasis was placed on obtaining and integrating the views of each senior manager and focusing on the information summaries (pro/con charts and evaluation matrices) to facilitate the discussions related to determining the appropriate level of agency attention. This information was distributed to meeting attendees prior to the meeting. It provided the basis for review and discussion of each plant's performance and for senior management identification of those plants and issues of greatest concern.

In reviewing the reactor plants that potentially warrant or are currently receiving agency-level attention, the NRC managers utilized the following definition.

Agency-Focus. Plants requiring the direct attention and/or involvement by the EDO and/or Commission to coordinate NRC resources and maintain cognizance of licensee performance (e.g., issuance of an order, enactment of agency-level oversight or inspection).

Recommendations were made during the May 2000 SMM to enable the agency to focus on plants and issues of greatest concern.

Summary of Decisions

The following charts list conclusions reached by the senior managers at this meeting and from the previous meeting for nuclear power plants and for materials licensees:

NUCLEAR POWER PLANTS

<u>Meeting Dates</u> MAY 10-11, 2000	<u>Agency-Focus</u> ¹ DC Cook ² Indian Point 2		<u>Routine Oversight</u> Millstone 2 Millstone 3 Clinton
<u>Meeting Dates</u> APRIL 20-21, 1999	<u>Agency-Focus</u> Millstone 2 D.C. Cook	<u>Regional-Focus</u> Millstone 3 Clinton	<u>Routine Oversight</u> Crystal River 3 Salem 1&2 LaSalle 1&2 Dresden 2&3 Quad Cities 1&2

MATERIAL LICENSEES

<u>Meeting Dates</u>	<u>Facilities for Priority Attention</u>
MAY 10-11, 2000	None
APRIL 20-21, 1999	None

(1) After the May 2000 SMM and resultant Commission briefing, use of the existing SMM process will be discontinued. Assessment activities for all operating reactors will be conducted under the ROP as described in Inspection Manual Chapter (IMC) 0305, "Operating Reactor Assessment Program." With implementation of the ROP, the terms agency-focus will no longer be used, and the level of regulatory oversight and agency actions will be as prescribed by the ROP Action Matrix.

(2) As of the time of the May 2000 SMM, DC Cook was not ready for approval of restart and was being assessed using IMC 0350, "Staff Guidance for Restart Approval," .

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implementation of the actions specified in the licensee's PFE have been sustained and the licensee's corrective action program has been effective in ensuring that previously identified performance weaknesses did not develop into significant programmatic concerns. While trending as an integral part of the corrective action program has only recently been fully implemented, and certain other corrective action program elements have progressed slowly, overall, licensee performance continues to improve indicating that the corrective action program is sufficiently implemented. The PFE was subsumed in a 5-year strategic plan which was developed and implemented by AmerGen as it took over station ownership and resources have been allocated to implement the strategic plan. Licensee performance is closely monitored by the new management organization, and an overall improving performance trend exists.

SMM Discussion:

Clinton was determined to warrant oversight as a regional-focus plant following the last SMM.

The senior managers considered an evaluation matrix that analyzes current license performance in determining the appropriate agency response to the identified performance concerns. All evaluation factors were considered to have been met. The senior managers noted that Clinton had demonstrated sustained, successful plant performance since it was restarted in May 1999 and reached full power on June 2. The unit has operated continuously since then, with only two brief, non-routine power reductions to address equipment issues. No significant plant transients have occurred since plant restart. The transition from ownership by Illinois Power Company to AmerGen in December 1999, occurred without problems.

The senior managers noted that Clinton management has demonstrated its commitment to improve licensee performance through (1) the development of a strategic plan to sustain and improve licensee performance in key areas, and (2) the allocation of sufficient resources for the strategic plan to be implemented as part of the business plan. NRC inspections verified the licensee's corrective action program had been effective in ensuring that previously identified performance weaknesses did not develop into significant programmatic concerns. However, some process weaknesses continued to exist in operations and selected aspects of the corrective action program. The senior managers recognized that initiatives to improve these areas have been included in the licensee's strategic plan.

The senior managers determined that assessment activities for Clinton will be conducted using the NRC ROP as described in IMC 0305.

2. The following facilities have been categorized as Agency-Focus (e.g., Plants requiring direct attention and/or involvement by the EDO and/or Commission).

INDIAN POINT 2

Background Information:

Indian Point 2 was discussed at SMMs between June 1997 and July 1998. At the July 1998 meeting, the senior managers determined that considerations for maintaining agency attention

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and giving the licensee a period of time to execute its performance improvement initiatives outweighed those for increasing agency attention and that no agency level action was required. The plant was not discussed at the April 1999 SMM.

During the last several months, Indian Point Unit 2 (IP2) operated at power for periods of time but was impacted by two significant events, each of which led to an extended outage. The first significant event involved an August 1999 automatic reactor shutdown that was complicated by an electrical transient that adversely affected important safety-related equipment and control room annunciators. The electrical transient was caused and aggravated by plant equipment deficiencies and configuration control problems. This resulted in a six-week-long plant shutdown during which Consolidated Edison (ConEd) management developed and implemented an IP2 Recovery Plan to guide not only their assessment of the event, but also the development of short and long term corrective actions. An NRC Augmented Inspection Team (AIT) performed the initial fact-finding review of the event, while a subsequent follow-up team assessed short-term corrective actions.

In February 2000, a second significant event occurred. A steam generator tube failed which resulted in declaration of an Alert. This event occurred after the end of the plant performance review (PPR) assessment period and was not evaluated as a part of the PPR sent to the licensee. However, since then, the findings have been presented in the final AIT report, dated April 28, 2000. The plant remains shut down pending completion of steam generator inspections as well as other corrective actions. Also, based on the steam generator inspection results thus far, the licensee must obtain NRC approval of restart as required by facility Technical Specifications.

Overall, events and related findings during the assessment period represented issues that were of substantial safety significance. While the August 1999 event challenged safe operation, safety margins were maintained at an acceptable level. The event was risk significant and revealed general weaknesses in communications and coordination, configuration management/control, engineering support, and the corrective action program. An AIT identified these performance issues while a follow-up inspection team verified that reasonable short term actions had been taken to address the event and its causes. Also, ConEd management developed an IP2 Recovery Plan that contained improvement plans to address the general and specific weaknesses that were revealed during the August 1999 reactor trip. Although short term actions were completed prior to restart, long term improvement efforts were slated to continue throughout the year 2000.

The significant performance issues in the reactor safety strategic performance area included weaknesses in configuration management/control, communications and coordination, engineering support, and the corrective action program. These weaknesses were evidenced for example, by equipment problems and delayed mitigative actions associated with the August 1999 event. Configuration management/control problems were evident with the improper settings of the station auxiliary transformer tap changer and a emergency diesel generator over-current device which led to the unnecessary lockout of offsite power supplies and the complete loss of power to some safety equipment during the event. In other instances, communications and coordination problems hampered the functioning of the work control process in resolving equipment degradations in a timely manner which resulted in plant backlogs continuing at high levels.

An example of weak engineering support was that prior spurious trips of the Over Temperature/Delta Temperature channel that caused the August trip had not been sufficiently analyzed. In addition, engineering did not provide adequate controls for degraded voltage relay reset values or the sequencer timing for vital bus loading on a blackout signal which contributed to the complexity of the event.

Repeat problems in the area of emergency preparedness (EP) were identified during the August event and a subsequent exercise. These problems had also been observed during previous inspections and exercises. These observations reflected continued difficulty with implementation of the corrective action program. These EP problems were of a sufficient magnitude to cause a drill and exercise performance indicator (PI) to cross a threshold requiring additional NRC inspection based on fourth quarter 1999 data. No significant performance issues were identified in the radiation safety or safeguards strategic areas.

In the reactor safety strategic performance area, The PPR letter outlined a plan to perform baseline inspections and to perform supplemental or initiative inspections of (1) plant modifications and engineering support, (2) backlog reduction efforts, (3) long-term improvements in response to the August 1999 event, (4) corrective action program self-assessment activities and (5) emergency preparedness.

The PPR letter also indicated that these plans would be revisited, and likely expanded, at the completion of the AIT review of the steam generator tube failure. The AIT report, issued April 28, 2000, concluded that initial licensee response to the event was prompt and appropriate; however, several equipment deficiencies, procedural problems, and a few operator performance lapses caused delays in plant cooldown; and, several emergency response performance issues were identified. An ongoing safety review by NRR (with input from RES) involves steam generator issues at IP2 and could lead to additional changes to NRC inspection plans.

The licensee has been attempting, for several years, to improve their performance and has been receiving close Regional attention and numerous significant enforcement issues. In 1997-98, the licensee completed an extended outage for equipment repairs and improvements; in early 1998, they also obtained an Independent Safety Assessment from industry peers and developed an improvement plan. From late 1998 to the August 1999 event, the plant was on-line for an extended time; however, during that time, NRC inspection findings continued to illustrate corrective action program performance problems, work control problems, and lapses in engineering support. During this same time frame, there was also some buildup of equipment deficiencies and some loss of licensee focus on their improvement plan. At the time of the August event, some of the licensee senior managers were relatively new hires to the utility.

From September through November 1999, the licensee developed and revised their IP2 Recovery Plan. This plan was created to address the longstanding issues that the August 1999 event revealed and continue station improvement efforts. The most recent revision described, in some detail, improvement initiatives in twelve focus areas. ConEd management transitioned the improvement efforts from the recovery plan into an integrated business plan in December 1999. Senior site management has promoted high standards and there have been performance improvements at the station. However, ConEd still has substantial room for improvement in the areas of corrective action, backlog reduction, engineering support, and

plant material condition. The NRC expects to continue to review how recovery plan commitments will be monitored and what changes, if any, to program scope and priorities will be made as ConEd makes this transition and responds to the recent steam generator tube failure.

SMM Discussion:

Indian Point 2 was not discussed at the previous SMM.

The senior managers discussed recent plant performance including two risk significant events: an August 1999 reactor trip with electrical system complications and a February 2000 steam generator tube failure. In both of these events, the senior managers noted concerns that illustrate a number of longstanding performance issues. Senior managers determined that these events revealed several interrelated problems: (1) communication and coordination weaknesses among various site organizations; (2) engineering support shortcomings that led to narrowly focused assessment of plant problems; (3) configuration management/control problems; (4) equipment reliability problems and large corrective action backlogs; and (5) operator knowledge, station training, and procedural weaknesses. The senior managers further were concerned with recurrent emergency preparedness weaknesses that have hampered performance during exercises and during the August 1999 and February 2000 events.

The senior managers concluded that the broad performance issues that have existed at Indian Point 2 for the past several years have revealed a number of deficiencies in licensee corrective action program efforts. Utility improvement initiatives have yielded some progress but, overall, have been limited in remedying the underlying problems.

Senior managers noted the current Chief Nuclear Officer has set high standards, has brought a more self-critical approach to the station, and has directed development of new improvement plans. However, achieving fundamental improvements including corrective action program efforts, and dealing with legacy issues, will require consistent corporate support to the station. Based on these concerns, the senior managers concluded that Indian Point 2 warrants oversight as an agency-focus plant.

DC COOK 1 & 2

Background Information:

D.C. Cook was first discussed at the July 1998 SMM. A significant decline in licensee performance in the area of engineering had been identified during an NRC Architect Engineering (A/E) team inspection conducted in the Fall 1997. Further review concluded that the licensee had operated both units outside the design basis on multiple occasions and that several safety systems were inoperable, including the refueling water storage tank, residual heat removal system, and portions of the service water, instrument air and component cooling water systems. The NRC identified that the installation of fibrous material inside the containment and the potential blockage of ventilation holes in the containment recirculation sump which could have rendered the emergency core cooling system inoperable, also exemplified engineering program deficiencies in design changes and licensing basis reviews.

ATTACHMENT 3

**Senior Management Meeting
Evaluation Matrices
and Pro/Con Chart**

**Indian Point 2
Millstone
Clinton
DC Cook**

**INDIAN POINT 2
PRO/CON CHART
ARGUMENTS FOR INCREASING AGENCY ATTENTION**

Reactor Safety

- Two recent, risk significant events -- an August 1999 reactor trip with electrical system complications ((CCDP ~ 2E-04)(delta CDF ~ 3E-05 to 7E-05)) and a February 2000 steam generator tube failure (delta CDF& LERF ~ 7E-05 to 1E-04) -- illustrate a number of longstanding performance issues. These include the following interrelated problems:
 - (1) Communication and coordination weaknesses among various site organizations. (These problems have been manifested in routine station work control processes as well as during events);
 - (2) Engineering support shortcomings have often led to narrowly focused assessment of plant problems;
 - (3) Configuration management/control problems (e.g., transformer tap changer and diesel breaker settings not consistent with design basis);
 - (4) Equipment reliability problems [e.g. RPS channel spiking (OTdT), air ejector control valve problems] and large corrective action backlogs;
 - (5) Operator knowledge, station training and procedural weaknesses.
- Continuing emergency preparedness weaknesses, which have hampered performance during exercises and during the August 1999 and February 2000 events.
- There have been broad performance issues with this licensee for several years. A number of utility improvement initiatives have yielded some progress but, overall, have been limited in remedying the underlying problems. Some issues surfacing now are manifestations of past performance problems; however many reflect current performance. The combination of significant legacy issues and current performance problems is straining the organization.
- Management turnover has been a problem at the station and corporate support to improvement efforts has appeared uneven. While current management has high standards, efforts to communicate expectations throughout the station are still producing mixed results.
- While the revised reactor oversight program (RROP) is being newly implemented for IP2, applying the action matrix to performance during the August 1999 and February 2000 events would most likely result in multiple/repetitive degraded cornerstones depending on confirmation of preliminary significance reviews.

Radiation Safety and Safeguards

No performance issues have been identified in this Strategic Performance Area.

Cross-Cutting Issues

Corrective action program (CAP) deficiencies have been persistent and have contributed to the performance problems discussed above. These problems point to a CAP that allows significant problems to go unaddressed, thereby negatively impacting performance in the Reactor Safety Strategic Performance Area. CAP deficiencies have included incomplete characterization of degraded conditions, weak root cause evaluations, and overly narrow corrective actions. It is too early to judge the effectiveness of current improvement efforts.

ARGUMENTS FOR MAINTAINING AGENCY ATTENTION

Reactor Safety

- Station management has stabilized somewhat under new CNO and appears to have gotten increased corporate support. Current senior site management has high standards and is self critical. The licensee has performed several detailed self-assessments and peer reviews, which have provided some important insights (ISAT in 1998, several smaller reviews from late 99-present). It has begun to focus attention on underlying problems (such as poor training and organizational/management changes).
- The licensee revamped its improvement plans after the August 1999 event and has indicated that these efforts will receive continued support through their Business Plan and that the plans will be revised to address lessons from the February 2000 event.
- Attempts are being made to improve engineering support. Actions are planned to improve safety system availability, the modification process, and the understanding of the licensing basis.
- While plant backlogs continued at high levels, ConEd management has continued efforts to improve work control/prioritization, engineering support, and corrective action activities to support backlog reduction.
- While effectiveness of efforts have yet to be assessed, ConEd management has made changes in the emergency preparedness (EP) area (new EP manager, revised emergency response organization, new EP procedures, and more drills) to address problems.
- The region's technical divisions have conducted periodic meetings to discuss and review IP2 performance. These meetings have been effective in coordinating on-site inspection and management review activities.

Radiation Safety and Safeguards

No performance issues have been identified in this strategic performance arena.

Cross-Cutting Issues

While corrective action program (CAP) weaknesses continued, licensee management realized the importance of the corrective action program and is implementing a new set of improvement initiatives.