

**Metropolis Works
License Performance Review
February 7, 2005**

#SUB-526, Docket No. 40-3392

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Summary

We agree with NRC's assessments and that licensed activities were conducted safely during the review period.

- **MTW's performance in 2003 was below our expectations and we made significant changes to improve our performance.**
- **In 2004, MTW focused on procedural development and adherence, training and plant upgrades.**
- **The following areas have shown significant improvement in 2004:**
 - ✓ **Procedures & Training**
 - ✓ **Emergency Response**
 - ✓ **Engineering Controls**
 - ✓ **Management of Change**

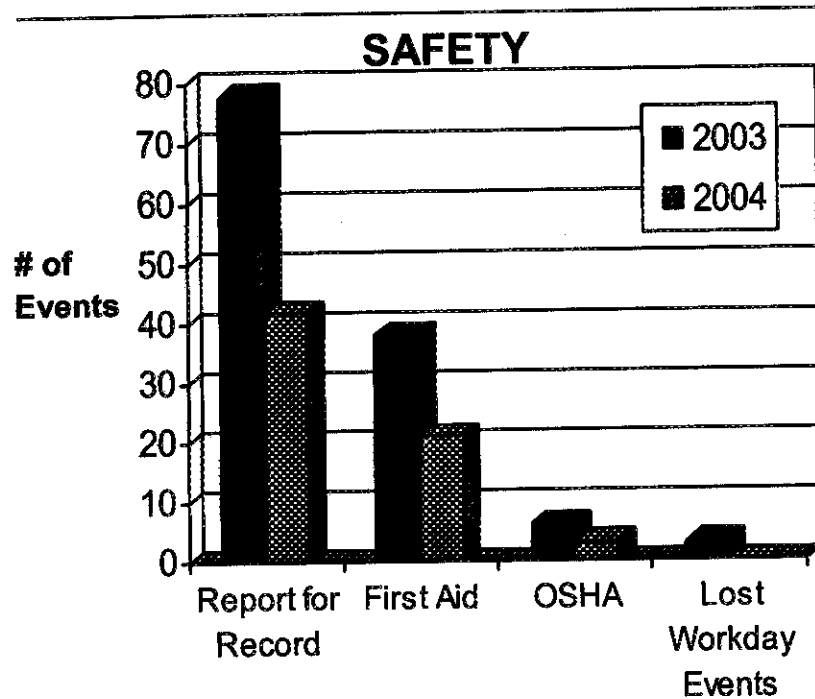
- **Areas needing improvement in 2005 include:**
 - ✓ **Implementation of a Safety Conscious Working Environment**
 - ✓ **Corporate & Plant Oversight**
 - ✓ **Corrective Action Program**
 - ✓ **Material Condition and Maintenance Work Process**
 - ✓ **Management Assurance**
 - ✓ **Improved Root Cause Analysis Skills (Lesson's Learned)**
- **Safety and Environmental performance in 2004 showed real progress.**
- **Our commitment is to continue this positive trend in 2005 and beyond to ensure safe operations.**

Safety Performance Overview

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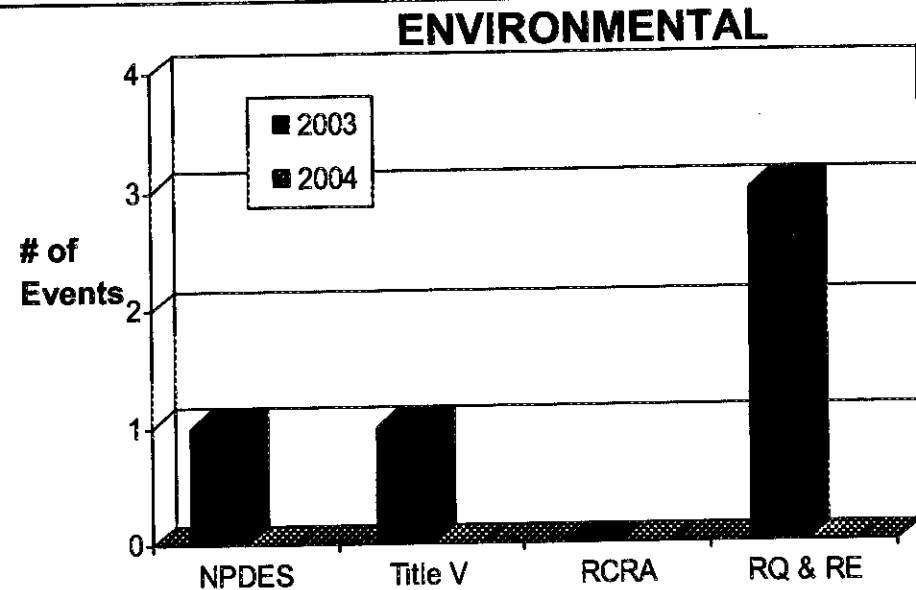
Safety & Environmental Review

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04 Safety Improvements

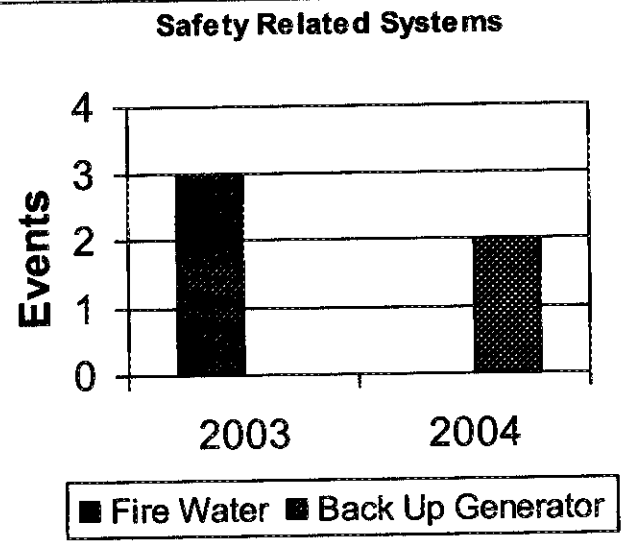
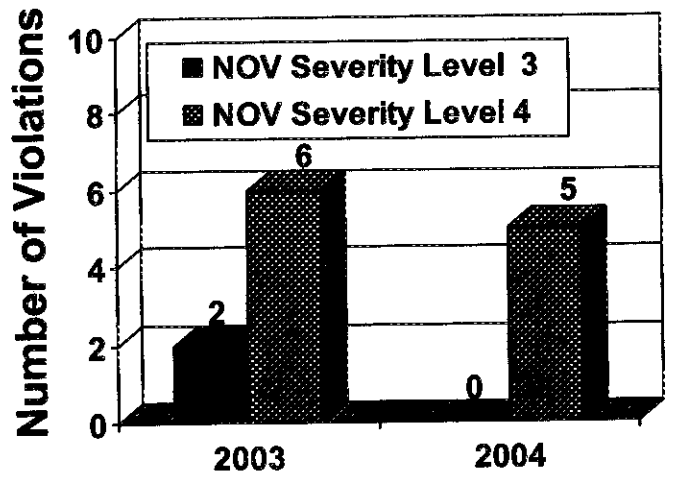
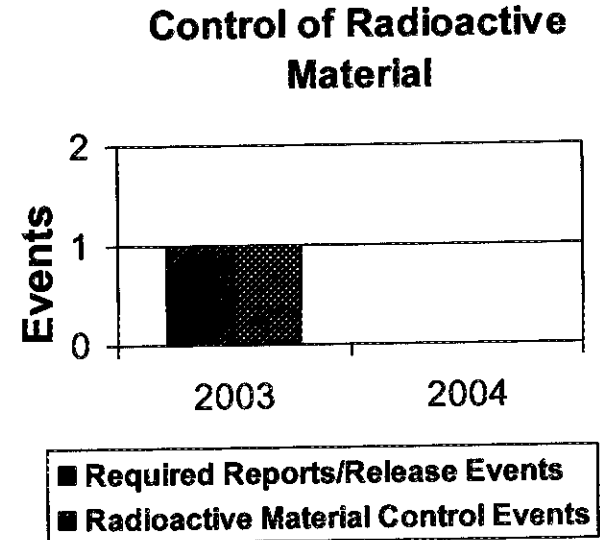
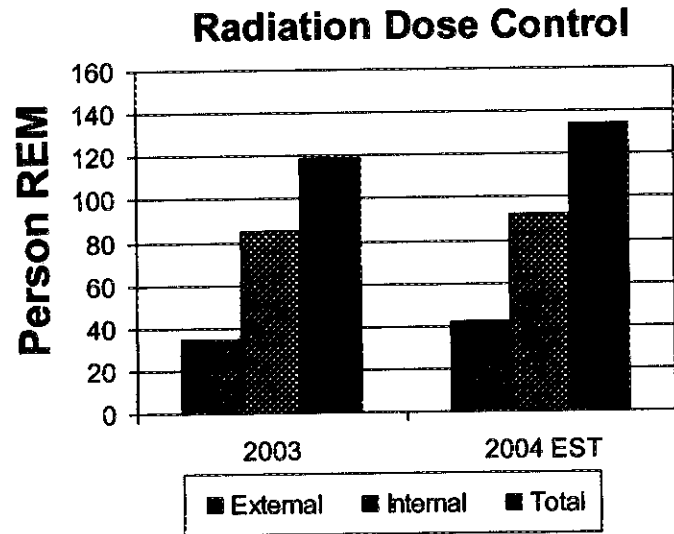
- Provided Hazard Awareness training for all employees
- New Safety Council charter to improve safety processes
- Revised Life Safety Permits
- Upgraded Personal Protective Equipment requirements in high risk areas
- Formalized Job Hazard Reviews



04 Environmental Improvements

- Chartered New Environmental Council
- RCRA Groundwater Plan in Action
- EPF Upgrades Reducing Solids / B-E Pond Closure
- Pollution Control Equipment Efficiency Program
- Environmental Monitoring & Tracking Improvements

Health Physics Review



All plant workers are below regulatory radiation exposure limits

2003 Safety Committee/Oversight Structure

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**A-Council
(Safety)**
Monthly

**ALARA Council
(Health Physics)**
Quarterly

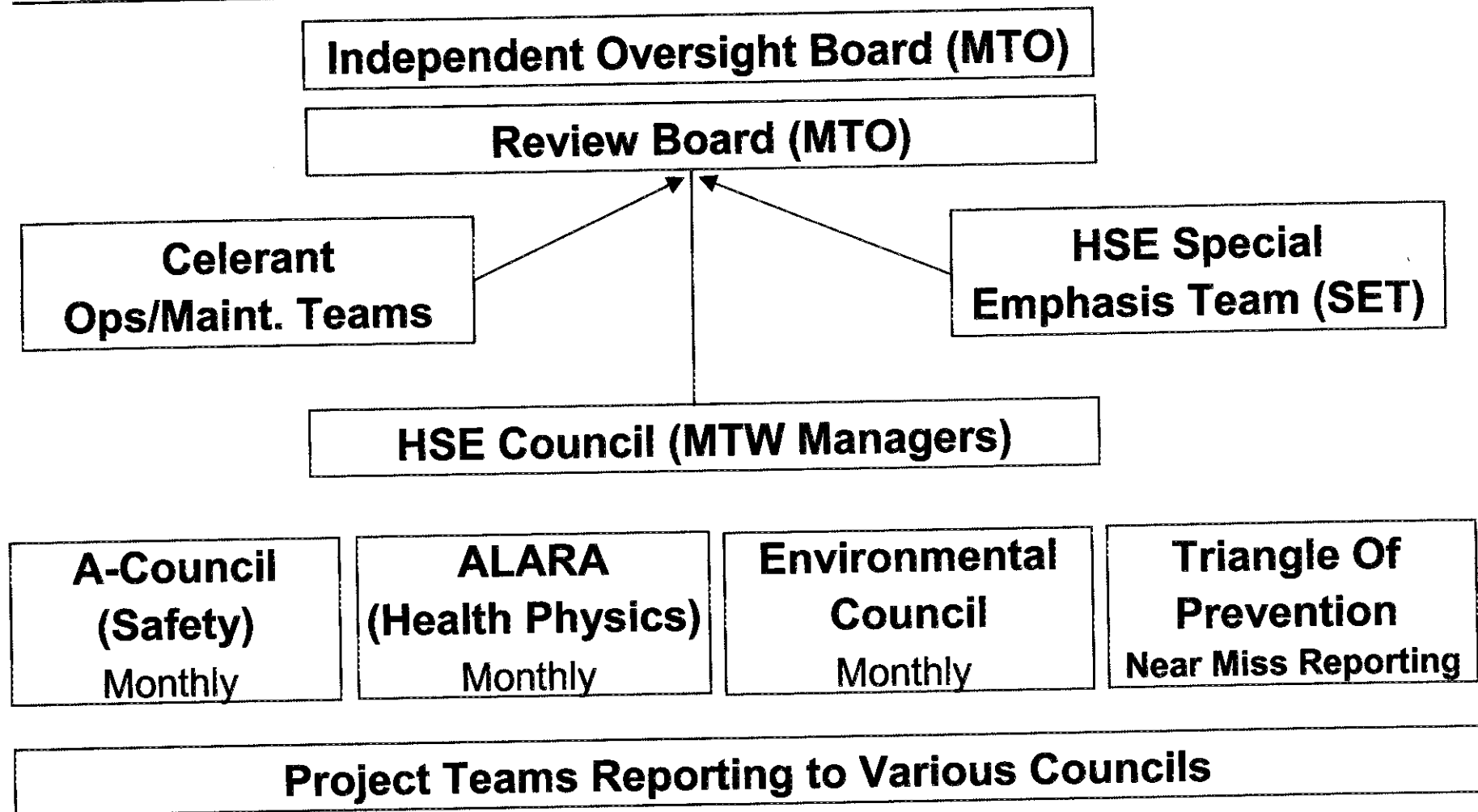
**B-Council
(Employee Safety Meetings)**
Monthly

**Triangle Of Prevention
(PACE Near Miss Program)**
Ongoing

HSE/HP Issues were brought to the two councils or raised during a monthly employee safety meeting. Each council was primarily a reporting of issues. The TOP Program allowed employees a method to report near misses.

2005 Safety Committee/Oversight Structure

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Action Oriented Teams and Councils have been developed in addition to the increased Oversight Boards to ensure progress.

Safety Operations

**Chemical and Radiological Safety,
Plant Operations and Fire Safety**

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Procedural Quality & Adherence

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Status

- **New processes for writing and issuing technical and administrative procedures**
 - ✓ Implemented writers guide
 - ✓ New Web-based Document Management System
 - ✓ New verification and validation process
- **New process for issuing and managing temporary procedures**
- **New Point of Contact for implementing procedural changes**
(Foreman hired to work in training group to facilitate process)
- **Created procedure categories: “in-hand” or “reference”**
- **Completed Operating Procedure Gap Analysis**

Procedural Quality & Adherence

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Actions to Ensure Sustainability and Improvement

- **Management Expectations**

- ✓ Demonstrate unequivocal management support
- ✓ Plant Manager champions procedural adherence
- ✓ Develop basic Conduct of Operations policy

- **Training Improvements**

- ✓ Foster good procedure use/adherence understanding
- ✓ Enhance Supervisor participation in cultural change effort

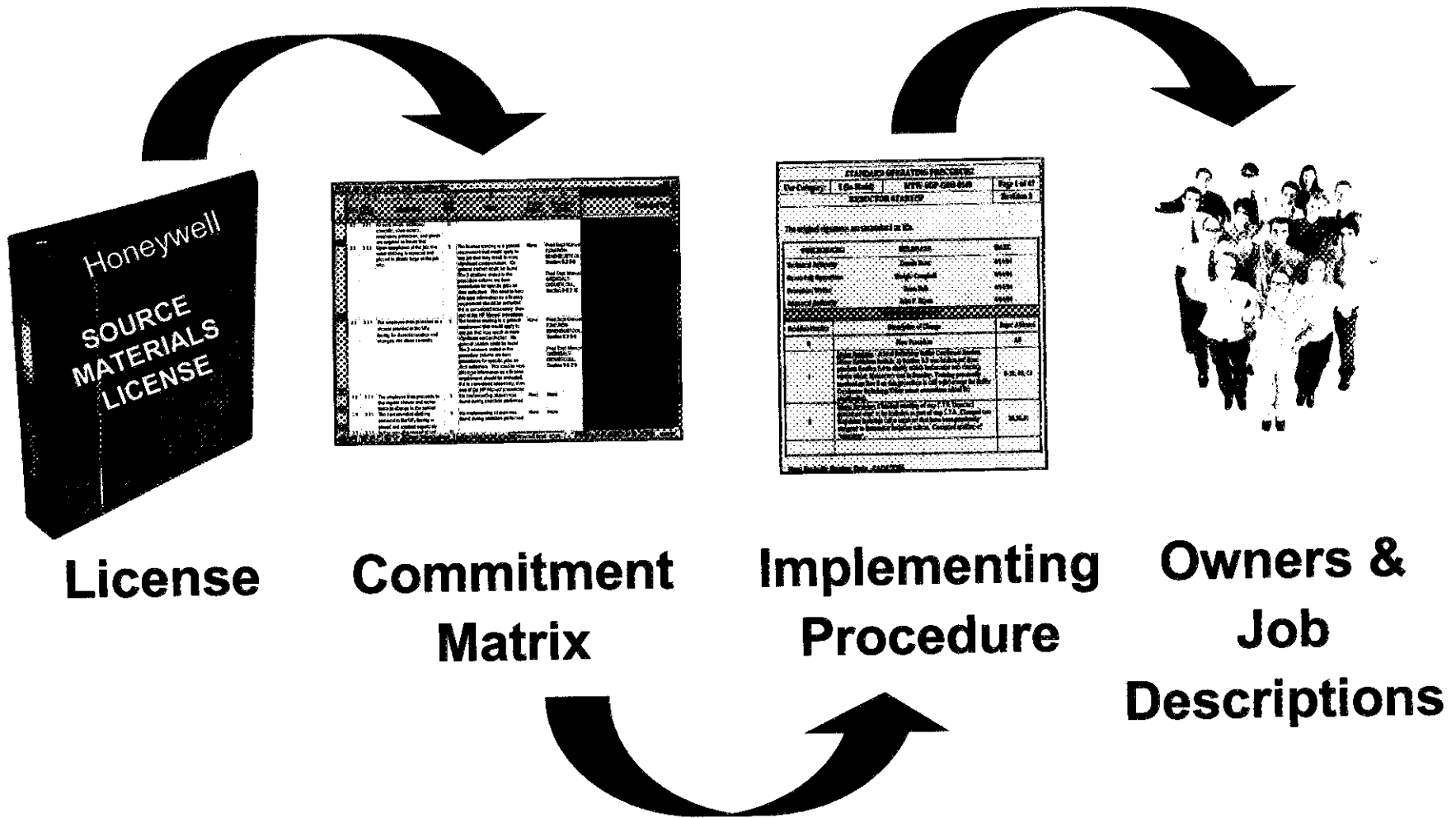
- **Safety Conscious Work Environment**

- ✓ Foster “Thinking Compliance” and “Questioning Attitude”
- ✓ Implement survey process for employees feedback
- ✓ Conduct training on Corporate “hotline” for employees to report safety concerns
- ✓ Establish employee concerns point of contact

- **Procedural Improvements**

- ✓ Make them reliable
- ✓ Make them accessible
- ✓ Change “old notions” to achieve procedural adherence

Commitment Matrix Process



Implementing Procedures identified within commitment matrix will be tagged within the document management system to ensure license commitments are maintained through normal procedural revisions and upgrades.

Control Room Conduct of Operations

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Status and Improvements

- **Increased Management Oversight of Control Room Operations**
 - ✓ New “standing order” process and “required reading” boards
 - ✓ Weekend duty assignment for managers and enhanced security checks
 - ✓ Added On-shift Advisors to help coach and mentor supervisors and operators on Conduct of Operations expectations.
 - ✓ Prescriptive time requirements for managers to be in the field
- **Utilize formal shift turnover briefings for communications with operators**
- **Enhanced Alarm Response Procedures - Separated from operating procedures**
- **Instituted a formal Job Hazard Analysis process used prior to maintenance evolutions**

Control Room Conduct of Operations

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Actions to Ensure Sustainability and Improvement

- **Implement Safety Conscious Work Environment**
- **Implement Abnormal Condition procedures manual**
- **Develop a “Logbook” procedure**
- **Implemented control of overtime hours worked by operators to reduce potential fatigue**
- **Upgrade Process control system to improve alarm maintenance**
- **Review and adjust Nuclear Services organization to ensure proper full-time management oversight on all shifts**
- **Train Metropolis Managers, Engineers and Corporate Managers on regulatory culture**

Radiological Controls

**Radiation Protection, Environmental
Protection, Waste Management and
Transportation**

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Radiological Controls & Practices

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Status and Improvements

- **Improved Radiation Posting**
 - ✓ Installation of additional red lights in UF₆ process areas
 - ✓ Increased use of manual posting
 - ✓ Improved posting of Bed Material Filter Fines restricted areas
 - ✓ Reviewed existing radioactive material postings
 - ✓ Installed “red light” notification system for HP group
- **Replaced existing contamination monitoring equipment**
- **Improved equipment calibration process**
- **Instituted daily checks for survey equipment in addition to the required calibrations**
- **Immediate work scope assessments initiated for focused tasks.**
- **HP Audit program upgraded to better focus on housekeeping and contamination control.**
- **Enhanced trending and reporting practices of HP data**
- **Created new E-Council focusing on environmental improvements**
- **Financial reserves established to pay for legacy radiological waste disposal**

Actions to Ensure Sustainability and Improvement

- **Full radiological survey to be conducted for entire site to establish a new baseline for the facility**
- **Improve response time for field survey results through upgraded equipment**
- **Improve employee exit monitoring process**
- **Increased and improved surveying**
 - ✓ Enhance the monitoring process to improve reliability of “free-releasing” of equipment
 - ✓ Enhance survey process for incoming equipment
 - ✓ Improve housekeeping
- **Splitting Regulatory Affairs from Health, Safety, Environmental and adding a staff position**

Facility Support

**Maintenance/Surveillance, Training,
Emergency Preparedness,
Management Organization and
Controls**

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Material Condition

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Improvements

- Invested \$13 million in capital improvements
- Examples:
 - ✓ Significant equipment replacements
 - A & B Fluorinators
 - A & B Reductors
 - ✓ Implemented Safe Haven Control Room improvements
 - ✓ Upgraded Strobe Lighting in FMB for Rad Control
 - ✓ Distributed Control System Installed in GF2
 - ✓ Upgrade Natural Gas Piping System(Nearly Completed)
 - ✓ Completed UF₆ and NH₃ PHA Revalidation

Actions to Ensure Sustainability and Improvement:

- **Planned capital investments of \$10 million in 2005**
- **Implement Maintenance Excellence with Celerant**
- **Data collection & tracking of Mech. Reliability**
- **Establish data trending (SAP Improvements)**
- **Improve effectiveness of planning and scheduling**
- **Complete Implementation of FMEA improvements**
- **Finalize Critical Equipment PM Assignments & Schedule**

Status of Improvements

- **Pre-Job briefs Training**
- **Operators trained in new procedures prior to use**
- **Implemented a systematic training process for trainers and operators**
 - ✓ Hired three full time training professionals
 - ✓ Implemented Train-the-trainer process
 - ✓ Created Job Performance Measures for all UF₆ operators jobs
- **Enhanced new-supervisor training process**
- **Training is now completed per Management Of Change (MOC) requirements**

Action Sustain

- **Develop Supervisory and Management Training Program**
- **Develop Job Performance Measure Plant wide**