Point Beach Nuclear Plant

Confirmatory Action Letter Public Meeting

June 25, 2004

Introduction

- Nuclear Management Company (NMC) and Point Beach leadership continue to be committed to the safe and reliable operation of the Point Beach units

- PBNP will meet the Confirmatory Action Letter (CAL) commitments

Focus Areas

- Human Performance
- Corrective Action Program
- Emergency Preparedness
- Oversight and Assessment
- Engineering Organizational Effectiveness
- Configuration Management
- Management Effectiveness
- Equipment Reliability
- Training Organizational Effectiveness

CAL Focus Area Effectiveness

- Achieve Results
- Measure Progress
- Acknowledge Challenges

Focus Area: Human Performance

- Results
  - Completion of ACEMAN training (end of June)
  - ACEMAN and Management Observations are increasing and have resulted in increased oversight of plant activities
  - The average time between Station Human Performance Clock Resets is increasing
- Progress
  - Excellence Plan infrastructure initiatives complete
  - Individuals are starting to understand and use ACEMAN

Focus Area: Human Performance

- <u>Challenges</u>
  - Expand the use of ACEMAN and error reduction tools
  - Balanced Station Observations
  - Operating Experience Program
  - Improve the Quality of NRC Submittals

Focus Area: Corrective Action Program

- Results
  - CAP backlog is decreasing
  - CAP initiation rate is increasing
  - Root Cause Evaluation Quality is improving
- Progress
  - Screen Team
  - CAP Coaches
- Challenges
  - Timeliness and Effectiveness of Corrective Actions
  - Apparent Cause Evaluation Quality
  - Continued Backlog Reduction

Focus Area: Emergency Preparedness

Emergency Response Organization (ERO) Training and Procedures

- Results
  - Trained on new procedures and implemented them in March 2004
  - 97% success for classification, notification, and protective action recommendations this year (18/18 in training and 17/18 in performance indicator drills)
- Progress
  - Organized ERO into 4 Teams
  - Expanded simulator training into mini-drills to include Technical Support Center and Emergency Operations Facility participation
  - Continue to receive very positive feedback from ERO members
- Challenges
  - Additional ownership and accountability from some ERO members

Focus Area: Emergency Preparedness

Emergency Action Level (EAL) Revision

- Results
  - Revised EALs submitted to NRC by the end of June
- Progress
  - Revised EALs were approved by the site, underwent a fleet challenge board, and were approved by state and counties. NRC pre-submittal call held on June 15th
- Challenges
  - Implementation of revised EALs within 90 days of NRC approval
    - Scheduling of Training and Drills
    - Updating of the Position Instruction Manuals

Focus Area: Emergency Preparedness

Corrective Action Program (CAP)

- Results
  - EP is a strong advocate of the CAP program and continues to be a leader at the site
  - Backlog was reduced from over 200 action items in July 2003 to approximately 40 open items today
- Progress
  - EP has met 100% of our commitments since November 2003
  - While driving backlog down, initiation rate for CAPs has remained high
- Challenges
  - None

Focus Area: Emergency Preparedness

Equipment Matrix

- Results
  - Matrix created and validated
- Progress
  - EP equipment was assessed for operability, basis, functionality, appropriateness of preventive maintenance and obsolescence issues
  - CAPs initiated to address issues
- Challenges
  - Institutionalize matrix into plant processes and procedures

Focus Area: Emergency Preparedness

Staff Training and Roles/Responsibilities

- Results
  - Processes have been formalized via job aids and procedures
- Progress
  - At least one person is qualified for each task, and 47% of the tasks have at least one backup qualified
  - Staff members are on schedule for completing their qualification cards
- Challenges
  - Three new people hired this quarter

Focus Area: Oversight and Assessment

- Results
  - Plant observations identifying underlying problems
  - Rotation plan implemented both at the leadership and assessment level
  - Bi-weekly meetings with the Site Vice President
- Progress
  - The number of longstanding QA findings reduced
  - Fleet support in plant assessments
  - Problem development sheets identifying problems
  - Implementation of the fleet-wide NOS training program
- Challenges
  - Station understanding their role in QA program and role of NOS
  - Line recognition and response to NOS issues

Focus Area: Engineering Organizational Effectiveness

- Results
  - Improvement has been noted in procedure use and adherence
  - Quality of engineering products is improving
  - The Design Review Board (DRB) has reduced the number of field changes per modification to <1.5
  - The Engineering Safety & Design Review Group is in place and performing in line independent review of safety related products
  - The Quality Review Team (QRT) is providing assessments and feedback on engineering products. The QRT does a sample review to assess overall quality, clarity and completeness.

Focus Area: Engineering Organizational Effectiveness

- <u>Progress</u>
  - QRT directed rework decreased from 30% to <7%
  - Operable but degraded/nonconforming condition backlog decreased from 32 to 14
  - Condensate and Metering & Relaying Maintenance Rule performance improved

Focus Area: Engineering Organizational Effectiveness

- <u>Challenges</u>
  - Improving human performance
  - Increasing trend in QRT directed rework
  - Maintenance Rule performance for one channel of Source Range Nuclear Instrumentation did not meet our goal, action plan being revised

Focus Area: Configuration Management

- Results
  - Timeliness of modification closure is improving
  - 9 of 51 Configuration Management procedure revisions complete
  - Safety related calculation project has been initiated
- Progress
  - The backlog of modifications in closeout >90 days has been reduced from 42 to 19
  - Corrective actions from Vendor Technical Information Program Self Assessment are complete
  - AFW design basis document validation specification is in development

Focus Area: Configuration Management

- Progress (cont)
  - The calculation project design interface agreement is in place
  - Initial screening and categorization of 1400 calculations completed
  - Work has started on revision to 87 electrical and 197 mechanical calculations
  - Detailed review is in progress on 57 I&C and 329 mechanical calculations
- Challenges
  - Procedure review schedule
  - Internal review and owner acceptance of revised calculations

Focus Area: Management Effectiveness

- Results
  - Auxiliary Feed Water (AFW) system is operable and system health per our monitoring program is improving
- Progress
  - Effectiveness Review plan has been developed including an interim review
  - There are 5 remaining action items from the AFW Root Cause Evaluations
- Challenges
  - Completion of one of the remaining action items

Focus Area: Equipment Reliability

- <u>Results</u>
  - AFW Appendix R modifications are complete
  - AFW component power supply modifications are complete
  - Calculations to support fault protection are being prepared and are undergoing internal reviews
  - Modifications are installed for manholes with Maintenance Rule scope cables

Focus Area: Equipment Reliability

- <u>Progress</u>
  - Bolted fault modifications are in progress
  - Schedule defined for additional modifications
- <u>Challenges</u>
  - Completing design packages and meeting the established schedule for bolted fault on-line and outage work

Focus Area: Training Organizational Effectiveness

- Results
  - Technical training program accreditation has been renewed
  - Line ownership of training has improved
  - At least one individual qualified for each task
- Progress
  - Mentoring guides revised and issued
  - Implemented an engineering training advisory committee and department curriculum review committees
  - Individual qualification progress is on track
- Challenges
  - None

CAL Inspection Lessons Learned

- PBNP will produce “stand alone”closeout packages
- Closeout packages will address the sustainability of the actions taken
- The staff is becoming engaged with ACEMAN
- Revisions to Excellence Plan may be necessary to accelerate improvements in human performance

Summary