

PRIDE Performance Recovery Plan

Vision

A strong nuclear safety culture is a key ingredient of any high performing nuclear organization. The PRIDE initiative is our platform for improving plant and organizational performance in order to recover our regulatory standing and achieve top industry performance. I need the support of every employee to embrace this plan and work with me to achieve the following vision:

“We will achieve and sustain Excellence in Nuclear Safety through engagement of our people, trust in each other and our processes, and ownership of our plant”.

Mark Schimmel – Site Vice President

Objectives

The primary objectives of the PRIDE Performance Recovery Plan are to achieve the following:

1. Successful completion of the 95001 NRC Regulatory Inspections in the 2nd and 4th quarter of 2009, and the 2nd quarter of 2010.

Measures

- Findings closed out as scheduled
- Achieve Column 1 for Unit 1 by 1st Quarter 2010
- Achieve Column 1 for Unit 2 by 3rd Quarter 2010

2. Corrective Action Process Improvements completed

Measures

- RCE/ACE Quality Grading Improves
- #of Repeat Issues drops by 50%
- A/B CAP Action Backlog is reduced by 25%
- Age of A/B action is reduced by 25%
- NOS rates CAP as meeting expectations
- No NRC Substantive Crosscutting Issues in CAP
- Additional Measures as described on GAP closure Plans

3. Human Performance Improvements completed

Measures

- # of Significant Events drops by 50%
- # of Site Clock Resets drops by 25%
- NRC Findings due to HU issues drops by 50%
- # of NOS Findings related to HU drops by 50%

- No NRC Substantive Crosscutting Issues in HU
 - Additional Measures as described on GAP closure Plans
- 4. The focus on becoming a process based organization through the Work Management Improvement (WMI) initiative remains on track**
 - 5. Issues Associated with Recovery Plan related RCEs are Closed Out**

Measures

- RCE Effective Reviews rated as Effective

- 6. All NRC Substantive Crosscutting Issues are Closed Out**

- SCC Issues closed in end of 2009 NRC assessment letter

Background

In 2008, Prairie Island received 2 greater than Green NRC Findings/Violations. These were related to the failure of the 11 TD AFW Pump following a Unit 1 reactor trip on July 31, 2008 resulting in a WHITE finding, and a radioactive material shipment which exceeded DOT package surface radiation level limits on October 31, 2008 resulting in a preliminary YELLOW finding.

The first finding placed Prairie Island Unit 1 in NRC Reactor Oversight Process (ROP) Column 2, also known as the “Regulatory Response Column”. The second finding, resulted in both units being placed in ROP Column 2. As a direct result of being placed in column 2 of the ROP, the NRC will schedule additional special inspections to ensure that actions have been, or are being taken to correct the conditions that led to the greater than green violations. Additionally, there may be additional NRC inspections scheduled to ensure that the extent of condition and extent of the causes leading to the violations are also being adequately addressed to prevent similar issues from reoccurring.

An additional preliminary White finding during the 3rd quarter of 2009 was received, which was related to a HELB interaction with the Component Cooling system and affects Unit 2. This would keep Unit 2 in Column 2 until the completion of the Root Cause Evaluation and an NRC 95001 inspection, expected in the 2nd quarter of 2010.

Root Cause Evaluations were completed for each of these regulatory issues. Additionally, a Common Cause Evaluation was completed on these and other important Causal Evaluations and some of the assessments conducted in 2008 including 1) Independent Human Performance Assessment, 2) Management Safety Review Committee (MSRC) comments, 3) INPO Mid-Cycle Self Assessment, 4) NOS 3rd Quarter Report, 5) 2006-2008 A/B CAP Trend data, and 6) USA Safety Culture Self Assessment. Some key findings from the Root Causes and the Common Cause Evaluation are described below:

- 1. Radiation Protection and Chemistry procedures do not describe the methods required to successfully evaluate, package, and ship materials and the significance the site has assigned the Radioactive Material Shipping Program (RMSP) do not align with the potential adverse consequences.**
- 2. There are inadequate configuration controls for components that have the potential to adversely impact the design function of safety related Structures, Systems and Components (SSCs) and evaluation of past recurring issues involving components that affect the function of safety related systems have not implemented corrective actions of sufficient scope to remedy problems in other safety related systems.**
- 3. Human Performance has not been a high priority with station management. Managers and Supervisors rationalize and tolerate poor HU behavior. Plant personnel have a tolerance for risk, rationalize it away, or don't consider it.**
- 4. Station workers, supervisors and managers lack a clear picture of Excellence in Human Performance resulting in poor application of human performance fundamentals.**
- 5. In some cases, causal factors stop at the symptom and inadequate use of the WHY staircase has led to missed learning opportunities and development of corrective actions that may not solve the problem.**
- 6. Ineffective or noncompliant use of processes has contributed to insufficient resolution of equipment problems and to delays in addressing emergent issues.**
- 7. Workers demonstrate low levels of discipline and accountability to follow station procedures and fail to seek clarification when procedural controls are deficient.**
- 8. Station procedures and work instructions do not cover pertinent situations and contain all relevant information.**

The PRIDE Performance Recovery Plan will be the controlling document to track completion of all improvement activities essential to achieving excellent organizational performance. The PRIDE Recovery Team, working with Prairie Island Plant Staff in an integrated and coordinated manner, will ensure that all actions are completed per the schedule and are measured for effectiveness following completion. Key contributors to the success of the plan include:

- The full commitment and cooperation of Prairie Island and fleet personnel.
- Clearly defined roles and responsibilities for PRIDE Improvement Teams
- Decision-making is timely, clear to all, and communicated to Prairie Island and fleet personnel
- Schedules for completing recovery plan actions are developed and communicated to Prairie Island and fleet personnel

- A significant shift in safety culture, evidenced by behavioral changes among employees driving improved performance at Prairie Island
- Emergent issues that are potential barriers to success are promptly identified, prioritized and resolved.

Scope of Plan

The scope of work addressed by the PRIDE Performance Recovery Plan is outlined in the following nine (9) performance improvement areas:

- Radioactive Material Packaging and Shipping Program Improvements
- Component Labeling Improvements
- Conservative Decision-making Issue Resolution
- Thorough Evaluation of Problems Resolution
- Corrective Action Implementation Issue Resolution
- Procedure Quality Improvements
- Following Procedures (PU&A) Issues Resolution
- Human Performance (HU) Fundamentals Improvement
- Consistent Application of Station Processes and Rigorous Coaching to the Behaviors that Support Process Discipline

Responsibilities

The Recovery Team organization was established to develop and implement a comprehensive recovery plan to return Prairie Island to ROP Column 1 at the earliest opportunity and improve overall station safety culture to industry leading levels. This includes both the Human Performance and Corrective Action Program areas. The Performance Recovery Team Manager is responsible for the execution of the Recovery Plan and is the primary interface with the other PRIDE improvement initiatives and the plant organization. The Recovery Team is specifically responsible for:

- Overseeing the integrated implementation of the PRIDE recovery actions
- Coordinating the interfaces between improvement areas
- Ensuring that crosscutting issues are consistently addressed within each improvement areas
- Assessing completeness and effectiveness of improvement areas
- Assessing readiness for the 95001 inspections
- Implementing the NRC 95001 Inspection Readiness Plan
- Communicating and reporting PI Site Management and staff the schedule and status of implementation

Although the Recovery Team organization is largely responsible for overseeing and coordinating the implementation of the Recovery Plan, the Site Management and plant

staff (line organization) are responsible for implementing the changes in performance and behaviors that are critical to the success of the plan.

PRIDE Performance Recovery Team NRC Inspection Key Actions and Milestones

The Recovery Plan actions and milestones are maintained in Appendix 3. Key project milestone dates are as follows:

4/3/09	Staff Recovery Plan Development Team
4/17/09	Recovery Plan Drafted
4/30/09	Complete Common Cause Evaluation
5/8/09	Train Root Cause Evaluators
6/5/09	Complete Reconstitution of Root Cause/Apparent Cause Evals
6/17/09	Update Recovery Plan based on RCE/ACE Reconstitution
8/26/09	95001 NRC Inspection for AFW Misposition Issue
12/1/09	95001 NRC Inspection for RP Shipping Issue
1/1/2010	Return Unit 1 to ROP Column 1
3/1/2010	95001 NRC Inspection for CC/HELB Issue
10/1/10	Return Unit 2 to ROP Column 1

Planning and Execution

The successful completion of the PRIDE Performance Recovery Plan is critical to the long term success of the Prairie Island organization. Instilling the Principles for a Strong Nuclear Safety Culture into our daily behaviors will ensure that we always treat nuclear technology as special and unique with the highest level of respect.

“Nuclear safety must always be our top priority, and this will be demonstrated through our values and behaviors, and reflected in our actions every day.”

Kevin Ryan – Plant Manager

NRC 95001 Inspection Readiness

The PRIDE Recovery Team is responsible for assessing PI's readiness for the NRC 95001 inspections. Readiness will be *based upon* the following:

- PRIDE Improvement teams are staffed.

- PRIDE Improvement Team deliverables are identified.
- Corrective Actions to address the NRC 95001 related root causes and common cause are identified, prioritized and scheduled.
- Corrective Actions related to management assessments are identified, prioritized and scheduled.
- Ten percent (10%) of the action item closure packages are complete and verified acceptable by the PRIDE Action Item Closure Team.
- Any identified procedures, instructions and *guideline* changes are complete and implemented.
- At least one team of Root Cause Evaluators has been trained to the revised process.
- Remedial actions for rejected closure packages, if any, are scheduled.
- Interim measures for the Common Cause are identified and established.

A PRIDE Recovery Action Item Closure Team has been established to review action items related to the NRC 95001 inspection and ensure that documentation is complete and available in order to expedite NRC review during the inspection. The PRIDE Action Item Closure Team will function as a subcommittee of the PARB. The PRIDE Action Item Closure Team Charter and Action item Closure Process Flow Diagram are in Appendix 1.

Communications

The PRIDE 95001 Communications Plan is attached, and will be kept up to date as we make progress in the improvement initiatives.

Attachments

Figure 1 - Recovery Team Organization Chart
 Figure 2 – Strategic Plan
 Appendix 1 – Closure Team Charter
 Appendix 2 - Recovery Plan Schedule
 Appendix 3 - Actions and Milestones
 Appendix 4 - Recovery Communications Plan
 Appendix 5 - NRC Inspection Plan

Other Attachments

AFW Labeling Improvement Plan
 RP Shipping Improvement Plan
 Site HU Improvement Plan – Target Zero
 Site CAP Improvement Plan
 NRC Inspection Preparation Manual

APPENDIX 1

Performance Recovery Plan Closure Board Charter

PURPOSE

The purpose of this administrative instruction is to direct the process and methodology for implementing the Prairie Island Nuclear Generating Plant Performance Recovery Plan (PRIDE).

1.1 Applicability

This instruction is applicable to the Prairie Island Nuclear Generating Plant Performance Recovery Plan (PRIDE).

2.0 PRIMARY RESPONSIBILITIES

- 2.1 A Closure Board, consisting of independent outside industry experts and corporate executive management, will provide oversight of the implementation and effectiveness of the Performance Recovery Plan (PRIDE).. This board will meet on an as needed basis upon completion of the focus areas (level one) associated actions (attachment 1).
- 2.2 The Nuclear Oversight organization will provide independent review and assess the adequacy and effectiveness of level two actions (attachment 2) completed as part of the Performance Recovery Initiative. This organization will review all completed improvement actions every 8 – 10 weeks initially or when requested by the Recovery Team Manager or Closure Board Chairman.
- 2.3 The Site Vice President provides direction and oversight of the Performance Recovery Plan (PRIDE).
- 2.4 The Recovery Team Manager is responsible for overall direction and management of the Performance Recovery Plan (PRIDE) and provides oversight to the station Recovery Team.

- 2.5 A station Recovery Team has been established to oversee the implementation of the Performance Recovery Plan Initiatives and to assist the line organization in the completion of their assigned tasks as requested. The recovery team owns the plan and is solely authorized to modify the plan elements and structure, including but not limited to oversight, and approval for the action plan goal(s), scope, actions, metrics, implementation timeframes, and completion effectiveness. The organization will also update the Senior Leadership Team on routine assessments of the actual progress and effectiveness of actions within the Performance Recovery Plan (PRIDE).
- 2.6 The responsibilities of the Management Owner are to ensure that the actions are completed and produced the desired results prior to presentation for closure.
- 2.7 The Assigned Individual for each action will be responsible to ensure that the action is completed in accordance with the defined scope and timeframe. Any questions on scope, timeframe, or intent should be referred to the recovery team. Assigned individuals or management owners require the approval of the recovery team to change either scope or due date for assigned actions. The assigned individual will partner with the Management Owner to ensure action effectiveness.

APPENDIX 4

Pride Initiative - Recovery Plan Internal Communications Plan

OBJECTIVE: Communicate the Prairie Island’s Recovery Plan to Prairie Island employees, the Nuclear Department, Xcel Energy employees and our regulators.

- **Educating and aligning management and workforce on 95001 inspection:**
 - What is the NRC Reactor Oversight Process?
 - What is a 95001 inspection?
 - Why is it taking place; how did we get into this situation (root cause, contributing causes)
 - What are the 95001 inspection objectives?
 - What are we doing to fix the situation?
 - What is the role of all employees on site regarding the inspections?
- **Educating and aligning management and workforce on the site’s recovery plan.**
 - Introduce the Recovery Plan team
 - What is the Recovery Plan?
 - What are we doing to recover?
 - What is the role of all employees on site regarding the Recover Plan?

What	Start date	End date	Owner	Who Delivers	Method	Venue	Complete	Frequency
95001/95002 inspection introduction to managers and supervisors	5/1/09	5/15/09	Scott Northard	Communications Department	Presentation	Leadership & Alignment Meeting		Once
Managers hold departmental briefings prior to inspections <ul style="list-style-type: none"> - how to communicate w/ NRC - what to expect - scope of inspection 	6/09	9/09	Communications Department	Department Managers	Face-to-Face	Department All Hands Meetings		Once for each inspection
95001/95002 inspection updates to managers and supervisors	5/1/09	9/09	Scott Northard	Scott Northard	Presentation	Leadership & PI Alignment Meeting		At least once per month
95001/95002 inspection: Series of articles from Scott Northard — March 11: RO Process	03/11/09	9/09	Scott Northard/ Communications Department	Communications Department	Print and Face-to-Face	Team Notes Face-to-Face/D-15 meetings		

What	Start date	End date	Owner	Who Delivers	Method	Venue	Complete	Frequency
<ul style="list-style-type: none"> — Action Matrix — What is a 95001 inspection/objectives — Why is PI in Column 2? — What are we doing? — What is employee's role? — Progress Updates during inspection 								
Publish link to entire 95001/95002 article series document on Pride Initiative Sharepoint webpage	4/09	09/09	Communications Department	Communications Department	Print and Electronic Media	Link on PI Net webpage		Duration of inspection phase
Partnership to Xcellence Information Guide	8/09	8/09	Communications Department	Communications Department	Print Media	Booklet for all site employees		
Create bulletins with 95001/95002 inspection notices	6/09	9/09	Communications Department	Communications Dept creates & publishes at PI	Electronic Media	Visix site monitors		As needed
Recovery Plan organization introduction to managers and supervisors	4/09	4/09	Scott Northard	Scott Northard	Presentation	Leadership & Alignment Meeting at PI		Once
Recovery Plan: Series of articles from Scott Northard <ul style="list-style-type: none"> — Recovery Plan organization — Recovery Plan basics — Role of employees 	4/09	12/31/09	Scott Northard/ Communications Department		Print and Face-to-Face	Team Notes Face-to-Face/D-15 meetings		
Establish weekly Recovery Plan updates including 95001 inspection updates to the workforce—under Scott Northard's name	4/09	12/31/09	Scott Northard/ Communications Department	Comm Dept writes articles/ Supervisors deliver in D-15 meetings	Print and Face-to-Face	Team Notes Face-to-Face/D-15 meetings		Weekly
Create Recovery Plan web page	4/09	4/09	Scott Northard/ Communications	IT (Debbie Eppen)	Electronic Media	Nuclear Dept internet	Completed 4/09	

What	Start date	End date	Owner	Who Delivers	Method	Venue	Complete	Frequency
			Department					
Communicate the existence and location of the Recovery Plan Web page	5/09	5/09	Communications Department	Communications Department	Print Media	Team Notes		Once and include information on the web site in each monthly Team Notes update
Posters	5/09	12/31/09	Communications Department	Communications Department	Print Media	Posters		As needed
Recovery updates to workforce through site-wide all hands meetings	04/30/09	08/09	Scott Northard	Scott Northard	Face-to-Face	All Hands Meeting		Once in April 2009 & August 2009
Include a discussion of recovery plan in the monthly 2Cs meetings	5/09	12/31/09	Scott Northard	Brad Sawatzke	Face-to-Face	2Cs meetings		Monthly
Include a discussion of recovery plan at Leadership Forum	5/09	12/31/09	Scott Northard	Scott Northard	Face-to-Face	Leadership Forum		Monthly
Updates to managers at PERG meetings	5/09	12/31/09	Scott Northard	Scott Northard	Face-to-Face	PERG meetings		Weekly
Update NRC Resident Inspectors	6/09	12/31/09	Scott Northard	Scott Northard & Jon Anderson	Face-to-Face	Face to face meetings		Bi-weekly
Update NRC Branch Chief (Jack Geisner)	6/09	12/31/09	Scott Northard	Scott Northard & Jon Anderson	Telephone conference	Conference calls		Monthly
Update NRC Regional Management (Steve West & Cindy Peterson)	6/09	12/31/09	Scott Northard	Scott Northard & Mike Wadley	Telephone conference	Conference calls		Monthly Updates
Update NRC (Mark Satorious) Drop in visits: -introduce plan	6/09	12/31/09	Scott Northard	Scott Northard, Mike Wadley & Dennis Koehl	Face-to-Face	Drop in visit @ Regional Office		Once 7/09 & 12/09

What	Start date	End date	Owner	Who Delivers	Method	Venue	Complete	Frequency
-update on actions complete & open -effectiveness measures -behaviors that changed								
Updates to community stakeholders – PI Indian Community & local officials	6/09	12/31/09	Scott Northard	Mike Wadley	Face-to-Face & emails	Informal meetings		Quarterly
INPO communications				Brad Swatzke & Kevin Ryan	Face-to-Face	Drop in visits		Quarterly

APPENDIX 5
NRC INSPECTION 95001 INSPECTION READINESS PLAN

PRAIRIE ISLAND INSPECTION OBJECTIVES

The primary *objective* of the NRC 95001 Readiness Plan is to demonstrate the effective implementation of CAP and Human Performance. Specifically, demonstrate that corrective *actions to prevent* recurrence have been identified and are being implemented for conditions that resulted in the FNP degraded cornerstone. Success is defined as satisfying NRC inspection objectives such that the inspected areas contain no significant weaknesses.

RESPONSIBILITIES

The Management Sponsor is the Site Vice President and will provide overall response and team direction. In addition, the Recovery Team Manager is responsible for identifying response team members and obtaining commitments from appropriate management for continued timely participation in accordance with the inspection schedule.

PRIDE 95001 Recovery Team is the lead organization and is responsible for coordinating inspection activities, The Recovery Team is responsible for:

- Coordinating a mock inspection in the style of an NRC *inspection*.
- Developing the NRC 95001 Inspection Communication Plan.
- Developing the NRC 95001 Inspection Schedule.
- -Establishing and maintaining an NRC Q&A database to track inspector requests for information and issues.

The *NRC 95001* Inspection Response Team consists of the following members:

- Technical lead – Scott Northard
- Recovery Team Staff
- PRIDE Recovery Improvement Team Staff
- Performance Assessment (P1) staff
- Station Licensing representative
- Fleet representative
- Root Cause Evaluation (RCE) leads for AFW Mispo and RP Shipping Issues
- Common Cause lead
- Engineering representative

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NRC INSPECTION 95001 INSPECTION READINESS PLAN

- Operations representative
- Maintenance representative
- Administrative support
- IT support, as needed

The NRC 95001 Inspection Response Team (IRT) responsibilities include:

- Coordinate NRC 95001 Inspection task assignments
- Coordinate NRC 95001 Inspection related meetings
- Coordinate NRC information requests
- Coordinate assignment, response development and issue resolution to NRC questions
- Provide daily status to management during the conduct of the NRC 95001 inspection
- Ensure timely documentation of NRC 95001 Inspection issues in CAP
- Coordinate post NRC 95001 Inspection critique

PRE-INSPECTION ACTIVITIES

PRIDE Recovery Inspection Team Logistics

Coordinate site access, badging and dosimetry for NRC 95001 Inspectors through the site NRC senior resident

Provide NRC 95001 Inspector facility setup, support, and equipment needs

Designate central location for the NRC 95001/95002 Inspection Response Team, and ensure location has appropriate equipment (e.g., telephones, computers, printers)

Management Sponsor

Select and assign members of the NRC 95001 Inspection *Response* Team

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NRC INSPECTION 95001 INSPECTION READINESS PLAN

PRIDE Recovery Team Preparation

Coordinate the collection of technical and reference information requested by the NRC prior to the inspection (e.g., ARs, closure packages). Perform quality checks of the information collected.

Ensure documents containing proprietary information are marked in accordance with 10CFR2.390.

Perform independent assessment of all white findings. The purpose of *the* independent assessments is to verify the completion and *adequacy of* Root Cause Evaluations and corrective actions.

Brief NRC 95001 Inspection Response Team members on the NRC Reactor Oversight Process (ROP), NRC Inspection Procedures, and FNP protocol and communication expectations (attached). Cover the following NRC related items:

- 1 ROP Cornerstones and Objectives
- 2 Inspection elements (baseline, supplemental, generic safety issues, special/infrequent)
3. Relationships between Inspection Findings and Performance Indicators (PIs), including:

ROP Cornerstones

PIs

Problem Identification and Resolution (PI&R)

Safety Culture

INSPECTION ACTIVITIES

PRIDE Recovery Team

Notify senior management (e.g., Vice President and Plant Manager) of the dates, times, and locations for the entrance and exit meetings. The expectation is that senior management will *attend* the entrance and exit meetings.

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NRC INSPECTION 95001 INSPECTION READINESS PLAN

Track NRC comments and questions. Issue a daily Outstanding Issue Report including the issue owner and status.

NRC 95001 Inspection Response Team

Coordinate assignment, response development and issue resolution to NRC questions.

NOTE: Every attempt should be made to resolve inspection issues before the close of the inspection.

Daily Debriefs with NRC Inspectors.

Provide daily status to management during the conduct of the NRC 95001 Inspection.

Ensure timely *documentation* of inspection issues in CAP.

Promptly notify management of outstanding disagreements and unresolved issues.

For significant issues, debrief senior management prior to the NRC 95001 Inspection exit.

POST-INSPECTION ACTIVITIES

NRC 95001 Inspection Response Team/Line Organization

Coordinate post NRC 95001 Inspection critique.

Within 30 days of receiving an NRC 95001 Inspection Report:

- Ensure that ARs are/were initiated for *NRC* findings and Prairie Island actions taken to address NRC concerns during the inspection.
- Coordinate the development of written responses for each finding. If a response is not available within 30 days, provide a schedule when a response will be sent to the NRC.
- Identify any new Prairie Island commitments.
- Correct or clarify inaccuracies in the NRC Inspection Report.

FIGURE 1
Recovery Team Organization Chart

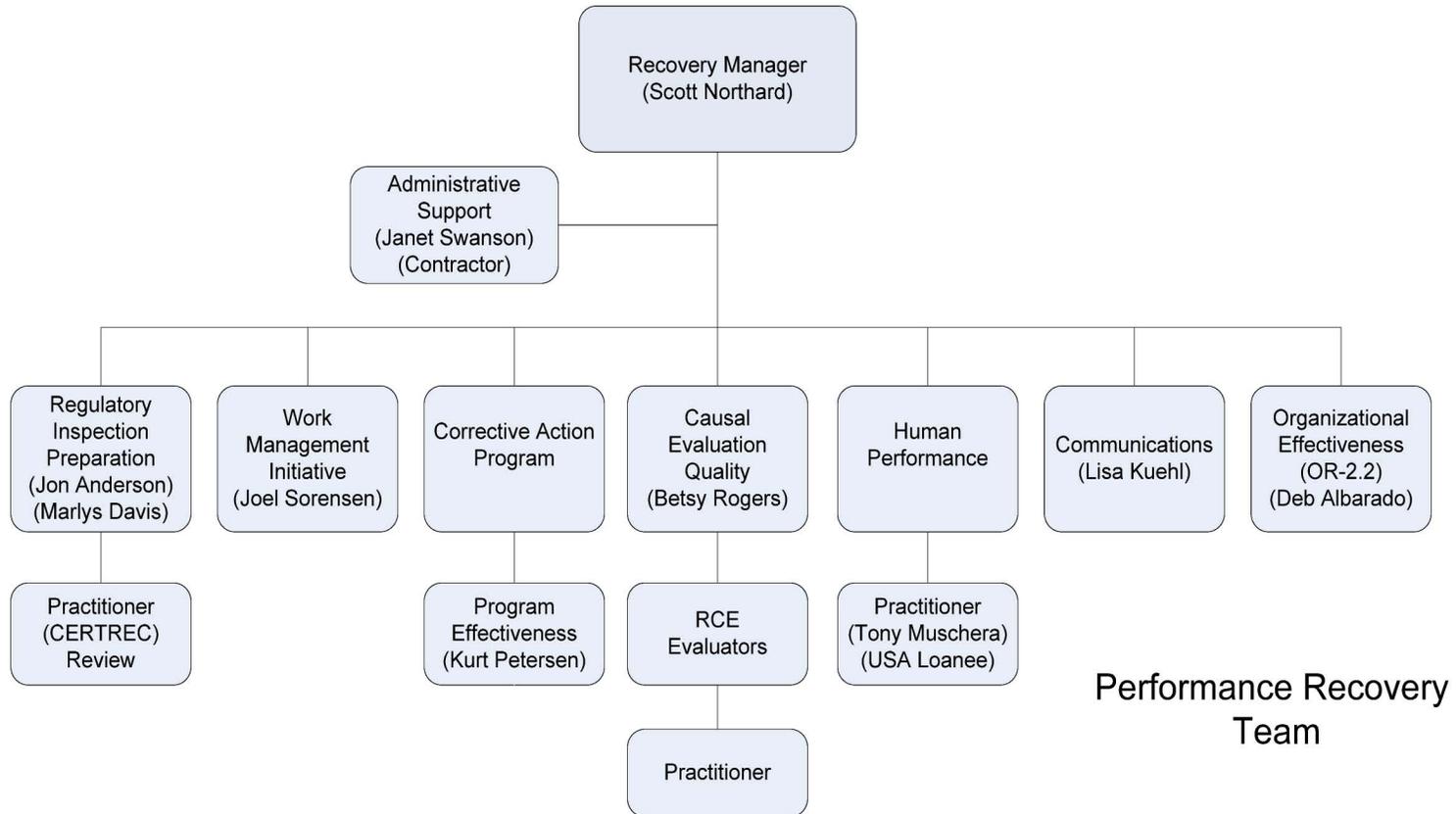


FIGURE 2 Prairie Island

Performance Recovery Plan

