

Iowa Electric Light and Power Company

February 28, 1983

NG-83-0963

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

TE HQ FILE COPY

Subject: Plan of Action

- References: 1) Letter, J. Keppler to D. Arnold dated
June 4, 1982, same subject
2) Letter, L. Liu to J. Keppler dated
September 30, 1982, same subject

File: A-103

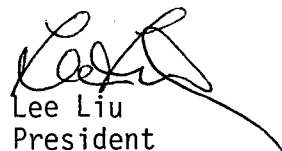
Dear Mr. Keppler:

This is in further response to your letter of June 4, 1982 and your request for an update on our plan of action to upgrade our regulatory performance in areas where you have identified the need for improvement. Our letter LDR-82-276, which is reference 2, provided you with our Regulatory Performance Improvement Program.

The enclosed update to the Regulatory Performance Improvement Program provides the current status of each category under the Program as discussed in your office on February 10, 1983. These actions are a part of broader programs within Iowa Electric which are designed to improve our management effectiveness and efficiency of operation.

We have aggressively approached the implementation of improvements under the Regulatory Performance Improvement Program. Many elements of the Program have been accomplished. We are committed to accomplish the remaining improvements with the same dedication and vigor.


Very truly yours,


Lee Liu
President

LL/DLM/SNL/sg
Enclosure

cc: D. Arnold (all w/e)
S. Tuthill
L. Root
NRC Resident Office
Commitment Control Ref: 820178

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DUANE ARNOLD ENERGY CENTER
REGULATORY PERFORMANCE IMPROVEMENT PROGRAM

INTRODUCTION

Iowa Electric (IE) is strengthening its management program to further assure the continued safe, efficient operation of the Duane Arnold Energy Center. These improvements also focus on assuring superior regulatory performance on the part of the Company. This has been a subject of several discussions with the NRC Region III personnel, which have been extremely helpful.

IE will reevaluate, as described herein, organizational responsibilities, management controls, staffing levels, staff education, training programs, communications, committee activities and operating procedures and practices at both the Duane Arnold Energy Center and the General Office.

This submittal contains a status on each of the specific actions, dates and milestones identified per the attached outline in LDR-82-276 which was submitted on September 30, 1982. Additional supporting details are also made available for your review. We have revised the dates associated with some milestones as the program has been refined. The status of items as provided in the submittal, is presented in the same sequence as those in the September 30, 1982 plan of action.

Asterisks identify milestones completed since original report, new milestones added and schedule changes.

I. COMMUNICATIONS

1. Managerial/Supervisory Training

The expanded managerial/supervisory training program, including an emphasis on required formal and informal communications systems as they relate to the Nuclear Generation Department and management by objectives concept has been completed. Consideration is being given to repeating this training in the future.

<u>Key Milestones</u>	<u>Date</u>	
• Definition of Curriculum Objectives	Complete	*
• Initiate Course Instruction	Complete	*
• Conclude Course Instruction	Complete	*

2. Objectives and Goals

The development of the Nuclear Generation Division Management Manual is continuing. The manual, when completed, will contain current Division objectives, and where appropriate, functional area objectives.

<u>Key Milestones</u>	<u>Date</u>	
• Complete development of initial Nuclear Generation Division Objectives and Goals	Complete	
• Complete "workshop" meetings with appropriate functional areas	Complete	*
• Obtain initial management approval of Nuclear Generation Division Management Manual	March, 1983	*

3. Facilities

In order to provide proper facilities for the increasing number of personnel at the DAEC, Iowa Electric has conducted a facilities study. This study is being evaluated by Division Management. It is now planned to incorporate the new instrument shop in a Data Acquisition Center which will be needed as part of the emergency response facilities. This will result in a delay in completion of the instrument shop as indicated.

<u>Key Milestones</u>	<u>Date</u>	
• Development of Nuclear Generation Division facility plans and integration into divisional planning activities	Complete	*

3. Facilities (continued)

<u>Key Milestones</u>	<u>Date</u>	
• Corporate approval of 1983 facility expenditures	Complete	*
• Renovate Change House	Complete	*
• Complete Instrument Shop	December, 1984	*

4. Commitment Control

The Commitment Control Program has been implemented. It incorporates commitments to the NRC and outside agencies such as INPO, ANI, etc. Major Nuclear Generation Division internal commitments with Iowa Electric are also included in the program as identified by department or division management. An individual is assigned to manage the Program and it is regulated by Administrative Control Procedure. The Quality Assurance organization will be part of the program evaluation and will audit the program routinely.

<u>Key Milestones</u>	<u>Date</u>	
• Develop Nuclear Generation Division instruction for commitment control system	Complete	*
• Implement interim commitment control system	Complete	*
• Evaluate system and revise as necessary	June, 1983	*

5. Management Meetings

Management meetings are described in the September submittal and continue to be held.

<u>Key Milestones</u>	<u>Date</u>
• Facilitate communications through regular and special meetings	Complete
• Implement frequent corporate management visits and inspections at the DAEC	Complete

II. MANAGEMENT AND SUPERVISORY INVOLVEMENT

1. Enhanced Management Overview Program

Quarterly management briefings and supplemental periodic reports to senior management as described in the September submittal have been instituted. Quarterly management briefings will be proceduralized.

<u>Key Milestones</u>	<u>Date</u>	
• Initiate enhanced management briefing program	Complete	*
• Initiate periodic reports to management	Complete	*
• Proceduralize management briefings	May, 1983	*

2. Reduced Administrative Burdens

- a. A draft Work Breakdown Analysis is currently under management review. In anticipation of the results of this study, additions to permanent staff have been authorized which will reduce the administrative burden on maintenance personnel and which will improve support for Operations Department supervisors.

<u>Key Milestones</u>	<u>Date</u>	
• First draft "work breakdown" analysis	Complete	*
• Initial Division management review	Complete	*
• Final "work breakdown" analysis for the Duane Arnold Energy Center	May, 1983	*

b. Computerized Cost Management System

The interim cost control system for relieving supervisors of manually maintaining cost data is in place and work on development of the final accounting and cost management system is proceeding.

<u>Key Milestones</u>	<u>Date</u>	
• Interim cost management system operational	Complete	*
• Implementation of interim cost management report system	Complete	
• Final accounting and cost management system	December, 1984	*

c. Computerized Maintenance Planning

The computerized maintenance planning system to be used at the DAEC has been selected and funding for the system has been approved. Work on the warehouse inventory control system is continuing.

<u>Key Milestones</u>	<u>Date</u>	
• Complete enhancement of interim maintenance planning techniques	Complete	*
• Complete power plant maintenance planning program	December, 1983	
• Complete power plant major outage planning program	June, 1984	
• Complete enhancement of existing power plant warehouse inventory control technique	September, 1984	

d. Computerized Health Physics Recordkeeping

This system is being developed as part of our overall "as low as reasonably achievable" program. Iowa Electric intends that the health physics recordkeeping system will ultimately interface electronically with the power plant maintenance system.

<u>Key Milestones</u>	<u>Date</u>	
• Selection of the health physics recordkeeping system	Complete	*
• Initial integration with power plant maintenance system	December, 1985	*

III. STATION PROCEDURES

The revision of the DAEC operating, emergency, maintenance and surveillance procedures is proceeding. Due to operational, regulatory and other commitments it has become necessary to reschedule three of the seven key milestones associated with this item. In order to make the revised procedures available as soon as possible rather than waiting for all procedures (eg. all emergency procedures), procedures will receive first line supervisor review as they are written. Walkthroughs of procedures will be conducted as the procedures are completed. Operating instructions will be implemented as appropriate.

III. STATION PROCEDURES (continued)

<u>Key Milestones</u>	<u>Date</u>	
• Develop plan for updating procedures	Complete	*
• Initiate rewrite of procedures	Complete	*
• Complete first line supervisor review	February, 1984	*
• Complete procedure "walkthrough"	March, 1984	*
• Complete final operating procedures	April, 1984	*
• Complete Surveillance Procedure update	December, 1983	
• Complete Emergency Operating Procedures	1984 Outage	

IV. SAFETY COMMITTEE CHARTER

Modification of the Safety Committee Charter and the implementation of Safety Committee Instructions have been completed. The review of backlogged items has been completed.

<u>Key Milestones</u>	<u>Date</u>	
• Revise Safety Committee Charter to reflect guidelines of ANSI N18.7-1976	Complete	
• Issue Safety Committee Instructions	Complete	*
• Complete review of present Safety Committee open items	March, 1983	

V. TRAINING PLAN

The Iowa Electric Training and Retraining Plan has been developed and delivered to Division management. The plans are approved and are being implemented.

<u>Key Milestones</u>	<u>Date</u>	
• Complete development of 1983 Departmental Training Plans	Complete	*
• Receive Division management approval of 1983 Training Plans	Complete	*
• Receive senior management approval of 1983 Training Budget	Complete	*

V. TRAINING PLAN (continued)

<u>Key Milestones</u>	<u>Date</u>	
• Commence move of most training activities into new facilities	April, 1983	*

VI. CORRECTIVE ACTION PROGRAM

The development of an Iowa Electric Corrective Action Program is proceeding. Our Corporate Quality Assurance Group is developing this improved trending and analysis program, which will initially be used with operational and maintenance data. The program is being computerized in order to expand the data base available for analyses.

<u>Key Milestones</u>	<u>Date</u>	
• Commence improved trending and analysis of operational and maintenance events	Complete	*
• Scope final trending and analysis program	March, 1983	
• Implement final trending and analysis program	December, 1983	