



December 5, 2006

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Serial No. 06-724
KPS/LIC/MH: R1
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
CLOSURE OF KEWAUNEE IMPROVEMENT INITIATIVES TO CORRECTIVE
ACTION PROGRAM

This letter provides notification that Dominion Energy Kewaunee, Inc. (DEK) no longer intends to provide the Nuclear Regulatory Commission (NRC) staff periodic updates regarding the Kewaunee Power Station improvement initiative commitments. These commitments were initially defined in a letter dated March 18, 2005 (reference 1). These commitments were endorsed and adopted with clarifications by DEK in a letter dated September 15, 2005 (reference 2). In a letter dated November 14, 2005 (reference 3), DEK provided an update to these initiatives.

DEK will continue to monitor the implementation and effectiveness of the improvement initiatives through the site corrective action program and the station's excellence plan. Adjustments to these improvement initiatives may be necessary in the future based on their effectiveness. These adjustments will be managed in accordance with the site corrective action program and during periodic review of the station's excellence plan. As always, the status and dispositioning of these corrective actions remain available for NRC review. Therefore, DEK considers the November 15, 2005 letter (reference 3) containing our stated improvement initiatives closed.

The attachment to this letter restates the Kewaunee Power Station improvement initiative commitments and contains a reference to the corrective action program entry for the stated commitment.

If you have questions or require additional information, please feel free to contact Mr. Tom Breene at 920-388-8599.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. R. Matthews".

W. R. Matthews
Senior Vice President - Nuclear Operations

References:

1. Letter from C. W. Lambert (NMC) to Document Control Desk (NRC), "Kewaunee Improvement Initiatives – Commitments," dated March 18, 2005 (ADAMS Accession No. ML050820213).
2. Letter from E. S. Grecheck (DEK) to Document Control Desk (NRC), "Endorsement and Adoption of Licensing Actions," dated September 15, 2005 (ADAMS Accession No. ML052590234).
3. Letter from W. R. Matthews (DEK) to Document Control Desk (NRC), "Update on Improvement Initiatives," dated November 14, 2005 (ADAMS Accession No. 053190099).

Attachment

1. Kewaunee Improvement Initiatives with Reference to Corrective Action Program Entry

Commitments made by this letter: NONE

cc: Regional Administrator
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Kewaunee Power Station

Attachment 1

KEWAUNEE IMPROVEMENT INITIATIVES
WITH REFERENCE TO CORRECTIVE ACTION PROGRAM ENTRY

KEWAUNEE POWER STATION
DOMINION ENERGY KEWAUNEE, INC.

Item 1	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
1.a	Implement NMC Fleet Operations Mentoring Program to improve Conduct of Operations.	To provide an immediate improvement in the Conduct of Operations, experienced SRO License holders from the NMC fleet have been temporarily placed on shift with the Kewaunee Operations crews to provide mentoring and feedback.	CA 18561	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> • Fleet NOS observations. • Documented feedback from mentors. • Conduct a follow-up assessment for an effectiveness review 3Q05.
1.b	Raise standards of performance within Operations.	<p>This objective will be achieved by:</p> <ol style="list-style-type: none"> 1. conducting a gap analysis between current conduct of Operations and industry best practices, 2. improving annunciator response expectations, 3. improving turnover and pre-shift brief expectations, and 4. improving log keeping expectations and "operator at the controls" expectations. 5. implement Check Operator Program to provide feedback on standard adherence. 6. implement Dominion 	<p>CA 18845</p> <p>COM 21608</p>	<p>2Q05</p> <p>4Q05</p>	<ul style="list-style-type: none"> • Revised Conduct of Operations Procedure issued. • Assess as part of mentor follow-up effectiveness review 3Q05. • Check Operator Program implemented. • DNOS approved and

		Nuclear Operations Standards (DNOS).			issued.
			COM 21609	4Q06	
Item 1 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
1.c	Improve understanding of what an Operations - led organization looks like.	To gain a broader perspective and improved understanding of what an Operations - led organization is, all Shift Managers will participate in a benchmarking trip to plants recommended by INPO or other industry groups.	CA 18846	2Q05	<ul style="list-style-type: none"> Trip reports documenting benchmarking trip results, including improvement actions.
1.d	Improve Operations training.	To improve performance of the Operations Department, experienced personnel from INPO and the NMC fleet have been temporarily placed with Kewaunee Operations Training staff. This will provide an immediate improvement in the conduct of Operations Training, recognizing that additional actions will be initiated based on the scheduled self-assessment.	CA 18847	2Q05	<ul style="list-style-type: none"> Documented feedback from mentors. Self-assessment of the Operations Training Programs. The self-assessment will include industry peers.
1.e	Improve the effectiveness of operational decision making.	The Kewaunee Operational Decision Making procedure will be upgraded to align with a more effective operational decision making model, based on industry practices. Appropriate training and/or briefing will be conducted	CA 18848	3Q05	<ul style="list-style-type: none"> Effectiveness Review of original procedure. Operational Decision Making Procedure revision issued. Training/briefing

		upon implementation.	COM 21689	1Q06	attendance records.
			COM 21690	1Q06	<ul style="list-style-type: none"> Effectiveness Review
Item 1 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
1.f.	Improve the understanding of License Requirements at KPS.	<p>Develop a training instrument to increase understanding of Technical Specifications.</p> <p>Conduct Training.</p> <p>Perform Effectiveness Review</p>	<p>COM 21612</p> <p>COM 21613</p> <p>COM 21614</p>	<p>1Q06</p> <p>3Q06</p> <p>4Q06</p>	<ul style="list-style-type: none"> Developed training. Training Attendance Records. EFR Completed.
1.g.	Improve Operations Procedures.	<p>1. Implement Westinghouse Owners Group (WOG) Rev. 2 into KPS IPEOPs.</p> <ul style="list-style-type: none"> Draft IPEOP based on WOG Emergency Response Guideline Rev. 2. Validate revised procedures. Incorporate comments and approve procedures. Train on and implement EOP. <p>2. Implement Dual Column Format Abnormal Procedures</p> <ul style="list-style-type: none"> Benchmark other Dominion and Industry sites for lists of typical EOP/AOPs (non-IPEOP). Establish a list of KPS EOP/AOPs. Establish a Work-off curve 	<p>COM 21615</p> <p>COM 21616</p> <p>COM 21617</p> <p>COM 21620</p> <p>COM 21621</p>	<p>2Q06</p> <p>3Q06</p> <p>4Q06</p> <p>1Q07</p> <p>2Q06</p>	<p>Revision drafted.</p> <p>Procedures validated.</p> <p>Procedures approved.</p> <p>Training attendance records.</p> <p>Benchmarking documented.</p>

		to revise the listed KPS EOP/AOPs into 2-column format.	COM 21621 COM 21621	2Q06 2Q06	List Published Work-off curve established.
Item 1 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
1.h.	Improve Non-Licensed Operator Continuing Training program	Revise the Nuclear Auxiliary Operator Training Program Description to improve the focus on systems. Develop, review, and approve the 2006-2007 Non-Licensed Operator Continuing Two-Year Training Plan. Perform effectiveness review.	COM 21622 COM 21623 COM 21624	4Q05 4Q05 2Q06	Program revised. Develop, review and approve plan. Effectiveness review completed.

Item 2	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
2.a	Improve the quality of Operability Determinations.	Combined Engineering and Operations training on Operability Determinations and Recommendations has been conducted. The audience for this training was and will be Shift Managers, Shift Technical Advisors, and those Engineers qualified to perform Operability Recommendations.	CAP 26045 CE 15568 CA 19128	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> • Training attendance records. • Effectiveness review 4Q05.
2.b	Validate the quality of existing open Operability Determinations.	To confirm quality and applicability of the operability determinations for all Operable but Degraded and Operable but Non-conforming conditions, an independent review of the associated operability recommendations will be completed. This review will encompass those which will remain open following startup from the Spring 2005 Forced Outage.	CA 18563	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> • Documented summary of reviews. • PORC concurrence of open operability determinations.

Item 3	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
3.a	Confirm prior NRC commitments have been implemented as required.	A representative sample of existing commitments will be performed to confirm the implementation of prior commitments that Kewaunee has made to the NRC.	CAP 26046 CE 15569 CA 19103 CAP 27239 CA 19531	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> Documented assessment results.
3.b	Confirm assumptions made in critical engineering calculations, that require operator actions to be performed within specific times, reflect actual operator response times.	<p>A validation will be performed of all time critical operator actions assumed in engineering calculations for the top 19 high risk / low margin components prior to startup from the current outage.</p> <p>The balance of the top 50 high risk components will be completed by 4Q05.</p>	CE 15570 CA 19152 CA 19153	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> Documented assessment results of top 19 components prior to startup from the current outage. Documented assessment results of top 50 components 4Q05.
3.c	Provide reasonable assurance of design basis compliance for high energy line breaks, tornados, flooding, and seismic events.	<p>Assessments and plant walk downs are being conducted to identify significant issues with high energy line break, tornados, seismic and flooding. The walk downs are designed to identify:</p> <ol style="list-style-type: none"> potential vulnerabilities to pipe whip, and/or postulated concurrent equipment failures, and potential component or 	CA 18880	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> Documented walk down results.

		structural failures that could impact the operability of safety-related equipment.			
Item 4	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
4.a	Resolve auxiliary feedwater system operability concerns due to loss of suction from the Condensate System.	Modifications will be implemented to restore operability of the auxiliary feedwater system. The scope of the modification will include re-routing of the auxiliary feedwater pump suction piping, and installation of a low suction pressure trip function.	CA 18934	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> Modification documents.
4.b	Address the turbine building flooding concerns.	Modification and repairs will be completed to address the turbine building internal flooding issue.	CA 18936	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> Modification documents.
4.c.	Reduce potential for residual heat removal pump pit flooding during shutdown.	Implement modification to reduce flooding potential for RHR pump pits.	COM 21626	3Q06	<ul style="list-style-type: none"> Approved design description, approved 10CFR50.59, completed work order.
4.d.	Submit flooding license basis.	Submit flooding license amendment request.	COM 21627	1Q06	<ul style="list-style-type: none"> LAR submitted.
4.e.	Resolve auxiliary feedwater local operator actions	The auxiliary feedwater system local manual operator actions as described in the license amendment request submitted May 5, 2005, and supplemented on June 9, 2005 will be eliminated.	COM 21628	NLT RFO-29	<ul style="list-style-type: none"> Local operator actions eliminated.

4.f.	Update PRA Model	Incorporate turbine building flood modifications and operations procedure changes	COM 21629	1Q06	<ul style="list-style-type: none"> PRA Notebook issued
Item 5	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
5.a	<p>Validate and improve documentation of the design basis for:</p> <p>Internal Flooding,</p> <p>High Energy Line Breaks,</p> <p>Station Blackout,</p> <p>Tornados, and</p> <p>Seismic Events</p>	A project plan will be developed and implemented to complete design basis topical reports. CA 18849	<p>COM 21749</p> <p>COM 21751</p> <p>COM 21753</p> <p>COM 21754</p> <p>COM 21756</p>	<p>4Q05</p> <p>4Q05</p> <p>2Q06</p> <p>3Q06</p> <p>4Q06</p>	<ul style="list-style-type: none"> Internal flooding topical report completed High energy line break topical report completed Station blackout topical report completed Tornado topical report completed Seismic topical report completed
5.b	Complete documentation and validation of the license bases for the safety functions of the most risk significant safety systems.	A project plan will be developed and implemented for the documentation and field validation of license bases for the safety functions of the Auxiliary Feedwater System, Service Water System, Residual Heat Removal System, Component Cooling Water System, and Emergency Diesel Generators, 4kV electrical system and DC electrical system. CA 18850	<p>COM 21737</p> <p>COM 21738</p> <p>COM 21748</p> <p>COM 21739</p> <p>COM 21740</p> <p>COM 21741</p> <p>COM 21742</p> <p>COM 21743</p>	<p>1Q06</p> <p>2Q06</p> <p>3Q06</p> <p>3Q06</p> <p>4Q06</p> <p>1Q07</p> <p>2Q07</p> <p>4Q07</p>	<ul style="list-style-type: none"> AFW System completed SW System completed Interim project progress review RHR System completed CCW System completed EDG completed 4kV System completed DC System completed

Item 5 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
5.c	Improve retrievability and control of calculations of record.	<p>The following will be completed:</p> <ol style="list-style-type: none"> 1. Complete populating the current safety related calculations into the calculation database, and 2. Incorporating cross-reference information of inputs/outputs between calculations. 	CA 18851	<p>1Q06</p> <p>1Q06</p> <p>2Q06</p>	<ul style="list-style-type: none"> • Electronic database population complete. • Cross-referencing between calculations in database complete. • Effectiveness review.
5.d.	Updating of Environmental Qualification (EQ) Program	Conduct a validation assessment of a sample of completed EQ program documents for adequacy in incorporating design basis information and assess prioritization of update plan.	COM 21631	2Q06	<ul style="list-style-type: none"> • Perform assessment of completed file upgrades and plan.

Item 6	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
6.a	Complete AC electrical models and calculations to provide clear bases for safety related settings and loads.	Complete AC electrical calculations for: 1. load flow, CA 18853 2. short-circuit currents, CA 18853 3. EDG loading, CA 18853 4. relay setting, CA 18853 5. protection coordination, CA 18853 6. control circuit voltage drops, CA 18853 7. cable ampacity, CA 18853 8. thermal overload relays. CA 18853	COM 21832 COM 21833 COM 21834 COM 21837	2Q06 4Q06 1Q07 2Q07	<ul style="list-style-type: none"> • Interim project progress review. • Interim project progress review. • Calculations completed, validated, and issued. • Interim Progress Review
6.b	Complete DC electrical models and calculations to provide clear bases for safety related settings and loads.	Complete DC electrical calculations for: 1. battery sizing, CA 18854 2. charger sizing, CA 18854 3. voltage drop, CA 18854 4. short-circuit currents, CA 18854 5. control circuit voltage	COM 21833 COM 21837 COM 21834	4Q06 2Q07 4Q07	<ul style="list-style-type: none"> • Interim project progress review. • Interim project progress review. • Calculations completed, validated and issued.

		drops, CA 18854			
		6. breaker and fuse coordination CA 18854			

Item 7	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
7.a	Improve the quality of Engineering products.	<ul style="list-style-type: none"> • An assessment of engineering has been conducted using NMC fleet and external expertise to identify the key areas for improvement and to develop associated action plans. • To improve the quality of Engineering products, an interim Independent Review Group (IRG) has been established to provide an in-line independent review of engineering products, including: <ol style="list-style-type: none"> 1. Operability Recommendations, 2. 10 CFR 50.59 evaluations, 3. calculations important to safety, and 4. modifications important to safety. • Training will be conducted to reinforce expectations regarding Engineering product quality. 	<p>CE 15571</p> <p>CA 18890</p> <p>CA 18891</p>	<p>Prior to Startup from the Spring 2005 Forced Outage</p> <p>Prior to Startup from the Spring 2005 Forced Outage</p> <p>4Q05</p>	<ul style="list-style-type: none"> • Completed assessment report. • IRG Implemented • Engineering quality effectiveness review 4Q05. • Training attendance records.

Item 7 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
7.b	Improve Engineering knowledge and understanding of design and licensing bases.	Training will be conducted on design and licensing bases for Engineering personnel.	CA 18855	4Q05	<ul style="list-style-type: none"> • Training attendance records. • Effectiveness review 2Q06.
7.c	Improve the interface between Operations, Maintenance, and Engineering.	Roles and responsibilities for Operations, Maintenance, and Engineering as they relate to Engineering support will be examined and re-defined as necessary.	CA 18856	3Q05	<ul style="list-style-type: none"> • Roles and responsibilities documented. • Effectiveness review 4Q05.
7.d.	Improve Station Engineering Support	Establish System Engineering	COM 21808 COM 21809	4Q05 1Q06	<ul style="list-style-type: none"> • Dominion Assist Visit • Implement Dominion Plant Health Reports.
7.e.	Improve Equipment Reliability	Establish a Station Equipment Reliability Team (SERT) and Station Equipment Reliability Issues List (SERIL).	COM 21812 COM 21814	1Q06 1Q06	<ul style="list-style-type: none"> • Team established • List developed

Item 8	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
8.a	Ensure station personnel are aware of their roles and responsibilities in the Corrective Action Program (CAP).	<p>Actions will be taken to ensure that station personnel are aware of their roles and responsibilities as they pertain to the Corrective Action Program.</p> <p>Implement communications campaign to reinforce roles and responsibilities.</p>	<p>CA 18857</p> <p>COM 21632</p>	<p>3Q05</p> <p>2Q06</p>	<ul style="list-style-type: none"> • Employee briefings completed. • New employee training program revised. • Copies of D-15 and presentation materials.
8.b	Validate the appropriateness of the significance level assigned for all currently open conditions adverse to quality in the Corrective Action Program.	An independent review of all open conditions adverse to quality in the Corrective Action Program is being completed.	CA 18566	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> • Documented results of the assessment.
8.c	Assure CAP trends are identified and used in the significance and level of effort assigned during CAP screening.	Trend information related to repeat CAP items will be provided to the daily CAP screen team.	CA 18564	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> • Generation of adverse trend CAPs. • Effectiveness review 4Q05.

Item 8 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
8.d	Assure that managers recognize the significance of long standing issues.	Training on risk significance will be provided to the management team. This training is also part of the corrective actions to prevent recurrence from the containment equipment hatch close root cause evaluation.	CA 18858	3Q05	<ul style="list-style-type: none"> • Training attendance records. • Assessments indicate no significant CAP prioritization errors. Goal is to have: <ul style="list-style-type: none"> ▪ No level "A" misclassifications ▪ \geq 90% level "B" issues properly classified.

Item 9	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
9.a	Improve the quality of Apparent Cause Evaluations (ACEs).	The Corrective Action Program screening team will select Apparent Cause Evaluations that will be brought to the Corrective Action Review Board (CARB) for review upon completion. Feedback on the quality and grading will be provided to the authors.	CA 18565	Prior to Startup from the Spring 2005 Forced Outage 2Q06	<ul style="list-style-type: none"> • Criteria established for ACE reviews to be completed by CARB. • Average ACE quality grade is ≥ 85 sustained over a 3-month period.
9.b	Determine the effectiveness of the actions taken in 9.a.	Nuclear Oversight (NOS) will review a selected sample of CARB-approved ACEs to determine the effectiveness of the actions taken and determine if the average quality of ACEs has been sustained at ≥ 85 over at least 3 months.	CA 18859	4Q05 4Q06	<ul style="list-style-type: none"> • Nuclear Oversight report documenting results of the reviews.
9.c.	Improve the quality of causal evaluations.	Implement Dominion Nuclear Administrative Procedure (DNAP) 1604, Dominion Cause Evaluation Program.	COM 21633 COM 21634	2Q06 1Q07	<ul style="list-style-type: none"> • DNAP approved and issued. • Conduct Effectiveness Review

Item 10	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
10.a	Validate the timeliness for resolution of current open significant issues.	An independent review is being conducted of all open corrective actions from level "A" and "B" action requests to validate the timeliness of resolution for significant issues.	CE 15567	Prior to Startup from the Spring 2005 Forced Outage	<ul style="list-style-type: none"> Documentation of results from the review.
10.b	Assure operable but degraded / non-conforming issues are corrected in a timely manner.	Administrative procedures have been revised to include requirements for timely resolution of operable but degraded / non-conforming issues. As of March 15, 2005, 28 open OBDs remain.	CA 18860	4Q05	<ul style="list-style-type: none"> Revision to procedure GNP 11.08.01 issued. March 15, 2005 backlog of open operable but degraded / non-conforming conditions reduced by $\geq 50\%$.
10.c.	Upgrade the KPS Emergency Action Levels (EAL) to the NEI 99-01 EAL scheme as submitted to NRC on October 26, 2004	<p>Conduct training.</p> <p>Implement new EALs.</p>	<p>COM 21635</p> <p>COM 21636</p>	<p>6 months after NRC approval.</p> <p>6 months after NRC approval</p>	<ul style="list-style-type: none"> Training completed Procedures revised.

Item 11	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
11.a	<p>Communicate Kewaunee "Picture of Excellence" to employees to help facilitate sustained performance improvement.</p> <p>NRC-05-118 stated to the NRC that DEK no longer commits to the Kewaunee Picture of Excellence but rather the Kewaunee Passion for Excellence.</p>	<p>Action steps to meet this objective include communicating and reinforcing the "Picture of Excellence" to improve accountability and individual behaviors. Training for managers and supervisors has begun, and will be completed prior to unit startup.</p>	CA 18861	2Q05	<ul style="list-style-type: none"> • Training attendance records.

Item 11 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
11.b	Provide the necessary infrastructure and tools required to execute and reinforce the "Picture of Excellence".	<p>The implementation steps include:</p> <ul style="list-style-type: none"> • Incorporating ACEMAN into daily Plan Of the Next Day (POND) meetings. • Implementation of a daily meeting (D-15) between supervisors and individual contributors. The purpose of the D-15 meetings is to improve communication between employees, supervisors and managers. They are designed to enhance the information flow between employees and all levels of management and create an environment for open communication. • Alignment of Performance Management Plans to the "Picture of Excellence" • Establishing monthly Picture of Excellence Review Group (PERG) meetings to foster accountability for implementation of the site Excellence Plans. 	<p>CA 18958</p> <p>CA 18958</p> <p>CA 18993</p> <p>CA 18958</p>	2Q05	<ul style="list-style-type: none"> • ACEMAN grading employed at POND meetings. • D-15 meetings implemented. • "Picture of Excellence" and ACEMAN incorporated into station Performance Management Plans. • PERG
11.c.	Build depth in Emergency Response Organization	<p>Assess staffing needs and qualification in Emergency Preparedness positions.</p> <p>Train additional personnel.</p>	<p>COM 21637</p> <p>COM 21638</p>	<p>2Q06</p> <p>3Q06</p>	<ul style="list-style-type: none"> • Assessment Report • Training attendance records.

Item 12	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
12.a	<p>Improve the leadership capability of supervisors in:</p> <ol style="list-style-type: none"> 1. Operations, 2. Operations Training, and 3. Engineering. 	<p>A leadership assessment will be conducted for the:</p> <ol style="list-style-type: none"> 1. Assistant Operations Managers, 2. Shift Managers, 3. Control Room Supervisors, 4. Operations Instructors, 5. Engineering Managers, and 6. Engineering Supervisors. <p>The assessment will focus on leadership capabilities and capacity to implement a continuous improvement culture. Results of the assessments will be factored into individual improvement plans.</p>	<p>CAP 26038</p> <p>Engineering CA 18562 CA 18972</p> <p>Operations CA 18973 CA 19211</p>	<p>Operations & Operations Training will be completed 2Q05</p> <p>Engineering will be completed 3Q05</p>	<ul style="list-style-type: none"> • Documented results of the assessments. • Individual Performance Management Plans updated with improvement areas.
12.b.	<p>Improve the leadership capability of supervisors in: Maintenance, Chemistry, Outage and Planning, Emergency Planning, & Radiation Protection</p>	<p>A leadership assessment will be conducted for:</p> <p>Maintenance Supervision</p> <p>Chemistry Supervision</p> <p>Outage and Planning Supervision</p> <p>Emergency Planning</p>	<p>COM 21639</p> <p>COM 21643</p> <p>COM 21644</p> <p>COM 21641</p>	<p>2Q06</p> <p>3Q06</p> <p>3Q06</p> <p>2Q06</p>	<ul style="list-style-type: none"> • Documented results of the assessments. • Individual Performance Management Plans updated with improvement areas.

		Supervision Radiation Protection Supervision	COM 21645	3Q06	
Item 12 (Cont'd)	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
12.c.	Improve line manager ownership and accountability.	Implement DNAP 0114, Dominion Nuclear Self Evaluation Program.	COM 21646	4Q05 4Q05	<ul style="list-style-type: none"> • DNAP Approved. • Station Self Assessment Meeting (SSEM) Held

Item 13	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
13.a	Improve Nuclear Oversight (NOS) effectiveness.	Implement mentors from other NMC sites for a period of 6 weeks, assign assessors to a functional area, and implement a rotation plan. An improvement plan addressing assessor performance will be developed which will include additional actions.	CA 18862	3Q05 3Q06	<ul style="list-style-type: none"> • Rotation policy in-place. • Assessors assigned to functional areas. • Develop improvement plan. • Review effectiveness of Nuclear Oversight processes.
13.b.	Strengthen Nuclear Oversight Assessment Processes	Implement Dominion Nuclear Oversight model which includes separate Specialist Assessment and Audit Programs	COM 21647	1Q06	<ul style="list-style-type: none"> • Establish and fill positions

Item 14	Objective	Summary of Commitment Steps	Corrective Action Program Entry	Completion Date	Methods to Verify Commitment Met
14.a	Improve understanding of conservative decision making by managers and supervisors.	Site management will conduct training on conservative decision making for managers and supervisors.	CA 18863	2Q05	<ul style="list-style-type: none"> • Training attendance records.