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To: DB Panel
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Subject: Restart Checklist Item 5c Operations Readiness Writeup

For discussion at next Panel.

Thanks,
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RESTART CHECKLIST ITEM 5C: OPERATIONS READINESS FOR RESTART

The NRC's evaluation of this Restart Checklist Item was based on the results of the NRC's December 2003 restart readiness assessment team inspection (IR 03-11), a follow-up restart readiness assessment team inspection (IR-04-04 and associated Memo from the team to the 0350 Panel), resident inspections (IRs 03-25 and 04-02), and information in the licensee's Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station.

In its November 24, 2003, "Integrated Report to Support Restart of the Davis-Besse Nuclear Power Station," and its supplement dated February 6, 2004, Davis-Besse described in detail its corrective actions, including long-term corrective actions, to address problems from its conduct of operations. The corrective actions include new leadership in the operations department, establishment of peer evaluators, and increasing accountability of individuals in adhering to management standards and expectations.

The restart readiness assessment team inspections verified proper alignment of various safety-related systems, and also confirmed that the service water system was operated consistent with the design and licensing documents. In addition, the follow-up inspection team verified that specific problem areas and issues observed during the first restart readiness assessment team inspection, such as pre-job briefings, operator awareness, control room team work, shift turnover, self-checking and procedural use and adherence had been adequately resolved, and that corrective actions for deficiencies involving configuration control were acceptable. Around-the-clock observations of complex control room evolutions were observed by the restart readiness assessment team and the resident inspectors. No significant problems were observed during these observations.

The initial restart readiness assessment team inspection conducted in December 2003 identified a number of operational issues which necessitated a follow-up restart readiness assessment team inspection to assess operational improvements. Although the results from the follow-up inspection were satisfactory, to provide added assurance following restart of the continued effectiveness of the corrective actions in the operations area, the Panel is preparing to issue an Order requiring independent assessments following restart to be conducted annually for five years, or until the licensee has demonstrated good cause that these requirements could be relaxed.

The following is more detailed discussion of the results of the restart readiness assessment team inspections.

The initial inspection was documented in IR 03-11 for inspection conducted in early December 2003. At the time the team concluded that the licensee was not ready to start up the plant because of failures to consistently implement licensee management expectations and standards for conduct of operations. The team found several examples of operators' lack of preparation for plant activities and awareness of plant equipment status, a lack of project oversight to ensure proper rigor in the work control process, concerns regarding the traceability of test equipment, examples of procedure quality and adherence inadequacies, and some corrective actions resulting from operational performance issues in September 2003 were neither tracked nor effective. The Operations Department implemented additional corrective actions and performed internal assessments to gauge the effectiveness of those actions.

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The follow-up restart assessment team inspection was conducted during the week of February 2, 2004. The results from the follow-up inspection, documented in IR 04-04, indicated a step improvement in performance as compared to the performance observed in December 2003. It appears that recent changes in Operations Department Management has increased the accountability of the operators. The team noted more consistent implementation of standards and expectations. Although a few examples were noted where expectations were not met, it was not widespread as observed in December 2003. Furthermore, the team noted an increased involvement of management in the observations and assessment of the Operations Department's performance. The team also noted improved work scheduling. And noted a significant improvement in the quality of pre-job briefs.

Observations from the resident inspectors as documented in Inspection Reports 03-25 and 04-02 support the conclusions of the restart readiness assessment team inspectors. Taken collectively, the results of NRC inspections and evaluations provide reasonable assurance that the licensee has taken appropriate actions to ensure that the plant can be started and operated safely and in conformance with license and design requirements.