



June 11, 2007

NRC 2007-0037
CAL 3-04-01 Revision 1

Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Point Beach Nuclear Plant
Corrective Action Program Self-Assessment Plan

References: 1. Letter from NMC to NRC dated February 10, 2006 (ML060440285)
2. Letter from NRC to NMC dated April 14, 2006 (ML061070061)

This letter submits the Nuclear Management Company, LLC (NMC) plan to perform an independent assessment of the corrective action program at Point Beach Nuclear Plant (PBNP).

The Corrective Action Program (CAP) Independent Assessment Plan Summary, as committed to in Reference 1, is enclosed.

The assessment is scheduled to commence on July 16, 2007. A debrief at the end of the assessment will be conducted with the PBNP staff.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

Dennis L. Koehl
Site Vice-President, Point Beach Nuclear Plant
Nuclear Management Company, LLC

Enclosure

cc: Document Control Desk
NRR Project Manager, Point Beach Nuclear Plant
Resident Inspector, Point Beach Nuclear Plant, USNRC

ENCLOSURE

CORRECTIVE ACTION PROGRAM INDEPENDENT ASSESSMENT PLAN SUMMARY

Assessment Tracking Number

SAR01057217

Assessment Objective

1. Assess the effectiveness of the actions taken in response to the 2006 NRC Problem Identification and Resolution (PI&R) Inspection.
2. Assess the effectiveness of management overview, involvement and reinforcement of the Corrective Action Program (CAP).
3. Verify that station problems are being identified, reported and properly screened.
4. Verify that evaluation of problems and identification of corrective actions are commensurate with the significance of the problem.
5. Determine the effectiveness of corrective actions resolving identified problems.
6. Verify that performance indicators effectively characterize corrective action program performance and that (CAP) trending identifies potential adverse trends.
7. Assess the actions taken from the January 2007 CAP self-assessment.

Assessment Purpose

The purpose is to provide an independent and comprehensive assessment of the quality of implementation of the Corrective Action Program at PBNP. The assessment will be performed in accordance with NMC procedure FP-PA-SA-01, "Focused Self-Assessment Planning, Conduct and Reporting." The assessment will be used to evaluate the quality of implementation of the three phases of the corrective action program – problem identification, problem evaluation, and problem resolution. The assessment report will provide an overall concluding statement on the effectiveness of implementation of the corrective action program.

Assessment Scope

Evaluate PBNP performance and implementation of the NMC Fleet Corrective Action Program (CAP) with respect to the criteria established in NRC Inspection Procedure 71152, "Identification and Resolution of Problems," and various industry guidelines and performance criteria.

This assessment will review the products and results of the PBNP corrective action program to measure their quality. Examples of the products and results to be reviewed include but are not limited to CAPs, apparent cause evaluations, root cause evaluations, operability recommendations, and corrective actions. The assessment team will limit its review to products completed within the past year.

Narrative Discussion of Assessment Objectives

1. Assess the effectiveness of the actions taken in response to the 2006 NRC Problem Identification and Resolution (PI&R) Inspection.

The evaluations and corrective actions associated with a cross-cutting finding from the 2006 NRC PI&R inspection will be assessed.

2. Assess the effectiveness of the actions taken in response to the January 2007 CAP Self-Assessment.

The current status and effectiveness of actions that were identified in the January 2007 CAP self-assessment will be assessed.

3. Management oversight, involvement and reinforcement of the CAP assure effective CAP implementation.

The team will assess the level of management oversight and ownership of the corrective action program by observing CAP Screening Team and Performance Assessment Review Board activities. Through interviews, the assessment will assess the effectiveness of senior management involvement and ownership of recent root cause investigations and corrective action program performance indicators.

4. The willingness and ability of CAP problem reporting, and a defined process in assigning prioritization will be assessed.

The assessment team will interview station personnel to determine the willingness, ability and threshold for identifying problems using CAP. Through monitoring daily plant meetings, station activities and observations, the assessment team will determine if CAPs are being written as appropriate; determine how poorly-written CAPs are fed back to the initiator; if consistent processes are used to assign classification, problem evaluation depth and ownership.

5. Problem analysis, action planning, and management review and approval are effective in meeting quality standards.

The team will review a sample of recent root cause and apparent cause evaluations to determine whether these causal analyses effectively determined the cause of significant problems, included an appropriate extent of condition assessment, and identified the appropriate corrective actions. The NMC administrative procedures will be used as the applicable standard for grading during the assessment. The PBNP evaluation and response to NRC identified issues will be reviewed to verify that sufficient causal analysis and corrective actions were taken since the last PI&R inspection. The adequacy of Maintenance Rule evaluations will be reviewed. In addition, the adequacy of the evaluation of departmental human performance clock reset events will be assessed for adequacy.

6. Corrective action program action assignments and tracking is appropriately managed.

The assessment team will interview managers to determine if the backlog is actively managed, and if there is appropriate awareness of the content. The team will interview oversight personnel to determine how corrective action quality is assessed.

7. Corrective action program trend and performance indicators effectively characterize program performance and identify potential adverse trends.

The Assessment Team will review the corrective action program performance indicators for adequacy and completeness. The team will evaluate the trending program (Department Roll-Up Meeting – DRUM) for effectiveness at the individual department and station level. Corrective action program trend data will be reviewed to validate that adverse trends are being identified, entered into the corrective action program, and are properly evaluated and resolved.

Independent Assessment Team

- John Hamilton, John Hamilton and Associates
- William Bryan, Florida Power & Light Company, St. Lucie
- John Tortora Jr., Tennessee Valley Authority, Watts Bar
- Mark Poland, Exelon Nuclear, LaSalle Station

Schedule

- July 9-13, 2007, Off-site (in office) review in preparation for onsite assessment
- July 16, 2007, Assessment team will assemble at PBNP for pre-job briefing
- July 16-20, 2007, Conduct onsite assessment and provide site management with preliminary result prior to leaving the site
- August 10, 2007, Draft assessment report provided to the site
- September 12, 2007, Final assessment report provided to the site

Assessment Methods

The independent assessment team will use procedure FP-PA-SA-01, "Focused Self-Assessment Planning, Conduct and Reporting," as guidance in conducting this assessment. The assessment methodology may include, but is not limited to, a combination of the following: Observation of activities, interviewing personnel, data and document reviews, reviewing procedures and programs, and review of performance indicators. These inputs will be assessed against internal standards and nuclear industry standards.

Assessment Team Experience and Qualifications

John Hamilton (Assessment Team Leader) John Hamilton and Associates

Experience

Approximately 35 years of commercial nuclear power industry experience in positions of increasing responsibility. Primary emphasis in quality assurance and quality control and performance assessment, including corrective action, performance improvement and project management.

Education

1970 BS-Metallurgical Engineering, Virginia Polytechnic Institute and State University

William Bryan, Florida Power & Light Company

Experience

Approximately 22 years of commercial nuclear power plant experience in design and systems engineering, nuclear safety and thermal hydraulic analyses, and performance improvement including trending, development of apparently cause evaluation training and human performance program improvements.

Education

1984 BSME, University of Florida

1989 MBA, Florida International University

John Tortora Jr., Tennessee Valley Authority

Experience

Approximately 22 years of commercial nuclear power plant experience of increasingly more responsible positions including daily scheduling, maintenance training, projects, and performance improvement manager.

Education

1976 BA-English, Clark University

1981 MS-Management, Rensselaer Polytechnic Institute

**Mark Poland, Excelon Nuclear
LaSalle**

Experience

Approximately 26 years of commercial nuclear power plant experience of increasingly more responsible positions including different engineering positions, planning and scheduling, outage scheduling, nuclear oversight, contracts and corrective action programs.

Education

1980 BS-Civil Engineering, Valparaiso University