

NOV 3 0 1993

DCP/DCB

Docket Nos. 50-456; 50-457  
50-454; 50-455  
50-237; 50-249  
50-373; 50-374  
50-254; 50-265  
50-295; 50-304

Commonwealth Edison Company  
ATTN: Mr. M. J. Wallace, Vice President  
and Chief Nuclear Officer  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

Dear Mr. Wallace:

This refers to a Management Meeting conducted by Mr. J. B. Martin, other members of the Nuclear Regulatory Commission, and Commonwealth Edison Company management. The meeting was held on November 3, 1993, at the Nuclear Regulatory Commission Office in Glen Ellyn, Illinois.

The purpose of the meeting was to review the status of Commonwealth Edison Company's initiatives on quality assurance and corporate engineering support. Attached is a list of the participants and copies of information which was presented at the meeting.

If you have any questions regarding the information or the meeting, please contact Mr. Brent Clayton at (708) 790-5574.

Sincerely,

Original signed by E. G. Greenman

Edward G. Greenman, Director  
Division of Reactor Projects

Attachments: As stated

See Attached Distribution

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RIII  
PLH  
Roton for

RIII  
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Hiland  
11/18/93

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Cah  
Hausman  
11/23/93

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NOV 30 1993

cc w/attachments:

Site Vice Presidents,  
Braidwood, Byron, Dresden,  
LaSalle, Quad Cities, Zion

Station Managers,  
Braidwood, Byron, Dresden,  
LaSalle, Quad Cities, Zion

Regulatory Assurance Supervisors,  
Braidwood, Byron, Dresden,  
LaSalle, Quad Cities, Zion

D. Farrar, Nuclear Regulatory  
Services Manager

OC/LFDCB

Resident Inspectors Braidwood,  
Byron, Dresden, LaSalle,  
Quad Cities, Zion

Licensing Project Managers,  
Project Directorate III-2, NRR

H. A. Learner

R. Hubbard, MHB Technical Associates

J. McCaffrey, Chief, Public Utilities  
Division

R. Newmann, Office of Public Counsel  
Mayor, City of Zion

Administrator, Wisconsin Division of  
Emergency Government

State Liaison Officer

Chairman, Illinois Commerce Commission

J. B. Martin, RIII

H. J. Miller, RIII

J. E. Dyer, NRR

cc: PUBLIC

COMMONWEALTH EDISON COMPANY  
MANAGEMENT MEETING  
NOVEMBER 3, 1993

PARTICIPANTS

Commonwealth Edison Company

L. O. DelGeorge  
T. J. Kovach  
D. L. Shamblin  
R. P. Tuetken  
I. M. Johnson

U. S. Nuclear Regulatory Commission

J. B. Martin, RIII  
H. J. Miller, RIII  
T. O. Martin, RIII  
G. E. Grant, RIII  
H. B. Clayton, RIII

**Management Discussion**

**Nuclear Regulatory Commission  
Region III**

**and**

**Commonwealth Edison Company  
Nuclear Engineering and Technology Services**

**November 3, 1993**

## Table of Contents

- Dan Shamblin - Background Information (Pg. 1)
  - Education/Experience
  
- Key Roles of NETS in Nuclear Division (Pg. 2)
  - provide specialized engineering & programmatic support
  - develop generic programs to consistently address issues
  - support generic program implementation
  - ensure Engineering Services Strategy is successfully implemented
  - KEY BENEFIT: achieve economies of scale
  
- NETS Mission (Pg. 3)
  
- Proactive Partnership Values (Pg. 3)
  - Success Through Partnership
  - Satisfying Customer Needs
  - Accountability
  - Continuous Improvement
  
- NETS Functional Areas (Pg. 4)
  - organizational chart
  
- Corporate & Site Engineering Roles Comparison (Pgs. 5-9)
  - examples: equipment specialists, commercial grade dedication, IPEs, MOVs

## Table of Contents (cont.)

- **Commonwealth Edison Nuclear Engineering Team** (Pg. 10)
  - NETS part of larger team consisting of NETS, SEC, System Engineering
  - common objective: "Become a World Class Engineering Operation"
  - NECB and NEC formed to facilitate achieving common objective
  
- **Nuclear Engineering & Construction Board (NECB)** (Pgs. 11-12)
  - NECB Responsibility
  - Participants
  - Charter Areas of Focus
  
- **Nuclear Engineering Committee (NEC)** (Pg. 13)
  - NEC Responsibility
  - NEC Policy
  
- **NETS Strategic Plan** (Pg. 14)
  - NETS Key Managers Refocused Strategic Plans to Support NOD Strategies
  - Safety Culture
  - Resource Management
  - Technology Development
  - Proactive Partnership
  - Personnel Development

## Table of Contents (cont.)

- Engineering Function Self Assessment (Pgs. 15-16)
  - purpose
  - TENERA Assessment
  - Expert Steering Committee
  
- Self Assessment Issues (Pg. 17)
  - establishment and maintenance of "hows"
  - focus on true ownership of design of the plants
  - improve capabilities of personnel
  - maintain a focus on "integrated strategic planning"
  - align and utilize engineering resources in optimal manner
  
- Next Steps (Pg. 18)
  - Completion of Self Assessment Activity
  - Approval/Communication of Self Assessment Recommendations

## Dan Shamblin - Background Information

- **Education**
  - 1972 Michigan Technological University - BSCE
  - 1982 University of Chicago - MBA
- **Experience**
  - 21 + yrs with Commonwealth Edison
  - 15 yrs Engineering, Construction, Testing and Project Management of Nuclear Station Projects
  - 5 yrs Managing Contracted Modification, Maintenance and New Construction Support to Edison Nuclear Plants
  - Assigned to Engineering Department Manager position in December 1992
  - Edison's Point of Contact with the AFL-CIO Building Trades - Local and National Level



### Key Roles of NETS in Nuclear Division

- Provide specialized engineering and programmatic support to the stations consistent with the priorities and goals outlined by the Chief Nuclear Officer and Site Vice Presidents.
- Develop generic programs to consistently address technical and licensing issues across the six nuclear stations at the direction of the CNO and SVPs.
- Support generic program implementation at the stations in a sequence determined by the CNO and SVPs.
- In conjunction with the Site Engineering and Construction (SEC) Managers to ensure the Engineering Services Strategy is successfully implemented.
- **KEY BENEFIT** - Achieve the economies of scale available from centralizing specific engineering and construction activities, while core engineering activities are focused at the six nuclear stations.

## NETS MISSION

NETS will provide professional support and proactive guidance in a manner that promotes the safe, reliable, and cost-effective operation of our nuclear plants; and that is responsive to regulatory requirements.

### Proactive Partnership Values

#### *Success Through Partnership*

The success of our partners and teammates is foremost in our plans and actions and is critical to our success.

#### *Satisfying Customer Needs*

We will meet the needs of our customers - external and internal. We will make ourselves aware of our customer's needs. We will always deliver what we promise - the first time, on time, every time.

#### *Accountability*

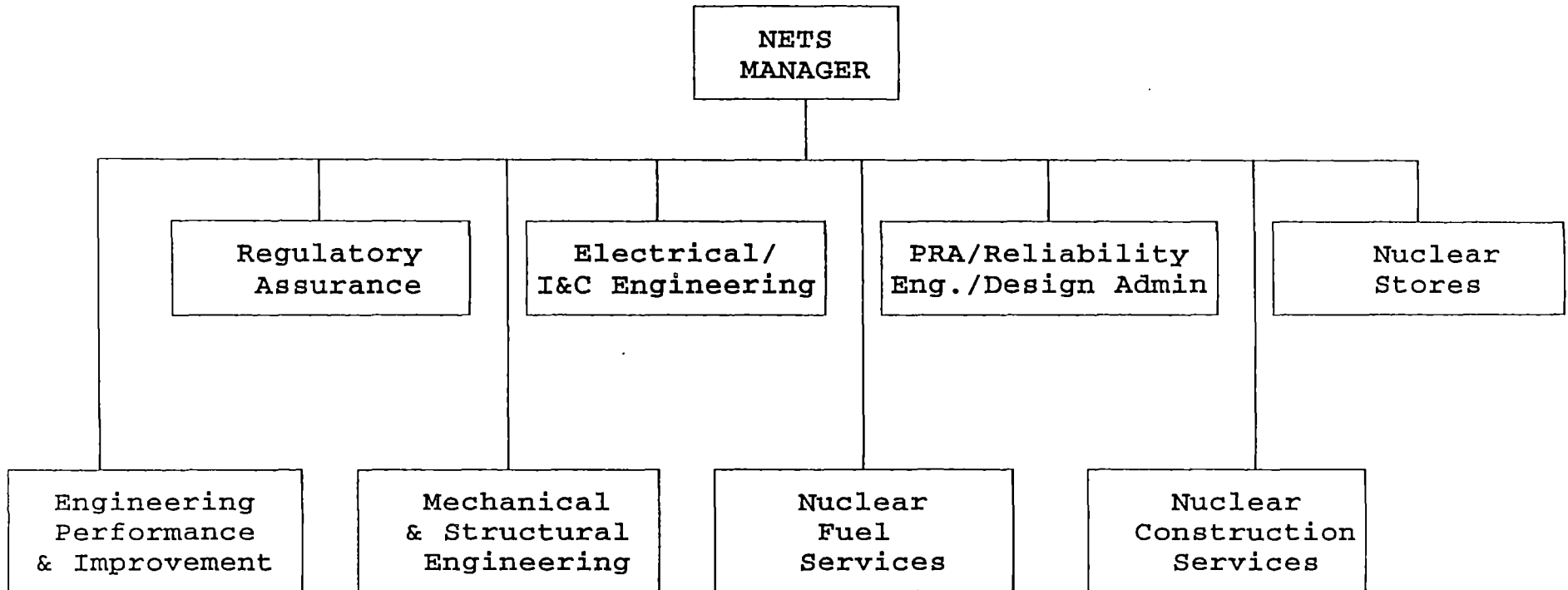
A well-established culture of accountability will be practiced and supported by all employees.

#### *Continuous Improvement*

We will constantly look for more effective or efficient ways of doing business. We will continuously improve through training and lessons learned so that we will remain competitive, competent, and respected in the eyes of our partners and customers. We will be viewed as innovators and leaders, not followers.

Nuclear Engineering and Technology Services

Functional Areas



## Corporate and Site Engineering Roles Comparison

<u>Activity Example</u>	<u>Corporate Engineering Roles</u>	<u>Site Engineering Roles</u>
Modification Design	Support - when requested	Manage or Perform Activity
Ongoing Station Support (i.e. ISI/IST)	Functional Direction	Conduct Activity
Generic Programs (i.e. GL 89-10)	Develop - when requested	Implementation Activity
Design Basis Consolidation	Program Development and Implementation	Program Development and Implementation
Engineering Standards Development	Joint Development Activity	Joint Development Activity
Commercial Grade Dedication	Primarily Performed Centrally	Small Amount of Site Activity
Core Reload Design	Performed Centrally by Nuclear Fuel Services	Support NFS Activity

## Example of Support Work Activity

### Equipment and Component Specialists

- **Corporate Engineering Responsibilities**
  - Provide equipment and component performance monitoring guidance
  - Provide expert consulting on equipment and component issues (i.e. PWR Stations - Steam Generators, Zion - Diesel Generators)
  
- **Site and System Engineering and Construction Responsibilities**
  - Monitor equipment and component performance (i.e. Maintenance Strategy Owners)
  - Develop equipment and component repair and/or replacement programs
  - Support ongoing maintenance and repair activity

**Example of Support Work Activity**

**Commercial Grade Dedication**

- **Corporate Engineering Responsibilities**
  - Develop and modify procedures for CGD activity
  - Perform materials engineering for CGD activity
  - Receive and test equipment and components as part of CGD activity
  - Provide functional direction to Site CGD activity
  
- **Site and Systems Engineering and Construction Responsibilities**
  - Support (as necessary) off-site CGD activity
  - Perform limited on-site CGD activity

## Example of Support Work Activity

### GL 88-20 - IPEs

- **Corporate Engineering Responsibilities**
  - **Work with Sites to prepare and respond with specific GL 88-20 commitments**
  - **Prepare Individual Plant Evaluation reports**
  - **Interface with NRC during IPE review cycle**
  - **Work with Sites to develop and deploy "applications tools" (i.e. Quad Cities - VAT, all Stations - MOV testing prioritization, applicable Stations - IPEEE/SQUG methodology)**
  
- **Site and System Engineering and Construction Responsibilities**
  - **Support IPE preparation activity**
  - **Utilize "application tools" in ongoing engineering activity**

## Example of Support Work Activity

### GL 89-10 - MOV Program

- **Corporate Engineering Responsibilities**
  - **Worked with Sites to self assess program implementation and refocus program activity (i.e. rebaselined program)**
  - **Technical issues resolution across six stations**
  - **Generic testing to support design assumptions (i.e. AC motor testing)**
  - **Catalyst for lessons learned across six stations**
  
- **Site and System Engineering and Construction Responsibilities**
  - **MOV static and dynamic testing**
  - **Resolution of operability issues**
  - **Design modification activity**



## Commonwealth Edison Nuclear Engineering Team

- NETS is a part of the larger engineering function team.
- Team consists of NETS, Site Engineering and Construction Department and System Engineering Department .
- Common Objective - "Becoming a world class engineering operation that provides superior engineering support to Operations and Maintenance".
- Nuclear Engineering and Construction Board (NECB) and the Nuclear Engineering Committee (NEC) formed to facilitate achieving our common objective.

## Nuclear Engineering and Construction Board (NECB)

- **NECB Responsibility**  
  
**"Provide leadership and proactively improve processes and manage issues and opportunities within the broad definition of the engineering and construction function".**
  
- **Participants**
  - **Six Site Engineering and Construction Managers**
  - **NETS Manager**
  - **Facilitator**
  
- **Nuclear Operations Division Leadership Philosophy, Supporting Principles, and Leadership Behaviors govern discussion and actions.**
  
- **Meet monthly (all day) and weekly phone call.**

## Nuclear Engineering and Construction Board

- **NECB Charter Areas of Focus**

**Implementation of the NOD Design Responsibility through the Nuclear Engineering Committee**

**Generic Issues Committee**

**Technical integration of multi-location programs and projects**

**Technology planning and prioritization**

**Engineering and construction standards and processes**

**Identification and maintenance of critical engineering and construction related skills**

**Professional and technical excellence development**

**Personnel development**

**Technical and construction excellence recognition**

**Engineering and construction process measures**

**Engineering and construction related advice to the CNO, VP Nuclear Support, and Site Vice Presidents**

**Engineering development**

**Engineering and construction strategies development and implementation**

**Resources sharing and allocation**

**Information and lessons learned sharing**

## Nuclear Engineering Committee (NEC)

- **NEC Responsibility**

"The NEC is responsible for ensuring that design activities are conducted in compliance with regulations and the ASME Code in a manner that supports safe and reliable operation of the nuclear stations. The NEC will accomplish this through the development, maintenance, and assessment of the effectiveness of the overall policies, standards, requirements, controls, and procedures for design activities in support of the nuclear stations.

The implementation of NEC design policies, standards, requirements, controls, and procedures is the responsibility of the SEC Managers for all design activities under their direction or performed on-site, and the NETS Manager for all design activities under the direction of or performed by Downers Grove departments.

The NEC is responsible for developing the requirements for overall design basis management. SEC Managers are responsible for control and maintenance of the design basis."

- **NEC Policy**

The NEC will be comprised of the Nuclear Engineering and Technology Services (NETS) Manager and the six (6) Site Engineering and Construction (SEC) Managers. The NETS Manager will serve as the Chairman of the NEC.

The responsibility for implementation of design policies, standards, requirements, controls, and procedures may be delegated by the NETS Manager or SEC Managers for their respective areas of responsibility, within clearly specified limits and controls; however, responsibility for ensuring those delegated activities are carried out in a manner that produces high quality design remains with the respective manager. This includes the delegation of design activities to outside engineering and consulting firms.

The NEC shall meet on a periodic basis to fulfill these responsibilities.

## NETS Strategic Plan

- Given our support role focus, in September, NETS key managers refocused our strategic plans to better support the NOD strategies and the NETS Mission and Values.
  
- **Safety Culture**
  - recognition as industry leader
  
- **Resource Management**
  - effective and efficient use of resources
  
- **Technology Deployment**
  - leadership in bringing new technology into NOD
  
- **Proactive Partnership**
  - provide highest quality services at a reasonable cost
  
- **Personnel Development**
  - development of the human resources necessary to accomplish the NETS mission

## Engineering Function Self Assessment

- Decentralization of many engineering activities was a fundamental change that impacted the total engineering function.
- Given the importance for the effective performance of the engineering function and the impact that the reorganization had on it, NOD executives requested that TENERA perform a comprehensive assessment of the engineering function.
- The purpose of this assessment was to status the current activity and direction of the engineering function and identify areas where current and future activities could be realigned to support the NOD Vision more closely.
- The assessment was undertaken to provide management with additional insights into how to achieve engineering performance consistent with its vision.

## Engineering Function Self Assessment

- **TENERA Assessment Focused on Four Questions**
  - Where Have We Been?
  - Where Are We?
  - Where Are We Going?
  - Is This Direction Appropriate?
  
- **TENERA Used Organizational Model to Conduct Assessment**
  - Structure
  - People
  - Planning
  - Knowledge Sharing
  - Management Processes
  
- **Expert Steering Committee established to provide independent overview to the ongoing engineering function reorganization, transition activities, and effectiveness functions.**

## Self Assessment Issues

- Establish clear leadership and authority to guide the establishment and maintenance of the "hows" (the standards, methods, design control processes, etc.) that the engineering function employs in conducting its activities. This includes defining the appropriate level of commonality in critical work processes, methodologies, and organizational structure.
- Focus on true "ownership" of the design of the plants (i.e. detailed knowledge and understanding to the degree that the design can be applied in the management of design changes and resolution of design-related issues). Improve the access to and control of design information.
- Improve the capabilities of personnel in all positions of the engineering function so they can more effectively carry out their specific roles.
- Maintain a focus on "integrated strategic planning; for the engineering function with both short and long term improvement objectives, measures to judge progress and success/failure, and assignment of resources to both short and long term activities.
- Align and utilize engineering resources (i.e. NETS, SEC, SED, and Contractors) in the optimal manner to accomplish short and long term operational and maintenance support activity and engineering function improvement activity.



## Next Steps

- **Completion of Self Assessment Activity**
  - **Executive and senior engineering managers review of TENERA assessment information.**
  - **Expert Steering Committee review of TENERA assessment information.**
  - **Expert Steering Committee independent input on improvements for engineering function.**
  
- **Approval/Communication of Self Assessment Recommendations**
  - **Finalization of recommended actions (i.e. "course corrections") and approval by Executive management.**
  - **Communication of engineering function "course corrections" to engineering function managers, supervisors, individual contributors, and contractors.**

## Tom Kovach - Background Information

- **Education**
  - 1974 Central Michigan University - BS Applied Sciences
  - 1976 The University of Michigan - MS Environmental Health
  - 1992 The University of Chicago - MBA
  
- **Experience**
  - 17 + yrs with Commonwealth Edison
  - 9 years at Quad-Cities Station Managing Radiation Protection and Chemistry.
    - SRO at Quad-Cities
  - 3 yrs Managing Nuclear Division Radiation Protection Program
  - 4 yrs Managing Nuclear Licensing and Compliance
  - Project Manager for the 1992 Tamera Evaluation of Division Performance
  - Project Manager for the 1993 Quad-Cities Business Development Team

# NUCLEAR OVERSIGHT

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- ★ **NUCLEAR OVERSIGHT: THE COMBINED AREAS OF NUCLEAR SAFETY AND QUALITY ASSURANCE IN A SINGLE ORGANIZATION**
- ★ **OBJECTIVE: ASSURE WORK IS PERFORMED CORRECTLY, PROBLEMS ARE PREVENTED. SHOULD PROBLEMS OCCUR, THEY MUST BE DETECTED AND IMPROVEMENTS MADE.**
- ★ **ACCOUNTABILITIES: PROVIDE INDEPENDENT ASSESSMENT OF DIVISION SAFETY AND COMPLIANCE, EVALUATE THE EFFECTIVENESS OF DIVISION SELF ASSESSMENT**
- ★ **PRIMARY RESPONSIBILITIES: DEVELOP AND IMPLEMENT ONSITE NUCLEAR SAFETY (ISEG), REVIEW & INVESTIGATION, AND AUDITS**

# **SIGNIFICANT CHANGES**

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- ★ MAJOR UPGRADE TO THE QUALITY ASSURANCE MANUAL AND RELATED PROCEDURES
- ★ UPGRADE STAFF COMPETENCIES
- ★ MORE NUCLEAR OVERSIGHT RESOURCES LOCATED AT THE OPERATING NUCLEAR STATIONS
- ★ HIGHER MANAGEMENT LEVEL FOR SITE LEADERSHIP POSITION (SITE QUALITY VERIFICATION DIRECTOR)
- ★ NUCLEAR OVERSIGHT IMPROVEMENT INITIATIVES BASED ON 1993 INDEPENDENT REVIEW OF FUNCTIONAL AREAS
- ★ CREATION OF SAFETY REVIEW BOARDS AT EACH NUCLEAR STATION FOR THE NUCLEAR OPERATIONS DIVISION

# QA MANUAL AND PROCEDURES

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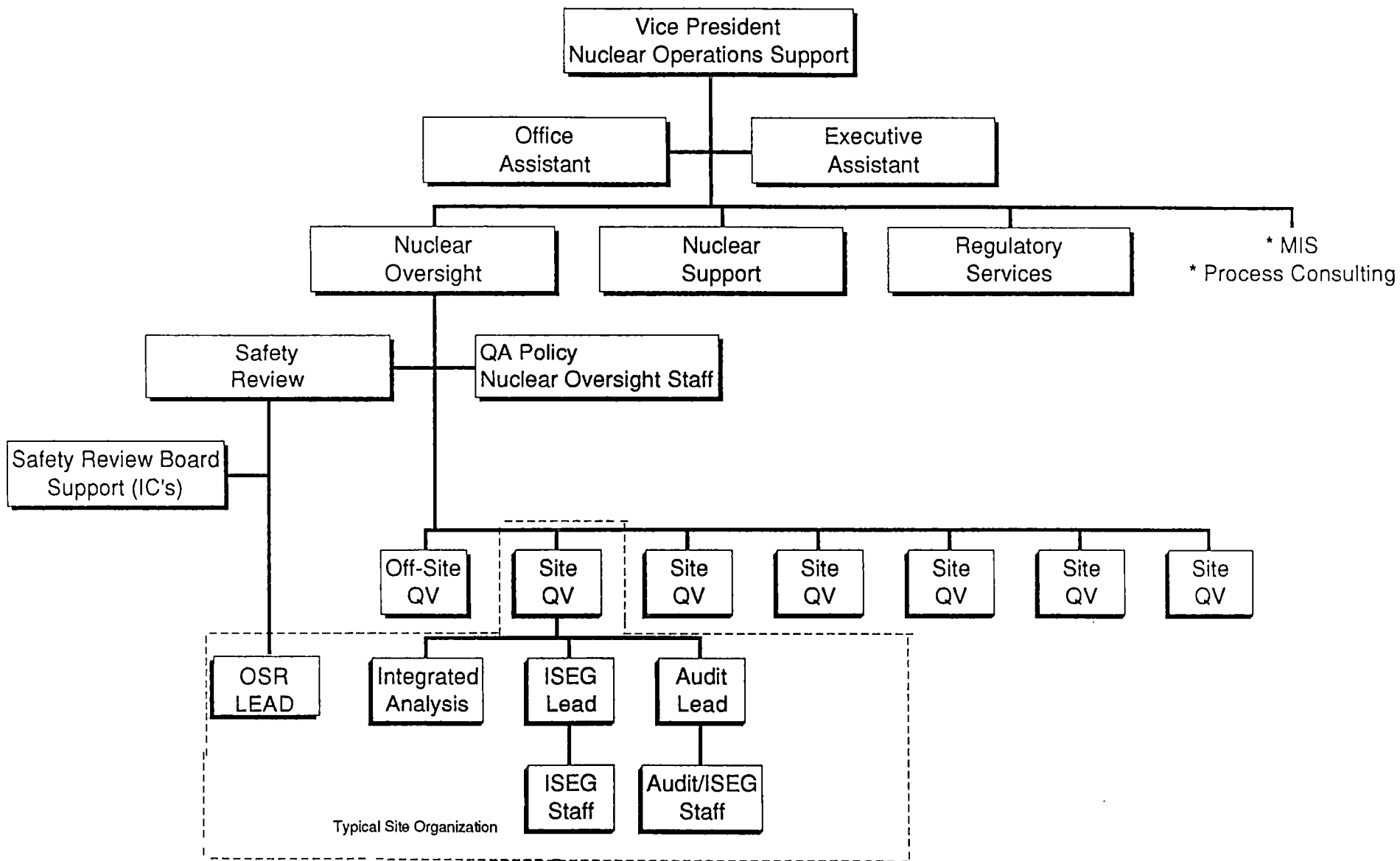
- ★ MULTI-YEAR REWRITE EFFORT RECENTLY COMPLETED
- ★ PROGRAM STREAMLINED WITH AN EMPHASIS ON BUILDING QUALITY INTO PRODUCTS
- ★ WORKSHOP FORUM USED TO PROMULGATE CHANGES AND AFFECT OWNERSHIP
- ★ ONGOING SPECIFIC PROCEDURE UPGRADE AND TRANSITION EFFORT

# COMPETENCIES

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- ★ ENHANCED 94 TRAINING SCHEDULING TO MANAGE AUDIT SCHEDULE CONSTRAINTS
- ★ STRENGTHEN CORE COMPETENCIES AND ENHANCE OVERALL SKILLS IN AUDITING AND REVIEW & INVESTIGATION
  - PERFORMANCE-BASED AUDIT TRAINING/APPLICATION
  - ROOT CAUSE SKILL APPLICATION
  - OBSERVATION SKILLS MENTORING
  - PRA TRAINING/APPLICATION
  - TOTAL QUALITY TRAINING/APPLICATION
  - IS APPLICATIONS

WORKING ORGANIZATION CHART FOR NUCLEAR OVERSIGHT



# **DECENTRALIZED RESOURCES**

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- ★ **CONSISTENT WITH NUCLEAR OPERATIONS DIVISION VISION AND OBJECTIVES**
- ★ **INCREASES THE RANGE OF NUCLEAR OVERSIGHT CAPABILITIES AT EACH OPERATING STATION**
- ★ **FACILITATES BETTER COMMUNICATIONS BETWEEN LINE ORGANIZATIONS AND NUCLEAR OVERSIGHT**



# DECENTRALIZED RESOURCES

(CONTINUED)

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- ★ SIGNIFICANT RELOCATION OF TALENT AND EXPERIENCE TO THE OPERATING SITES
  - 12 SROL/SRO CERTS ADDED TO SITE QV
  - PRA EXPERTISE ADDED TO ISEG
  - 2 FORMER INPO LOANED EMPLOYEES AND 1 FORMER INPO MANAGER ADDED TO SITE QV ORGANIZATIONS
  
- ★ TRANSFER OF "INTEGRATED ANALYSIS" TO THE SITES
  
- ★ STRENGTHENED ISEG STAFF
  
- ★ USE OF THE NUCLEAR OVERSIGHT COORDINATING COMMITTEE TO LEVERAGE EXPERIENCE
  
- ★ INCREASED OPPORTUNITY TO DIRECTLY MONITOR AND ADDRESS PERFORMANCE AND STATION ACTIVITIES RELATED TO QUALITY AND SAFETY

# **SQV LEADERSHIP POSITIONS**

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- ★ **ESTABLISHED AT THE DIRECTOR LEVEL**
- ★ **MORE READILY ATTRACT HIGHLY QUALIFIED CANDIDATES WITH BROAD EXPERIENCE**
- ★ **SEEN AS A PEER WITH NUCLEAR STATION LINE MANAGERS**
- ★ **MANAGE THE NUCLEAR OVERSIGHT FUNCTIONS: AUDIT, ISEG, INTEGRATED ANALYSIS AND INDEPENDENT REVIEW**

# TRANSITION FOCUS

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★ EXPEDITE REORGANIZATION AND ASSIGNMENTS

- ALL NO PERSONNEL ASSIGNED

★ FILL ZION QV SUPERINTENDENT POSITION

★ CURRENT SITE QV ATTENTION AREAS

- "INTEGRATED ANALYSIS" TO PROVIDE COMMUNICATION FOCUS FOR QV DIRECTORS AND AUDIT/ISEG PLANNING FOCUS
- "SITE QV ATTENTION AREAS" DEFINED AS AN INTERIM APPROACH UNTIL INTEGRATED ANALYSIS FUNCTION IS REALIZED

QUAD-CITIES

- SAFETY SYSTEM PERFORMANCE, CORRECTIVE ACTION PROGRAM, RADIATION PROTECTION

# TRANSITION FOCUS

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## ★ CURRENT SITE QV ATTENTION AREAS

### DRESDEN

- WORK MANAGEMENT, CORRECTIVE ACTION/ROOT CAUSE PROGRAMS, RADIATION PROTECTION

### BYRON

- HOUSEKEEPING , MATERIEL CONDITION

### LASALLE

- CORRECTIVE ACTION PROGRAM, RADIATION PROTECTION

### BRAIDWOOD

- PERSONNEL SAFETY, CONTROL ROOM PERFORMANCE

### ZION

- PERSONNEL SAFETY, RADIATION PROTECTION, MATERIEL CONDITION IMPROVEMENT PROGRESS, SHUTDOWN RISK MANAGEMENT DURING "DUO"

# IMPROVEMENT INITIATIVES

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- ★ INTERNALLY GENERATED "SURVEY" OF NUCLEAR OVERSIGHT PERFORMANCE BY "CUSTOMERS"
  
- ★ INDEPENDENT REVIEW OF THE ASSESSMENT/ QUALITY VERIFICATION FUNCTIONAL AREA BY A THIRD PARTY
  - VALIDATION OF RESULTS BY AN "EXPERT COMMITTEE" AND CEC<sub>o</sub> MANAGEMENT
  
  - FEEDBACK SESSIONS AND WORKSHOPS TO DEVELOP AND DEPLOY DEFINED IMPROVEMENTS
  
  - PRIORITY ATTENTION ISSUES
    - DEFINE AND COMMUNICATE CECO QUALITY MODEL
    - REINFORCE ROLES, RESPONSIBILITIES, ACCOUNTABILITIES
    - ENHANCE & INTEGRATE PRODUCTS & PROCESSES

# **IMPROVEMENT INITIATIVES**

## **(CONTINUED)**

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### **★ SELF ASSESSMENT ISSUES**

- ESTABLISH A FOCUSED ENVIRONMENT THAT REINFORCES ACCOUNTABILITY AT ALL LEVELS**
- INTEGRATE THE NUCLEAR OVERSIGHT FUNCTIONS**
- ENHANCE SELECTED PROCESSES AND PRODUCTS**
- REVIEW ORGANIZATION SKILLS AND RESOURCES TO ASSURE OPTIMUM PERFORMANCE**

# **SAFETY REVIEW BOARDS**

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- ★ **CREATED TO PROVIDE A SELF-ASSESSMENT FORUM TO CRITICALLY REVIEW STATION ISSUES**
- ★ **INCREASE THE ABILITY TO DETECT AND MEET RISING INDUSTRY STANDARDS**
- ★ **INTEGRATE MANAGEMENT AND LEADERSHIP ISSUES WITH TECHNICAL REVIEWS AND AUDITS**
- ★ **ROLL-UP PRIORITY ISSUES TO THE NUCLEAR OPERATIONS COMMITTEE**