

September 16, 1999

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

**SUBJECT: STATUS MEETING ON THE PERFORMANCE OF COMMONWEALTH EDISON
COMPANY'S NUCLEAR GENERATION GROUP**

Dear Mr. Kingsley:

This refers to the meeting conducted at the NRC Region III Office in Lisle, Illinois, on July 13, 1999. The purpose of this meeting was to discuss Commonwealth Edison Company (ComEd) Nuclear Generation Group's (NGG's) performance as it relates to actions ComEd has taken in response to the NRC's 10 CFR 50.54(f) letter, dated January 27, 1997, regarding safety performance at ComEd's nuclear facilities. Attendees at the meeting are listed in Enclosure 1. Enclosure 2 is a copy of ComEd's presentation materials.

ComEd presented the results of the Strategic Reform Initiative (SRI) Step 3 Effectiveness Reviews. The Effectiveness Reviews were conducted by 18 team members consisting of external industry and ComEd senior management peers. The purpose of the Effectiveness Reviews was to verify that the processes, procedures, and programs established by the 13 SRIs were institutionalized and self-sustaining, understood by NGG personnel, and supported by the NGG management and workforce. The Effectiveness Review Team concluded that the cyclic performance of ComEd's nuclear facilities had been arrested, and that an infrastructure of programs, processes, and procedures for continuous improvement is in place. However, two areas of focus were identified: (1) human performance error reduction, and (2) alignment of management and bargaining unit personnel. Corrective actions for the areas of focus include establishing human performance and configuration control action plans at each facility, improving management alignment and leadership, engaging the first line supervisors, and increasing employee involvement. ComEd concluded that the standards and fundamentals embodied by the SRIs will continue to govern NGG performance and will be the foundation for continuous improvement.

ComEd developed the 13 SRIs and associated work plans in early 1998, in response to the NRC's 50.54(f) letter. The initiatives support four overarching goals that ComEd had established: Operational and Technical Excellence; Material Condition; Organizational Alignment and Workforce Engagement; and Effective Leadership and Management. These initiatives also addressed the root causes of ComEd's cyclic performance.

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P PDR

In June 1997, the NRC formed the Commonwealth Edison Performance Oversight Panel (CPOP) to provide an integrated NRC assessment of ComEd's nuclear safety performance, particularly focusing on whether sustained performance improvement was being accomplished at each facility. The CPOP developed and implemented a plan to inspect and review selected ComEd activities and products associated with the SRI work plans. The summary status of those inspections and review activities were the subject of previous Commission meetings to discuss ComEd performance. All inspection activities developed by the CPOP are complete. In addition, a number of public meetings have been conducted to discuss SRI implementation, compare ComEd and NRC assessments of plant performance, review ComEd's development of performance indicators, assess the effectiveness of lessons learned implementation at all ComEd facilities, and evaluate ComEd's efforts to improve corporate-wide engineering activities. At the most recent ComEd Commission meeting on March 2, 1999, both ComEd and the NRC staff presentations highlighted the improved or consistent performance results at all ComEd facilities.

In a memorandum to the Commission, dated June 14, 1999, the NRC staff outlined criteria for discontinuance of CPOP activities. Based on the results of ComEd's SRI effectiveness review presented during a May 27, 1999, public meeting, the NRC determined that the criteria were satisfied. Therefore, the NRC will discontinue CPOP activities including the periodic public meetings. As part of the normal Plant Performance Review (PPR) process, the NRC will continue to evaluate performance trends at each of the ComEd facilities, as well as conduct an integrated assessment of ComEd performance. In addition to the PPR public meeting to discuss licensee performance at specific reactor facilities, the NRC and ComEd agreed to conduct periodic public meetings to discuss ComEd's overall performance. The first meeting is planned for December 1999.

As a separate issue, ComEd presented its plans for ensuring that overtime is managed within the guidelines of Generic Letter 82-12. ComEd has established a common NGG overtime procedure to be implemented prior to fall outages. The procedure will replace site-specific procedures and will establish more rigorous overtime controls.

In accordance with Section 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC's Public Document Room.

O. Kingsley

-3-

If you have any questions regarding this meeting or if our understanding of actions ComEd is taking, as discussed above, differs from yours, please contact me at (630) 829-9657.

Sincerely,

/s/J. E. Dyer

J. E. Dyer
Regional Administrator

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

License Nos. NPF-72; NPF-77;
NPF-37; NPF-66;
DPR-19; DPR-25;
NPF-11; NPF-18;
DPR-29; DPR-30

Enclosures: 1. Attendance List
2. Licensee Presentation

See Attached Distribution

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| NAME | PPelke/m | | GGrant | CThomas | | JDyer |
| DATE | 07/23/99 | | 07/19/99 | 07/23/99 | E-MAIL | 07/16/99 |

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H. Stanley, Vice President, Nuclear Operations
R. Krich, Vice President, Regulatory Services
DCD - Licensing
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W. Levis, Byron Site Vice President
M. Heffley, Dresden Site Vice President
J. Benjamin, LaSalle Site Vice President
J. Dimmette, Jr., Quad Cities Site Vice President
K. Schwartz, Braidwood Station Manager
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State Liaison Officer, State of Illinois
State Liaison Officer, State of Wisconsin
Chairman, Illinois Commerce Commission
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120657

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ATTENDANCE AT THE JULY 13, 1999 MEETING BETWEEN THE NRC AND COMED

COMED ATTENDEES

| | |
|------------------|--|
| O. Kingsley, Jr. | President and Chief Nuclear Officer |
| D. Helwig | Senior Vice President |
| S. Perry | Nuclear Oversight Vice President |
| C. Crane | BWR Vice President |
| H. Stanley | PWR Vice President |
| R. Krich | Vice President, Regulatory Services |
| W. Bohlke | Vice President, Engineering |
| D. Sager | Vice President, Generation Support |
| R. Landy | Vice President, Human Resources and Administration |
| J. Bauer | Nuclear Licensing Administrator |
| D. Green | Regulatory Services |
| B. Adams | Regulatory Assurance Manager, Byron |
| V. Lopez | Nuclear Generation Group (NGG) Communications |
| E. Spencer | NGG Communications |
| J. Randich | NGG E.A. |
| E. Adams | NGG E.A. |
| K. Kociuba | NGG E.A. |

NRC ATTENDEES

| | |
|-------------|--|
| J. Dyer | Regional Administrator, Region III |
| C. Thomas | Director, Project Directorate III, NRR |
| G. Grant | Director, Division of Reactor Projects (DRP), Region III |
| M. Dapas | Deputy Director, DRP, Region III |
| S. Reynolds | Deputy Director, Division of Reactor Safety, Region III |
| M. Ring | Chief, Projects Branch 1, DRP, Region III |
| P. Pelke | Reactor Engineer, Technical Support Staff, DRP, Region III |
| M. Jordan | Chief, Projects Branch 3, DRP, Region III |
| D. Skay | Project Manager, NRR |
| B. Burgess | Team Leader, Technical Support Staff, DRP, Region III |
| M. Leach | Chief, Projects Branch 2, DRP, Region III |

OTHER ATTENDEES

| | |
|----------|-------------------------------------|
| D. Tubbs | Senior Engineer, MidAmerican Energy |
|----------|-------------------------------------|

***NUCLEAR GENERATION GROUP
PERFORMANCE STATUS
MEETING***

**July 13, 1999
NRC Region III
Lisle, IL.**

OPENING REMARKS

O. D. Kingsley, Jr.

Agenda

Opening Remarks

O. D. Kingsley, Jr.

Strategic Reform Initiatives

- Step 3 Effectiveness Reviews - Process

J. S. Perry

- Step 3 Effectiveness Reviews - Results

D. R. Helwig

- Human Performance Error Reduction

C. M. Crane

**- Alignment of Management and
Bargaining Unit Personnel**

H. G. Stanley

Overtime Management

R. J. Landy

Closing Remarks

O. D. Kingsley, Jr.

Strategic Reform Initiatives

- **SRIs Addressed Causes of Cyclic Performance**
 - **Lack of Effective Management Attention and Application of Resources**
 - **Weak Corporate Oversight of Nuclear Operations**
 - **Poor Problem Recognition and Failure to Ensure Lasting Corrective Actions**
 - **Lack of Adequate Engineering Support**
 - **Inability or Reluctance to Learn from Experiences at ComEd and Other Utilities**

Strategic Reform Initiatives (cont.)

- **SRI Implementation Complete**
 - **Clearly Defined Standards and Expectations**
 - **Results-Oriented Performance Monitoring**
 - **Accountability for Results**
 - **Strong Leadership, Support, and Oversight**

- **SRI Actions and Effectiveness Reviewed**

- **Three Step Process**
 - **Sponsor Confirmed Actions**
 - **Nuclear Oversight Review of Individual SRI Actions**
 - **Overall Effectiveness Review by Team**

***STRATEGIC REFORM INITIATIVE
(SRI) STEP 3 EFFECTIVENESS REVIEWS -
PROCESS***

J. S. Perry

SRI Step 3 Effectiveness Reviews - Process

- **SRI Step 3 Effectiveness Reviews Provide Additional Evaluation of Effectiveness of SRIs**
 - **Established Standards**
 - **Installed Fundamental Programs, Processes, and Procedures**
- **SRI Step 3 Effectiveness Reviews Provide Additional Evaluation of Effectiveness of SRIs**
 - **Established Standards**
 - **Installed Fundamental Programs, Processes, and Procedures**

SRI Step 3 Effectiveness Reviews - Process

(cont.)

- **Objectives of Effectiveness Reviews**
 - **Verify that Processes, Procedures, and Programs are:**
 - + **Institutionalized and Self-Sustaining**
 - + **Understood by NGG Personnel**
 - + **Supported by NGG Management and Workforce**

SRI Step 3 Effectiveness Reviews - Process

(cont.)

- **Establishment of Team**
 - **Industry and ComEd Peers (18 Team Members)**
 - **External Industry Peers**
 - + **Familiar with ComEd**
 - + **Four External Members of ComEd PWR and BWR Nuclear Safety Review Boards**
 - **ComEd Peers**
 - + **Historical Knowledge of ComEd**
 - + **Other Nuclear Industry Experience**
 - + **Familiar with SRI Assessment Reports and Implementation**

SRI Step 3 Effectiveness Reviews - Process

(cont.)

- **Team Planning**

- **Defined Attributes of SRIs Based on Expected Results Specified in February 17, 1998, Letter**
- **Developed Questions**
- **Collected and Reviewed Associated Documentation and Data**
- **Determined Appropriate Interview Population**
- **Cross-Cutting Review**
 - + **Covered all Sites, all Functional Areas**

- **Team Functional Areas**

- **Divided into Four Functional Areas**
 - + **Operations**
 - + **Maintenance**
 - + **Engineering**
 - + **Management and Oversight**

- **One Functional Area Team Assigned as Lead for Each SRI**

SRI Step 3 Effectiveness Reviews - Process

(cont.)

- **Team Interviews**

- **Four Days of Interviews Conducted**

- + **Interviewed Cross-Section of Employees from Stations and Downers Grove Functional Areas**

- ◆ **Senior Management**
- ◆ **Middle Management**
- ◆ **First Line Supervisors**
- ◆ **Working Level Personnel**
- ◆ **Bargaining Unit Personnel**

- + **Shared Observations**

- + **Ensured Coverage of All Stations and Downers Grove**

- + **Ensured Effectiveness of Each SRI Was Assessed**

SRI Step 3 Effectiveness Reviews - Process (cont.)

- **Team Conclusion**

- **Cyclic Performance of ComEd's Nuclear Plants Arrested**
- **Infrastructure of Programs, Processes, and Procedures In Place**
- **Focus Areas**
 - + **Human Performance Error Reduction**
 - + **Alignment of Management and Bargaining Unit Personnel**

***SRI STEP 3 EFFECTIVENESS REVIEWS
- RESULTS***

D. R. Helwig

NGG-1, Strengthen Performance Monitoring and Management

- **Accomplishments**
 - Consistent Implementation of Measures and Reports
 - Incorporation of Measures into Business Plans and Goals
 - Management Review and Use
 - Use of Escalation Process

- **Focus Area**
 - Use for Trending and Analysis
 - Site Ownership of Corporate Support Indicators
 - Usefulness of Training Measures

NGG-1, Strengthen Performance Monitoring and Management

- **Step 3 Conclusions**
 - ✓ **Confirmed Common Performance Indicators Established**
 - ✓ **Identified Performance Gaps Are Used to Focus Work**
 - ✓ **Common Understanding of Performance Indicators Achieved**
 - **Further Work Required to Standardize Lower-Tier Performance Indicators**

NGG-2, Upgrade Operations Department Leadership Role in Ensuring Excellent Plant Operations

- **Accomplishments**

- **Demonstrated Ability to Operate the Plants Safely and Reliably**
- **Demonstrated Improvement in Adherence to and Enforcement of Operations Standards**
- **Demonstrated Improvement in Operations Teamwork**
- **Active Management Leadership and Coaching to Improve Operations Performance**
- **Operations Management Involved in Day-to-Day Operations**
- **Demonstrated Improvement in Control Room Professionalism and Command-and-Control**

NGG-2, Upgrade Operations Department Leadership Role in Ensuring Excellent Plant Operations (cont.)

- **Focus Areas**

- Leadership in the Work Control Process (NGG Wide)
- Use of Self-Assessment for Continuous Improvement (NGG Wide)
- Maintaining Proper Plant Configuration (Byron and Quad Cities)
- Higher Standards of Performance (Byron and Quad Cities)
- Management Involvement and Leadership (Quad Cities)

- **Step 3 Conclusions**

- ✓ **Operations Driving Issue Resolution**
- ✓ **Improved Planning and Execution of High-Risk Activities**
- **Human Performance-Related Occurrences Continue**

NGG-3, Ensure Excellence in Plant Material Condition

- Accomplishments
 - Work Control Planning Process
 - System Health Indicator Program (SHIP)
 - Long-Term Material Condition Plans
 - Material Condition Process Model
 - Reduction in Caution Cards, Reduction in Operator Work Arounds, NGG Wide Improvement in Capacity Factor and in Unplanned Capability Loss Factor

NGG-3, Ensure Excellence in Plant Material Condition (cont.)

- **Focus Areas**
 - Improve Execution of Work Management Process
 - Incorporate the Results of Maintenance Activities Into the Preventative Maintenance Program
 - Refinement of Long-Term Material Condition Planning Process
 - Proactive Use of SHIP

- **Step 3 Conclusion**
 - ✓ **Consistent**

NGG-4, Align and Integrate Resources

- **Accomplishments**

- Consolidated Priority Lists
- Peer Group Involvement
- Adoption of Best Practice Templates
- Integration with Performance Measures

- **Focus Areas**

- Process Simplification
- Consistency of Field Implementation
- Site Leadership Sponsorship

- **Step 3 Conclusion**

ComEd ➤ Use of Integrated Operational Schedule Not Well Understood
A Unicom Company

NGG-5, Assess Organizational Accountability and Revise Structure

- **Accomplishments**

- **Downers Grove Organization Implemented**

- + Roles Defined in Support, Governance, Technical Expertise, Oversight
- + Site Interface is Understood

- **Standard Site Organization Implemented**

- **Roles and Responsibilities are Clear**

- **Focus Areas**

- **Continued Work in**

- + Office Support
- + Project Management Processes and Roles
- + Transition to Chemistry Shift Supervisor

NGG-5, Assess Organizational Accountability and Revise Structure

- **Step 3 Conclusions**
 - **Update Summary Position Descriptions**
 - **Complete Staffing of Standard Site Organization**

NGG-6, Revise

Business Management Process

- **Accomplishments**

- Station and Corporate Business Plans Developed
- Aligned the NGG on a Resource-Loaded Action Plan
- Identified Ownership for Business Plan Resources
- Received Buy-In from Organizational Groups
- Created Awareness of NGG Goals at All Levels

- **Focus Areas**

- Administrative Processes
- Link Personal Performance to Business Plan Goals
- Monitor Business Plan Results

- **Step 3 Conclusions**

- ✓ Standardized Business Planning Process Developed
- Increase Effectiveness of Site and NGG Priority Integration

NGG-7, Strengthen Regulatory Compliance Processes

- **Accomplishments**
 - Roles and Responsibilities of Regulatory Organizations Are Clear
 - Standardized Procedures Implemented
 - Communication of Rule Changes

- **Focus Areas**
 - Use of External Operating Experience

- **Step 3 Conclusion**
 - **Complete Staffing of Regulatory Organization**

NGG-8, Prioritize and Enhance Execution of Engineering Improvements

- Align Corporate and Site Organizations
- Prioritize Engineering Initiatives
- Issue First Five Common Technical Programs
- Implement Engineering Work Management Systems
- Schedule Development of Next Ten Technical Programs

- **Step 3 Conclusions**
 - ✓ **Roles and Responsibilities of Engineering Organizations Defined**
 - ✓ **Engineering and Station Priorities Aligned**
 - ✓ **Peer and Working Groups Sharing Lessons Learned**
 - **Complete Transfer of Responsibilities between Engineering and Other Departments**
 - **Complete Organization Definition and Staffing of Site Engineering Organizations**

NGG-9, Enhance Management Development

- **Step 3 Conclusions**
 - ✓ **Succession Planning Process Developed**
 - ✓ **Regular Senior Management Development Committee Meetings Conducted**
 - ✓ **Key Positions for Succession Planning Identified**
 - ✓ **Templates for Progression Delineated**
 - ✓ **Pool of Candidates Identified**
 - ✓ **Candidates Assessed and Developmental Plans Created**
 - **Further Work Required in Consistent Succession Planning Program Implementation for Other Positions**

NGG-10, Enhance Communications

- **Accomplishments**

- **Expectations for Frequent Communications Established**
- **Supporting Materials Being Provided**
- **Various Forums in Use**

- **Focus Areas**

- **Communication Skills**

- **Step 3 Conclusions**

- **Effectiveness of Communications Continues to Need Work**
- ✓ **Common Baseline Understanding of NGG General Direction and Goals Achieved**
- ✓ **Strong Link between Business Plans and Individual Employee Performance Goals**

NGG-11, Enhance Employee Alignment and Involvement

- **Accomplishments**

- **Management Performance Appraisal and Incentive Program Aligned to NGG Goals**
- **Employee Incentive Program Aligned, Agreed to for 1999**
- **HIT Teams Making Substantial Contributions to Successful Outages**
- **Labor Strategy Developed**
- **Standard Work Practices Being Developed**

- **Focus Areas**

- **Continue Implementation of Labor Strategy, Direction**
- **Increase Employee Involvement**
- **Expansion of Standard Work Practices**

- **Step 3 Conclusion**

- **Alignment of Management and Bargaining Unit Personnel Needed**

NGG-12, Reinforce Training Programs for Improved Performance

- **Accomplishments**

- Instituted an NGG Master Training Schedule
- Elimination of Unnecessary Course Offerings and Course Codes
- Standardization of All Major Accredited Training Programs
- Created a Master Schedule of NGG Site Self-Assessments

- **Focus Areas**

- Line Management Involvement in Training Process
- Initial License Training Improvement
- Management Evaluation of Training Effectiveness

- **Step 3 Conclusions**

- **Line Management Involvement in Training Improved**
- **Non-Licensed Operator Training Program Needs Evaluation**
 - + **Structure, Standardization, Adequacy**

NGG-13, Strengthen Nuclear Safety Oversight

- **Accomplishments**

- Restructured of the Nuclear Oversight Committee of the Board of Directors
- Restructured of the Nuclear Safety Review Board
- Plant Operations Review Committee Consistent with Industry Practice
- Improvement in Effectiveness of Nuclear Oversight Assessments

- **Focus Areas**

- Use of Operating Experience/Lessons Learned Across the NGG
- Use of the Self-Assessment Program to Improve Performance
- Establish Meaningful Corrective Action Trending Data
- Assess Performance Against Industry Best Practices

- **Step 3 Conclusion**

- Use of Operating Experience Increasing

***HUMAN PERFORMANCE ERROR
REDUCTION***

C. M. Crane

Human Performance Error Reduction

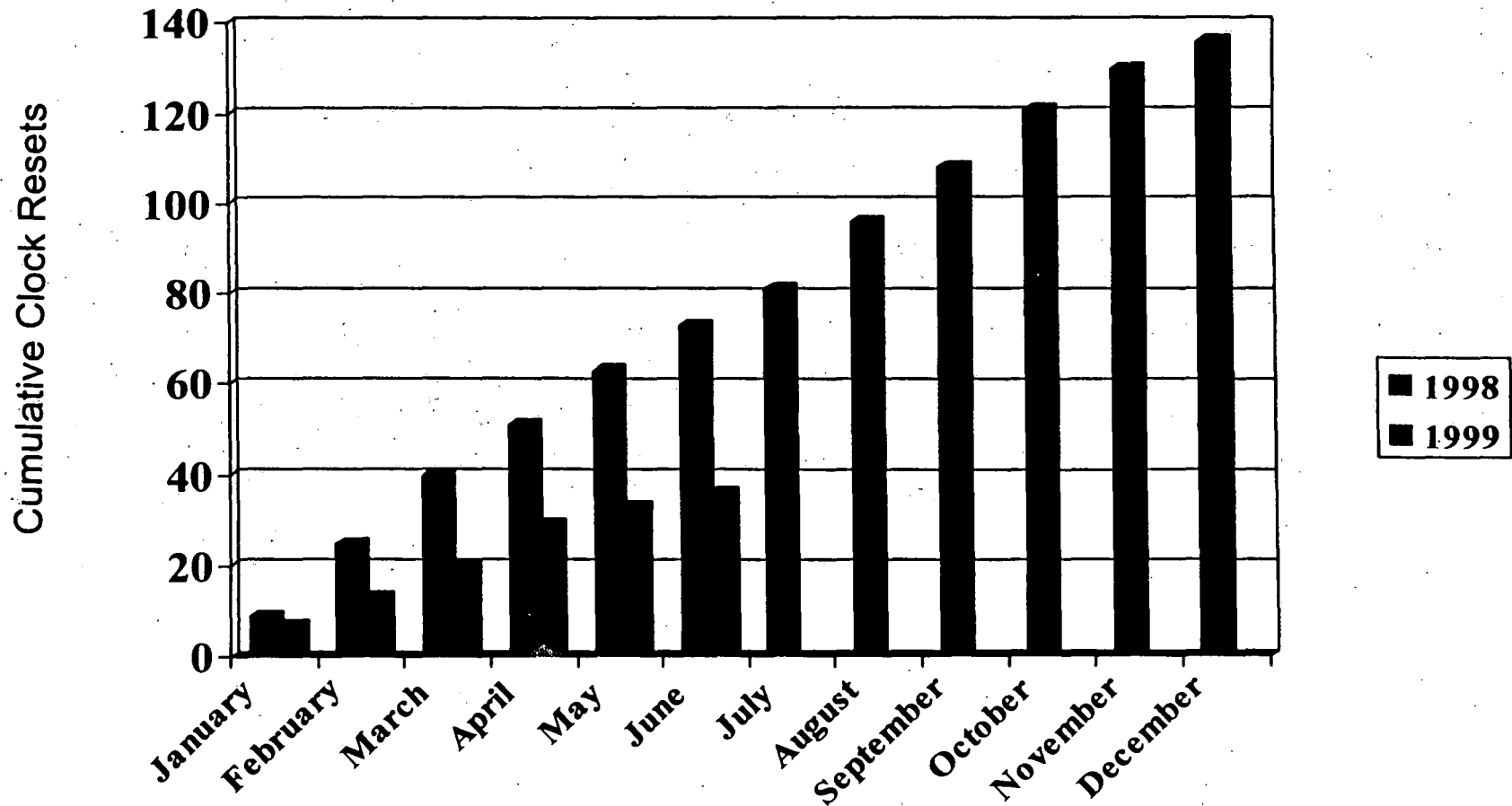
- **Key Issue**
 - **Human Performance-Related Occurrences Continue**
- **Human Performance Action Plans at Each Site**
 - **Personnel Accountability**
 - + **Personnel Performance Reviews**
 - + **Engaging Workforce**
 - **Supervisor Effectiveness at Error Prevention**
 - + **Training**
 - + **Senior Management Observations**
 - **Error Prevention**
 - + **Training**
 - + **Scorecard**
 - + **Pre-job Briefing Enhancements**

Human Performance Error Reduction

- **Human Performance Action Plans at Each Site (cont.)**
 - **Event Review Boards at Each Site**
 - **Human Performance Teams at Each Site and Peer Group**
 - + **Ensures Dissemination of Information to All Sites**
 - **Significant Senior Management Attention and Sponsorship**
 - + **Both Sites and NGG**

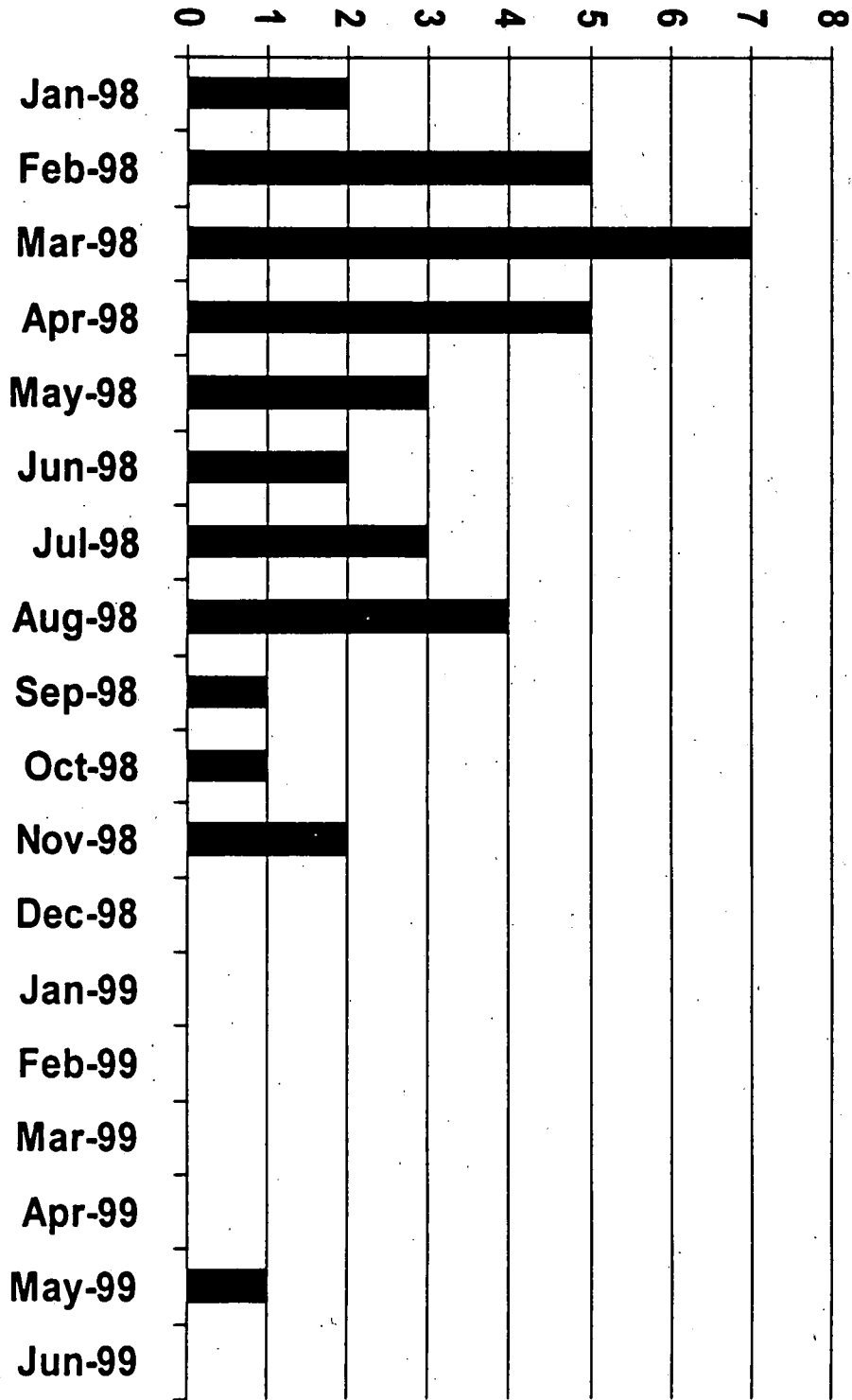
- **Configuration Control Action Plans at Each Site**
 - **Enhanced Out-of-Service Checklist**
 - **Policy for Pre/Post Job Brief Expectations**
 - **Heightened Worker Awareness**
 - **Increased Operations Management Oversight**
 - **Identified Tasks Requiring Peer Checks**

NGG Event Free Clock Trends



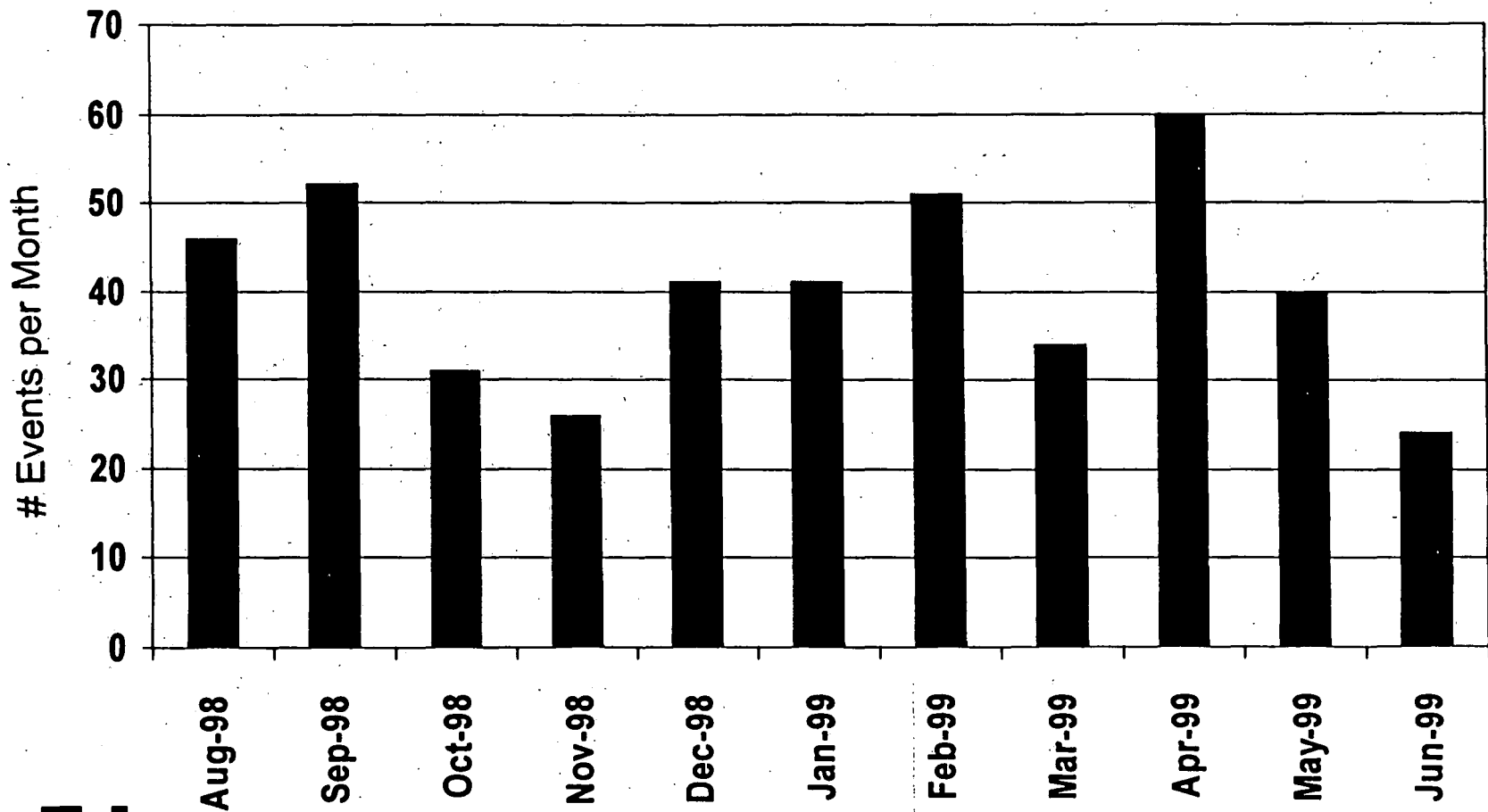
NGG Human Performance Licensee Event Reports

LERs per month

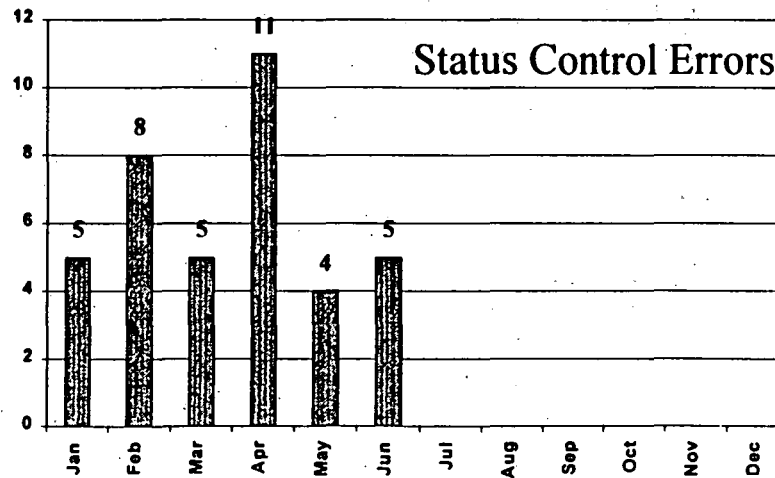
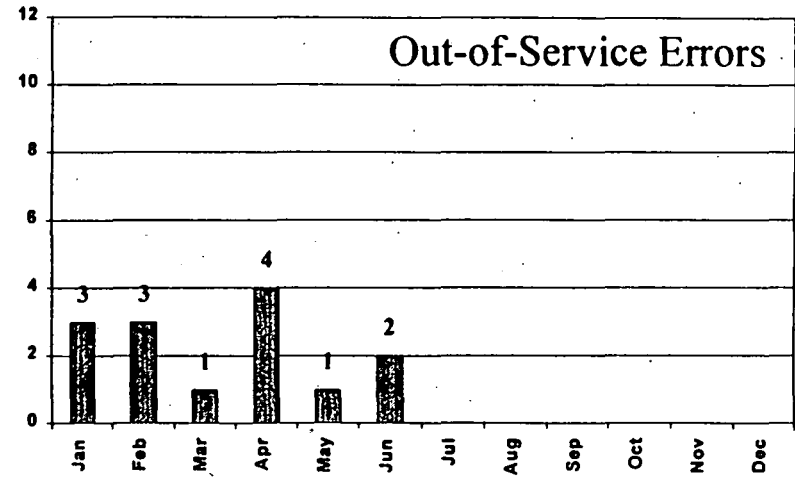
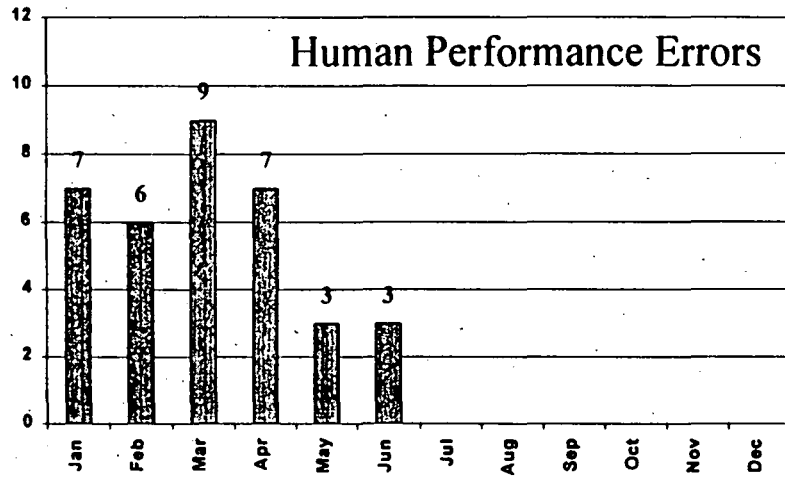


Human Performance

Lower Threshold Events



Human Performance Error Reduction



Good



Human Performance Error Reduction

- **Accomplishments**

- **Progress is Being Made**

- + **Reduction of Human Performance LERs**

- + **Extended Intervals for Event Free Clock Resets**

- **Focus Areas**

- **Lower Level Performance Focus**

- + **Subdivided Measures**

***ALIGNMENT OF MANAGEMENT AND
BARGAINING UNIT PERSONNEL***

H. G. Stanley

Alignment of Management and Bargaining Unit Personnel

- **Accomplishments**
 - **Incentives Aligned**
 - **High Impact Team Outage Results**
 - **Improved Communications with Workforce**
 - **Individual Performance Appraisals Reflect NGG Improvement Initiatives**

- **Focus Areas**
 - **Strengthen Middle Management**
 - **First Line Supervisor Engagement**
 - **Workforce Involvement**

Alignment of Management and Bargaining Unit Personnel (cont.)

- **Management Alignment and Leadership**
 - **Setting NGG Management Direction**
 - **Ensuring Clarity of Roles and Responsibilities**
 - **Focusing on Development of Middle Managers Skills and Abilities**
 - + **Position Qualification Charting**
 - + **Assessment/Development Plans**
 - + **Succession Planning**
 - + **Emphasis on Coaching and Time in Field**
 - + **Performance Appraisal/Management**
 - + **Leadership Development**

Alignment of Management and Bargaining Unit Personnel (cont.)

- **Engaging the First Line Supervisors**
 - **Clarifying Expectations**
 - **Integral Part of Management Team, Inclusion in Management Meetings**
 - **Support for First Line Supervisor Role**
 - **Evaluate/Reduce Administrative Burden**
 - **Emphasis on Time in Field**
 - **Increased Management Involvement in First Line Supervisor Training**
 - **Assessment/Development Plans**
 - **Continuing Training**
 - **Compensation review**

Alignment of Management and Bargaining Unit Personnel (cont.)

- **Increase Employee Involvement**
 - **Increased Use of Employee Teams**
 - + **Additional Outage Planning and Execution**
 - + **Safety**
 - + **Human Performance**
 - + **Process Improvement**
 - **Ongoing Communications**
 - **Management Involved with Workforce**

OVERTIME MANAGEMENT

R. J. Landy

Overtime Management

➤ **Staffing**

- + **Objective - Maintain Sufficient Staff to Work a Nominal 40 Hour Week During Routine Plant Operations**

➤ **Use of Overtime**

- + **For Unforeseen Problems or Extended Shutdowns, Overtime Will Be Used on a Temporary Basis Within Generic Letter 82-12 Guidelines**

Overtime Management

➤ **Overtime Guideline Deviation**

- + **Generic Letter 82-12 Guidelines Will Be Exceeded Only Under “Very Unusual Circumstances”**

For Example:

- ◆ **Emergency Situations to Protect Public Safety**
 - ◆ **Critical Emergent Work**
 - ◆ **Activities Needed to Avoid an Unnecessary Shutdown or Achieve Startup**
- + **Deviations Will Receive Prior Approval by the Station Manager or Deputy**

Overtime Use

- **NGG Overtime - Operations**
 - **Shift Turnover**
 - **Vacation**
 - **Short Notice Personnel Absences**
 - **Occasional Operational Challenges**
 - **Outage Support**

Overtime Management

- **Established Common NGG Procedure**
 - **Procedure to be Implemented Prior to Fall Outages**
 - **Replaced Existing Site-Specific Procedures**
 - **Established More Rigorous Overtime Controls**
 - **Purpose**
 - + **Ensures Personnel Effectiveness**
 - + **Ensures Compliance With Technical Specifications and NRC Generic Letter 82-12 Guidelines**

Overtime Management

➤ **Procedure Scope**

+ **Controls Apply to Safety-Related Work Activities Performed by:**

- ◆ **Operations**
- ◆ **Health Physics**
- ◆ **Maintenance**
- ◆ **Engineering**

+ **Work Activities Not Subject to Generic Letter**

82-12 Guidelines:

- ◆ **Shift Turnover and Break Times**
- ◆ **Meetings and Training Activities**

Overtime Management

➤ Responsibilities Clearly Defined

+ Each Individual Responsible for Monitoring Own Time

+ Supervisor

- ◆ Ensures No One Exceeds Generic Letter 82-12 Guidelines Without Proper Prior Authorization**
- ◆ Monitors Personnel Coming From Different Work Locations**
- ◆ Obtains Approval of Overtime Guideline Deviation Authorization Form As Necessary**
- ◆ Assesses Each Employee for Fatigue During a Face-to-Face Meeting Prior to Exceeding Guidelines**
- ◆ Assesses Each Employee Periodically During the Work Period Exceeding Guidelines**

Overtime Management

➤ **Responsibilities Clearly Defined (cont.)**

+ **Department Head**

- ◆ **Reviews the Overtime Guideline Deviation Authorization Form Prior to Individual Exceeding Guidelines**

+ **Station Manager (or Deputy)**

- ◆ **Approves the Overtime Guideline Deviation Authorization Form Prior to Individual Exceeding Guidelines**

+ **Human Resources Supervisor**

- ◆ **Monitors Effectiveness of Overtime Controls**
- ◆ **Generates a Quarterly Report**

Overtime Management

➤ **Responsibilities Clearly Defined (cont.)**

+ **Site Vice President**

- ◆ **Assesses Overtime Use for Potential Abuse and Excessive Overtime Deviation Authorizations**
- ◆ **Initiates Self-Assessments, as Needed**

+ **Nuclear Oversight Manager**

- ◆ **Assesses Control of Overtime Process at Least Annually**

Safety Impact of Overtime - 1999

- **No Human Performance Event at Any of Our Nuclear Stations Attributed to Overtime or Worker Fatigue**
 - **Reviewed Human Performance Event Root Causes**
 - **Reviewed Work History for Individuals Involved in Events**

CLOSING REMARKS

O. D. Kingsley, Jr.

SRI Step 3 Effectiveness Reviews - Closing Remarks

- **Standards and Fundamentals Embodied by the SRIs Will Continue to Govern NGG Performance**
 - **Defined in Established Programs, Processes, and Procedures**
- **Foundation for Continuous Improvement**
- **Step 3 Effectiveness Review Accomplished its Objective**
 - **Determination of Success in Institutionalizing Fundamentals**
- **Conclusion**
 - **Cyclic Performance of ComEd's Nuclear Plants Arrested**
 - **Infrastructure of Programs, Processes, and Procedures In Place**
 - **Focus Areas**
 - + **Human Performance Error Reduction**
 - + **Alignment of Management and Bargaining Unit Personnel**