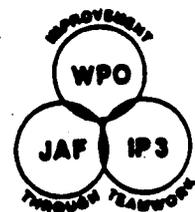


**New York Power
Authority**

**INDIAN POINT 3
NUCLEAR POWER PLANT**

PERFORMANCE IMPROVEMENT PLAN

EXCELLENCE • INTEGRITY • INNOVATION • TEAMWORK



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PERFORMANCE IMPROVEMENT PLAN

PREAMBLE

Our ability to take corrective action begins with the recognition that undesirable or unsatisfactory conditions exist, coupled with the desire to make changes to improve the situation. This corrective action plan is titled the Performance Improvement Plan. The objective is to do more than just correct deficiencies, it is to improve the nuclear plant operation here at the Indian Point 3 Nuclear Power Plant.

The areas that have been identified within this document will effect every member of the IP3 and the corporate office staff of the Nuclear Generation department. I firmly believe that we have the desire to succeed and the sense of pride and ownership needed to acheive our goals. I am encouraged by the effort and progress the staff has made in improving IP3 to date and feel that we can and will achieve excellence in our operation of the facility.



William A. Josiger

INDIAN POINT 3
PERFORMANCE IMPROVEMENT PLAN
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1. PLAN DEVELOPMENT

The following factors were used in the development of the IP3 Performance Improvement Plan (PIP) and will serve as a basis for developing policies, programs, and processes to address long-standing problems and to affect continuing improvement.

1. Recognition of the decline in performance.
2. Identification of the symptoms and issues involved in the decline (the plant staff knows what the problems are).
3. Determination of the causes.
4. Development of an action plan to address issues and causes.

Recognizing the decline in performance.

While the decline in IP3 performance has not been as precipitous or as severe as that suffered at other plants, management clearly recognized in mid-1992 that a deteriorating situation was in progress. The decline in plant performance was identified through self-assessments, inspections, and performance monitoring. The Nuclear Generation Business Plan that was developed in 1991 helped to provide an integrated approach to this monitoring.

Identifying the symptoms and issues involved in the decline.

Recognizing that business-as-usual was not working, a concentrated effort was begun to develop a plan to solve the causes of the decline in IP3 performance. Based on the premise that "the plant and corporate staffs know what the symptoms are and can determine the issues involved in the decline," management selected and assembled a team made up of plant and corporate personnel. Their assignment was to review available assessments, identify symptoms of problems as they saw them, review inspection documents, and determine the root causes involved in the decline. Members of the team were asked to begin the process by identifying "issues."

This Performance Improvement Plan Team met to discuss problems affecting the plant. The first step in the process was to list the symptoms that the staff recognized as indicators of the decline. A "symptom" was defined as "subjective evidence of a problem at the plant." Symptoms were grouped together as a means of identifying issues. Some symptoms were indicative of problems occurring in more than one area and were listed in appropriate issue categories.

An "issue" was defined as "a condition which the team members considered, either through perception or objective evidence, to be an area where performance improvement was necessary." Through Team discussions, five major categories of issues emerged and served as the starting point for the cause determination:

1. Communications, teamwork, and personnel issues
2. Leadership and management
3. Accountability
4. Performance constraints
5. Prioritization and planning - utilization of resources

These five major categories also served as the initial basis for the action plan outline.

The Team also examined inspection reports from industry sources and the regulator. While this examination identified, in many cases, "objective" evidence of problems, such as violations of regulations, they were listed as "symptoms" and were found to occur in four major issue categories:

1. Safety/Regulatory
2. Corrective action
3. Surveillance and oversight
4. Standards

These issue categories were considered in the determination of the causes and in the action plan development.

Part of the process in identifying management issues involved a management self-assessment. Information was gathered through a series of confidential interviews that were conducted with 120 interviewees representing a cross section of plant personnel. Three major areas of concern for the leadership of the plant were identified:

1. Inappropriate leaders' involvement in employees' performance
2. Poor management of change
3. Lack of effective cross-functional relationships between departments

The Plant Leadership Team (PLT), consisting of the Resident Manager and the three general managers, also reviewed the issues and challenges. They considered the problems facing the plant and made the following observations:

Observations by Plant Leadership Team

1. Management has been ineffective in establishing appropriate standards, goals, and meaningful performance indicators so that performance can be assessed on a regular basis.
2. Management has not been involved, becoming detached from the real problems and issues in the field (people and equipment).
3. Our work practices and controls have become so cumbersome and restrictive that we are no longer able to accomplish work efficiently. This applies to engineering, corrective maintenance, material procurement, etc. Everyone feels their hands are tied.
4. There is a widespread loss of individual accountability for items and issues. The cumbersome work controls contribute to this. Our processes have become so complex that no single department or individual is allowed to make all the decisions necessary to resolve an issue. Often our backlogs are so high, even simple issues have difficulty making it through the multi-tiered process.

These issues and observations were considered in determining causes and corrective actions associated with the issues and were integrated into the action plan during development.

Determining the causes

The symptoms and issues that resulted from the team discussions, the document review, the management self-assessment, and the observations by the Plant Leadership Team were considered in determining the causes. The "Root Causes," i.e. the fundamental cause(s) that, if corrected, will prevent recurrence of an issue which were more symptomatic in nature, are identified below.

ROOT CAUSES

Management has been ineffective in:

1. fostering an atmosphere that promotes communication and teamwork,
 2. providing leadership that involves management in the real problems and issues in the field,
 3. managing the many changes
- and
4. establishing, communicating, and enforcing standards to promote accountability.

CONTRIBUTING CAUSES

Management of resource utilization, including prioritization and long-term planning, has been ineffective.

Programs such as surveillance testing, corrective action/work control, engineering, material procurement, and outage control are cumbersome, have been poorly implemented, lead to performance constraints, and contribute to widespread loss of individual accountability.

Leaders have been inappropriately involved in employees' performance. Some have been detached, while others have been involved at the micro level.

Cross-functional relationships between departments have not been effectively developed.

Developing an action plan to address the causes

The Performance Improvement Plan action items were developed utilizing a number of inputs that included:

1. Items determined by the PIP Team to be necessary to solve root and contributing causes.
2. Items from the Management Self-Assessment Proposed Action Plan that were developed to address the three major areas of concern.
3. Items taken from the FitzPatrick Results Improvement Program (taking advantage of lessons learned) that were included to solve similar causes and were determined to be applicable to IP3.
4. Items determined to be needed by the Resident Manager.

Some action items are considered tactical, solving problems in the short term, while others are more strategic and solve root and contributing causes. This dual approach was used so that results could be obtained to remedy some problems in the short term while a long-term action plan was in place.

2. IMPLEMENTATION

Performance Improvement Plan Implementation Basis

PURPOSE:

To provide a structured plan of continuous improvement for IP3.

MISSION STATEMENT:

Our mission is the safe, reliable and efficient generation of electricity.

NUCLEAR GENERATION GUIDING PRINCIPLES:

We are a team of Nuclear Professionals who embrace the following principles:

- ◆ We conduct our business with a spirit of cooperation and will strive to achieve our objectives through trust, shared goals, and respect for each other.
- ◆ We use an inquisitive and self-critical approach to foster improvement in our operation.
- ◆ We hold ourselves and each other accountable for our performance and place a high value on personal integrity, honesty and straightforwardness.
- ◆ We respect each individual and recognize our responsibility to create opportunities for all personnel to achieve their maximum potential while achieving our mission.
- ◆ We staff our organization with highly-trained professionals who will conduct business with integrity and pride.

PERFORMANCE IMPROVEMENT PLAN GOALS

1. To be graded SALP 1 in all aspects of plant operation.
2. To be a top performer and be regarded as such by INPO.
3. To achieve the highest level of performance as measured by the key indicators.
4. To be recognized as a model plant by our peers.

Action Item Development

The action items address the generic issues affecting the plant. In establishing the Action Items, the following criteria were taken into consideration:

- ◆ The objective should be aggressive but achievable.
- ◆ The Nuclear Generation Business Plan and the Performance Improvement Plan should be mutually supportive.
- ◆ The improvements should be scheduled for completion in a timely fashion.
- ◆ Resources appropriate to the applicable action item would be available to ensure that the schedule can be met. The uncertainty inherent in predicting future resource availability is recognized.

Each department is required to maintain their own department improvement plan. The department plans were reviewed as part of the PIP development process. Those action items that were viewed as interdepartmental and determined to be of help in solving a root or contributing cause were integrated into the Action Plan.

While many of the items in the Action Plan stand alone, department plans will be used to support and contribute to the success of the PIP.

1. In order to resolve some of the major issues, many departments may be assigned actions to implement the PIP.
2. A department manager may be assigned a single item in PIP to resolve an issue; that manager may require many resulting action items in his/her department plan.
3. Recommendations resulting from PIP action items may also require implementation by the departments. For example, in the area of surveillance testing and work control, individual departments will be required to include task force recommendations as action items in their department plans.

Roles and Responsibilities

The overall responsibility for the effective development, implementation and performance monitoring of the IP3 Performance Improvement Plan rests with the Resident Manager. The general managers, in their role as members of the Plant Leadership Team, will play a major role in determining the applicability of new action items and whether the closeout of items is appropriate. The Plan has the full support of the Executive Vice President - Nuclear Generation.

A PIP Coordinator will be responsible for the administration of the plan. The PIP Coordinator will track and trend the resolution of issues and maintain the PIP action item data base.

Action items will be assigned via the chain of command, and those action items that are within the control of an individual will become part of that individual's performance evaluation to ensure accountability.

Ownership

The PIP plan was developed by obtaining input from the various individual department improvement plans, employee interviews, and issues communicated by the PIP Team. The PIP Team will remain active and meet periodically to discuss changes to the plan and make recommendations and serve as an input vehicle for employees.

The employees will be informed of the basics of the plan and their support will be solicited. Those individuals assigned action items will be given specific instructions for implementation of the plan. They will be held accountable for successful completion of the assigned action items. Key performance indicators will be posted for information.

Scheduling and Prioritization

The Resident Manager will assign the PIP action items via the chain of command to the responsible party. General managers will reach agreement with the department manager as to the schedule, and the department manager will assign the responsible party. The department manager will be held accountable by the respective general manager for the successful completion of all action items assigned to that department's personnel. Should it become necessary due to unforeseen circumstances to change a due date, the responsible party will seek relief. The department manager will concur (or deny the request) and appeal to the general manager to have the date changed. All approved action item changes will be rescheduled through the PIP Coordinator. The Resident Manager will periodically review rescheduled items with the general managers with the objective of holding these appeals to a minimum.

Once the initial list of action items was developed, it was reviewed by the PIP Team and management. This review included a process to prioritize the action items. The priorities were assigned according to "importance" as follows:

Priority I Action Items (most important items):

Action items that if accomplished will significantly improve IP3 performance and if not accomplished will significantly contribute to a continued decline in performance.

Priority II Action Items (other items):

Action items that if accomplished could improve IP3 performance and if not accomplished could contribute to a continued decline in performance.

Priorities are identified in the Action Plan section below as follows:

Priority I - action items are in double line boxes

Priority II - action items are not in boxes

Evaluation and Feedback

The Performance Improvement Plan is a living document and will be changed to meet changing needs. As new areas for improvement are identified, action items to resolve them will be added. During the first few years the plan will be assessed semi-annually by a group designated by the Nuclear Leadership Team. The results of the review will be presented to the Executive Vice President - Nuclear Generation, who will be responsible for determining the adequacy of progress.

The Performance Improvement Plan will be evaluated through a number of mechanisms:

◆ Performance Indicators

Where appropriate, areas of the plan will be linked to specific performance indicators.

◆ Periodic NLT Assessment

A group designated by the Nuclear Leadership Team will review the plan and perform an assessment of its effectiveness.

◆ Department Self-assessment

Each department will continue to perform self-assessments to provide status of existing improvement activities and also to provide input for future enhancements.

◆ PIP Team Review

PIP Team will meet periodically to review the plan, assess progress, and make recommendations for improvements.

◆ Employee Feedback

Feedback from employees through a structured mechanism will provide a means of evaluation.

◆ Evaluations by Outside Agencies

The results of NRC and ANI evaluations and inspections, and INPO evaluations and assist visits will be evaluated to determine the effectiveness of the Performance Improvement Plan.

Resources

Many of the resources needed to ensure the success of the PIP are already available through the existing budget process. These resources, in some cases, need to be redirected through prioritization and planning, or better managed through a change in work plans. Other resources have been identified and are part of longer-range projects. Where resources are needed to ensure the success of the plan, the existing resources will be reallocated, if possible. However, all improvements must be properly planned and scheduled. The "quick fix" of throwing unlimited resources to develop "grand" but ineffective programs will not be used.

3. ACTION PLAN

Action Plan Outline

- I. Communications/Teamwork
 - A. Communications
 - B. Teamwork
- II. Leadership/Management
 - A. Plant Leadership Team
 - B. Safety/Regulatory
 - C. Personnel Issues
 - D. Skills Development
 - E. Involvement with Employees
- III. Accountability
 - A. Standards
 - B. Oversight
- IV. Performance Constraints
 - A. Surveillance Testing
 - B. Corrective Action/Work Control
 - C. Plant Modification
 - D. Outage Management
 - E. Material Condition
 - F. Engineering Support
- V. Resources
 - A. Resource Management
 - B. Prioritization
 - C. Long-Term Planning

I. Communications/Teamwork

PURPOSE: To institutionalize mechanisms that require management-staff communication and cooperation among departments.

CAUSE STATEMENT: Management has been ineffective in fostering an atmosphere that promotes communications and teamwork within the staff. Cross-functional relationships between departments have not been effectively developed.

Action Plan:

A. Communications

1. Meetings

Conduct periodic all-employee meetings including contract and temporary employees to discuss current IP3 status, Nuclear Generation issues, and financial issues facing the Authority. Establish for all departments regularly scheduled departmental meetings to discuss work related issues, provide positive feedback, and promote constructive interfacing among all staff levels including contract and temporary employees (due 2/28/93).

2. Plant Status

Display daily plant status at strategic locations. Consider a large monitor or an easy to read board at the main entrance that is updated each morning showing the plant status, top five operational issues, and major jobs being performed (due 6/30/93).

3. Employee Feedback

Establish an employee feedback program with forms and drop-off. Ensure that feedback is promptly answered (due 1/31/93).

4. Management/Employee Communications

Establish a policy and a management culture requiring routine visits to offices and work spaces by senior and middle management to provide an opportunity for informal discussions and dialogue with employees (due 2/28/93).

A. Communications (cont)

5. Open-Door Policy

Establish a station standard that requires all managers to set aside a specific time to provide individual employees an opportunity to discuss concerns and issues in private with their department manager, or as needed, with the general managers or the Resident Manager (due 2/28/93).

6. WPO/IP3 Meetings

Assess the effectiveness of communications with and support from the corporate office. Review the routinely scheduled meetings between WPO and IP3, such as the project staff meeting (due 4/30/93).

7. Weekly Newsletter

Publish weekly newsletter to provide a vehicle for two-way communication on views, plant news, events and employee information (complete).

8. Employee Plant Tours

Make available periodic plant tours for interested employees (due 1/31/93).

9. Quarterly Topical Listing

Publish in Inside IP3 a quarterly plant topical listing (agenda) which is proactive, is based on the Business Plan, and provides guidance to managers on priorities for assigning tasks. Include sections on performance goals, major evolutions, regulatory interface, and personnel issues (due 3/31/93).

10. WPO/IP3 Facilities

Develop a common E-Mail system and publicize the teleconference capabilities between JAF, IP3 and WPO Nuclear Generation to improve communications (due 4/30/93).

11. IP3 Meetings

Assess the effectiveness of IP3's routinely scheduled meetings (due 3/31/93).

A. Communications (cont)

12. Speakerphone Capabilities

Assess speakerphone capability, locations and quality to improve existing units (due 4/30/93).

13. Info Line

Establish a plant status info line using an answering machine that is updated daily (due 6/30/93).

14. Page/Party System

Completely refurbish the plant page/party system (due 12/31/93).

B. Teamwork

1. Interdepartmental Cooperation

Improve organizational cooperation, and the sharing of lessons learned and good practices. Develop a teamwork model using interdepartmental task forces established to improve surveillance testing and work control (see items IV. A. 1. Surveillance Testing Reorganization and Improvement Plan [STRIP] and IV. B. 1. ROME Users Group [RUG], respectively) for lessons learned (due 6/30/93).

2. Department Manager Teambuilding

Conduct teambuilding meetings involving all department managers with the purpose of performing group problem solving and conflict resolution. Attendees should receive conflict resolution training (see item II. D. 1.) (due 8/30/93).

3. Support Teams

Expand the use of temporarily assigned non-line department personnel, such as Training personnel, to support and assist other departments, such as Operations, during outages (due 3/31/93).

B. Teamwork (cont)

4. Line Department Involvement in Training

Establish Training Program Review Committee to replace the existing curriculum committees. Rewrite committee charter. Establish a schedule for meetings and rigorously enforce attendance (due 2/28/93).

5. Training Program Input

Publicize the means by which all employees can provide input into the training program (due 4/1/93).

6. Nuclear Generation Support Services Committee

Promote teamwork within Nuclear Generation by establishing a Support Services Committee, using the Maintenance and Operations Committees as models, involving WPO and both sites (due 4/30/93).

II. Leadership/Management

PURPOSE: To compel plant management to be more appropriately involved in their leadership role and to improve skills of managers and supervisors.

CAUSE STATEMENT: Management has been ineffective in providing leadership that involves management in the real problems and issues in the field. Management has not effectively managed the many changes occurring. Leaders have not been appropriately involved in employees' performance.

Action Plan:

A. Plant Leadership Team

1. Role Definition

Define the role of the Plant Leadership Team (PLT) (comprised of the three general managers and the Resident Manager) to enable these managers to focus on broad, strategic issues. Clearly define the roles (by charter) that the Team must play in 1) creating and implementing plant strategy, 2) promoting a vision of a positive future, 3) facilitating the creation of policy implemented through department managers, 4) providing role models, and 5) encouraging openness, empowerment, and teamwork. Establish accountability for each PLT member through the performance planning and review process (due 3/31/93).

2. Skills Development

Provide training to each Plant Leadership Team member that emphasizes skill development in strategy, vision, empowerment, and teamwork with a feedback mechanism on the effectiveness of this training for staff and departments (due 6/30/93).

3. Communicate Plant Leadership Team Roles

Clearly communicate what the Plant Leadership Team is and its role in directing operations of the plant to all employees (due 04/30/93).

A. Plant Leadership Team (cont)

4. Policies

Complete the program establishing the hierarchy of policies/directives/procedures that derive from the Nuclear Administrative Policies (NuAPs). Complete the effort to revise the NuAPs (due 12/31/93).

B. Safety/Regulatory

1. Regulatory Policy

Evaluate the methods used by plant management to address programmatic issues. Define management expectations and standards for working with regulator/agencies and the public including NRC, INPO, NYS/Counties, DEC, USCG, ANI, FEMA, DOSH, and NUMARC. Recommend improvements in setting the plant agenda to be less reactive and more proactive. Recommendations should also be made to increase employee awareness of nuclear safety regulations and commitments and the impact of missed commitments (due 6/30/93).

2. Regulatory Commitments

Strengthen the controls to achieve timely compliance with commitments, resolve engineering issues, and meet regulatory requirements. The controls should: 1) define and establish a method for making "commitments"; 2) define roles and responsibilities, and establish accountability for missed commitments; 3) assure that affected individuals agree with their involvement in meeting commitments; 4) develop commitment action plans; and 5) establish an effective review process for all submittals prepared by plant and corporate personnel (due 9/30/93).

3. Nuclear Generation Action Tracking

Develop a computerized, Nuclear Generation-wide tracking system with access for all supervisory, management and engineering positions. Consider using ROME and NIMITZ data base capabilities (due 06/30/93).

B. Safety/Regulatory (cont)

4. Licensing Configuration

Establish controls that identify and maintain the IP3 facility design and licensing configuration (due 6/30/93).

5. Commitment Identification

Incorporate a process to identify commitments in plant procedures and establish a method to provide traceability to the commitment within the document (NRC, EPA, DEC, Etc.) (due 12/31/95).

6. FSAR Upgrade

Determine if the FSAR should be upgraded to Reg. Guide 1.70 format and content and define the level of detail that should be contained in the FSAR (due 9/30/93).

7. Technical Specifications Improvement

Evaluate and determine the desirability of implementing a Tech Spec improvement program (due 7/30/93).

8. Operability Issues

Review current methods and recommend improvements to promptly resolving operability issues (due 6/30/93).

9. Design Basis Documents

Develop Design Basis Documents (DBDs) (due 12/31/95).

10. Safety Reviews

Evaluate and recommend improvements in procedures for performing 10CFR50.59 safety reviews including: 1) initial screening, 2) documentation, and 3) reporting to the NRC (due 12/31/93).

11. Documentation Standard

Establish a standard for the documentation required to demonstrate compliance with regulatory requirements (due 12/31/93).

B. Safety/Regulatory (cont)

12. Compliance Verification

Evaluate and recommend improvements in the process for verifying regulatory compliance (due 12/31/93).

13. System Descriptions

Update all the IP3 System Descriptions (due 12/31/95).

14. Principle NRC Interface

Designate a person at the plant (with staff if necessary) to act as the principle interface with the NRC Resident Inspector and to assure that all NRC questions and concerns are promptly and properly addressed (due 1/31/93).

15. Interface Meetings

Conduct monthly meetings between the PLT and the Resident Inspector (due 1/31/93).

16. NRC Project Manager Meeting

Schedule a periodic meeting that should be attended by the NRC/Plant interface person, the Director, Nuclear Licensing, the Resident Inspector and the NRR Project Manager to review open items, address issues and discuss NYPA submittals and NRC reviews in progress (due 3/31/93).

17. Meeting Protocols

Establish protocols covering the preparations for, and conduct of, meetings held with the NRC. The protocols should address review of issues, critiques of positions and presentations, the name and numbers of attendees, the review of meeting "handouts", and scheduling (to allow preparation time). Implement a public speaking training course for those individuals who may be presenters at SALP or enforcement conferences (due 6/30/93).

B. Safety/Regulatory (cont)

18. SALP Board Information

Establish a formal policy to communicate to the SALP board members on a semi-annual basis the status of regulatory issues for Indian Point and the progress being made in the Plant Improvement Program (due 6/30/93).

19. Submittal Preparation

Evaluate the process used to prepare submittals including LERs. Make recommendations to ensure accuracy and timeliness in the areas of investigation, drafting, review, and approval (due 6/30/93).

C. Personnel Issues

1. Physical Work Environment

Establish an on going process that involves employees in setting standards and making improvements in the utilization of offices and work spaces. This effort should promote professionalism, build pride, and enhance a sense of ownership in the plant (due 6/30/93).

2. Hiring Practices

Reassess the current personnel selection policies and procedures to ensure that they are fair, equitable, and enhance the credibility of the hiring and promotion process (due 6/30/93).

3. On-the-Spot Appreciation

Evaluate instant "On-The-Spot" appreciation programs, such as the Iowa Electric "Atta-Buck" used at the Duane Arnold Plant, that will recognize employees for outstanding performance (due 4/30/93).

C. Personnel Issues (cont)

4. Employee Recognition Programs

Evaluate the employee recognition and reward program regarding its effectiveness and parity to ensure people receive recognition for work accomplished and the Employee of the Quarter program. Evaluate the employee suggestion program regarding its effectiveness and parity. Evaluate the Perfect Attendance Award Program and make recommendations for its improvement (due 6/30/93).

5. Performance Incentives

Evaluate the incentive program(s) where performance relative to an established goal would lead to an award for plant employees. Incentive should be to increase performance while always using the best and safest work practices (due 12/31/93).

6. Work Schedules

Evaluate changing station working hours and progressive scheduling to enhance consistency, develop teamwork, and improve morale (due 6/30/93).

D. Skills Development

1. Manager Development

Complete the program that enhances management skills of supervisors and managers (starting from the top down) through accelerated IP3 enrollment in the NYPA Middle Manager Training program. Enroll plant managers and supervisors in courses for problem-solving, decision-making, conflict resolution and time management (due 3/31/94).

2. Advancement Development

Evaluate the possibility of establishing an advancement development process that satisfies the needs of the plant. Develop an advancement planning program that addresses all management positions. Identify job requirements for key positions to subordinate staff. (due 9/30/93).

3. Change Management

Institutionalize a model for managing change. Develop a program and train managers, starting with the Plant Leadership Team, on how to systematically manage changes in programs, policies, and organizations. After completion of training sessions, hold a PLT/department manager conference to develop an IP3 change-management model, implemented by procedure, and used for large and selected small-scale changes (due 12/31/93).

4. NLT Leadership Training

Conduct periodic leadership training for the Nuclear Leadership Team (due 2/28/93).

E. Involvement with Employees

1. Manager/Employee Involvement

Develop a policy for the involvement of direct reports in 1) direction setting, 2) soliciting input on decision making from all parts of the organization, 3) delegating decisions to the appropriate level, 4) providing the authority to implement the decision, 5) and formalizing feedback from direct reports. A Plant Standard may be used as a vehicle (see III. A. 1.). Plant staff should have input into the policy development. Once developed, provide the "involvement policy" is to be communicated down through the management ranks to the plant staff (due 3/31/93).

2. Decision Making

Identify (this should be performed by the Plant Leadership Team) where inappropriate decision making is occurring and hold managers accountable (via PPR) per the established policy (due 6/30/93).

III. Accountability

PURPOSE: To provide clear expectations that can be enforced.

CAUSE STATEMENT: Management has been ineffective in establishing, communicating, and enforcing standards to promote accountability.

Action Plan:

A. Standards

1. Standards Development

Develop standards of performance that will allow plant policies to be uniformly implemented. Those standards should include: management and supervision, employee practices, job performance, administration, and work practices. Collect existing standards as they currently exist in memo, notice, standing order, or policy statement form. Reformat, restate (where necessary), and develop new standards where needed (due 6/30/93).

2. Admin Control of Standards

Develop a procedure that provides admin controls for plant standards (due 4/30/93).

3. Communicate Standards

Communicate standards to the staff and continuously monitor and enforce the standards. Provide guidelines for managers in preparing PPRs in order to emphasize accountability for performing tasks in accordance with established standards (due 7/31/93).

B. Oversight

1. Manager Observer Program

Establish an interdepartmental Manager Observer Program to include all aspects of plant operation and a schedule that specifies the frequency of observations. It should ensure that members of the plant management staff are scheduled to make formal documented observations of training-in-progress and work-in-progress. FitzPatrick AP-03.07 may be considered as a model (due 3/31/93).

2. Business Plan-Oversight Program

Develop the capability to prepare reports that monitor and track progress for meeting Business Plan goals. Consider standardization with INPO and NRC data for reports (due 7/31/93).

3. Department Self-assessment

Review the intradepartmental self-assessment programs and recommend changes to enhance departments' capabilities to assess their operations. Evaluate establishment of an intradepartmental Worker/Management interface program in each department modeled after the RES Department "Technician/Management Interface Program." Specifically a member of management parallels worker during watch functions once per month to provide oversight and observe work in progress (due 4/30/93).

4. Corporate Assessment

Develop a Nuclear Generation assessment program. Research and evaluate existing NYPA assessment and performance monitoring capabilities. Prepare charter and make budget estimates for Self-Assessment Program. Generate position description. Interview and execute manning decisions for Self-Assessment Program (due 6/30/93).

5. Assessment Information

Research and evaluate industry assessment practices, CP&L, VEPCo (Surry, North Anna), PECO, Con Ed, Ill Power (due 3/31/93).

B. Oversight (cont)

6. Self-Assessment Training

Train assessment personnel in the contents of the Assessment Program (due 9/30/93).

7. Department Involvement in QA Audits

Evaluate a policy that allows QA to draw upon expertise from IP3 operating departments and the Safety Review Committee (it must take into consideration conflict-of-interest) to provide experts to more effectively perform audits and surveillances (due 3/31/93).

8. Integrated Program for Self-assessment (IPSA)

Develop a procedure to implement the IPSA ("Windows Program"). Procedure should include provisions to perform quarterly review by the PLT and NLT (due 6/30/93).

9. Department Performance Reports

Formalize the monthly department performance reports transmitted to the Resident Manager through the general managers (due 3/31/93).

IV. Performance Constraints

PURPOSE:

To require improved management of programs to increase productivity of workers while ensuring compliance with requirements.

CAUSE STATEMENT:

Programs such as surveillance testing, corrective action/work control, engineering, material procurement, and outage control are, in some cases, poorly implemented; lead to performance constraints; and contribute to widespread loss of individual accountability.

Action Plan:

A. Surveillance Testing

1. Task Force Recommendations

Incorporate appropriate recommendations of the Surveillance Testing Reorganization and Improvement Plan (STRIP) to improve the testing program in the PIP (due 1/31/93).

B. Corrective Action/Work Control

1. Work Process Assessment

Investigate and recommend improvements in the work control process using a task force approach through the ROME User Group (RUG). Perform a flow analysis of the work control system that categorizes the various types of work requests. The aim should be to create a user-friendly process that does what is intended without increasing conflict and turnaround time (due 3/15/93).

2. Work Control Implementation

Incorporate appropriate work control recommendations of the RUG task force in the PIP (due 1/31/93).

B. Corrective Action/Work Control (cont)

3. Productivity

Conduct a productivity audit of the Maintenance and I & C departments. The purpose of this study is to improve the timeliness of corrective actions and to issue a report to the Resident Manager (due 6/30/93).

4. Operating Experience Review

Review and recommend improvements in the operating experience review (OERG functions) of the corrective action system. Evaluate:

1) identification of issues (both material and programmatic), 2) operability and reportability processes, 3) performance of root cause analysis, 4) assignment of actions, 5) action tracking to close out, and 6) trending, (due 12/31/93).

5. Occurrence Reporting and Screening

Review and recommend improvements in occurrence identification process and ensure reporting (SOR) threshold is properly set. Revise as necessary to more effectively initiate corrective action. Evaluate AP-8 effectiveness and make recommendations to improve the process for screening deficiency and event reports. Consider assigning priorities (consider the JAF method) for performing root cause analysis based on degree of risk of recurrence and uncertainty as to cause (due 06/1/93).

6. Root Cause Analysis

Evaluate root cause analysis program including training, corrective action determination, and assignment of responsibility. Revise as necessary (due 9/30/93).

7. Action Tracking

Review and revise the present corrective action tracking programs (RINDs, PORC follow, CARs, etc.) and merge them into one system. Consider using ROME data base capabilities (due 6/30/93).

B. Corrective Action/Work Control (cont)

8. Information Exchange

Establish a means for sharing information between JAF/WPO/IP3 on root cause and corrective action programs through the operating review groups (OERG and ORG at JAF). Evaluate the use of NPRDS and ensure that proper utilization of the program is obtained (due 12/31/93).

9. HPES

Develop and implement a Human Performance Enhancement System (HPES) program (SOER 92-01) at IP3 to identify and resolve procedural, supervisory, and training issues (due 4/30/93).

10. Engineering Support

Conduct an assessment of the effectiveness of engineering and technical support functions used to support maintenance, operations and radiological safety. Make recommendations to strengthen engineering support (due 6/30/93).

11. Work Scheduling Process

Evaluate locating department schedulers in a common area working for one supervisor. Implement Work Process Task Force recommendations regarding scheduling (see item IV. B. 9) (due 12/31/93).

12. Planning and Scheduling Reorganizations

Improve the work control process by establishing a new Planning and Scheduling Department. The department's primary responsibility is to direct and coordinate all outage and non-outage work efforts including long-term planning, day-to-day work coordination, scheduling, risk assessment, tag outs and clearances, and reporting (due 2/28/93).

C. Plant Modification

1. Temporary Modification (Temp Mod) Process

Develop an action plan to revise the Temp Mod process to eliminate most Temp Mods and restrict the use of Temp Mods in the future (due 2/15/93).

2. Minor Modification Process

Simplify the engineering process for minor and/or non-safety related modifications (due 5/31/93).

3. Impact of Untimely Release of Modifications

Develop a mechanism that quantifies and qualifies the impact of untimely projects and provides feedback to the person/group requesting same for approval (due 7/1/93).

4. Modification Control Manual (MCM) Improvement Process

Perform an assessment for the need to develop new MCM procedures and the need to revise existing procedures. Identify recommendations for improvements and establish schedule for procedure changes as necessary (due 12/31/93).

5. Modification Control Manual/Design Control Manual (MCM/DCM)

Revise the MCM and DCM to resolve outstanding issues (WPO) (due 12/31/93).

6. Configuration Management

Develop a Configuration Management Information System Plan with HSI & PEDB data base enhancements (due 12/31/94).

7. Design Basis Document (DBD) Program

Develop DBDs for the Feedwater, Containment Integrity, Seismic Structures, Condensate, and Fire Protection (due 12/31/93).

C. Plant Modification (cont)

8. Engineering Services Backlog

Implement the plan to meet Business Plan goal of reducing outstanding Requests for Engineering Services to 320 by 1996 (due 2/28/93).

9. Engineering Support

Develop procedures for obtaining corporate support so that the plant Tech Services will be less dependant on outside contractors. Delineate clear divisions of responsibility in revised admin procedures (Conduct of Site Engineering and Conduct of Tech Services). Address each departments role and how they will work together (due 6/30/93).

10. Simulator Impact

Improve the evaluation of simulator impact during the modification design phase (due 4/30/93).

D. Outage Management

1. Outage Planning

Develop a planning process that incorporates pre-outage milestone schedules so that departments can track progress. Develop and implement a more effective outage planning process for all outages that considers a progressive escalation process for failure to meet pre-outage and outage milestones and performance indicators (due 9/30/93).

2. Start-up Scheduling

Perform a time validation study to provide an accurate account of resources required to startup after outages. Ensure operational actions required to be performed are scheduled into the outage. By providing time for these required actions, the quality and productivity of work will be improved (due 9/30/93).

D. Outage Management (cont)

3. Outage Schedules

Conduct interviews with appropriate managers and general supervisors to obtain input on their needs so that outage schedules can be made more understandable (due 3/31/93).

4. Outage Improvements

Review critiques of the JAF and IP3 outages and make five recommendations for improved outage performance (due 3/31/93).

5. Outage Scope Control

Re-evaluate and revise the administrative procedure that establishes firm control on the scope of outages and provides mechanisms for that control (due 6/30/93).

6. Outage Planning Group

Evaluate the concept of centralized planning. Consider establishing a dedicated group within the Planning and Scheduling Department (due 12/31/93).

E. Material Condition

1. Backlog Reduction

Through the Backlog Reduction Program Steering Committee, review and make recommendations to reduce the existing material deficiency lists. Use open PID count, work request count, and dollars spent as indicators to reach < 800 items per the Business Plan (due 12/31/93).

E. Material Condition (cont)

2. Model System

Select a plant system and assign a team of workers to identify improvements necessary to establish the system as a Plant Model System (due 12/31/93).

3. Model Area

Select a plant area and assign a team of workers to identify improvements necessary to establish the area as a Plant Model Area - should be done in conjunction with "Plant Model System" (due 12/31/93).

4. Appearance/Preservation

Develop a preservation plan to restore plant's appearance and housekeeping. Develop a coating repair and preventive maintenance program (due 9/30/93).

5. Leak Reduction Plan

Develop an oil/air/water/steam leak reduction plan that develops a schedule for reducing leaks and develops a strategy for dealing with any leaks that occur in the future (due 9/30/93).

6. Equipment Upgrade/Plant Aging

Develop a long-term program for equipment upgrade, replacement of plant components and evaluation of plant aging (due 12/31/94).

F. Engineering Support

- 1. Investigate and recommend improvements in engineering support to solve long-term issues at IP3. Focus on modifications, engineering evaluations/calculations, configuration management, outside vendor's work and interface with NED, and procedure improvement and reduction (due 6/30/93).**

2. Employee Involvement Program

The recommendations of the NED Employee Involvement Program should be reviewed as part of making overall improvements in the engineering support of the plant (due 6/30/93).

F. Engineering Support (cont)

3. System Engineer Hiring

Complete the hiring of staff for the System Engineer group (due 3/31/93).

4. System Engineer Program

Complete implementation of the System Engineer Program including training of personnel, certification, and procedures (due 6/30/94).

V. Resources

PURPOSE:

To require improved selection, planning, and scheduling processes; and accountability so that resources are better managed and utilized.

CAUSE STATEMENT:

Management of processes for resource utilization, including prioritizing and long term planning, has been ineffective.

Action Plan:

A. Resource Management

1. Work Force/Manpower Study

Perform a work force/manpower study to assess the needs of the plant and determine if resources are properly placed among the departments to meet those needs (due 9/31/93).

2. Financial Training

Provide training for IP3 employees covering purchasing, accounting, and budgeting so that employees will better understand the workings of NYPA system (due 12/31/93).

3. Material Management Backlog Reduction

Reduce the amount of Material Requisitions waiting review and approval by implementing the "Material Management Reduction Action Plan" (due 12/31/93).

4. Warehouse Improvements

Complete work on and open new warehouses. Initiate general housekeeping action plan for all warehouses to improve warehouse environment and working conditions (due 6/30/94).

5. Shelf Life PM Program

Improve inventory shelf life program by evaluating use of computerized control, incorporating EPRI guidelines, rewrite all PMS, and initiate PM program. Improve the use of the "stock book" by updating if necessary (due 6/30/93).

A. Resource Management (cont)

6. Long-Term Plan

Develop long-term (five year) plan to improve material availability and warehouse inventory control to ensure ready and accurate supply of spares and improve service and assistance for the plant staff for spare part access. Consider using ROME data base capabilities (due 6/30/93).

7. Central Calibration Equipment Control

Evaluate the use of a central facility and organization for the control of all calibrated instruments and equipment (due 9/30/93).

8. Material Ownership

Evaluate a program (similar to JAF) that ensures ownership is assigned to all material brought into the plant (due 6/30/93).

9. Surplus Material

Establish a program to eliminate all surplus material from the warehouses to save on space and handling (due 6/30/93).

10. ROME Manhour Tracking

Evaluate utilizing ROME for manhour tracking and the use the info to schedule work and assign personnel (due 12/31/93).

B. Prioritization

1. Modification Prioritization

Evaluate the modification prioritization process to ensure that once a mod is designed, it will be installed. Goal should be to work only on mods that will be installed, and not to design mods that waste resources and may have completed engineering packages, but are never installed. Communicate the priority system that is developed to all employees (due 4/30/93).

2. O&M Cost/Benefit

Assess the utilization of the capital project cost/benefit prioritization methodology in the O&M budgeting process (due 12/31/93).

C. Long-Term Planning

1. Five-Year Work Plan

Develop and implement an integrated five-year work plan, including regulatory commitments, capital modifications, O&M modifications and major maintenance activities. Identify and incorporate human and financial resource allocations that are necessary (due 9/1/93).

2. Five-Year Budget Forecast

Develop a five-year budget forecast which utilizes the information contained in the integrated five-year work plan (due 12/31/93).

4. DRAFT STATION DIRECTIVE

ADM-SD-05, CONTROL OF PERFORMANCE IMPROVEMENT PROGRAM

INFORMATION ONLY



Control Copy #: _____

INDIAN POINT THREE STATION DIRECTIVES

ADM-SD-05

REVISION 0

CONTROL OF PERFORMANCE IMPROVEMENT PLAN

APPROVAL _____ DATE ____ / ____ / ____
Resident Manager, Indian Point Three

REVISION HISTORY

Rev	Reason for Issue	Approvals
0	New Issue	Preparer <u>J. Macchiarulo</u> Reviewer _____ Dept. Head <u>B. Ray</u> Release Date _____
		Preparer _____ Reviewer _____ Dept. Head _____ Release Date _____
		Preparer _____ Reviewer _____ Dept. Head _____ Release Date _____
		Preparer _____ Reviewer _____ Dept. Head _____ Release Date _____
		Preparer _____ Reviewer _____ Dept. Head _____ Release Date _____

CONTROL OF PERFORMANCE IMPROVEMENT PLAN

ADM-SD-05
Revision 0

1 PURPOSE

The purpose of this administrative procedure is to control the Performance Improvement (PI) Plan. It provides instructions for initiating, assigning and revising action items, for assessing program effectiveness and for determining progress of problem resolution.

2 APPLICABILITY

This procedure applies to the Performance Improvement Plan.

3 REFERENCES

3.1 Performance Improvement Plan - Submitted to the NRC, January 14, 1993.

4 DEFINITIONS

4.1 Management and Organization Issue

A condition which affects more than one department or organization and is considered to be an area where performance improvements are considered necessary.

4.2 Business Plan

The long range Nuclear Generation plan consisting of goals, objectives, strategies, and actions which provides consistent and comprehensive management direction to the Authority's nuclear facilities in accordance with NuAP 1.4.

4.3 Departmental Improvement Plan

Those plans developed in response to Resident Manager memo IP-ADM-92-203.

5 **RESPONSIBILITIES****5.1** **Resident Manager**

The Resident Manager has the overall responsibility for the effective development, implementation and performance monitoring of the plan. The Resident Manager shall approve action items before inclusion in the PI Plan and may assign responsibility for action items to members of other Authority organizations with concurrence from the Executive Vice President (EVP).

5.2 **General Managers**

The General Managers are responsible for assigning appropriate action items and assign completion dates to their respective department managers.

5.3 **Department Managers**

The Department Managers are responsible for delegating action items to responsible parties within their department.

5.4 **Responsible Party**

The responsible party is the action item assignee listed in the PI plan data base and is the person actively involved in implementing the required action.

5.5 **Plant Leadership Team**

The Plant Leadership Team (PLT), which consists of the Resident Manager and the General Managers, are responsible for oversight of the PI Plan and shall review action items to ensure completeness before close out.

5.6 **Performance Improvement Coordinator**

The Resident Manager will appoint a Performance Improvement Coordinator who shall be responsible for the administration of the PI Plan. The PI Coordinator shall provide periodic status reports to the Plant Leadership Team (see 6.7 Status Reports).

5.7 Nuclear Leadership Team

The Nuclear Leadership Team (NLT), which consists of the Executive Vice President, the Vice Presidents and the Resident Managers, are responsible for performing periodic effectiveness assessments of the PI Plan.

5.8 Performance Improvement (PI) Committee

A group of personnel, appointed by the Resident Manager, comprised of members of various station departments and augmented by corporate staff members, who facilitate the PI plan by defining its mission and managing its implementation.

6 PROCEDURE

6.1 Sources of Action Items

There are a variety of sources which are used as a basis for input of action items into the PI Plan. These include department improvement plans; employee feedback and suggestions, the PI committee, evaluations by outside agencies, management observations, performance indicators, audits, surveillances and appraisals by the Quality Assurance Department, and self assessments.

6.2 Initiation of Action Items

As new issues are identified by way of the above sources, action items to correct the condition may be initiated. The initiator shall complete a PI Plan Action Item Initiation form (see Attachment 1) and submit the proposed action item to the Resident Manager for approval. The Resident Manager will review the proposed item and determine if it is appropriate for inclusion in the PI Plan or whether it should be included in another corrective action system. (The Resident Manager may utilize the PI Committee for assistance in evaluating action items.) The Resident Manager will then communicate with the initiator and make a final decision.

6.3 Assignment of Action Items

The Resident Manager shall assign action items to the appropriate General Manager/Department Manager. The General Manager/Department Manager shall review the item, consult with the Resident Manager as to the implementation schedule based on available resources and priorities, and assign the item to the appropriate responsible party for implementation. The General Manager shall consult with the department manager as to the schedule.

Once the action item is assigned and a completion date is established, the appropriate information regarding the item (action statement, date, and responsible party) shall be forwarded to the PI Coordinator for incorporation into the PI Plan tracking system. When changes in the responsible party are made, the department manager shall notify the PI Coordinator as well as the new (and old) responsible party.

6.4 Completion Date Revision

Should it become necessary to revise a completion date, the responsible party should seek relief as soon as it is known that the date cannot be met. The department manager shall concur (or deny the request) and appeal to the General Manager for approval to have the date revised. The General Manager should consult with the Resident Manager on major schedule changes. Approved action item completion date revisions will be rescheduled through the PI Plan Coordinator. The Resident Manager shall periodically review rescheduled items with the General Managers in an effort to keep the schedule changes to a minimum.

6.5 Program Changes

Significant changes to the Performance Improvement Plan will require concurrence of the Plant Leadership Team and the Executive Vice President - Nuclear Generation.

6.6 Action Item Close Out

Upon completion of an action item, the responsible party shall complete a PI Plan Action Item Close-out form (See Attachment 2) and forward it through his/her department manager to the appropriate General Manager. The completed form containing information detailing the completion of the required action, shall be certified complete by the department manager, and presented by the General Manager to the PLT for approval.

Those items which are determined by consensus of the PLT to be complete, shall be approved as complete by the Resident Manager. Final close out shall be made by the PI Coordinator by showing "completed" in the action tracking system.

6.7 Status Reports

6.7.1 Quarterly Reports

A quarterly report showing the status of PI Plan action items shall be prepared by the PI Coordinator and forwarded by the Resident Manager to the Executive Vice President.

6.7.2 Monthly Reports

A monthly report showing the status of PI Plan action items shall be prepared by the PI Coordinator and forwarded to the Resident Manager with copies to the General Managers and Department Heads.

6.8 Assessment of Effectiveness

Semi-annual assessments shall be performed to ensure PI Plan effectiveness and to ensure communication and cooperation exist. These assessments shall be the responsibility of the Nuclear Leadership Team (NLT). A senior level manager shall be assigned responsibility for execution of the assessments.

Each department manager shall perform self-assessments to determine the status of existing improvement activities and to identify additional improvements and enhancements.

Employee feedback provides another means of measuring the effectiveness of the PI Plan and is also an indicator of the effectiveness of communications between staff and management. All employees shall be informed that their views as to the effectiveness of the Performance Improvement Plan are important to management and are necessary to stimulate the desired continuous improvement process.

6.9 Submittal to the NRC

The Initial Performance Improvement Plan documentation including action items and schedule will be presented to the NRC and docketed. There is no intention to submit subsequent revisions of the PI Plan but they will be available for inspection and review by the NRC at the site.

6.10 Accountability

The Department Manager and the General Manager shall be held accountable for the successful and timely completion of all action items assigned to the department's personnel. Actions item, once assigned via the chain of command, become part of the individual's performance evaluation assuring accountability.

6.11 Resources

Many of the resources needed to ensure the success of the plan are already available through the existing budget process. These resources, in some cases, need to be re-directed and properly managed. Other resources have been identified and are part of longer range projects.

7 ATTACHMENTS

7.1 Attachment 1 - Plan Action Item Initiation

7.2 Attachment 2 - Plan Action Item Close-Out

PI PLAN ACTION ITEM INITIATION

Issue Description:

(i.e., problem which action item is designed to remedy)

Proposed Action Item Description:

Initiator (person submitting this proposal): _____

Approval by Resident Manager:

_____ **for inclusion in PI Plan**

_____ **for inclusion in** _____
(tracking system)

Comments: _____

Proposed Completion Date: _____

Proposed Responsible Party: _____

Action Item No. _____ **(assigned by the PI Coordinator)**

PI PLAN ACTION ITEM CLOSE-OUT

Action Item No. _____ **Scheduled Due Date** _____

Responsible Party: _____ **Action Completed Date** _____

Description of completed Action: _____ **ACTS Number** _____

References:

(documentation verifying the completeness of required action)

Certified Complete: _____ **Department Manager**

Date Closed by PLT _____

Approval by Resident Manager:

_____ **for close out in PI Plan**

Comments: _____