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Downers Grove, Illinois 60515

June 22, 1994

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: **Dresden Station Units 2 and 3**
Quad Cities Station Units 1 and 2
LaSalle Station Units 1 and 2
Transmittal of BWR Immediate Improvement
Strategy Status Report
NRC Docket Nos. 50-273/249, 50-254/265 and 50-373/374

Dear Mr. Russell:

Attached is the fifth bi-weekly BWR Immediate Improvement Status Report. This report represents a revised format from previous reports. The report lists the metrics for each of the four critical areas at each CECO BWR which are either meeting the goals (stretch and/or threshold) or are not meeting CECO's expectations for improvement.

In addition, a summary of metric performance is provided for each BWR Station.

The next report will be issued in early-July 1994. Please direct any questions you may have with regards to this transmittal to this office.

Very truly yours,

I.M. Johnson
Licensing Operations Director

Attachment

cc: J. Martin, Regional Administrator - Region III
R. Capra, Project Director - NRR
B. Clayton, NRC Region III
Office of Nuclear Safety - IDNS

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**BWR IMMEDIATE IMPROVEMENT INITIATIVE METRICS
DRESDEN STATION
MID-JUNE 1994**

SUMMARY

Approximately 52% of Dresden Station's metrics are meeting stretch goals. An additional 9% are meeting threshold performance levels. Approximately 39% of the indicators are not meeting performance improvement expectations.

Overall, Dresden sees an improving trend. However, the results have been mixed in most areas. In Radiation Protection, five of eleven values are not meeting performance improvement expectations. Multiple management actions have been taken to reverse these trends.

In Material Condition, six of seventeen indicators are not meeting performance improvement expectations. These include three indicators from unit 3 (currently in a refuel outage): MOV Static Tests, HPCI Safety System Performance and Emergency AC Power Safety System Performance. All of these values are affected by the outage. HPCI Safety System Performance will improve after the outage, when HPCI will be returned to service. MOV static tests are being completed during the outage. Unit 3 Emergency AC Safety System Performance is improving and should meet end-of-year goals. Temporary Alterations and Backlog of Control Room Work Requests are unsatisfactory and steady.

One Problem Identification and Resolution item is not meeting performance improvement expectations. The Average Age of PIF Backlog is about 40 days, as opposed to the 30 day threshold. This is due to the large number of PIF's written. Management attention is being focused on reducing this measure.

Two Human Performance indicators are exceeding threshold value. The accident rate has exceeded the threshold for the entire period. The trend has been in the right direction and the value is presently very near to the threshold value. Operations has taken measures to address the Reactivity Management issues.

**DRESDEN STATION METRICS LISTING
MID-JUNE 1994**

MEETING STRETCH GOALS

Collective Exposure - 10 Outage Repetitive Jobs
Hot Spot Reduction
Contaminated Area
Outage Exposure
Radiation Worker Events
Backlog of Nuclear Work Requests
Refueling Outage Performance
Safety System Performance - U2 HPCI, U2 LPCI, U3 LPCI, U2 Emerg. AC
Operator Workarounds - U1, U2, U2/3
Number of PIFS
Recurring Problems
CAR Level A
CAR Completion
Average Age of PIFs
Percentage of PIF Investigations - Level 1, 2, or 3
Personnel Related Events
Procedure Adherence Events

MEETING THRESHOLD GOALS

CAR Level B
Operator Workarounds - U3
MOV Static Tests - U2

NOT MEETING PERFORMANCE IMPROVEMENT EXPECTATIONS

Non Outage Exposure
High Radiation Area Violations
Personnel Contamination Events
Radiation Material Violations
Shoe Contaminations
Average Age of PIF Backlog
Reactivity Management
Industrial Safety Accident Rate
Temporary Alterations
Safety System Performance
Operator Work Arounds
Safety System Performance - U3 HPCI, U3 Emergency AC
Top 25 Technical Issues Reduction

**DRESDEN STATION METRICS LISTING
MID-JUNE 1994
(cont.)**

RADIATION PROTECTION

- ***Meeting Threshold/Stretch Goal***
 - Collective Exposure - 10 Outage Repetitive Jobs (Stretch)
 - Hot Spot Reduction (Stretch)
 - Contaminated Area (Stretch)
 - Outage Exposure (Stretch)
 - Radiation Worker Events (Stretch)
- ***Not Meeting Performance Improvement Expectations***
 - Non Outage Exposure
 - High Radiation Area Violations
 - Personnel Contamination Events
 - Radiation Material Violations
 - Shoe Contaminations

MATERIAL CONDITION

- ***Meeting Threshold/Stretch Goal***
 - Backlog of Nuclear Work Requests (Stretch)
 - Refueling Outage Performance (Stretch)
 - Safety System Performance - U2 HPCI, U2 LPCI, U3 LPCI, U2 Emergency AC (Stretch)
 - Operator Workarounds - U1, U2, U2/3 (Stretch)
 - Operator Workarounds - U3
 - MOV Static Tests - U2
- ***Not Meeting Performance Improvement Expectations***
 - Temporary Alterations
 - Safety System Performance
 - Operator Work Arouds
 - Safety System Performance - U3 HPCI, U3 Emergency AC
 - Top 25 Technical Issues Reduction

PROBLEM IDENTIFICATION AND RESOLUTION

- ***Meeting Threshold/Stretch Goal***
 - Number of PIFS (Stretch)
 - Recurring Problems (Stretch)
 - CAR Level A (Stretch)
 - CAR Completion (Stretch)
 - Average Age of PIFs (Stretch)
 - Percentage of PIF Investigations - Level 1, 2, or 3 (Stretch)
 - CAR Level B
- ***Not Meeting Performance Improvement Expectations***
 - Average Age of PIF Backlog

HUMAN PERFORMANCE

- ***Meeting Threshold/Stretch Goal***
 - Personnel Related Events (Stretch)
 - Procedure Adherence Events (Stretch)
- ***Not Meeting Performance Improvement Expectations***
 - Reactivity Management
 - Industrial Safety Accident Rate

**BWR IMMEDIATE IMPROVEMENT INITIATIVE METRICS
LASALLE COUNTY STATION
MID-JUNE 1994**

SUMMARY

75% of LaSalle County Station's goals are meeting expectations and 25% are not meeting performance improvement expectations.

Overall LaSalle has concentrated in improving Rad Worker performance. From the RP metrics the stations has met 10 out of 11 metrics. The efforts in this area continue. From an RP perspective you can assess the L1R06 outage as successful and the outage will come in under the dose goal by approximately 90 rem, even with an expanded outage scope that was not adjusted for dose increase.

The Material Condition and Problem Identification and Resolution areas have shown the least improvement in BWR metric space, 6 out of 13 metrics are not meeting performance improvement expectations. Material Condition may be an area to concentrate on in the future as it may reflect potential engineering improvements that can not demonstrate improvement in a short period of time.

Problem Identification and Resolution is a short term weakness that needs concentrated efforts. Currently emphasis is being placed on the commitment management process. Within this effort the methods of prioritization have proven to be inadequate thus lending the station to conflicting priorities. Both processes are getting attention and the performance in this area should turn shortly.

All Human Performance metrics are meeting goal.

**LASALLE COUNTY STATION METRICS LISTING
MID-JUNE 1994**

MEETING STRETCH GOALS

Collective Exposure - Top 10 Repetitive Jobs
Outage Exposure
Rad Worker Adherence
High Rad Area Violations
Contaminated Area
Backlog of Nuclear Work Requests
Refuel Outage Performance
Resolution of Key Site Specific Issues (BUP Action Plan)
Recurring Problems
Personnel Related Events
Industrial Safety Accident Rate
Procedure Adherence Events

MEETING THRESHOLD GOALS

Hot Spot Reduction
Non Outage Exposure
Year End Exposure
Personnel Contamination Events
Rad Material Violations
Backlog of Control Room Nuclear Work Requests
MOV Commitment Completion
Number of Problem Identification Forms (PIFs) Submitted
Reactivity Management

NOT MEETING PERFORMANCE IMPROVEMENT EXPECTATIONS

Shoe Contaminations
Number of Temporary Alterations
Safety System Performance
Operator Work Arounds
Average Age of PIF Backlog
% of PIF Investigations
Corrective Action Record Completion

LASALLE COUNTY STATION METRICS LISTING

MID-JUNE 1994

(cont.)

RADIATION PROTECTION

- ***Meeting Threshold/Stretch Goal***
 - Collective Exposure - Top 10 Repetitive Jobs (Stretch)
 - Outage Exposure (Stretch)
 - Rad Worker Adherence (Stretch)
 - High Rad Area Violations (Stretch)
 - Contaminated Area (Stretch)
 - Hot Spot Reduction
 - Year End Exposure
 - Reportable PCEs
 - Rad Material Violations

- ***Not Meeting Performance Improvement Expectations***
 - Shoe Contaminations

MATERIAL CONDITION

- ***Meeting Threshold/Stretch Goal***
 - Backlog of Nuclear Work Requests (Stretch)
 - Refuel Outage Performance (Stretch)
 - Resolution of Key Site Specific Issues (BUP Action Plan) - (Stretch)
 - Control Room NWRs
 - MOV Commitment completion

- ***Not Meeting Performance Improvement Expectations***
 - Temporary Alterations
 - Safety System Performance
 - Operator Work Arounds

PROBLEM IDENTIFICATION AND RESOLUTION

- ***Meeting Threshold/Stretch Goal***
 - Recurring Problems (Stretch)
 - Number of PIFs

- ***Not Meeting Performance Improvement Expectations***
 - Average age of PIF Backlog
 - % of PIF Investigations
 - CAR Completion

HUMAN PERFORMANCE

- ***Meeting Threshold/Stretch Goal***
 - Personnel Related Events (Stretch)
 - Industrial Safety Accident Rate (Stretch)
 - Procedure Adherence Events (Stretch)
 - Reactivity Management

**BWR IMMEDIATE IMPROVEMENT INITIATIVE METRICS
QUAD CITIES STATION
MID-JUNE 1994**

SUMMARY

Approximately 19% of Quad Cities Station's metrics are meeting stretch goals and 44% meeting threshold levels. Approximately 31% do not meet the improvement expectations. Twelve metrics are exceeding the threshold; five of those twelve are in the Radiation Protection area and five are in the Material Condition area.

Although performance has improved at Quad Cities, there is a concern with those indicators that are not meeting station expectations. Management attention is focused on these areas and work is in progress to reverse the trends.

The station continues to aggressively pursue material condition during the current Unit 1 refuel outage, as well as during the maintenance outages on both Units in late-1993 and early-1994. In addition, Unit 1 will undergo a planned maintenance outage in Fall 1994, and Unit 2 will start a refuel outage in early 1995 in order to continue the upgrade of material condition.

Specific actions in response to the adverse Radiation Protection trends have included the appointment of a Project Manager for the Torus Recoat job, as well as other large exposure jobs; initiation of a Level II PIF investigation for rad worker adherence events; and implementation of a station-wide stand-down of RCA work. This stand down was implemented in response to an increasing trend in the occurrences of rad worker adherence events, and included extensive discussion sessions with all radiation workers. These discussion sessions described the current rad worker performance problems at the site, and clarified management's expectations for conduct of work in the Radiologically Protected Area.

Specific Actions in response to adverse Problem Identification and Resolution trends have included monthly meetings with line management to resolve outstanding CAR's; and concentrated efforts by the Process Expert Group to properly classify and complete overdue Level III investigations. The number of long standing, open investigations have been reduced to 33, from a total of 54, within approximately 60 days.

QUAD CITIES STATION METRICS LISTING MID-JUNE 1994

MEETING STRETCH GOALS

Collective Exposure - 10 Outage Repetitive Jobs (Stretch)
Hot Spot Reduction (Stretch)
Contaminated Area (Stretch)
Resolution of VAT Issues (Stretch)
Procedure Adherence (Stretch)
Personnel Error Events (Stretch)

MEETING THRESHOLD GOALS

Rad Material Violations
Control Room NWRs
Refuel Outage Performance
Safety System Performance - U2 HPCI, U1 RCIC, EDG
Temporary Alterations
MOV Commitments - Unit 2
Number of PIFS
Recurring Problems
CAR Level A & B
Average Age of PIFs
Procedure Adherence (Stretch)
Personnel Error Events (Stretch)
Reactivity Management
Industrial Safety Accident Rate

NOT MEETING PERFORMANCE IMPROVEMENT EXPECTATIONS

Outage Exposure
High Rad Violations
Reportable PCEs
Shoe Contaminations
Rad Worker Adherence
Percentage of PIF Investigations
CAR Completion
Non-Outage Corrective NWRs
Safety System Performance - U1 HPCI, U2 RCIC
MOV Commitments - Unit 1
Operator Work Arounds

**QUAD CITIES STATION METRICS LISTING
MID-JUNE 1994
(cont.)**

RADIATION PROTECTION

- ***Meeting Threshold/Stretch Goal***
 - Collective Exposure - 10 Outage Repetitive Jobs (Stretch)
 - Hot Spot Reduction (Stretch)
 - Contaminated Area (Stretch)
 - Rad Material Violations

- ***Not Meeting Performance Improvement Expectations***
 - Outage Exposure
 - High Rad Violations
 - Reportable PCEs
 - Shoe Contaminations
 - Rad Worker Adherence

MATERIAL CONDITION

- ***Meeting Threshold/Stretch Goal***
 - Resolution of VAT Issues (Stretch)
 - Control Room NWRs
 - Refuel Outage Performance
 - Safety System Performance - U2 HPCI, U1 RCIC, EDG
 - Temporary Alterations
 - MOV Commitments - Unit 2

- ***Not Meeting Performance Improvement Expectations***
 - Non-Outage Corrective NWRs
 - Safety System Performance - U1 HPCI, U2 RCIC
 - MOV Commitments - Unit 1
 - Operator Work Arounds

PROBLEM IDENTIFICATION AND RESOLUTION

- ***Meeting Threshold/Stretch Goal***
 - Number of PIFS
 - Recurring Problems
 - CAR Level A & B
 - Average Age of PIFs

- ***Not Meeting Performance Improvement Expectations***
 - Percentage of PIF Investigations
 - CAR Completion

HUMAN PERFORMANCE

- ***Meeting Threshold/Stretch Goal***
 - Procedure Adherence (Stretch)
 - Personnel Error Events (Stretch)
 - Reactivity Management
 - Industrial Safety Accident Rate