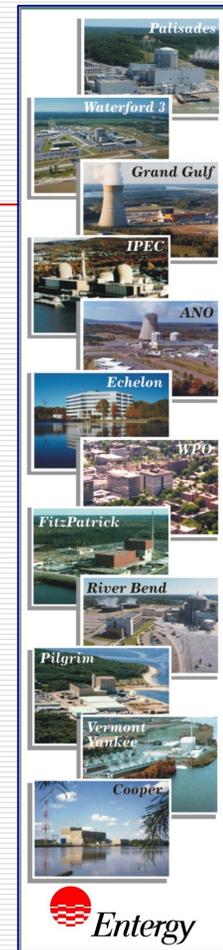


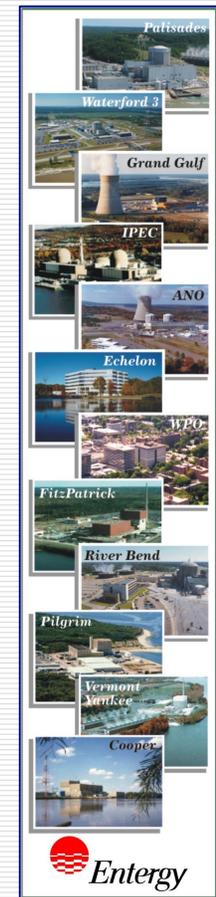
Palisades Substantive Cross Cutting Issue Status

September 24, 2009



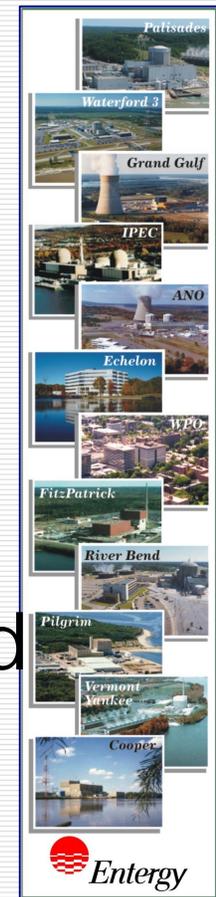
Agenda

- Introductions
- Issue Summary and Causal Analysis Results
- Root Cause / Contributing Cause Action Status
- Open Discussion and Feedback



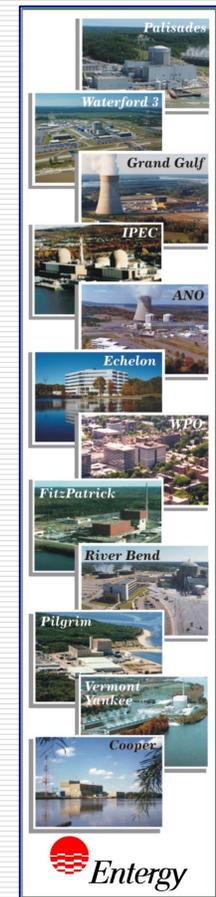
Substantive Cross-Cut H.2.C

Palisades received a substantive cross-cutting issue (SCCI) at the end of 2008, in the aspect of documentation / procedures (H.2.c). The SCCI was carried over because corrective actions were new or not yet implemented at the mid-cycle review.



Root Cause

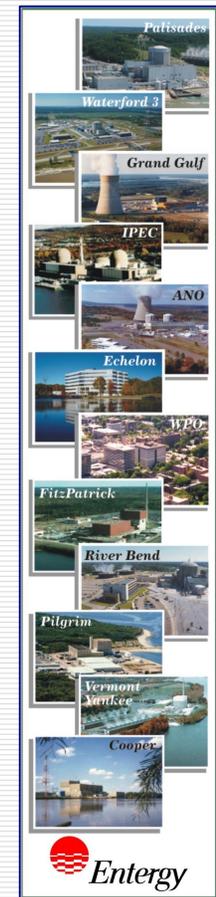
Plant personnel did not recognize the importance of high quality procedures / work instructions as evidenced by an inadequate focus on prioritizing, monitoring, scheduling, and implementing needed procedure changes.



Contributing Cause

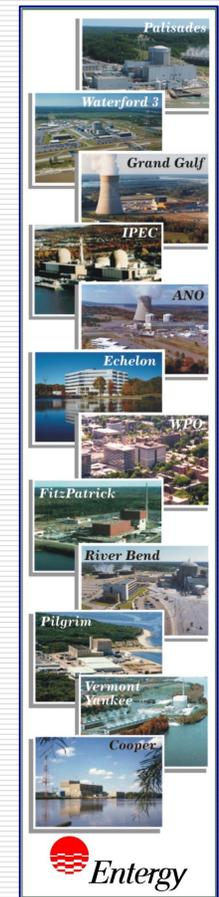
Procedure revision process did not support:

- timely revisions
- revision backlog prioritization
- efficient processing of revisions



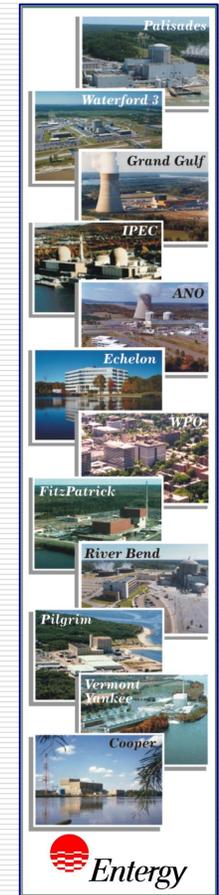
Root Cause Actions

- ❑ Procedure Improvement Team
- ❑ Procedure / Work Instruction Need and Content
- ❑ Benchmarking
- ❑ Training
- ❑ Site Communications



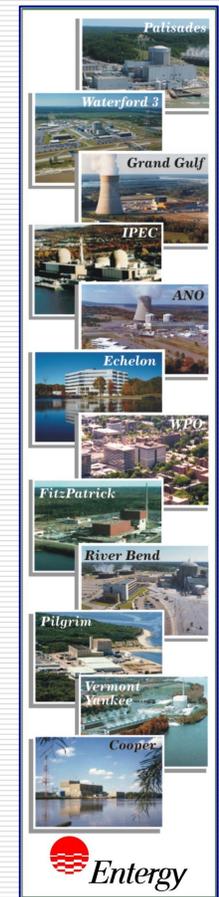
Completed Actions – Root Cause

- Procedure Improvement Team Charter
 - Multi-discipline team
 - Improve procedure quality
 - Provide procedure training (What Good Looks Like)
 - Provide tools for procedure revision management
 - Meets weekly
 - Monthly progress report to leadership team



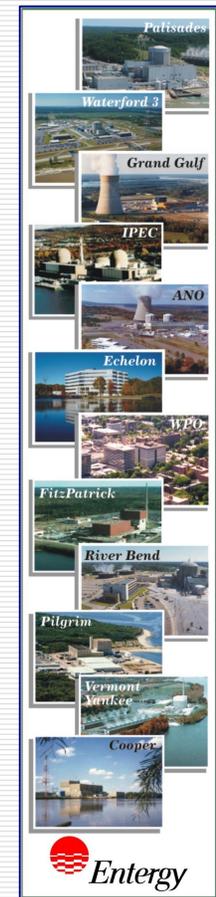
Completed Actions – Root Cause

- Procedure / Work Instruction Need and Content
 - Procedure writer peer group meetings
 - Work planning quality review team meetings
 - Review of procedure related condition reports
 - Checklist to assess procedure quality



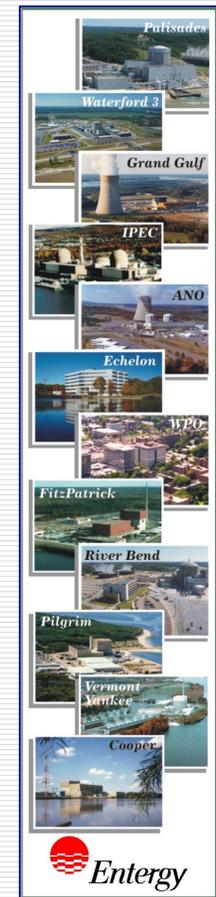
Completed Actions – Root Cause

- ❑ Benchmarking identified the following gaps:
 - No formal procedure user training
 - No formal procedure writer qualification program
 - Procedure reviews not targeted to experience level
 - No recurring procedure quality assessments



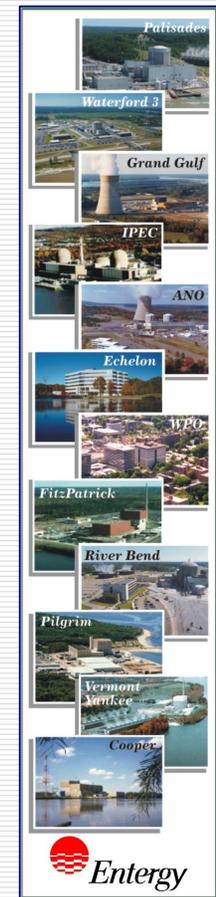
Completed Actions – Root Cause

- Site Communications
 - Procedure improvement team web page
 - Expectations to identify procedure revisions during training, walkdowns and usage.



Completed Actions – Contributing Cause

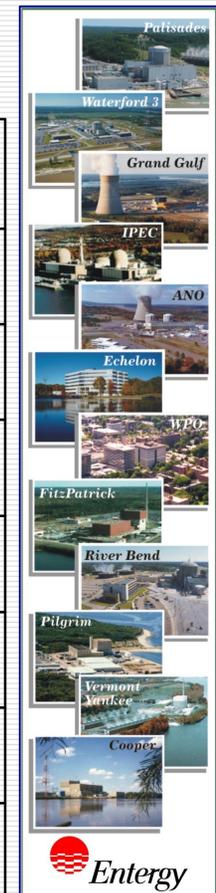
- Procedure Revision Management
 - Established Document Revision Notice (DRN) screening team and criteria
 - Screened backlogged DRNs
 - Created performance indicators (PIs) to track DRN backlogs



Completed Actions – Contributing Cause

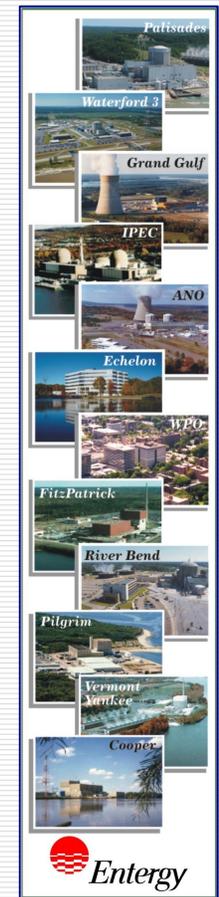
Performance Indicator Summary

Palisades August 2009 DRN Backlog	
Description	Open DRNs
Priority 1 - Immediate	0
Priority 2 - Vital	0
Priority 3 - Required	57
Priority 4 - Scheduled	410
Priority 5 - Enhancement	1187
Total	1654



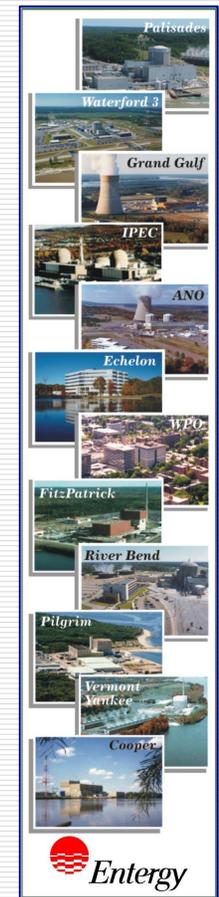
Completed Actions – Contributing Cause

- Performance Indicator Summary
 - Risk informed by prioritization thru screening with multi-discipline team
 - Expect initial DRN backlog growth prior to reduction as station applies “what good looks like”
 - PIs used to monitor and manage DRN backlog



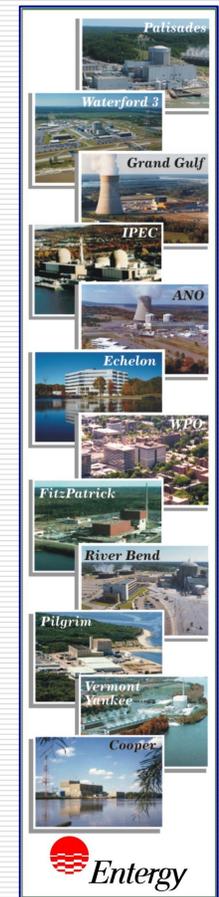
Remaining Actions – Root Cause

- Need and Content
 - Evaluate gaps between task qualification and procedure content
 - Implement a work plan standard
 - Conduct an assessment of procedure and work instruction quality
 - Conduct work planner in-field observation of work instruction implementation



Remaining Actions – Root Cause

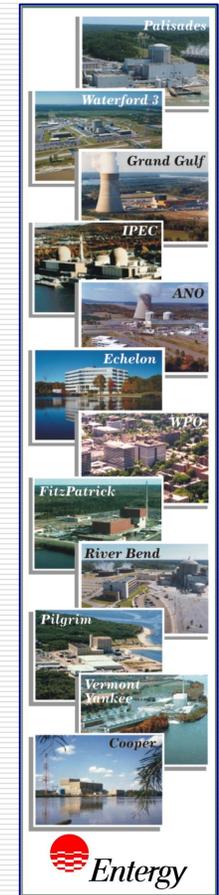
- Need and Content
 - Audit routine station tasks to determine if additional procedural guidance is needed
 - Flow chart selected station processes to determine if station and fleet procedure guidance facilitate task performance
 - Review selected processes that are covered by both site and fleet procedures to identify overlap or conflicts



Remaining Actions – Root Cause

□ Training

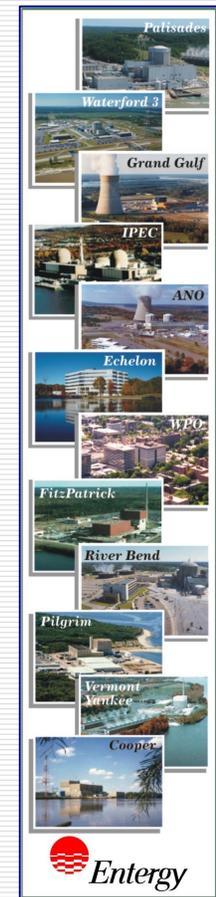
- Train site management on the importance of providing high quality procedures and work instructions
- Conduct INPO Procedure Writer Seminar for procedure writers and work planners
- Train site procedure users and reviewers on what good looks like
- Conduct work order package walkdown training for maintenance supervisors and craft personnel.



Remaining Actions – Root Cause

- Training

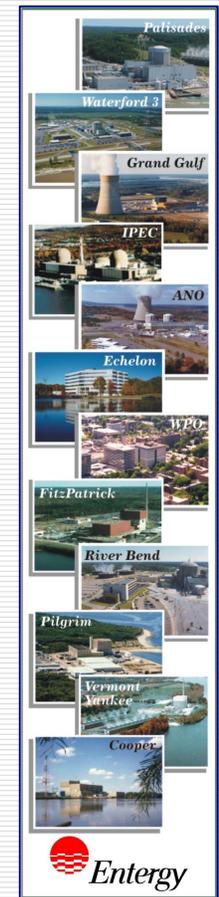
- Establish 5-year work planner training matrix
- Conduct EPRI work planner training
- Establish qualifications for procedure writers and reviewers
- Establish continuing training needs for procedure writers, reviewers, and users



Remaining Actions – Root Cause

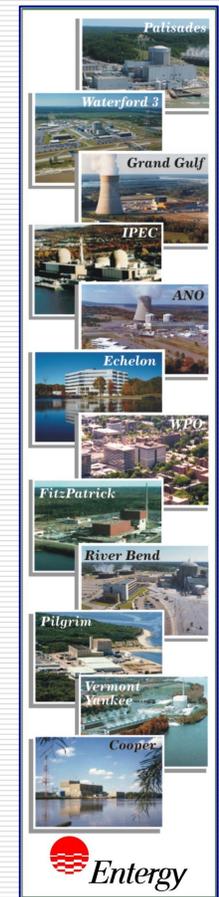
- Communications

- Periodic site communications on procedure improvement team progress.
- Outside of Procedure, Processes, Parameters–STOP (OOPS) Program



Sustainability

- ❑ Procedure quality assessments
- ❑ Work package quality reviews
- ❑ Continuing training and qualification program
- ❑ Procedure writer peer group
- ❑ DRN backlog management PIs
- ❑ Management observations



Open Discussion and Feedback

Open discussion and feedback

