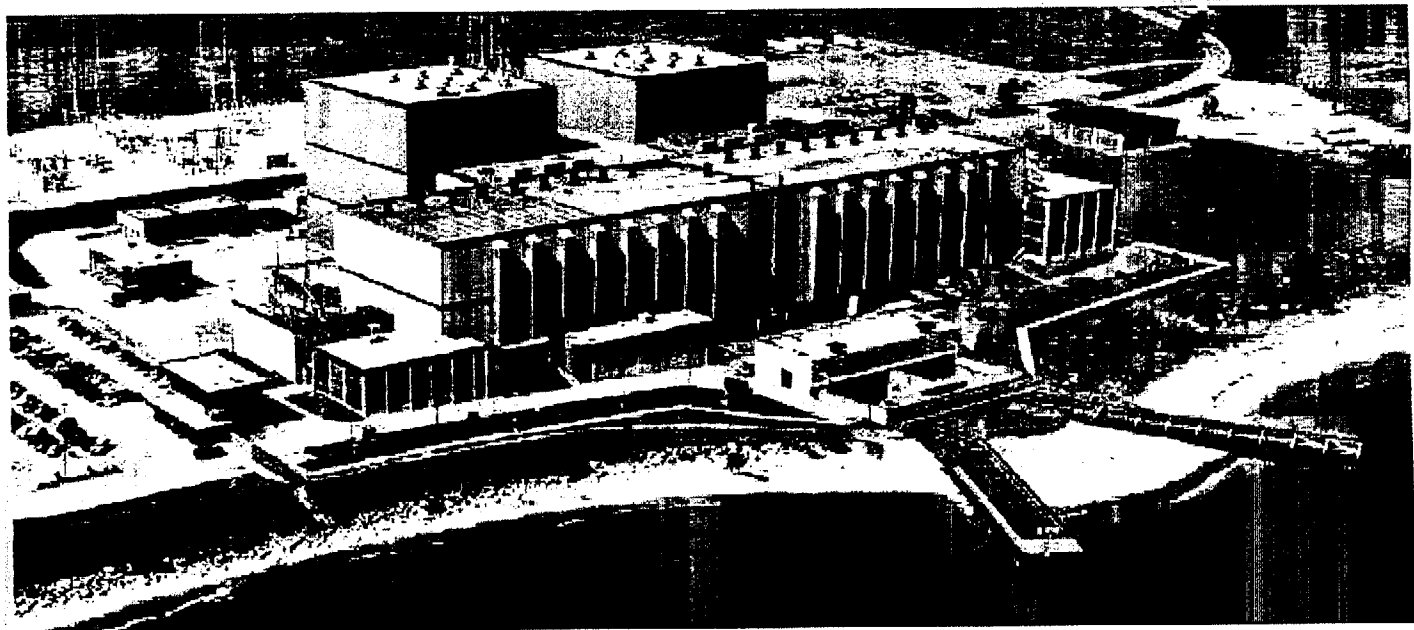




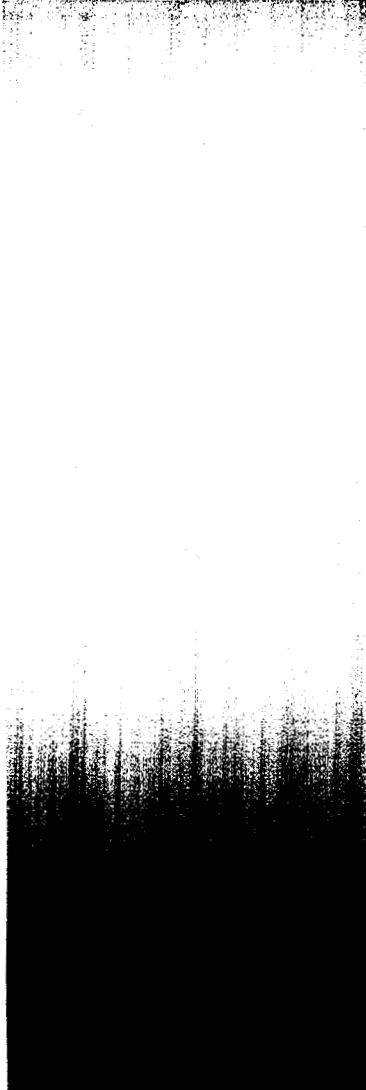
NMC

Point Beach Nuclear Plant

Confirmatory Action Letter Public Meeting

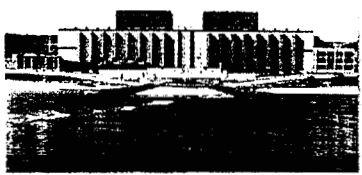


August 18, 2004



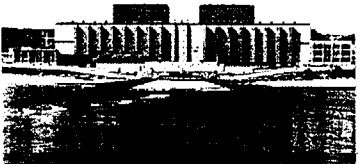

Introduction

Point Beach and Nuclear Management Company continue to be committed to the safe and reliable operation of the Point Beach units



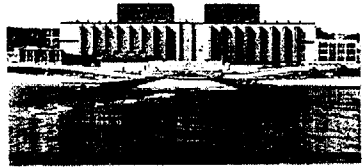
Follow-up Actions from the June 25 Meeting

- Justification for the closures of Generic Letter 91-18 items was provided to the Resident Inspector
- PBNP evaluated using Nuclear Oversight to perform an assessment of the Engineering Safety & Design Review Group
- The observations made by the NRC regarding Operating Experience (OE) have been incorporated into our meeting planning and rollout of OE



Focus Areas

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



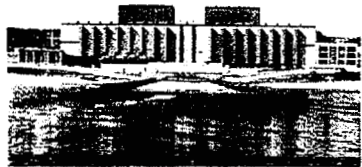
Focus Area: Human Performance

➤ Results

- ACEMAN training was completed on June 30
- Measures are in place to ensure future employees are trained
- ACEMAN and Management Observations have increased oversight of plant activities and have resulted in a decrease in the number of Station Human Performance Clock resets

➤ Progress

- Individuals are starting to understand and use ACEMAN
- The average time between Station Human Performance Clock Resets has improved but has not reached the goal
- ACEMAN observations continue to exceed monthly goals since March



Focus Area: Human Performance

➤ Challenges

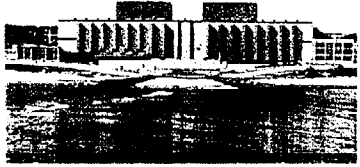
- July effectiveness review of our Human Performance initiative identified additional management attention is needed. Actions taken or are planned include:
 - Human Performance Fundamentals training for 40 employees
 - Human Performance Stand Down is scheduled for September
 - Human Performance Jamboree is scheduled in October
 - More critical job observations are needed
 - More balanced D-15 meetings are needed to discuss actual behaviors



Focus Area: Corrective Action Program (CAP)

➤ Results

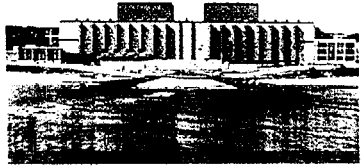
- The CAP backlog continues to decrease while we maintain an initiation rate of approximately 550 CAPs per month
- Classification of corrective action program documents has improved
- Root Cause Evaluation Quality continued to improve
- The Self-Identification Ratio continues to improve
- There is a decline in the number of corrective action extensions



Corrective Action Program (CAP)

➤ Progress

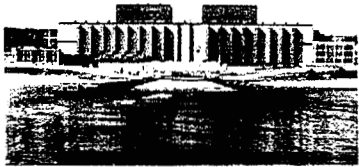
- Actions have been taken to improve station management ownership of the corrective action program
- The Plan of the Day Leadership Meeting has been redesigned to provide for issuance of Operating Experience the next morning
- We are using the Operating Experience gained from the Kewaunee Triennial Fire Protection Inspection during preparations for the upcoming Point Beach inspection



Focus Area: Corrective Action Program

➤ Challenges

- Timeliness and Effectiveness of Corrective Actions
- Apparent Cause Evaluation Quality
- We continue to reinforce internalization of the Corrective Action Program at all levels



Focus Area: Emergency Preparedness

Emergency Response Organization (ERO) Training and Procedures

➤ Results

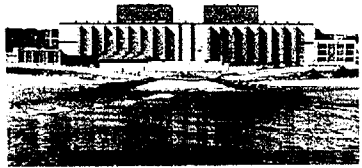
- ERO Participation Indicator has improved
- Effectiveness Review has been completed

➤ Progress

- Conducted a Security Drill utilizing Alternate Emergency Offsite Facility (AEOF) in Green Bay
- Scheduling additional training opportunities utilizing AEOF

➤ Challenges

- While there was an improving trend in drill and exercise performance indicators, in July we identified two missed classification opportunities. We are conducting an Apparent Cause Evaluation to determine improvements that can be made.



Focus Area: Emergency Preparedness

Emergency Action Level (EAL) Revision

➤ Results

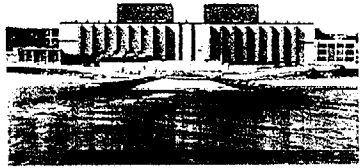
- Revised EALs submitted to NRC on June 25, 2004

➤ Progress

- Working meeting with NRC on September 2, 2004
- Scheduling “Train the Trainer” class for late September 2004

➤ Challenges

- Implementation of revised EALs within 90 days of NRC approval



Focus Area: Emergency Preparedness

Staff Training and Roles/Responsibilities

➤ Results

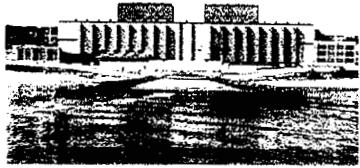
- All call-ups have a primary task-qualified individual
- Progress on qualifying a backup task-qualified individual for call-ups is ahead of schedule

➤ Progress

- Staff members are on schedule for completing their qualification cards
- Point Beach is leading the Region III Task Force for standardization of EP Staff Qualification Cards

➤ Challenges

- None



Focus Area: Oversight and Assessment

➤ Results

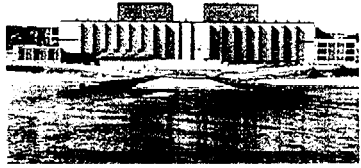
- Nuclear Oversight is fully staffed (one rotation; one external new employee)

➤ Progress

- Issued Integrated Assessment Procedure
- Created survey to judge Nuclear Oversight Effectiveness. The survey is used during the quarterly exit meetings
- Line Managers are presenting QA Program roles and responsibilities to their departments
- Expectations for “duty” assessor have been clarified

➤ Challenges

- Use of Problem Development Sheet
- Improving implementation of performance-based assessments



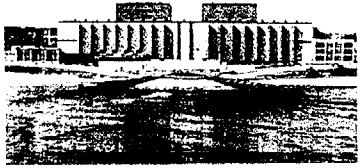
Focus Area: Engineering Organizational Effectiveness

➤ Progress

- Reactor Protection System has returned to Maintenance Rule (a)(2) status
- The Operational Decision Making Model procedure has been issued and is being used
 - Unit 2 5B Feedwater Heater
 - Degraded Grid Calculation

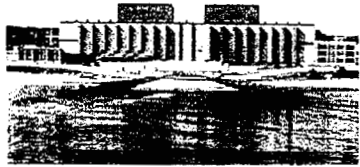
➤ Challenges

- Human Performance



Focus Area: Engineering Organizational Effectiveness

- Lessons Learned From Safety System & Design Performance Capability (SSDPC) Inspection:
 - Self-Assessment was narrowly focused upon design and did not assess performance capabilities
 - The Section XI Repair/Replacement program needs improvement
 - Continued improvements are needed in translation of design information into implementing documents



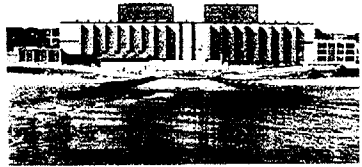
Focus Area: Configuration Management

➤ Results

- Timeliness of modification closure continues to improve
- Safety-related calculation project is progressing. Project scope has been expanded to provide increased validation of critical design inputs

➤ Progress

- We continue to meet our goal of modification closeouts in 90 days or less
- Auxiliary Feedwater System design basis document validation project is on schedule to be completed in September



Focus Area: Configuration Management

- Progress (cont.)
 - Review of 33 Auxiliary Feedwater Calculations is complete
 - Review of 48 Service Water Calculations is complete
- Challenges
 - Internal review of revised calculations



Focus Area: Management Effectiveness

➤ Results

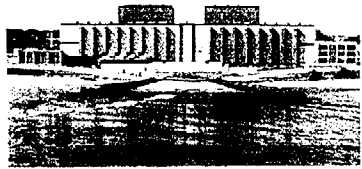
- Auxiliary Feedwater System health continues to improve

➤ Progress

- An Interim Effectiveness Review of Auxiliary Feedwater corrective actions was completed this month

➤ Challenges

- None



Focus Area: Equipment Reliability

➤ Results

- Bolted Fault Modifications continue

➤ Progress

- We are continuing to follow our plan and schedule for equipment reliability activities
- Bolted Fault Outage Scope has been defined and on-line work is progressing
- Calculations supporting Bolted Fault modifications continue

➤ Challenges

- Scope of Bolted Fault Calculations has been expanded



Focus Area: Training Organizational Effectiveness

- Results
 - Plan actions are complete
- Progress
 - An effectiveness review will be performed prior to the end of 2004
- Challenges
 - None



Summary

- PBNP will produce “stand alone” closeout packages. Management attention has been provided to CAL closeout packages. Approximately 16 packages have been now reviewed by NRC with no identified discrepancies.
 - First portion of Emergency Preparedness follow-up inspection is complete with no concerns identified
 - The Operational Decision Making Methodology and procedure (NP 1.1.12) have been established and rolled out
 - NP 10.4.3, “Derate/TSAC or Forced Outage Response,” has been issued and rolled out
 - The plant staff is becoming engaged with ACEMAN
 - The site continues to work at being a Learning Organization
 - Line engagement of NOS issues
- 