

DCD/OCB

May 14, 1998

Mr. J. B. Hosmer  
Engineering Vice President  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: ENGINEERING MANAGEMENT MEETING SUMMARY

Dear Mr. Hosmer:

On May 12, 1998, we met with you and members of your staff to discuss engineering activities at ComEd. Specifically, the meeting discussion focused on the engineering learning process. The handout you provided to us during the meeting to aid in the discussion is enclosed.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

Sincerely,

original /s/ J. A. Grobe

John A. Grobe, Director  
Division of Reactor Safety

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

Enclosure: As stated

See Attached Distribution

70037

IE45

DOCUMENT NAME: G:DRS\COM04158.DRS

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	RIII	<input checked="" type="checkbox"/> N	RIII	<input checked="" type="checkbox"/> C	RIII	<input type="checkbox"/>	RIII	<input type="checkbox"/>
NAME	Duncan:sd		Jacobson J. Gro		Grobe			
DATE	05/13/98		05/13/98		05/ /98		05/ /98	

OFFICIAL RECORD COPY

9805280051 980514  
PDR ADOCK 05000237  
P PDR

cc w/encl:

- M. Wallace, Senior Vice President
- D. Helwig, Senior Vice President
- G. Stanley, PWR Vice President
- J. Perry, BWR Vice President
- D. Farrar, Regulatory Services Manager
- I. Johnson, Licensing Director
- DCD - Licensing
- T. Tulon, Braidwood Site Vice President
- K. Graesser, Byron Site Vice President
- M. Heffley, Dresden Site Vice President
- F. Dacimo, LaSalle Site Vice President
- J. Dimmette, Jr., Quad Cities Site Vice President
- J. Brons, Zion Site Vice President
- Braidwood Station Manager
- K. Kofron, Byron Station Manager
- P. Swafford, Dresden Station Manager
- T. O'Connor, LaSalle Station Manager
- W. Pearce, Quad Cities Station Manager
- R. Starkey, Zion Plant General Manager
- T. Simpkin, Braidwood Regulatory Assurance Supervisor
- D. Brindle, Byron Regulatory Assurance Supervisor
- F. Spangenberg, Dresden Regulatory Assurance Manager
- P. Barnes, LaSalle Regulatory Assurance Supervisor
- C. Peterson, Quad Cities Regulatory Affairs Manager
- R. Godley, Zion Regulatory Assurance Supervisor
- R. Hubbard, MHB Technical Associates
- N. Schloss, Economist, Office of the Attorney General
- State Liaison Officer
- State Liaison Officer, Wisconsin
- Mayor, City of Zion
- Chairman, Illinois Commerce Commission
- W. Leech, Manager of Nuclear MidAmerican Energy Company

Distribution:

SAR (E-Mail)

NRR Project Mgrs. Braidwood,  
Byron, Dresden, LaSalle,  
Quad Cities, Zion w/encl

A. Beach, RIII w/encl

J. Caldwell, RIII w/encl

B. Clayton, RIII w/encl

SRIs Braidwood, Byron,  
Dresden, LaSalle,  
Quad Cities, Zion w/encl

DRP w/encl

TSS w/encl

DRS (2) w/encl

RIII PRR w/encl

PUBLIC IE-01 w/encl

Docket File w/encl

GREENS

IEO (E-Mail)

DOCDESK (E-Mail)

**COMMONWEALTH EDISON ENGINEERING MEETING  
MAY 12, 1998**

**LIST OF ATTENDEES**

ComEd

J. Hosmer, Vice President, Engineering  
D. Farrar, Licensing  
R. Renhart, Engineering

USNRC

J. Grobe, Director, Division of Reactor Safety  
J. Gavula, Chief, Engineering Specialists Branch 1  
J. Jacobson, Chief, Lead Engineers Branch  
M. Jordan, Chief, Branch 3, Division of Reactor Projects  
D. Butler, Reactor Engineer  
E. Duncan, Reactor Engineer

MidAmerican

D. Tubbs, Senior Engineer

---

# ENGINEERING LEARNING PROCESS

## COMED MEETING WITH NRC REGION III

May 12, 1998

# AGENDA

<u>Topic</u>	<u>Slides</u>	<u>By</u>
◆ Introduction		
– Objectives of Presentation	3	Hosmer
– Nuclear Safety	4, 5	Hosmer
◆ The Learning Process	6	Hosmer
◆ Dresden ISI and SSFI Lessons	7-13	Renuart
◆ Quad Cities Lessons	14-16	Hosmer
◆ Measuring Learning	17-20	Renuart
◆ Conclusions	21	Hosmer

# OBJECTIVES OF PRESENTATION

- ◆ Present the Learning Process
- ◆ Provide Examples of Learning by ComEd Engineering
- ◆ Discuss Measurements of Effectiveness
- ◆ Draw Conclusions about Effectiveness

# **NUCLEAR SAFETY**

## **Outcome**

**Avoidance  
of Events**

**Learning from  
Experiences**  
(Internal and External)

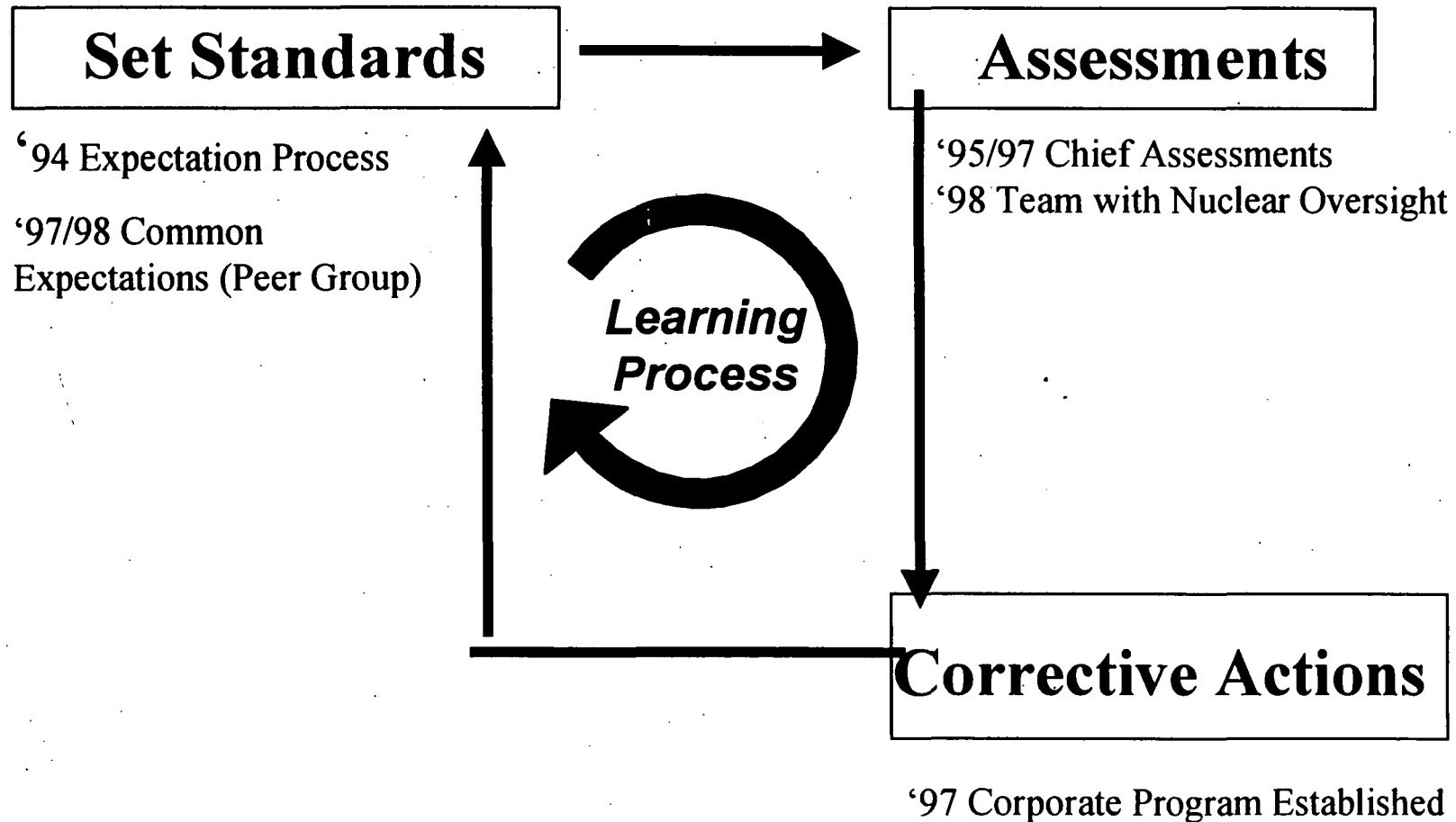
## **Achieved By**

**Setting High Standards  
and Expectations**

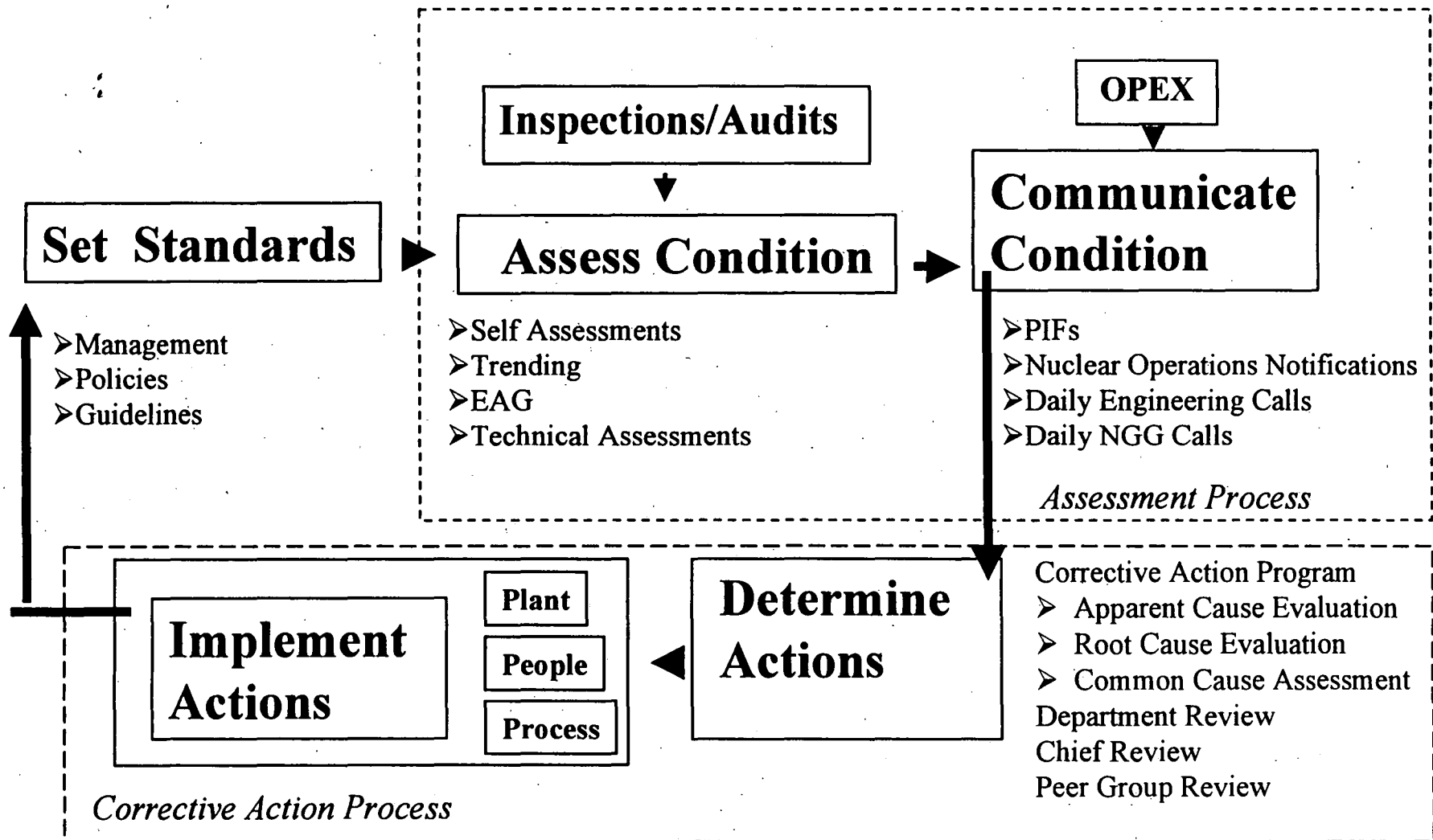
**Effective Learning Model**  
- Assessment  
- Corrective Action



# GENERAL LEARNING PROCESS MODEL



# THE LEARNING PROCESS AT COMED



# DRESDEN ISI

---

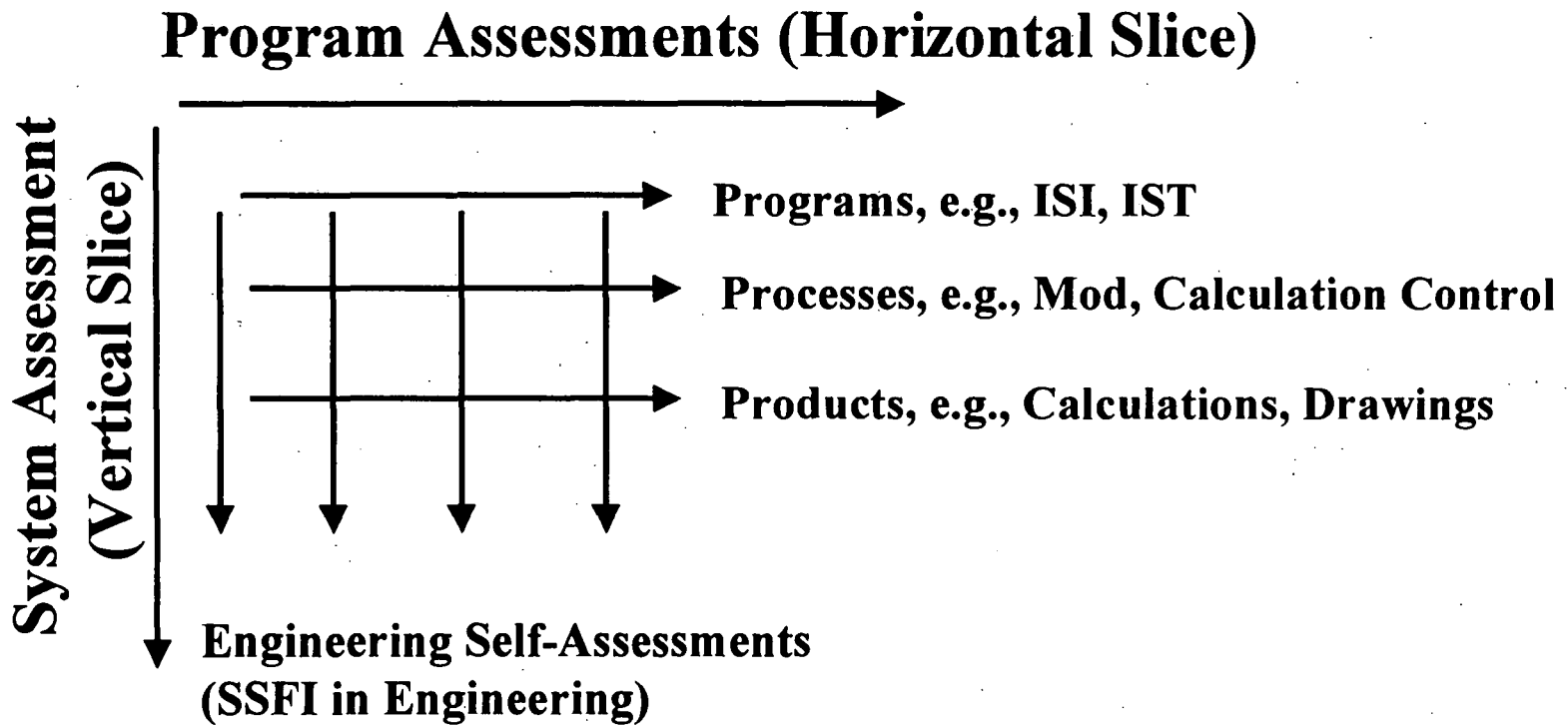
## ◆ Assessment Process:

- Need to Better Understand and Maintain Design Basis
- Need to Improve Quality and Access to Calculations
- Improve the Quality of Operability Assessments
- Improve the Quality of Safety Evaluations

## ◆ Corrective Actions Process:

- |   |         |
|---|---------|
| - Common NSPs (Operating Evaluations, 50.59, UFSAR) | Ongoing |
| - Safety Evaluation Training                        | Ongoing |
| - SSFIs in Engineering                              | Ongoing |
| - Design Basis Improvement Project                  | Started |
| - EAG Program                                       | Started |

# Engineering Assessment Model



# SUMMARY OF THE OVERSIGHT ACTIVITIES BY THE CHIEFS

## OVERSIGHT PERFORMED IN 1995-97

Programs/Plants	BRAIDWOOD	BYRON	DRESDEN	LASALLE	QUAD	ZION
ISI	YES	YES	YES	YES	YES	YES
IST	YES	YES	YES	YES	YES	YES
GL 89-13	NO	NO	NO	YES	NO	YES
Maint. Rule	YES	YES	YES	YES	YES	YES
Appendix R	YES	YES	YES	YES	YES	YES
Flow Acc. Coros	YES	YES	YES	YES	YES	YES
GL 89-10	YES	YES	YES	YES	YES	YES
VETIP	YES	YES	YES	YES	Yes	YES
Appendix J	YES	YES	YES	YES	YES	YES
Environ. Qual.	YES	YES	YES	YES	YES	YES
Setpoint Control	YES	YES	YES	YES	NO	YES
NDT/IST	YES	YES	YES	YES	YES	YES

\* Although the oversight is indicated as "No", support was provided to the site.

# **EFFECTIVENESS of CHIEFS' OVERSIGHT**

## **ASSESSMENT**

- ◆ **Did Not Influence Standard Programs**
- ◆ **Did Not Conduct Effectiveness Reviews**
- ◆ **Did Not Get Non-conformances Into Corrective Action Program**

## **CORECTIVE ACTION**

**Five Programs Underway**  
(ISI, MR, Appx R, IST, 89-13)

**Conduct 3 - 6 Months**

**PIFS Generated by Stations with Corrective Actions Identified**

# SSFI SUMMARY

---

## ◆ **Assessment:**

- **Most Issues had been Previously Identified and Lacked Closure**
  - » **Low Priority for Correcting Old Problems**
  - » **Engineering Culture did not Encourage Problem Identification Assessment**

## ◆ **Corrective Action:**

- **Better Procedural Adherence**
- **Better PIF Initiation as Problems are Discovered**
- **Accountability through Nuclear Tracking System**
- **Improved Engineering Work Control Program**

# SSFI RESULTS

---

- ◆ Identified 154 Issues
- ◆ 66 (43%) Issues Are Closed
- ◆ Open Items Are Tracked Through NTS



# SSFI RESULTS AND ACTIONS

---

## ◆ Resolution to Common General Process Weaknesses

### Assessments

- Design Basis
- Design Control
- Not Learning From Other Stations

### Corrective Actions

Design Basis Improvements (DBI) Project

Training, Process Improvements, NEP Revisions for Design

Strengthen Assessment Process  
Case Studies on Generic Items

# **QCNPS-LESSONS LEARNED: GOOD RESULTS**

- ◆ **RW Clean-up Pipe Break Upgrade**
  - Identified at Monticello Station
- ◆ **ECCS Strainer, NPSH Requirement Issue**
  - Identified at Dresden
- ◆ **Clean out of Reactor Bottom Head Drain**
  - Identified at Dresden

# **QCNPS-LESSONS LEARNED:MIXED RESULTS**

## **◆ Dresden ISI**

### **– HPCI Gland Seal Steam Condenser**

- » Reevaluated And Reclassified In The SOPI Preparation Phase**

## **◆ Air Start Motors**

- » Identified at Quad Cities**

# **QCNPS-LESSONS LEARNED: POOR RESULTS**

## **◆ Maintenance Rule**

- Inadequate Overall Performance**
- Several NRC Violations**

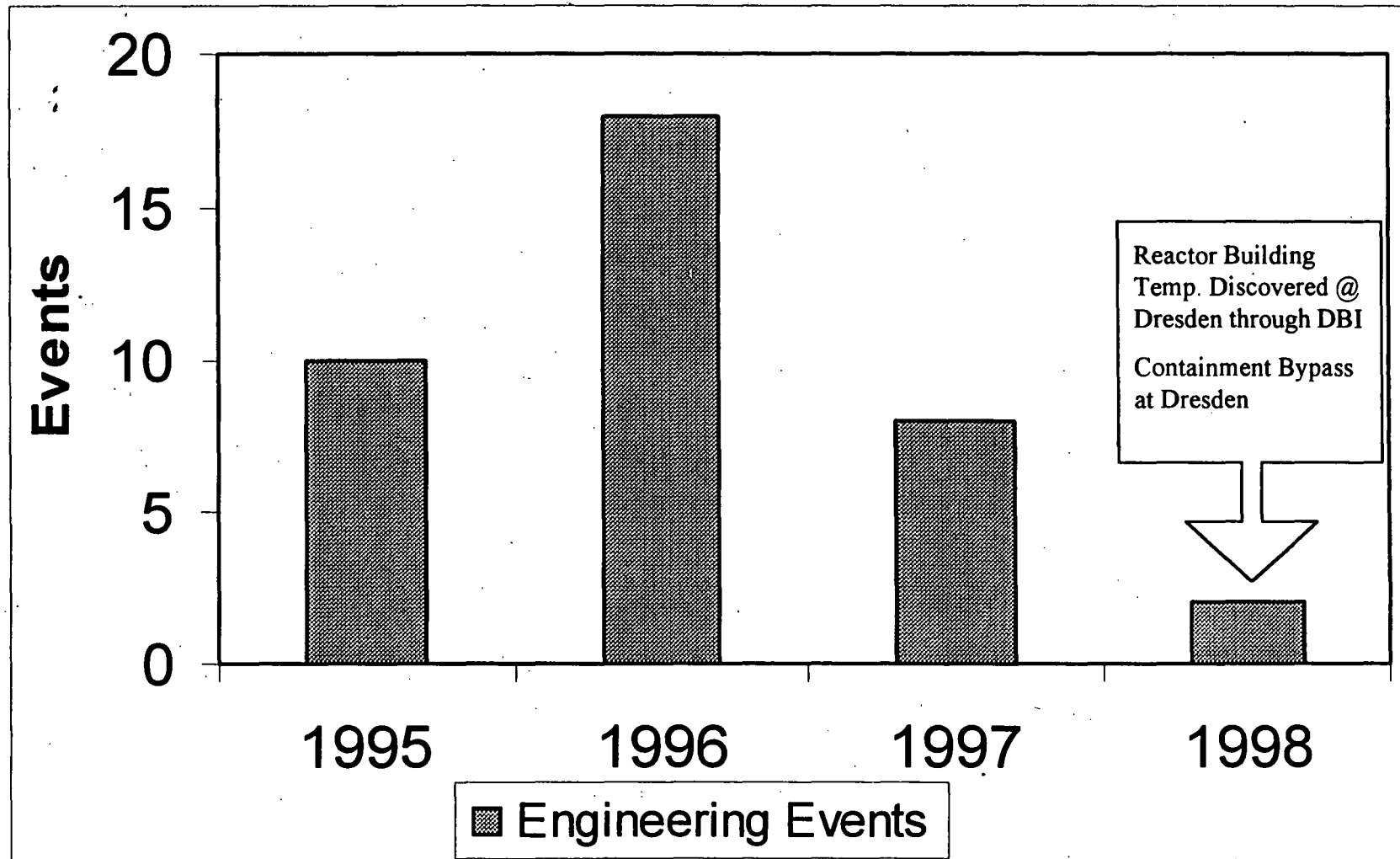
## **◆ Appendix R “Fire Protection”**

- Lack of recognition of commitments**
- SSA, FHA**

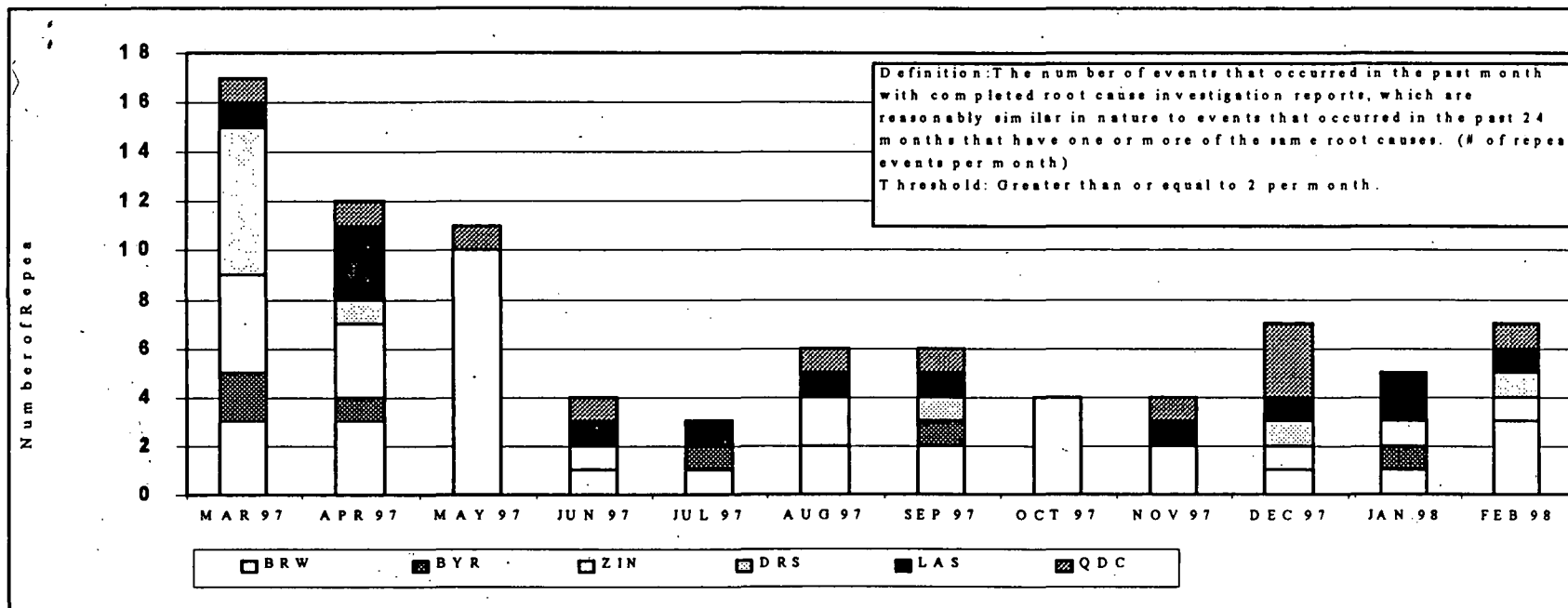
# **MEASURING LEARNING PROCESS**

- ◆ **Major Engineering Events**
- ◆ **Repeat Events**
- ◆ **Percent PIFS Identified by Engineering on Engineering**
- ◆ **ComEd Monitors All of Above**

# MAJOR ENGINEERING EVENTS



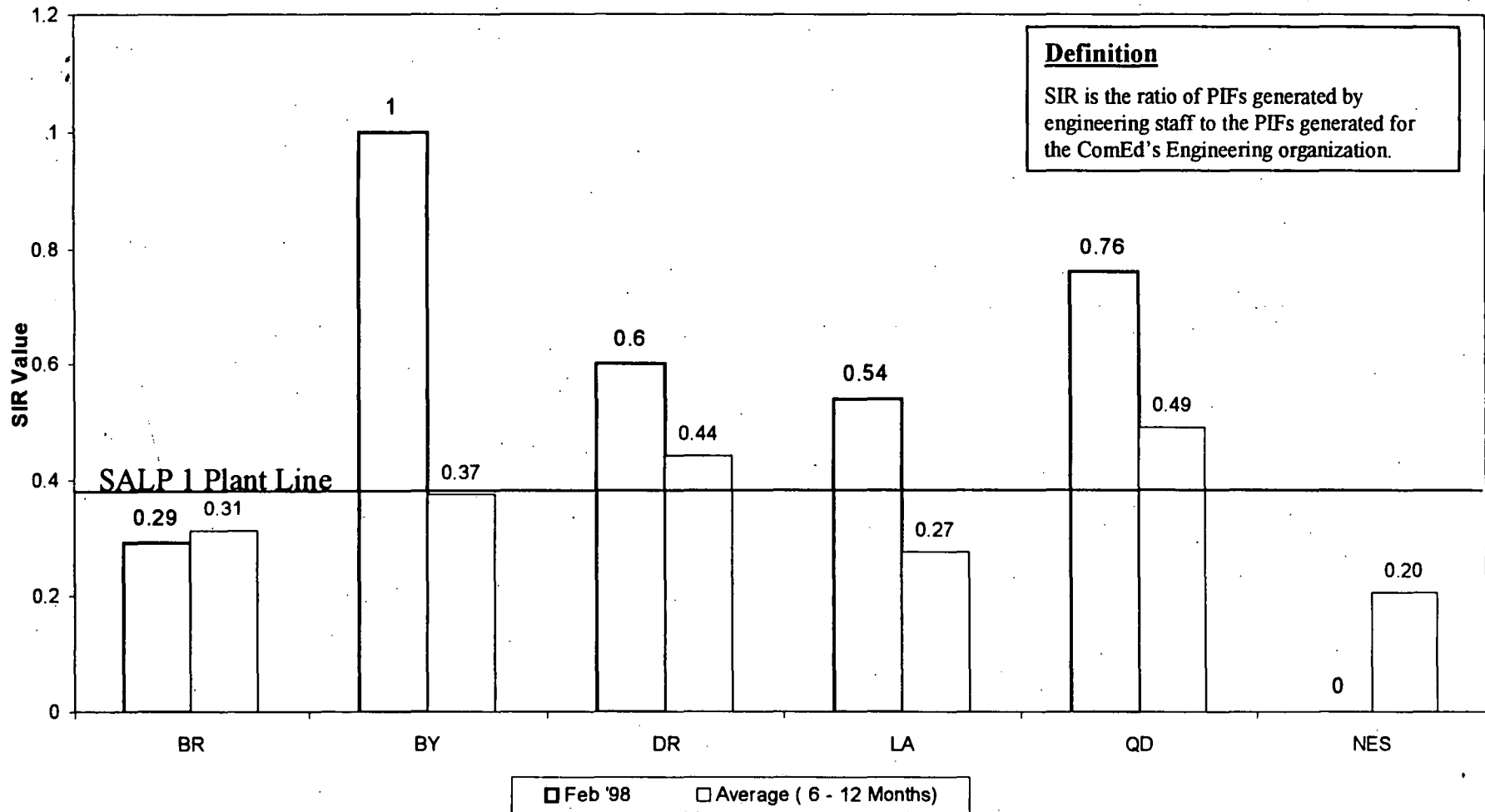
# REPEAT EVENTS METRIC



	MAR 97	APR 97	MAY 97	JUN 97	JUL 97	AUG 97	SEP 97	OCT 97	NOV 97	DEC 97	JAN 98	FEB 98
BRW	3	3	0	1	1	2	2	0	2	1	1	3
BYR	2	1	0	0	1	0	1	0	0	0	1	0
ZIN	4	3	10	1	0	2	0	4	0	1	1	1
DRS	6	1	0	0	0	0	1	0	0	1	0	1
LAS	1	3	0	1	1	1	1	0	1	1	2	1
QDC	1	1	1	1	0	1	1	0	1	3	0	1

Graph displays total number of repeat events for a rolling 12 months. Table displays number of repeat events per month.

# SELF-IDENTIFIED RATIO IN ENGINEERING





# CONCLUSIONS

---

- ◆ Made significant fundamental changes to the learning process in ComEd's Engineering.
- ◆ Will monitor performance using the Significant Events, Repeat Event Metric and other indicators such as the Self-Identification Ratio for Engineering PIFs.
- ◆ Existing data and trends are in the correct direction. Still have declining performance trend at Quad Cities.

<u>Issue</u>	<u>Failure</u>	<u>Corrective Actions</u>
Appendix R - QC	Lack of Recognition Poor Program	Look Back Improved Std Programs
Appendix G - QC	Poor Communication Safety Culture	ISI Program Change Licensing Reviews Culture Change
Maintenance Rule	Late Assessment No Action	3 mos Prior to Inspection Team not Family Approach