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Downers Grove, Illinois 60515

August 3, 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
Initiative Status Report
NRC Docket Nos. 50-273/249, 50-254/265 and 50-373/374

Dear Mr. Russell:

Attached is the sixth bi-weekly BWR Immediate Improvement Initiative Status Report. This report represents a mid-year summary of the Commonwealth Edison (ComEd) BWR improvement initiative. The report lists the metrics for each of the four critical areas at each ComEd BWR which are either meeting the goals (stretch and/or threshold) or are not meeting ComEd's expectations for improvement.

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

The next report will be issued in September 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
End-of-June 1994**

SUMMARY

Overall, the BWR Metrics at Dresden Station demonstrate an improving trend. Approximately 55% of the performance indicators are meeting stretch goals, while approximately 45% are not meeting performance improvement expectations. The metrics indicate that results have been mixed in most areas.

In Radiation Protection, four out of nine metrics are not meeting performance improvement expectations. These include *Personnel Contaminations, Radiation Work Practices and Radiation Material Violations*. All three are trending in an adverse direction. Multiple management actions have been taken to reverse these trends.

In Material Condition, seven of fourteen indicators are not meeting performance improvement expectations. These include three from Unit 3: *MOV Static Tests and Safety System Performance - HPCI and Emergency AC Power*. All of these values are affected by the outage. HPCI is not required during the outage, consequently, it's availability will not improve until after the outage. MOV static tests are being completed during the outage. Unit 3 Emergency AC is improving and should meet end-of-year goals. Temporary Alterations are unsatisfactory and steady. The Backlog of Control Room Work Requests is unsatisfactory and improving (presently at 15 down from 35).

One out of five Problem Identification and Resolution metrics 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 out of four Human Performance metrics are not meeting performance improvement expectations. 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. One reactivity management event has occurred. Operations has taken measures to address the Reactivity Management issue.

DRESDEN STATION METRICS LISTING End-of-June 1994

MEETING STRETCH GOALS

Collective Exposure - 10 Outage Repetitive Jobs
Hot Spot Reduction
Contaminated Area
Outage Exposure
Backlog of Nuclear Work Requests
Refueling Outage Performance
MOV Commitments - Unit 2 Static Tests
Safety Systems - Unit 2 HPCI, LPCI; Unit 3 LPCI
Operator Workarounds
Number of PIF's Written
Percentage of PIF Level 1, 2, or 3 Investigations
Corrective Action Records Overdue
Corrective Action Records--Level A and B
Personnel Error Events
Procedure Adherence Events

NOT MEETING PERFORMANCE IMPROVEMENT EXPECTATIONS

High Radiation Area Violations
Personnel Contamination Events
Radiation Material Violations
Shoe Contaminations
Temporary Alterations
Backlog of Control Room Work Requests
MOV Commitments - Unit 2 dP tests; Unit 3 Static and dP tests
Safety Systems - Unit 2 Emergency AC; Unit 3 HPCI, Emergency AC
Top 25 Technical Issues Reduction
Average Age of PIF Backlog
Accident Rate
Reactivity Management

DRESDEN STATION METRICS LISTING
End-of-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)

- ***Not Meeting Performance Improvement Expectations***
 - 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)
 - MOV Commitments - Unit 2 Static Tests (Stretch)
 - Safety Systems - Unit 2 HPCI, LPCI; Unit 3 LPCI (Stretch)
 - Operator Workarounds (Stretch)

- ***Not Meeting Performance Improvement Expectations***
 - Temporary Alterations
 - Backlog of Control Room Work Requests
 - MOV Commitments - Unit 2 dP tests; Unit 3 Static and dP tests
 - Safety Systems - Unit 2 Emergency AC; Unit 3 HPCI, Emergency AC
 - Top 25 Technical Issues Reduction

PROBLEM IDENTIFICATION AND RESOLUTION

- ***Meeting Threshold/Stretch Goal***
 - Number of PIF's Written (Stretch)
 - Percentage of PIF Level 1, 2, or 3 Investigations (Stretch)
 - Corrective Action Records Overdue (Stretch)
 - Corrective Action Records--Level A and B (Stretch)

- ***Not Meeting Performance Improvement Expectations***
 - Average Age of PIF Backlog

HUMAN PERFORMANCE

- ***Meeting Threshold/Stretch Goal***
 - Personnel Error Events (Stretch)
 - Procedure Adherence Events (Stretch)

- ***Not Meeting Performance Improvement Expectations***
 - Accident Rate
 - Reactivity Management

**BWR IMMEDIATE IMPROVEMENT INITIATIVE METRICS
QUAD CITIES STATION
End-of-June 1994**

SUMMARY

During the first six months of 1994, Quad Cities Station has focused extensive efforts and resources upon the improvement of Material Condition. The results of these efforts demonstrate that significant progress has been made with respect to: ***Operator Work Arounds; Resolution of VAT Issues; and Control Room Nuclear Work Requests.*** Additional effort will be necessary in order to meet performance expectations for ***Unit 1 MOV Commitments,*** and ***Safety System Performance (Unit 1 and 2 HPCI, and Unit 2 RCIC).***

The Problem Identification and Resolution area showed overall improvement, however ***Corrective Action Records (CARs) Open Greater than Sixty Days,*** and the ***Average Age of PIFs*** remain a problem. Site Quality Verification (SQV) has established a monthly meeting with Senior Station Management to resolve the issue of ***CARs Open Greater than Sixty Days.***

The Human Performance metrics demonstrated improved performance. However, ***Personnel Errors*** for June were unacceptable. These errors were related to Rad Worker practices during outage evolutions. This performance led to a Station Stand Down and implementation of a phased overview program to ensure appropriate Rad Worker practices.

Radiation Protection performance during the first six months of 1994 was mixed. The site met either the stretch or threshold goals in six areas, and were unsuccessful in four areas.

Overall the Station has made significant improvements in Material Condition, Human Performance and Problem Identification. Weaknesses still remain in the area of Radiation Protection.

QUAD CITIES STATION METRICS LISTING

End-of-June 1994

MEETING STRETCH GOALS

Contaminated Area
Rad Material Violations
Rad Worker Adherence
Resolution of VAT Issues
Operator Work Arounds
Control Room NWRs
Number of PIFS
Procedure Adherence
Industrial Safety Accident Rate

MEETING THRESHOLD GOALS

Collective Exposure - 10 Outage Repetitive Jobs
Hot Spot Reduction
Backlog of NWRs
Temporary Alterations
MOV Commitments - Unit 2
Refuel Outage Performance
Safety System Performance - U1 RCIC, EDG
Recurring Problems
CAR Level A & B
Reactivity Management

NOT MEETING PERFORMANCE IMPROVEMENT EXPECTATIONS

Outage Exposure
High Rad Violations
Reportable PCEs
Shoe Contaminations
Safety System Performance - U1 HPCI, U2 HPCI, U2 RCIC
MOV Commitments - Unit 1
Percentage of PIF Investigations
CAR Completion
Average Age of PIFs
Personnel Error Events

QUAD CITIES STATION METRICS LISTING
End-of-June 1994
(cont.)

RADIATION PROTECTION

- ***Meeting Threshold/Stretch Goal***
 - Contaminated Area (Stretch)
 - Rad Material Violations (Stretch)
 - Rad Worker Adherence (Stretch)
 - Collective Exposure - 10 Outage Repetitive Jobs
 - Hot Spot Reduction
- ***Not Meeting Performance Improvement Expectations***
 - Outage Exposure
 - High Rad Violations
 - Reportable PCEs
 - Shoe Contaminations

MATERIAL CONDITION

- ***Meeting Threshold/Stretch Goal***
 - Resolution of VAT Issues (Stretch)
 - Operator Work Arounds (Stretch)
 - Control Room NWRs (Stretch)
 - Temporary Alterations
 - Non-Outage Corrective NWRs (Stretch)
 - Backlog of NWRs
 - MOV Commitments - Unit 2
 - Refuel Outage Performance
 - Safety System Performance - U1 RCIC, EDG
- ***Not Meeting Performance Improvement Expectations***
 - Safety System Performance - U1 HPCI, U2 HPCI, U2 RCIC
 - MOV Commitments - Unit 1

PROBLEM IDENTIFICATION AND RESOLUTION

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

HUMAN PERFORMANCE

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

**BWR IMMEDIATE IMPROVEMENT INITIATIVE METRICS
LASALLE COUNTY STATION
End-of-June 1994**

SUMMARY

During the first six months of 1994, LaSalle County Station has concentrated on improving Rad Worker performance. This has resulted in 9 out of the 10 Radiation Protection (RP) metrics meeting either the stretch or threshold level of improvement. In addition, the station will continue to focus improvement efforts upon RP. From an RP perspective, the L1R06 outage is considered a success. Performance in the area of **Collective Outage Exposure** was approximately 90 rem under the goal, even with an expanded outage scope that was not adjusted for dose increase. Still, the Rad Worker "culture" does not seem to have taken a strong hold at the site.

The Material Condition and Problem Identification and Resolution areas have shown the least improvement in metric space. Four out of 13 metrics are not meeting performance improvement expectations.

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. This has led to conflicting priorities at the station. Both processes are receiving attention, which should result in performance improvement in this area.

All Human Performance metrics are meeting performance improvement goals.

**LASALLE COUNTY STATION METRICS LISTING
End-of-June 1994**

MEETING STRETCH GOALS

Collective Exposure - Top 10 Repetitive Jobs
Outage Exposure
Rad Worker Adherence
High Rad Area Violations
Contaminated Area
Hot Spot Reduction
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

Non Outage Exposure
Year End Exposure
Personnel Contamination Events
Rad Material Violations
Number of Temporary Alterations
Backlog of Control Room Nuclear Work Requests
MOV Commitment Completion
Number of Problem Identification Forms (PIFs) Submitted
Corrective Action Record Completion
Reactivity Management

NOT MEETING PERFORMANCE IMPROVEMENT EXPECTATIONS

Shoe Contaminations
Safety System Performance
Operator Work Arounds
Average Age of PIF Backlog
% of PIF Investigations

LASALLE COUNTY STATION METRICS LISTING
End-of-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 (Stretch)
 - 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
 - Temporary Alterations

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

PROBLEM IDENTIFICATION AND RESOLUTION

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

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

HUMAN PERFORMANCE

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