ENERCON SERVICES, INC: INDEPENDENT MANAGEMENT APPRAISAL PROGRAM PLAN FOR FLORIDA POWER AND LIGHT CO.

### PREPARED FOR:

FLORIDA POWER AND LIGHT COMPANY

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# INDEPENDENT MANAGEMENT APPRAISAL PROGRAM PLAN

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#### I. INTRODUCTION

Florida Power & Light (FP&L) Company operates the St. Lucie and Turkey Point nuclear power plants. FP&L is committed to achieving excellence in the operation of both of these plants as demonstrated by a recent ranking of the performance of world nuclear power plants which showed St. Lucie Unit 1 as the highest ranked U.S. plant. In addition, St. Lucie is consistently awarded high rankings in the NRC's Systematic Assessment of Licensee Performance (SALP) program. The Institute for Nuclear Power Operations has also commended St. Lucie in past plant evaluations.

In contrast to St. Lucie, the operation of the Turkey Point units has experienced problems resulting in a series of NRC enforcement actions. FP&L is greatly concerned about these problems and therefore has undertaken numerous initiatives to improve operations at Turkey Point including modifications of plant organization, improvements in procedures and a comprehensive program to nurture a sense of quality in all FP&L activities. However, FP&L management initiatives and NRC inspection activities have continued to identify breakdowns in communications and failures to comply with procedures and regulatory requirements.

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FP&L has committed to complete a comprehensive independent evaluation to identify the causes of the performance problems at Turkey Point. This evaluation will encompass corporate and plant management as well as specific technical areas. The evaluation will focus on identifying problems, establishing root causes for the problems, including attitudinal and cultural factors, and identifying recommendations for correcting problems and improving plant operations.

In general, the appraisal will, where applicable, consider the differences and similarities between St. Lucie and Turkey Point performance and the underlying reasons for their respective characteristics. Included in the analysis will be an evaluation of the operating experience feedback at each facility as well as the channels which exist for the exchange of experience between the sites and the efficiency of those channels.

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The study will emphasize how corporate nuclear goals and measures of achievement are established and communicated to employees, and degree of success achieved in conveying those corporate objectives. With the assistance of behavioral consultants, the will employee attitudes and dedication to appraisal assess accomplishing these goals. The study will also review the extent to which a sense of personal and organizational accountability exists for achieving the corporate nuclear goals. The extent to which qualities such as-teamwork, leadership, and professionalism exist throughout the organization and the methods used by management to develop these qualities will also be evaluated.

On October 19, 1987, NRC confirmed FP&L's commitment by NRC Order (EA 87-85). This Independent Management Appraisal Program Plan (Program Plan) meets the requirements of the Order, and Revision 1 to the Program Plan incorporates the responses, where applicable, to NRC comments provided to FP&L by letter dated December 2, 1987.

This Program Plan provides a description of the appraisal which will be completed for FP&L. The organization of the appraisal team is described in Section II of the Program Plan. A description of the appraisal process and the items to be completed during the appraisal is provided in Section III of the Program Plan. Section IV of the Program Plan provides additional descriptions of the subtasks which will be completed for Task 6.0, Conduct of Information Review, and Task 7.0, Conduct of Evaluations. A milestone schedule for completion of the appraisal is provided in Section V of the Program Plan.

On November 10, 1987, FP&L awarded the contract for conducting the appraisal to Enercon Services, Inc. (ENERCON). ENERCON is an engineering, management and technical consulting firm with a client which includes many engineering companies, most nuclear utility companies in the United States, and a number of foreign nuclear utilities. The ENERCON corporate office is located in ENERCON has regional offices in Tulsa, Oklahoma; Tulsa, Oklahoma. Pennsylvania which and Pittsburgh, Georgia; Atlanta, complimentary in terms of resources, capability and personnel ENERCON also has a satellite office for the Tulsa experience. division in Minneapolis, Minnesota. ENERCON is also the parent The NUCARD subsidiary specializes in company for NUCARD, Inc. information storage systems and management state-of-the-art ENERCON has an effective full time staff of over 140, technology. and provides services to the nuclear industry in the following areas:

- a. Management andManagement Systems
- g. Radiation Protection and Chemistry

b. Licensing

h. Emergency Planning

c. Operations

i. Security

d. Training

j. Reactor Engineering

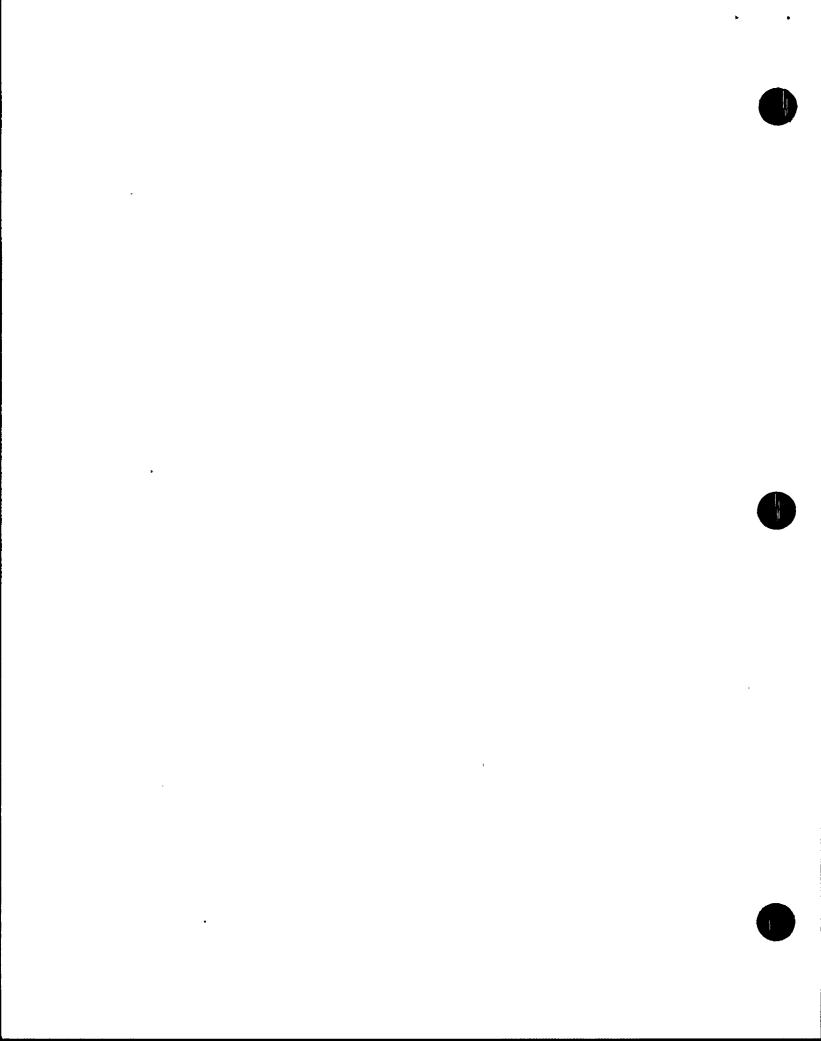
e. Maintenance

k. Safety Analysis

f. Engineering

ENERCON has assembled a highly qualified team of experts and professionals to fill the positions identified on the organization chart in Section II (Figure 1). The qualifications of the key members of the appraisal team are provided in the Addendum to this Program Plan. To assist in the appraisal, ENERCON has contracted for specialized expertise from Behavior Consulting Services, Inc. (BCS) and Tim Martin and Associates (TMA).

BCS is a consulting firm specializing in the application of behavioral principles to achieve lasting improvements in human performance. BCS is a leader in the design and implementation of performance management systems. BCS has provided their services to many corporations and utilities including three companies in the top 10 of Fortune 500 companies, and has trained over 100,000 management level personnel in behavior management skills. BCS has provided extensive human behavior services to E.I. du Pont de Nemours and Company, which is well known for an excellent safety record at their process facilities.



TMA is a management consulting firm specializing in management services to the nuclear utility industry. TMA has conducted management evaluations at other nuclear utilities, and TMA personnel have extensive experience in evaluation of organizational performance and identification of management performance improvement programs.

#### ORGANIZATION II.

The appraisal team organization is depicted in Figure 1. responsibilities of each position or group identified on the organization chart are discussed below. Key members of the appraisal team are identified, along with their qualifications, in the Addendum to this Program Plan.

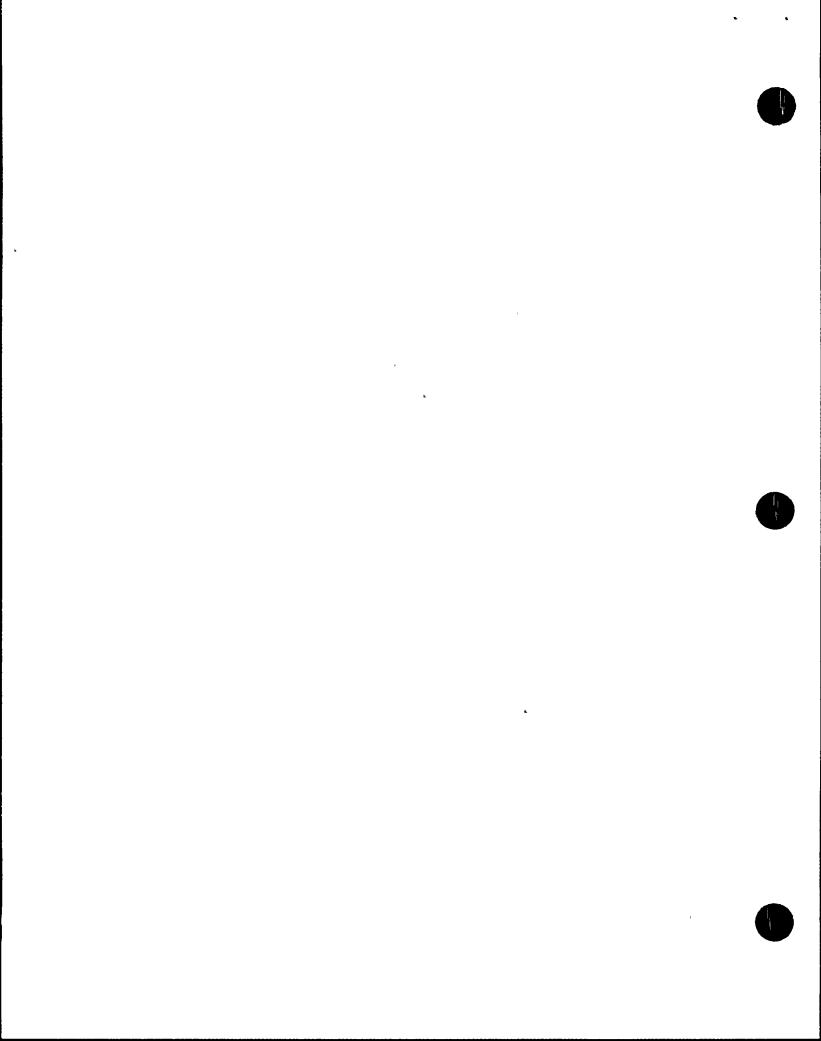
### Senior Vice President Operations

ENERCON'S Senior Vice President, Operations, J. K. Martin, will insure that the appraisal is completed in a professional manner and in accordance with ENERCON'S commitments to FP&L. Mr. Martin will chair the Senior Evaluation Team (SET) discussed below.

### Senior Evaluation Team (SET)

function as a largely autonomous group with responsibility for drawing upon a diverse mix of backgrounds to evaluate information identified by individual review teams. The SET will include members with experience in senior utility management nuclear regulation, naval nuclear power, positions, reactor commercial nuclear plant operation, and human behavior. The SET will critically review the results of the work of individual review The SET will focus on assuring that the reviews are sufficiently comprehensive, that the root causes for problems have been identified and that appropriate recommendations for correcting problems and improving performance have been made. The SET may conduct in situ spot checks as deemed appropriate, in order to validate reported conditions, assist in root cause identification, and support corrective recommendations. The SET will participate in all meetings with the FP&L Senior Level Review Board. The SET request the Project Manager, E.P. Stroupe, to undertake additional evaluations or investigations to resolve questions or further substantiate results.

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#### Project Manager

The Project Manager has overall responsibility for the conduct of the evaluation. The Project Manager will prepare procedures governing conduct of the evaluation, disposition of findings and response to any immediate safety concerns identified by the appraisal teams. The Project Manager will assure the availability of adequate project personnel to support the review efforts of each individual review team. The Project Manager will monitor overall progress of the appraisal and will interface with the SET.

#### Human Behavioral Specialists

ENERCON has retained Behavioral Consultant Services, Inc. (BCS) to in completing this evaluation. Behavioral Consultant assist Services, Inc. is an industrial psychology consulting firm with special expertise in motivational psychology. The behavioral consultants will assist in preparing and evaluating questionnaires to be used in conducting interviews with the FP&L personnel. behavioral consultants will train project personnel in interviewing techniques and recognition of potential problem areas and will participate in certain of the interviews. They will also assist in the evaluation of responses to questions and the identification of underlying attitudes, opinions and plant culture. BCS will assist and interpretation of the data from consolidation interviews, document reviews, surveys and observations.

#### Management and Organization Specialists

ENERCON has retained Tim Martin and Associates (TMA) to assist in completing this evaluation. TMA is a management consulting firm with specialized expertise in management evaluations and utility management organizations. The management and organization

consultants will assist in preparing and evaluating checklists and questionnaires to be used in conducting interviews with FP&L personnel and participate in conducting management interviews.

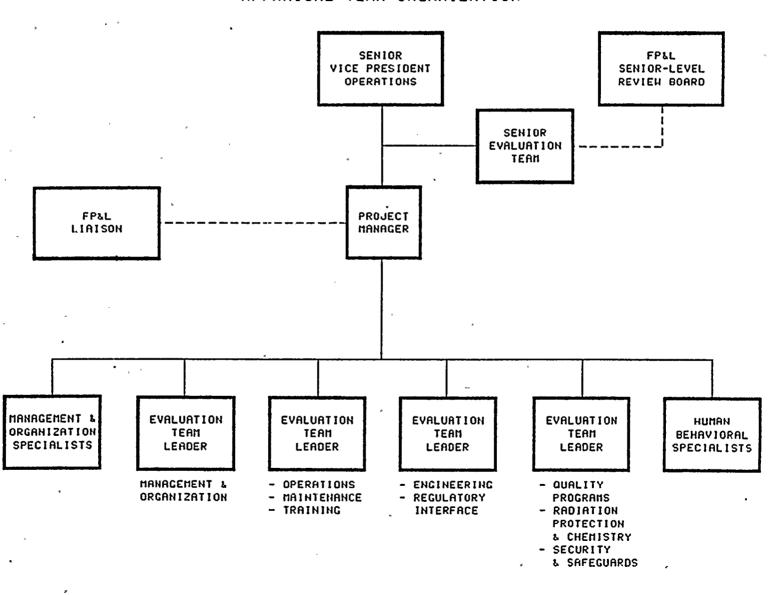
### Evaluation Team Leaders

The evaluation team leaders will be responsible for the conduct of the technical reviews. The team leaders will assure that project tasks are completed in accordance with the scope established in this program plan. The team leaders will approve checklists to be used in completing reviews, interview forms, and preparations for site observations. The team leaders will be responsible for presenting the results of the evaluation to the SET.

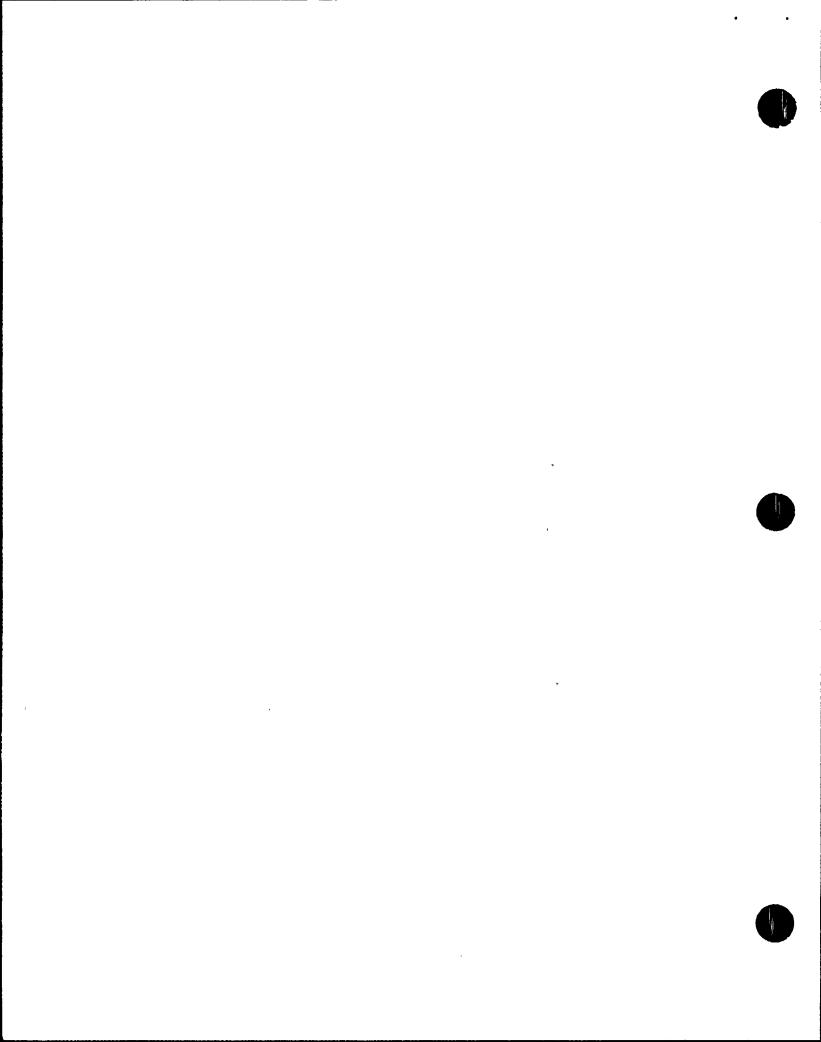
### Project Team Engineers

Project team engineers will be assigned to review teams based on experience and capability. An adequate number of project engineers with expertise in the area evaluated and with evaluation or audit team experience will be provided to each team to assure a comprehensive evaluation is completed in each area. Each engineer will be responsible for completing subtasks assigned by the review team leaders.

FIGURE 1
APPRAISAL TEAM ORGANIZATION



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#### III. APPRAISAL PROCESS

This section provides a general discussion of the conduct of the evaluation. Figure 2 is a network showing the overall flow of activities for the evaluation. The development of project procedures is described along with the integration of information gathering, information synthesis, identification of findings, and reporting. A review to identify fundamental differences between Turkey Point and St. Lucie is also included.

#### Program Plan Review (Task 1.0)

The NRC Order dated October 19, 1987 (EA 87-85), hereinafter referred to as the Order, requires that the NRC approve the methodology to be used in conducting the independent appraisal, i.e. the Program Plan. The SET and FP&L have assessed the Program Plan and will continue to do so as the project proceeds. The Program Plan is submitted to the NRC for approval.

#### Finalize Program Plan (Task 2.0)

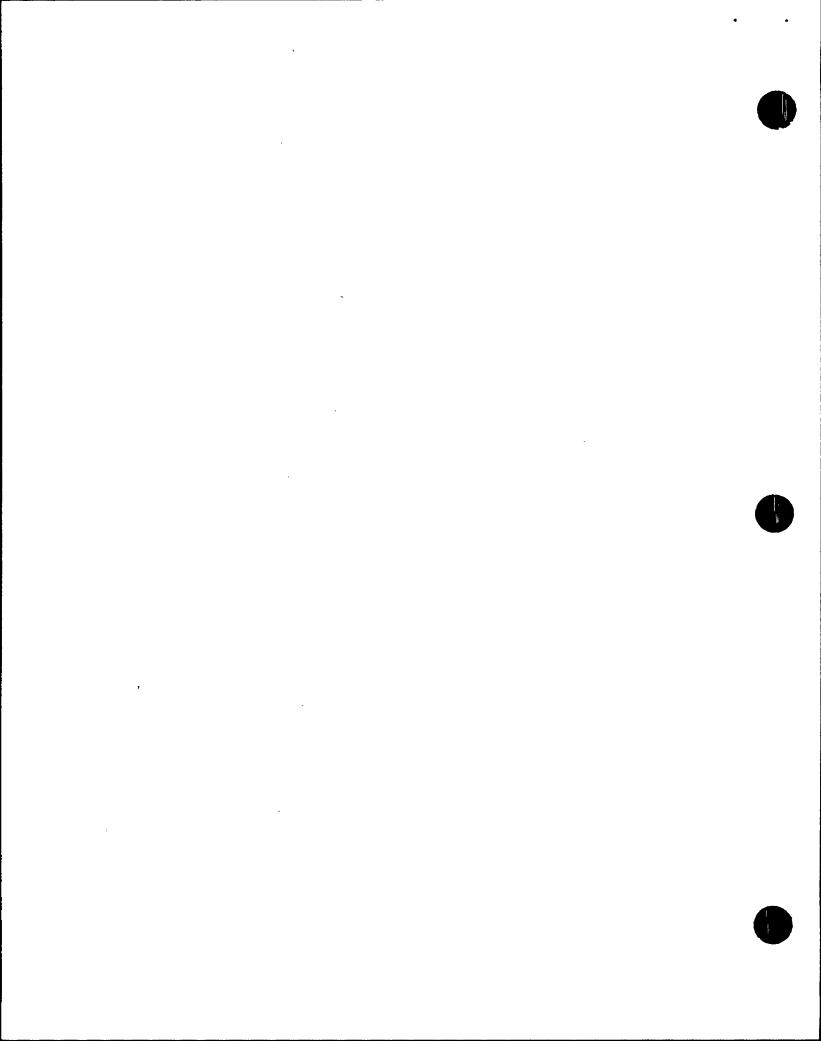
The Program Plan will be finalized based on any comments received from the NRC. A final version of the Program Plan will be submitted to the NRC.

### Develop Administrative Procedures (Task 3.0)

Detailed procedures governing conduct of the evaluation will be prepared. The procedures will specify responsibilities for the project personnel to inform the Project Manager of any conditions observed in the course of the review which involve safety issues requiring immediate corrective action. The procedures will describe the process to be used for processing immediate safety

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concerns including the methods for and timeliness of notification to FP&L. If an allegation is made to ENERCON of a violation or of a safety problem or possible safety problem, or if ENERCON obtains information which it recognizes as falling into such a category, it will inform the FP&L Project Liaison. The FP&L Project Liaison will initiate the appropriate steps for FP&L to deal with the matter by further investigating, reporting, etc., as required by regulation. The procedures will specify the methodology for developing checklists to be used in evaluating procedures, conducting onsite observations, assessing training, etc. procedures will also define key project terms such as "finding", cause", "deficiency", "requirements", and "improvement." Forms for recording the results of document reviews, interviews,

surveys, observations and for documenting findings will be prepared

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### Develop Project Control Systems (Task 4.0)

and included in the project procedures.

software will be utilized to manage Data base management information generated during the evaluation. A database management program will be established to track all items identified in the information review portion of the project (Task 6.0). This program will allow users to sort data based on potential causes of incidents (training deficiency, procedural deficiency, design problem, etc.), types of incidents (equipment failure, human error, etc.), source for identifying the incident (LER, Nuclear Plant Reliability Data System (NPRDS) report, NRC inspection report, etc.), date of occurrence, the affected area of the appraisal, and the corrective action taken, if any. The data base management system will be used also to manage findings identified in the of the project including root causes and recommended course improvements identified by the SET. This program will allow users to sort data by responsible organization, sources of findings, or is the basis for conclusions and information which recommendations.

The approach described in this Program Plan will assure that root causes are determined, conclusions are reached, and recommendations are developed based upon factual evidence. Recognizing that perception is, in many cases, reality, "factual evidence" as used in this report includes matters which are widely perceived as problems and concerns and other subjective views derived from interviews, and analyzed by the behavioral consultants. Therefore, detailed records will be maintained during the project, including the identification of the procedures, documents, reports, and other materials reviewed during the appraisal. These records will clearly identify the documented bases (including attitudes and subjective concerns expressed in interviews and other appraisal activities) which form the basis for any conclusions reached.

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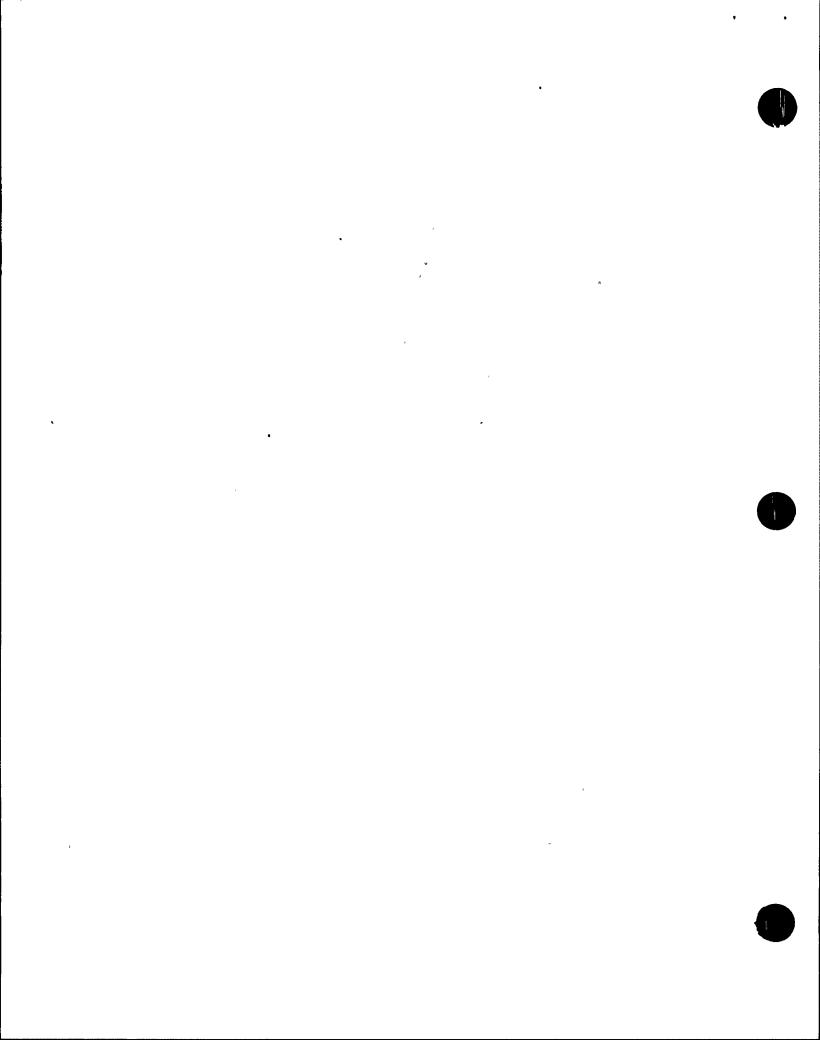
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### Training of Project Personnel (Task 5.0)

The Project Manager will assure that training is conducted for project personnel on the project procedures and use of project control systems. Utilization of project forms and documentation of bases for conclusions will be emphasized. The human behavioral specialists will train project personnel in interview techniques to sensitize them to body language, undertones in response, the need to convey questions neutrally, and methods of evaluating interviewee responses.

#### Conduct of Information Review (Task 6.0)

The first part of the data collection activities will be review of information to identify past problems. Particular emphasis will be given to those issues identified in Sections II and III of the Order. The individual sources of information which will be reviewed are discussed in Section IV of this Program Plan.



### Conduct of Evaluations (Tasks 7.0)

The part of the data collection activities involves completing detailed evaluations of management and plant activities Point and in the corporate offices. Comparable activities at St. Lucie will also be reviewed, evaluated and with those at Turkey Point to identify fundamental differences and the reasons for those differences, such as a difference in management skills, techniques programs. Therefore, the appraisal process will focus on establishing the root causes of problems at Turkey Point and then evaluate these areas at St. Lucie in order to establish the differences which lead to superior performance. The individual technical areas to be evaluated and the subtasks (7.1 through 7.9) are discussed in Section IV of this Program Plan. In each case, self assessment programs and improvement programs which have been initiated by FP&L will be evaluated. The evaluations conducted in each of the subtasks are designed to determine the root causes for performance The effectiveness of FP&L self problems Turkey Point. techniques will assesssment programs and be evaluated by determining if FP&L previously had identified the root causes of problems. If such root causes had not been previously identified by FP&L, the reason for the failure in the self assessment programs will be determined. In addition, as root causes are established for problems identified throughout the subtask evaluations, the of FP&L improvement programs in correcting the effectiveness problems will be evaluated. As discussed in Section IV, the results of the evaluations for each technical area will be reviewed by the SET.

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### Integrate and Evaluate Data (Task 8.0)

The results of the detailed evaluations in each technical area identified in Subtasks 7.1 through 7.9 will be evaluated by the Project Manager and Team Leaders, as appropriate, to identify root causes and to establish recommendations for improvement. This part of the independent appraisal involves integrating all of the findings identified in each technical area to determine if they are symptomatic of any overall organizational or management problems.

#### Senior Evaluation Team Meeting (Task 9.0)

The results from Task 8.0 will be presented to the SET with supporting documentation. The SET will consider the adequacy of the supporting information to assure that the data justifies the conclusions will identify any additional or different and conclusions based on their independent assessment of the data. The SET may identify additional potential problem areas and request the review teams to undertake additional evaluations. These additional evaluations would be completed and reviewed with the SET during preparation of the Final Report. The SET will provide a preliminary prioritization of the initial conclusions. The SET will review the identified root causes and recommendations for improvement.

### Meet FP&L Review Board (Task 10.0)

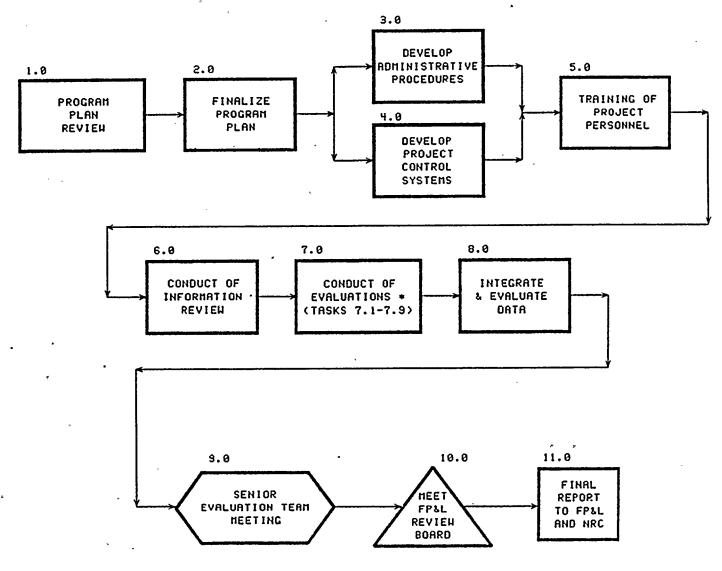
The SET will present the appraisal results with supporting documentation to the FP&L Senior-Level Review Board. The SET assessment of root causes, recommendations, and requests for any additional evaluations will be presented.

### Final Report (Task 11.0)

A final report for the independent appraisal will be prepared. The scope of the appraisal will be identified along with results of the evaluation, root causes and recommendations. The final report will include integration of appraisal results regarding overall organizational performance and will integrate the results from the evaluations of St. Lucie. Identified strengths will also be discussed in the report.

FP&L has directed ENERCON to submit to the NRC Region II Administrator a copy of the final report and any and all drafts thereof, at the same time they are sent to FP&L, including any of FP&L's employees or contractors.

### APPRAISAL PROCESS



\* INCLUDES SENIOR EVALUATION TEAM REVIEW AND FP&L SENIOR-LEVEL REVIEW BOARD MEETING CONCERNING EACH TECHNICAL AREA

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### IV. SUBTASK DESCRIPTIONS FOR TASKS 6.0 AND 7.0

This section identifies the major subtasks for Tasks 6.0 and 7.0. Figures 3 through 12 are networks showing the relationship of the individual subtasks. A description of the scope of each subtask is included.

#### TASK 6.0 CONDUCT OF INFORMATION REVIEW

This task involves an evaluation of documents which contain information related to FP&L's nuclear operations with particular emphasis on Turkey Point over the past three years. The documents will be reviewed to identify items which have had an adverse impact on plant performance. These items will be categorized based on potential causes of the incident, types of incidents, source for identifying the incident, date of occurrence, the affected area of the appraisal and corrective action taken, if any. These items will be entered into a computerized data base and will be reviewed by the appropriate technical evaluation team.

### 6.1 Review Licensee Event Reports

Licensee Event Reports will be reviewed to identify the nature of the event and the root cause established by FP&L. These items will be entered into the data base.

#### 6.2 Review NRC Inspection Reports

NRC inspection reports including SALP reports, augmented inspection team reports, safety system functional inspection reports and other special inspection reports will be reviewed. Findings identified in the reports will be entered into the data base.

#### 6.3 Review Enforcement History

Enforcement actions will be reviewed to identify potential causes. The reviewer will assure that items identified in this task do not duplicate items identified in subtask 6.2. This information will be entered into the data base.

### 6.4 Review INPO Evaluations

INPO evaluations of corporate and plant performance will be reviewed to identify findings and potential causes for the conditions which led to the findings. The nature of findings and potential causes will be entered into the data base.

#### 6.5 Review Quality Assurance Audit Reports

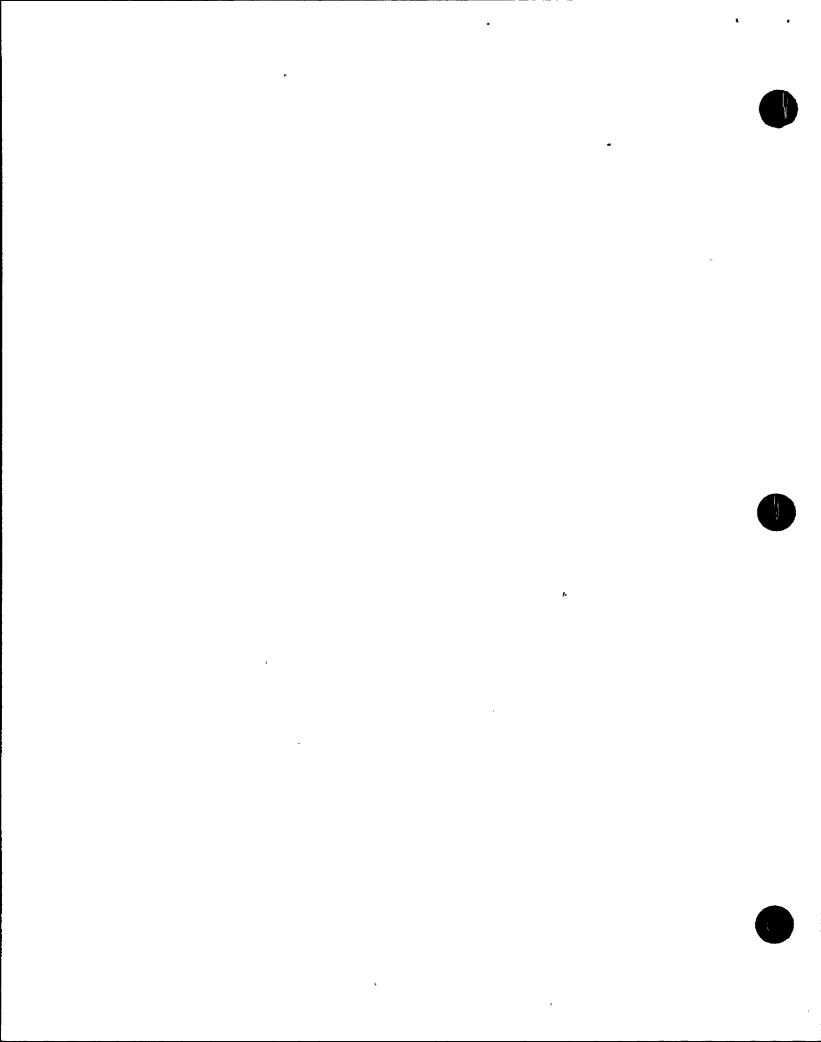
FP&L internal quality assurance audit reports will be reviewed to identify findings and potential causes for the conditions which resulted in the findings. The nature of the findings, potential causes, date of finding, and source documents will be entered into the data base.

### 6.6 Review NRC Correspondence to FP&L

NRC correspondence to FP&L including requests for information will be reviewed to identify any deficiencies or problems with FP&L submittals. The reviewer will assure that items identified in this subtask do not duplicate items identified in other subtasks. Specific items and potential causes will be identified and entered into the data base.

#### 6.7 Review NPRDS Reports

NPRDS reports will be reviewed to identify equipment failures and potential causes for the failures. Only those failures involving poor maintenance practices, insufficient testing, misapplication of equipment or operator error will be entered into the data base.



## 6.8 Review Other Internal and External Audit Results

Special audits conducted internal to FP&L or by third parties will be reviewed to identify findings. The potential causes for the conditions which led to these findings will be identified. The results of this review will be entered into the data base.

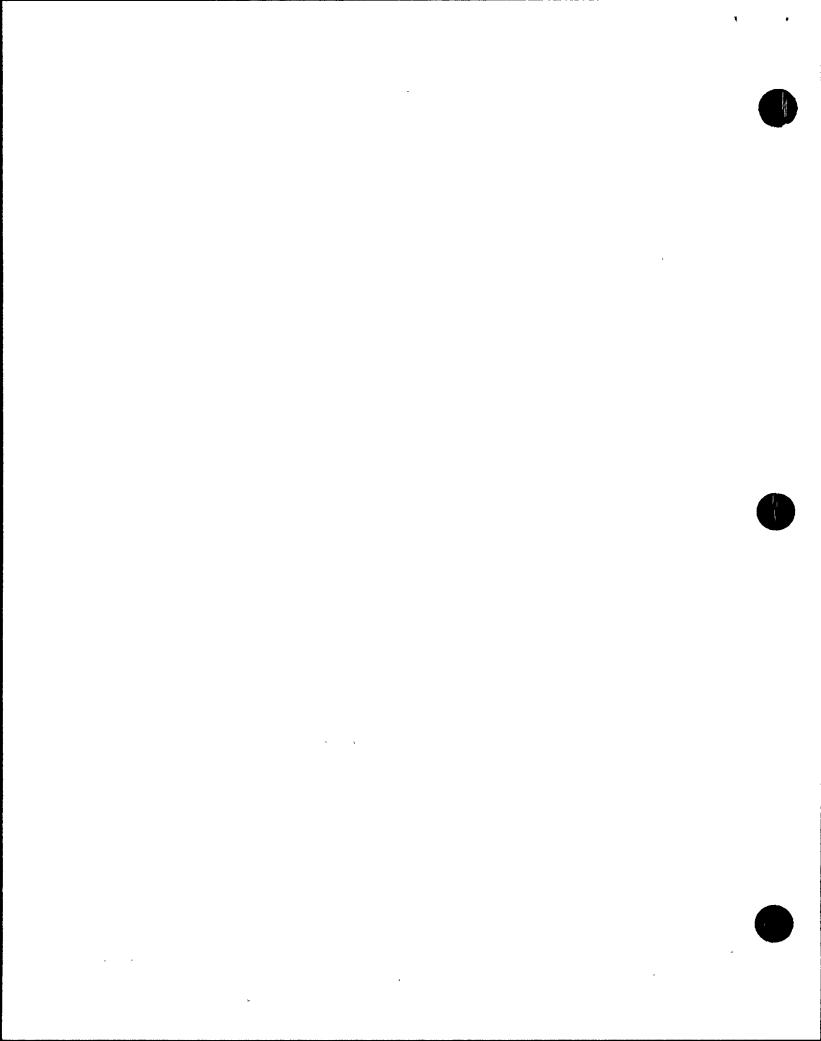
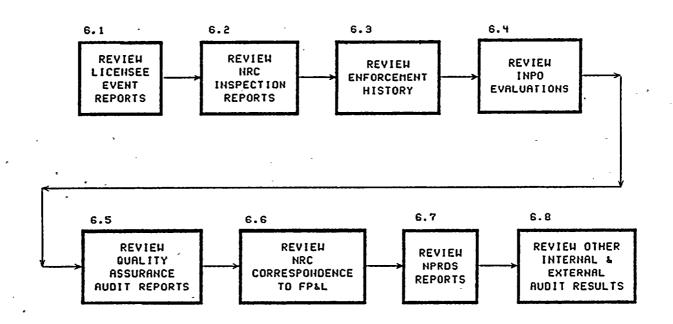
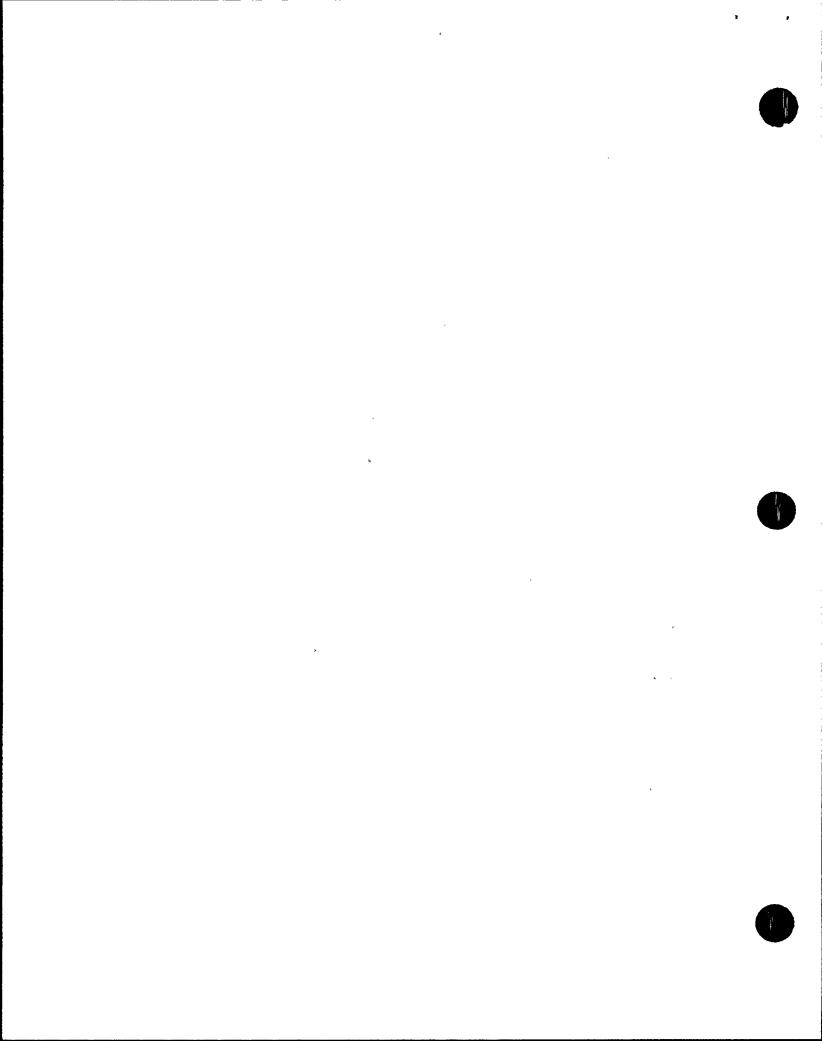


FIGURE 3
. TASK 6.0 CONDUCT OF INFORMATION REVIEW





#### TASK 7.0 CONDUCT OF EVALUATIONS

#### 7.1 MANAGEMENT AND ORGANIZATION

The Management and Organization Evaluation Team will evaluate responsibilities, organizational management controls, ]1 organizational accountability, staffing levels, personnel performance and competency, communications, and the role of the corporate and plant safety review committees. FP&L's programs for personnel motivation such as incentive and disciplinary programs will also be evaluated. The appraisal will include a review of ]1 site and corporate officers, management and supervisory personnel as well as a representative number of site working level personnel to determine their understanding of and commitment to regulatory and administrative requirements. The qualifications of personnel will be evaluated against required qualifications for management positions.

### 7.1.1 Correlate Items from Task 6.0

Items from the documentation review completed in Task 6.0 will be and identify trends and important reviewed correlated to relationships. Previous FP&L and NRC findings will be categorized in Task 6.0 based upon the date of occurrence, the type of problem procedural deficiency. (e.g., human error. training ineffectiveness, etc.) and by the appraisal area affected (e.g., operations, maintenance, training, etc). This subtask involves sorting this data with the aid of the computerized data base to establish trends and identify problem areas to be evaluated by the Evaluation Team.

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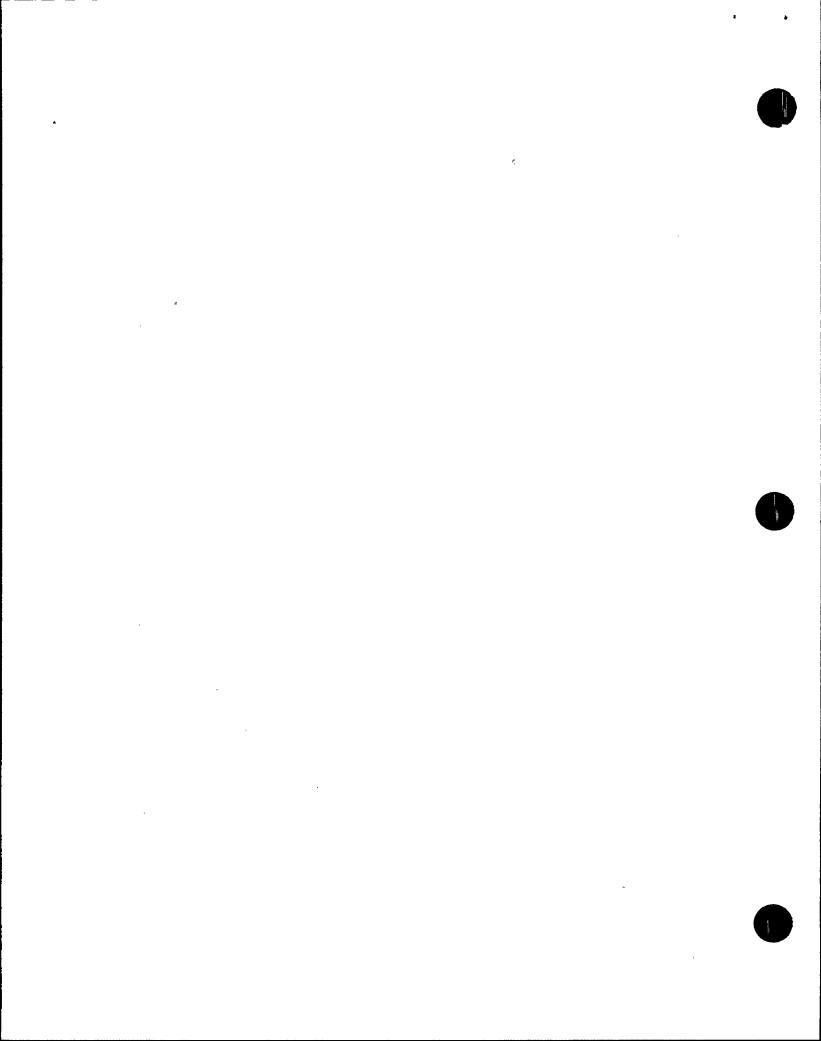
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### 7.1.2 Review Reporting Relationships and Responsibilities

The organizational structure will be evaluated to assure that the Evaluation Team has a thorough understanding of the relationship between key management positions. Job descriptions, administrative procedures detailing management responsibilities, and FSAR and technical specification descriptions of organizational and management responsibilities will be reviewed. Levels of authority and responsibility delegated to each management level will be reviewed throughout the organization, particularly as they relate to problem identification and response. The clarity of divisions of responsibility among organizations with collateral responsibility in a functional area will be examined.

#### 7.1.3 Review Organizational Goals and Objectives

The process of establishing corporate and organizational goals and objectives will be evaluated. Methods for individual organizations to provide input to goal definition will be reviewed. The methods used to identify corporate and organizational goals and objectives and the measures of achievement to all levels of personnel will be studied. In addition, the effectiveness of the Policy Deployment Process will be evaluated. Evaluations of performance against goals and objectives, and the feedback from the evaluations to the appropriate plant organizations will also be studied.

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### 7.1.4 Review Personnel Policies

Corporate personnel policies including disciplinary practices, performance incentive programs, criteria for transfer of personnel and hiring practices will be evaluated. Implementation of corporate policies by individual plant organizations will be evaluated in subtasks 7.2 through 7.9.

### 7.1.5 Review Administrative Procedures

A representative sample of administrative procedures will be reviewed to evaluate clarity, level of detail, and consistency. The procedures will be reviewed to determine the extent to which individual and organizational responsibilities are clearly defined. The methods for periodically reviewing and updating procedures will be examined as well as opportunities for employees to identify and implement procedural improvements. Reporting requirements in procedures will be evaluated to insure that appropriate levels of detail are provided.

#### 7.1.6 Assess Safety Review Committees

The effectiveness of the Company Nuclear Review Board (CNRB), the Turkey Point Plant Nuclear Safety Committee (PNSC), and the St. Lucie Facility Review Group (FRG), hereinafter collectively referred to as the Safety Review Committees (SRC), in assuring safe and reliable operations of the plants will be evaluated. The charters of the SRC will be reviewed to assure appropriate breadth and involvement of key supervisory and management personnel. Qualifications of SRC members will be evaluated. At least one SRC meeting will be observed, and a representative sample of SRC meeting minutes will be reviewed to determine the range of issues and topics considered.

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#### 7.1.7 Conduct Management Interviews

Interviews will be conducted with key managers and a representative number of working level personnel in the FP&L corporate nuclear staff and at the nuclear plants. The interviews will focus on personnel policies, corporate and organizational goals, plant operation, regulatory compliance, management practices and

teamwork. The interviews will be structured to encourage open discussion. The results of each interview will be documented. Surveys may also be used as appropriate.

### 7.1.8 Review Communications Flow and Content

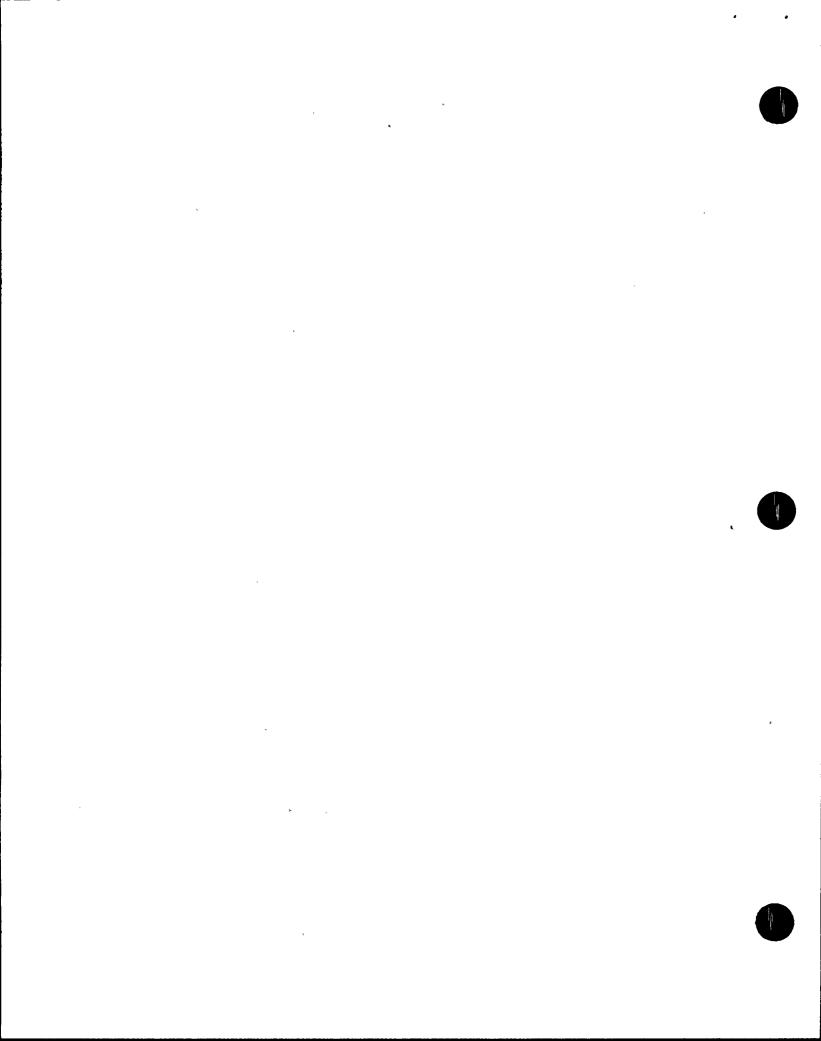
Information to and from management will be reviewed with particular attention on communications flow and content including problem identification and resolution. The methods used to communicate problems to management will be evaluated. Management feedback through the organization including adequacy of documentation and timeliness will be evaluated. Information flow from management will be reviewed to insure that organizational goals and objectives are clearly expressed, and the reasons for management decisions are clearly defined.

### 7.1.9 Assess Information Available to Management

The availability of information provided in the form of routine reports to management to support decision making and assess performance will be reviewed to judge usefulness and format of presentation of information. Any needs for additional information or changes in flow of information will be identified.

#### 7.1.10 Evaluate Disposition of Operating Experience

The utilization of plant and industry operating experience by management will be reviewed. Programs for periodically reviewing operating events and integrating "lessons learned" into routine operations will be examined. The effectiveness of communicating both laudable and unacceptable personnel performance as "lessons learned" throughout the organization will be evaluated.



# 7.1.11 Assess Qualifications of Current Personnel

The required qualifications for key management positions will be identified based on existing position descriptions, job task analyses and applicable licensing commitments. The experience, training and education of key managers will be reviewed.

# 7.1.12 Assess Training Effectiveness

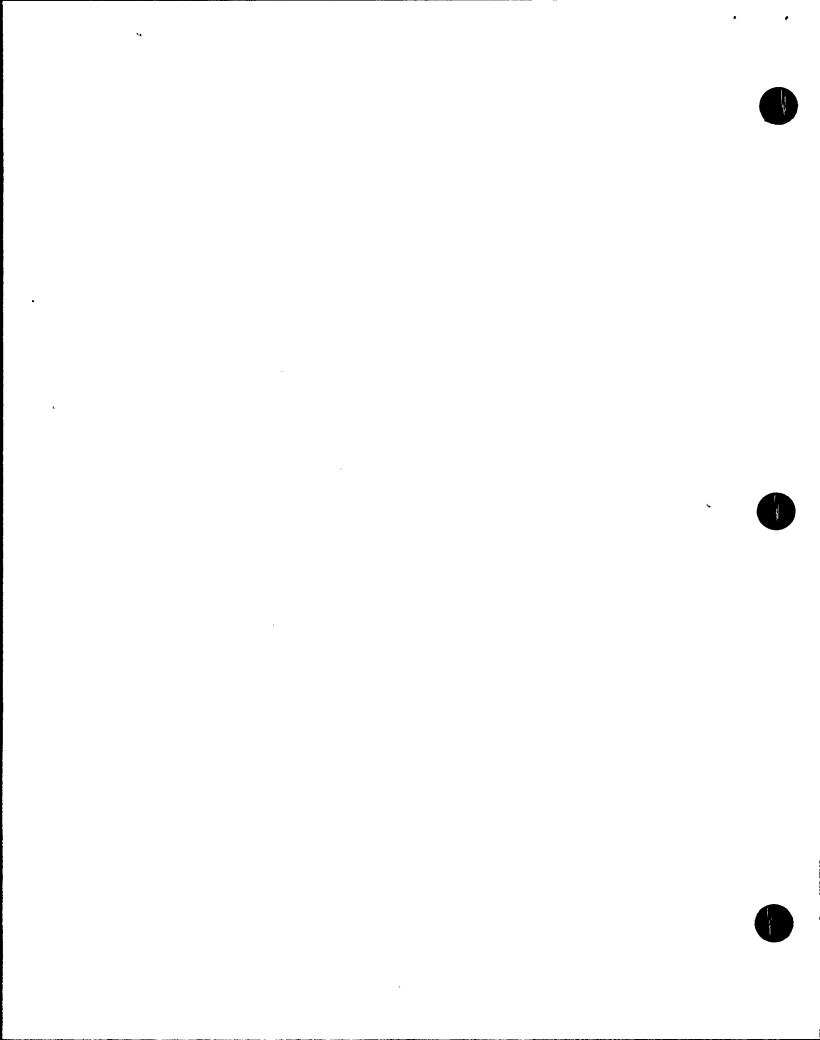
Training provided for management personnel will be evaluated. Both technical training and managerial and supervisory training will be reviewed. Comments from interviews completed under subtask 7.1.7 and items identified in Task 6.0 which may be related to management training will be utilized. Training materials will be examined as well as how management identifies additional training needs.

# 7.1.13 Senior Evaluation Team Review

The results from the previous subtasks will be presented to the SET with supporting documentation. The Senior Evaluation Team will consider the adequacy of the supporting information. The SET may request additional evaluations. The SET will review the root cause for problems associated with findings and will review recommendations for eliminating problems and improving operational performance.

## ·7.1.14 Meet FP&L Review Board

The SET will present to the FP&L Senior-Level Review Board the appraisal results with supporting documentation. The assessment of root causes, recommendations, and requests for any additional evaluations will be presented.



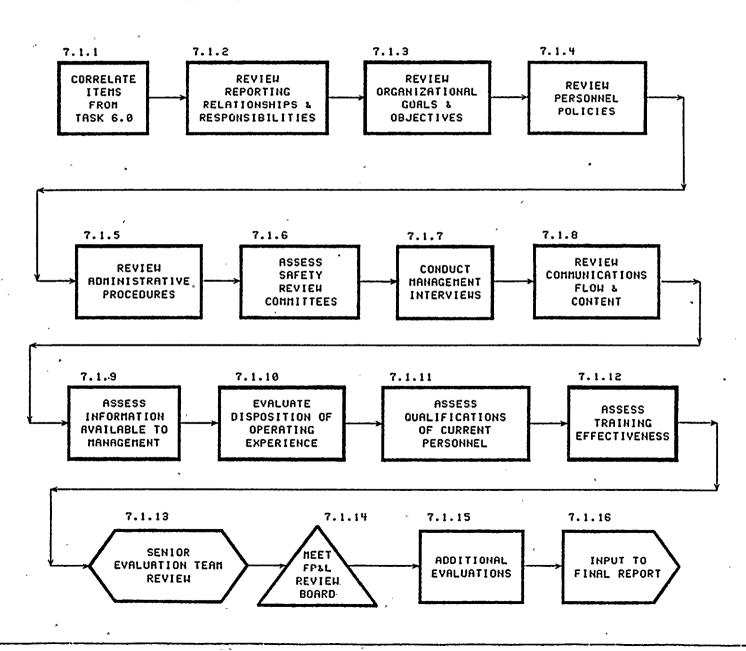
# 7.1.15 Additional Evaluations

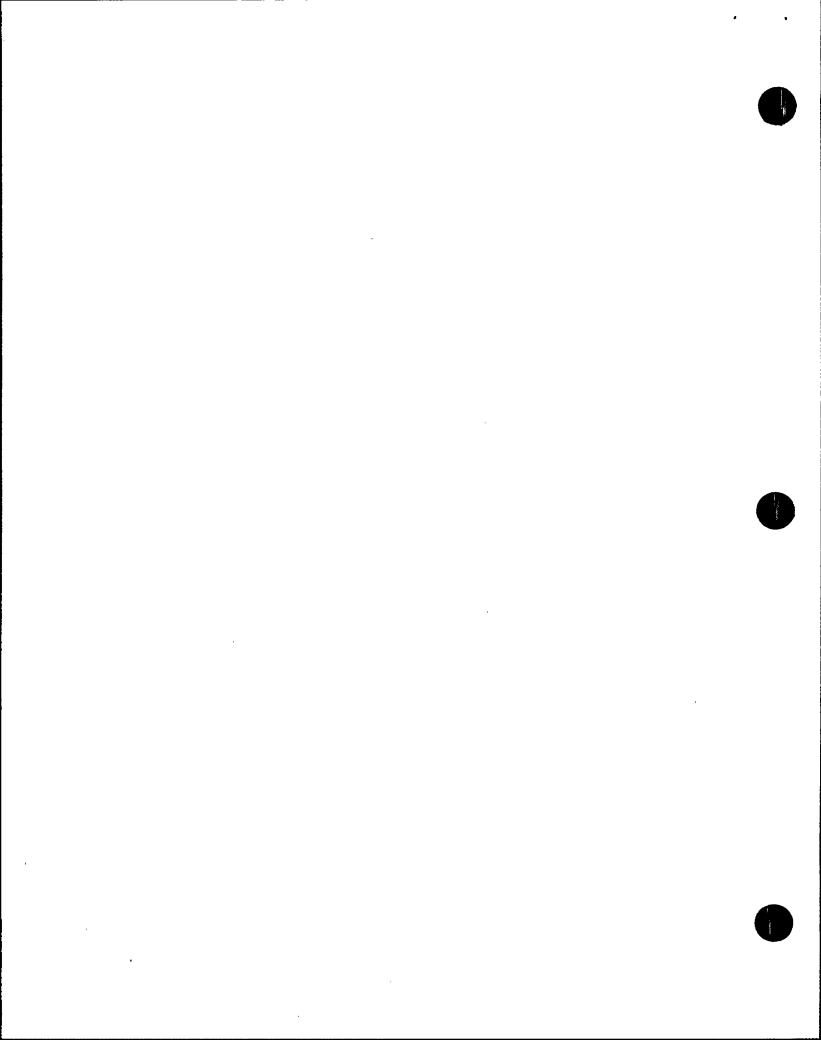
Additional evaluations requested by the SET will be completed. Results from these additional evaluations will be presented to the SET.

# 7.1.16 Input to Final Report

The results from the previous subtasks will be included in the final report as appropriate.

SUBTASK 7.1 MANAGEMENT & ORGANIZATION





# TASK 7.0 CONDUCT OF EVALUATIONS (Continued)

#### SUBTASK 7.2 OPERATIONS

The Operations Evaluation Team will evaluate operating practices, organization, procedures, intradepartmental communications and training. Interviews will be conducted with a cross section of operations personnel and the Evaluation Team will observe plant operations. Staffing levels and the qualifications of operations personnel will be evaluated.

## 7.2.1 Correlate Items From Task 6.0

Same as paragraph 7.1.1, page 21.

# 7.2.2 Review Communications Flow

The flow of communications between operations and various other plant organizations will be evaluated. The timeliness of operations department notifications of needs for corrective maintenance will be assessed. Methods for operations to provide input to engineering on plant improvements or chronic problems will be evaluated. Involvement of operations in design and maintenance planning will be evaluated. Timeliness and adequacy of information provided to licensing for reporting to the NRC will be reviewed.

## 7.2.3 Review Reporting Relationships and Responsibilities

The structure of the operations organization will be evaluated. Job descriptions and FSAR and Technical Specification discussions of department responsibilities will be reviewed. In addition, procedures governing conduct of operations will be examined. Staffing levels and overtime utilization will be evaluated.

#### 7.2.4 Review Operations Procedures

A sample of operations procedures will be reviewed to evaluate clarity, level of detail, and consistency. The methods to incorporate design changes in procedures and to periodically review and update procedures will be examined along with provisions for operations department personnel to identify and implement improvements to the procedures. Practices related to temporary procedure changes will be reviewed.

# 7.2.5 Conduct Onsite Observations

The Evaluation Team will conduct onsite observations of plant operations, control room operations, shift turnover, equipment shutdown and return to service, and other operations activities. Practices relating to communications between operational areas and the control room, control room decorum, and knowledge of procedures will be reviewed.

# 7.2.6 Evaluate Utilization of Operating Experience

The organization's utilization of plant and industry operating experience will be evaluated. Programs for identifying improvements in procedures or operating practices based upon operating experience will be evaluated. The effectiveness of communicating both laudable and unacceptable personnel performance as "lessons learned" throughout the organization will be evaluated.

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## 7.2.7 Assess Qualifications of Current Personnel

The required qualifications for positions in the organization will be identified based on position descriptions, job task analyses and applicable licensing commitments. The experience, training, and education of a representative sample of personnel will be reviewed.

## 7.2.8 Conduct Department\_Interviews

Interviews will be conducted with a representative sample of operations personnel. The interviews will focus on compliance with procedures, plant operations, training activities, regulatory compliance, interface with other organizations, and scope of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used as appropriate.

## 7.2.9 Assess Training Effectiveness

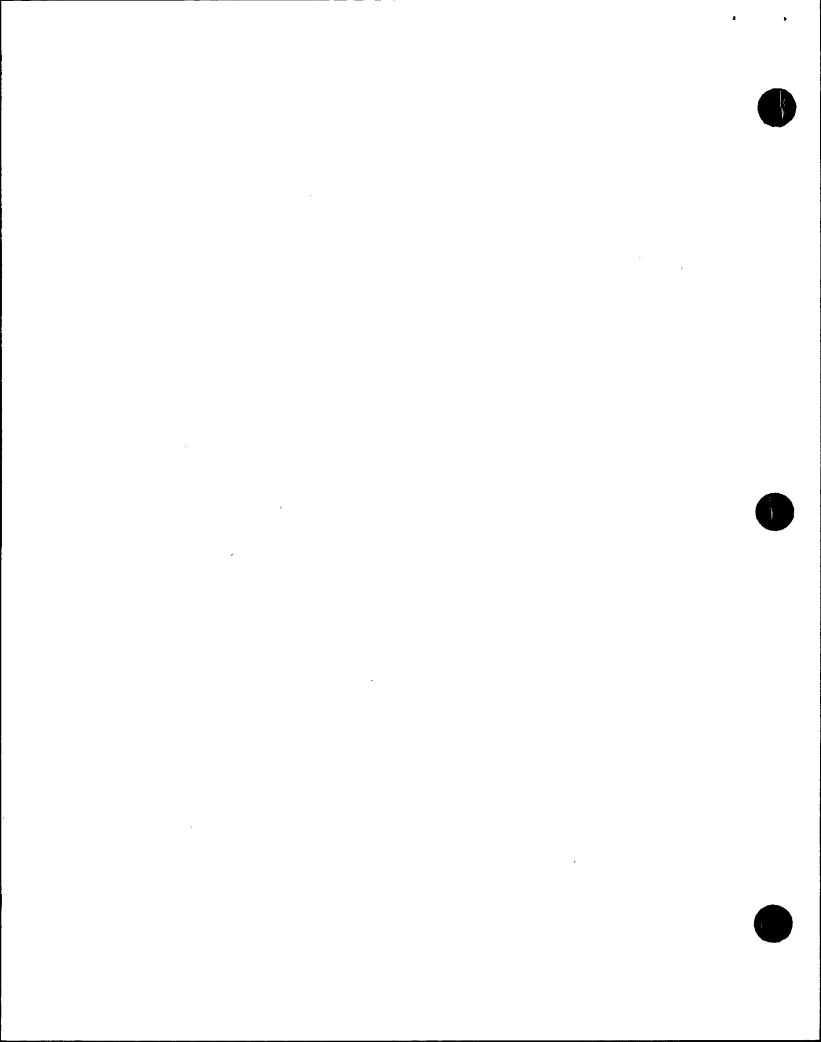
Training provided for operations personnel will be reviewed, including both technical training and managerial and supervisory training. Comments from interviews completed under subtask 7.2.8 and items identified in Task 6.0 which may be related to training will be utilized. Training materials will be examined as well as how operations personnel identify additional training needs.

# 7.2.10 Evaluate Intra-Departmental Communications

The Evaluation Team will assess the methods used for intradepartment communications. Posting of shift orders, utilization of operator logs, requirements for communication links to points where tests or maintenance are in progress and involvement of shift management in operations will be evaluated. The interactions among the members of the shift crew will be observed.

## 7.2.11 Assess Personnel Management

Implementation of corporate personnel policies within the organization will be evaluated. Historical practices regarding



discipline including leave without pay, reassignment, notations in personnel files and terminations will be reviewed. Utilization of incentives including commendations, promotions and merit pay increases will also be evaluated.

# 7.2.12 Senior Evaluation Team Review

Same as paragraph 7.1.13, page 25.

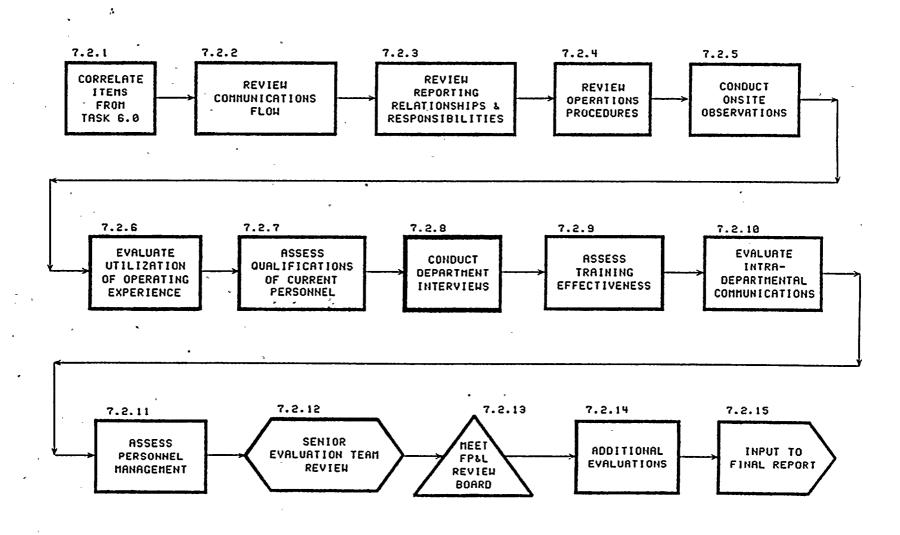
# 7.2.13 Meet FP&L Review Board

Same as paragraph 7.1.14, page 25.

# 7.2.14 Additional Evaluations

Same as paragraph 7.1.15, page 25.

# 7.2.15 Input to Final Report



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# TASK 7.0 CONDUCT OF EVALUATIONS (Continued)

## SUBTASK 7.3 TRAINING

The Training Evaluation Review Team will evaluate samples of training materials, interfaces with user organizations, and organizational structure. Interviews will be conducted with a cross section of training personnel, and selected training classes will be observed. The qualifications of training personnel, as well as the integration of operational experience into training programs will be evaluated. Staffing levels will also be reviewed.

# 7.3.1 Correlate Items from Task 6.0

Same as paragraph 7.1.1, page 21.

# 7.3.2 Review Communications Flow

The flow of communications between training and user organizations will be evaluated. The process for identifying training needs will be reviewed with emphasis on input received from maintenance and operations. Programs which allow these organizations to request modifications of training programs will also be reviewed. The quantity and disposition of requests will be reviewed.

# 7.3.3 Review Reporting Relationships and Responsibilities

The structure of the training organization will be evaluated. Job descriptions and administrative procedures will be reviewed.

## 7.3.4 Review Training Materials

A representative sample of training program elements will be reviewed. This will include job task analyses, selection of job elements for instruction, learning objectives, lesson plans and other training materials. Methods for periodically reviewing and updating training materials will be examined along with the timeliness of updates. Techniques for obtaining feedback on the effectiveness of training activities will be evaluated. Methods of obtaining information from engineering regarding design changes and from operations regarding procedure changes will be reviewed.

# 7.3.5 Conduct Onsite Observations

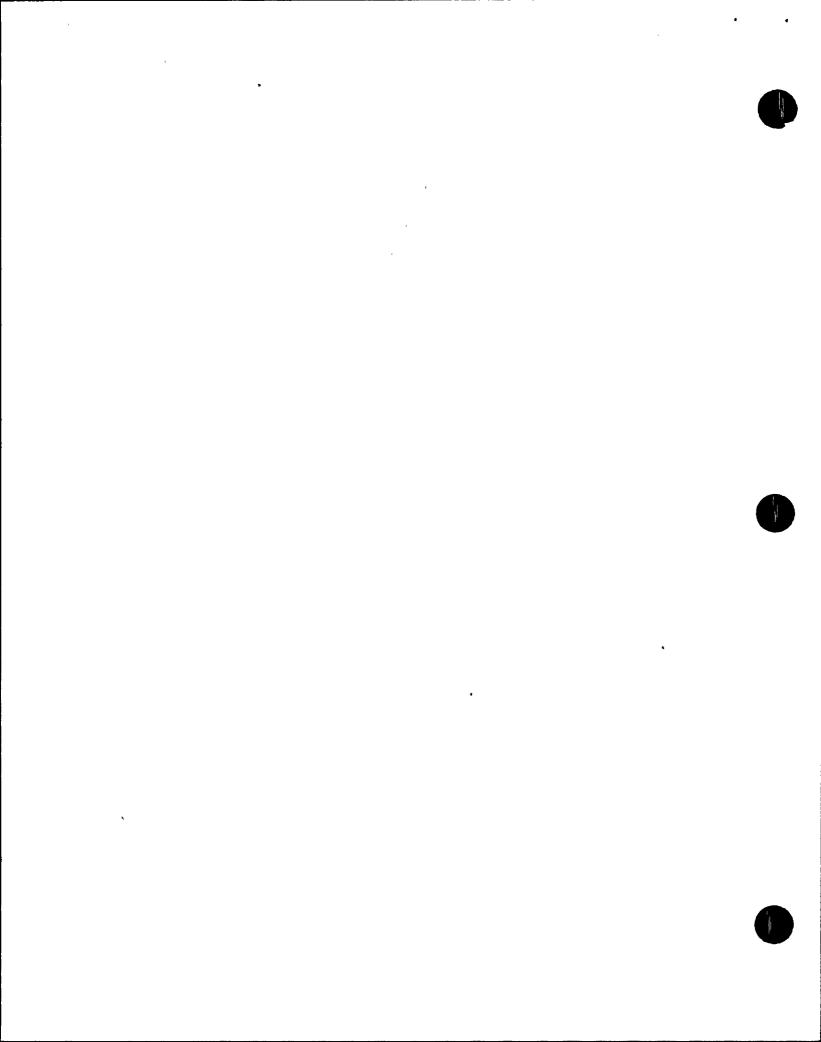
The Evaluation Team will conduct onsite observations of training. Classroom instruction, simulator instruction and laboratory training of various classes of plant personnel will be evaluated.

# 7.3.6 Evaluate Utilization of Operating Experience

Same as paragraph 7.2.6, page 28.

# 7.3.7 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.



# 7.3.8 Conduct Department Interviews

Interviews will be conducted with a sample of training personnel. The interviews will focus on plant operations, procedural compliance, regulatory compliance, interface with other plant organizations, and scope of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used as appropriate.

## 7.3.9 Assess Personnel Management

Same as paragraph 7.2.11, page 30.

# 7.3.10 Senior Evaluation Team Review

Same as paragraph 7.1.13, page 25.

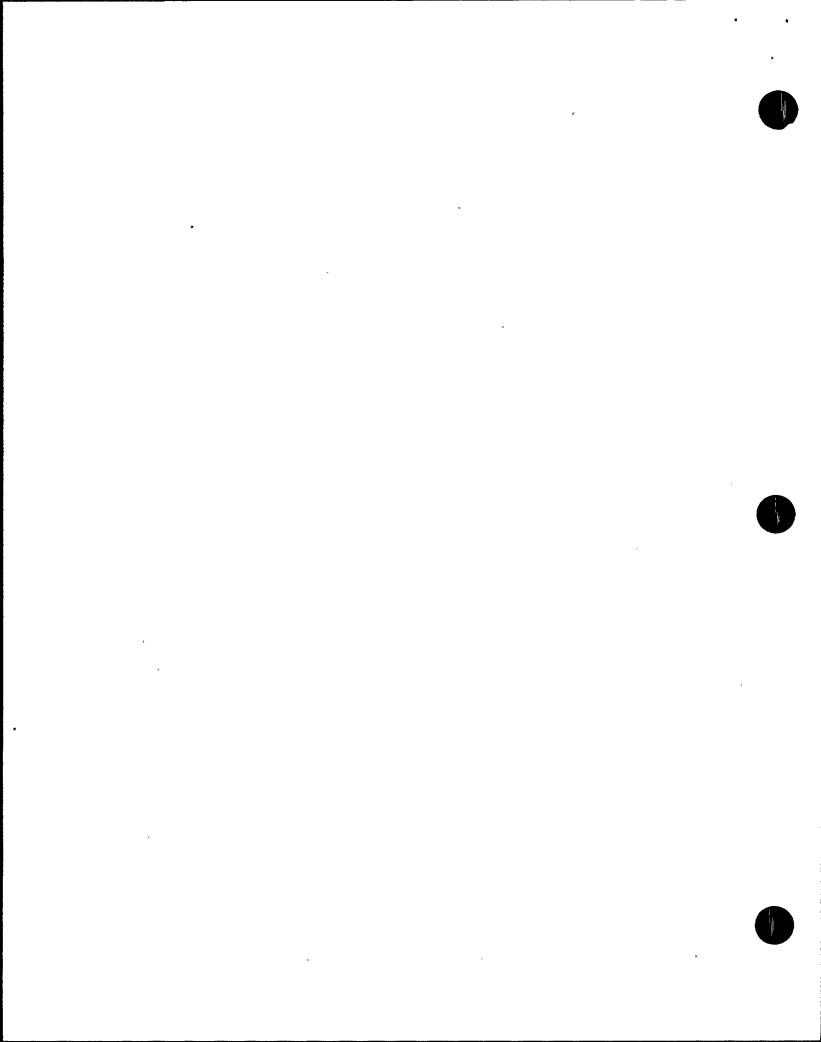
# 7.3.11 Meet FP&L Review Board

Same as paragraph 7.1.14, page 25.

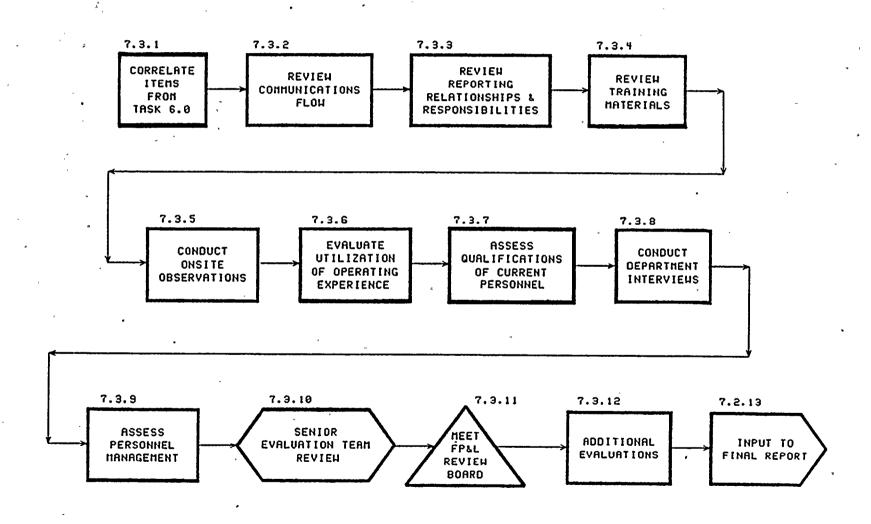
# 7.3.12 Additional Evaluations

Same as paragraph 7.1.15, page 25.

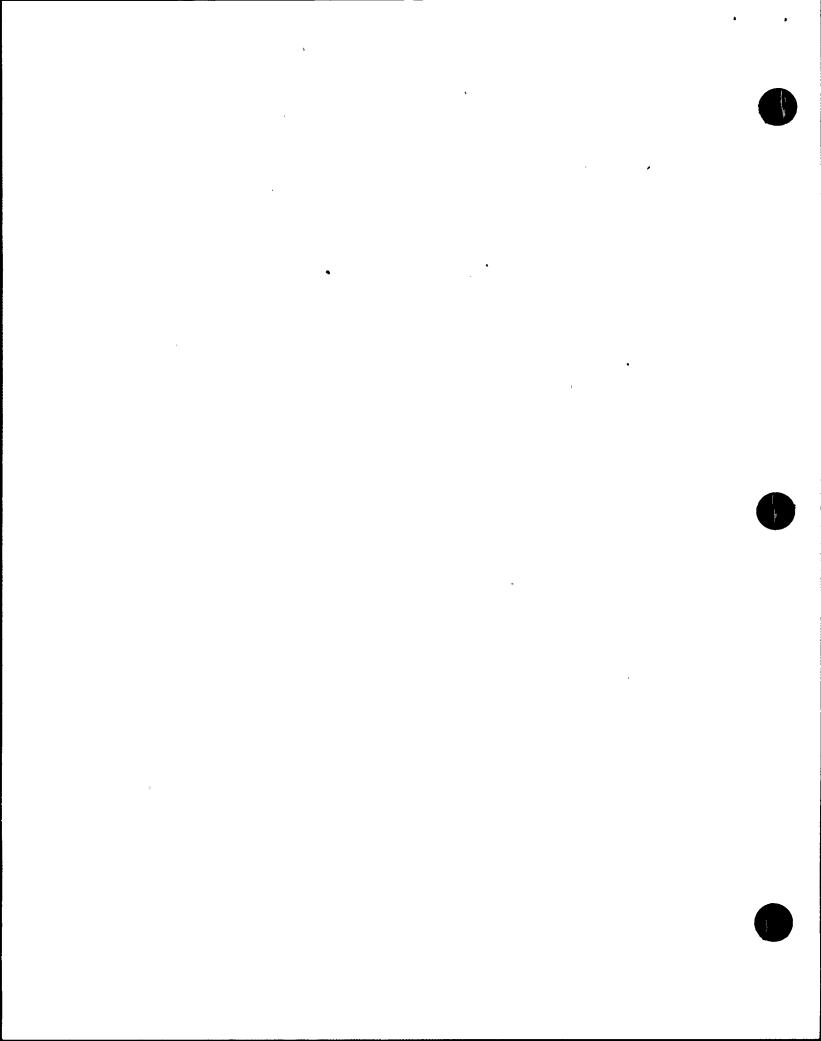
### 7.3.13 Input to Final Report



SUBTASK 7.3 TRAINING



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# TASK 7.0 CONDUCT OF EVALUATIONS (Continued)

#### SUBTASK 7.4 MAINTENANCE

The Maintenance Evaluation Team will evaluate the maintenance organization, procedures, communications with other organizations, and effectiveness of training. Interviews will be conducted with a cross section of maintenance personnel and the evaluation team will observe maintenance activities. The qualifications of maintenance personnel will be evaluated. Staffing of the maintenance organization will also be reviewed.

## 7.4.1 Correlate Items From Task 6.0

Same as paragraph 7.1.1, page 21.

## 7.4.2 Review Communications Flow

maintenance and other between of communications The flow organizations will be evaluated. Operations' responsiveness to maintenance requests for equipment clearances will be reviewed. addition, methods for maintenance to identify recommendations for will be assessed. practices operations improvements in Maintenance's communications with engineering will be reviewed to recurring equipment problems are identified to determine if engineering for resolution. Engineering's support for maintenance determinations of root causes for equipment problems will also be Communications between the maintenance and radiation evaluated. protection organization will be reviewed to determine if radiation protection requirements are clearly defined and followed, and that any changes in radiation protection requirements are identified.

## 7.4.3 Review Reporting Relationships and Responsibilities

The structure of the maintenance organization will be evaluated. Job descriptions and administrative procedures will be reviewed. Staffing levels will also be evaluated.

# 7.4.4 Review Maintenance Procedures

A sample of maintenance procedures will be reviewed to evaluate clarity, level of detail and consistency. The requirements for periodic review and update of maintenance procedures will be examined along with provisions for maintenance personnel to identify and implement improvements to the procedures.

#### 7.4.5 Conduct Onsite Observations

The Evaluation Team will conduct onsite observations of maintenance activities. The Evaluation Team will observe corrective maintenance activities, testing, and maintenance planning activities. The team will assess maintenance backlog, tagout procedures and practices and the ratio of preventive and predictive maintenance activities to corrective maintenance activities.

## 7.4.6 Evaluate Maintenance Planning

The Evaluation Team will evaluate maintenance planning and scheduling activities. Overall performance in managing the backlog of maintenance work orders will be reviewed.

# 7.4.7 Evaluate Utilization of Operating Experience

# 7.4.8 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.

#### 7.4.9 Conduct Department Interviews

Interviews with a sample of maintenance personnel will be conducted. The interviews will focus on plant operations, procedural compliance, regulatory compliance, interface with other plant organizations, plant maintenance activities, and scope of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used as appropriate.

# 7.4.10 Assess Training Effectiveness

Training provided to maintenance personnel will be reviewed, including both technical and managerial and supervisory training. Comments from the interviews completed under subtask 7.4.9 and items identified in Task 6.0 which are related to training will be utilized. Training materials will be examined as will how operations personnel identify additional training needs.

## 7.4.11 Assess Personnel Management

Same as paragraph 7.2.11, page 30.

## 7.4.12 Senior Evaluation Team Review

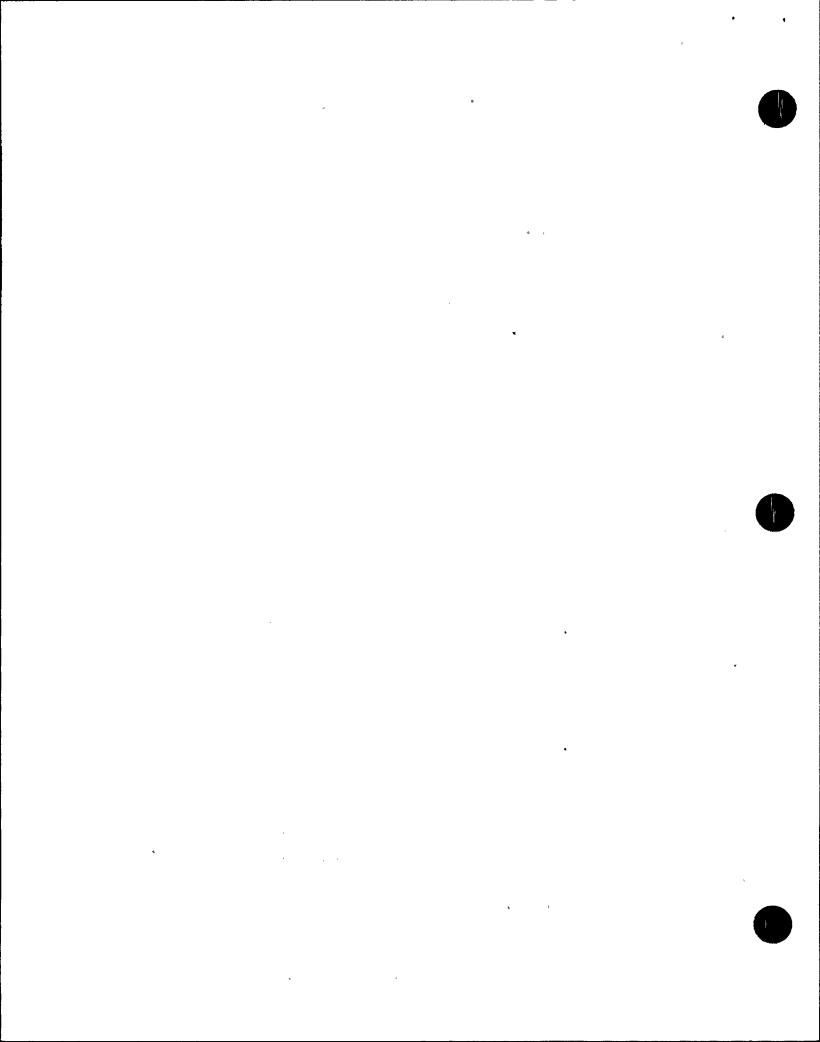
# 7.4.13 Meet FP&L Review Board

Same as paragraph 7.1.14, page 25.

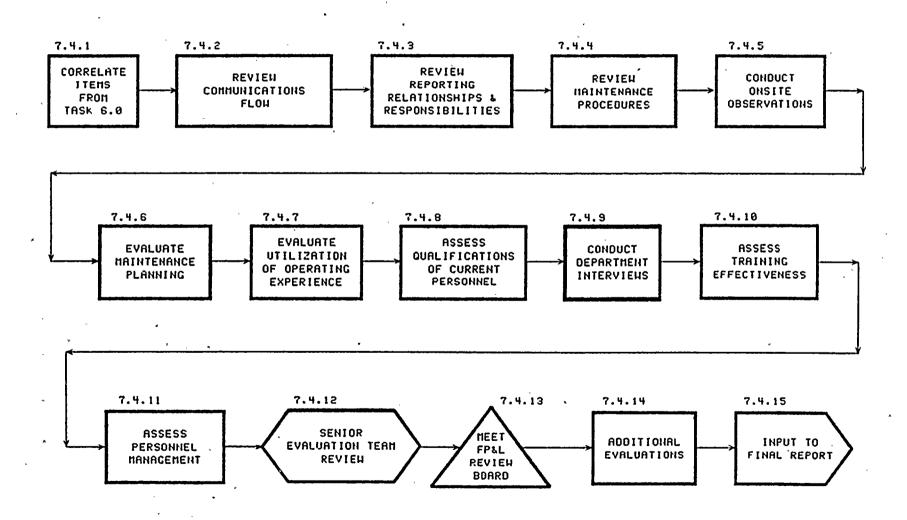
# 7.4.14 Additional Evaluations

Same as paragraph 7.1.15, page 25.

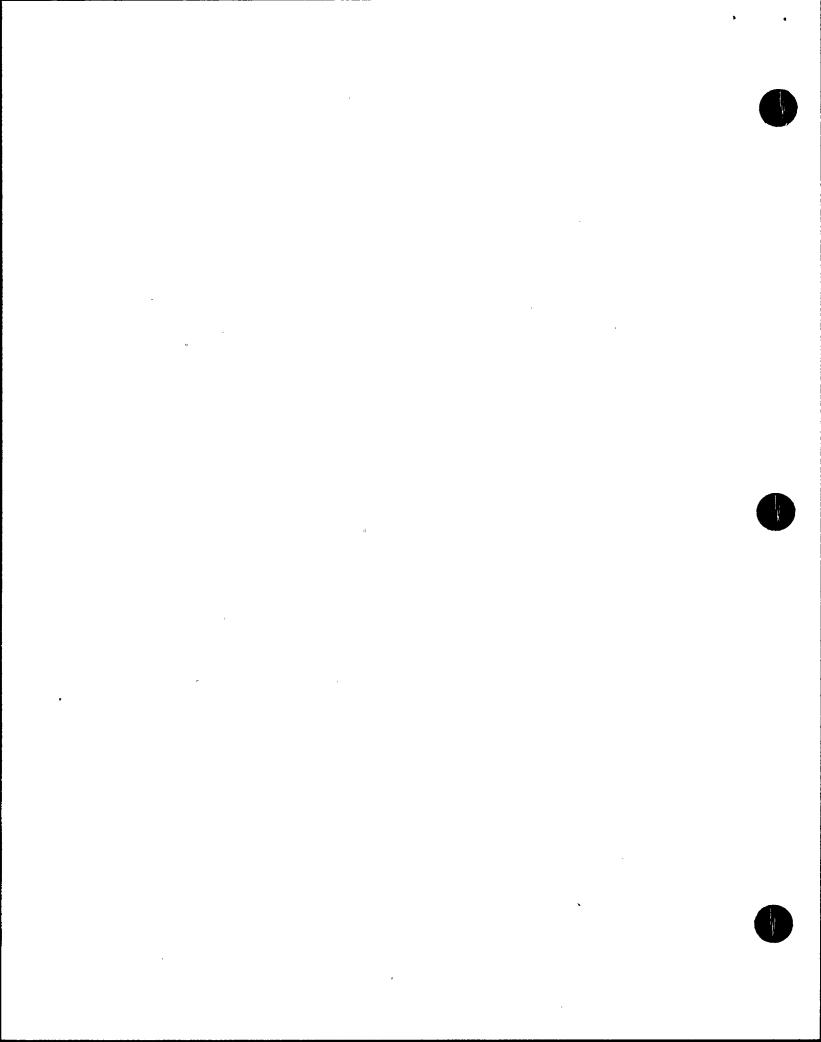
# 7.4.15 Input to Final Report



## SUBTASK 7.4 MAINTENANCE



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## 7.0 CONDUCT OF EVALUATIONS (Continued)

# SUBTASK 7.5 ENGINEERING

Engineering Evaluation Team will evaluate performance of The engineering support including the corporate engineering support The evaluation will examine organizational structure and communications among the various organizations and with other plant organizations. Interviews will be conducted with a cross section of engineering personnel in various engineering disciplines. The qualifications of engineering personnel will be evaluated against qualifications requirements. A sample of safety evaluations performed within the engineering organization will also be reviewed. In addition, staffing of the engineering groups will be reviewed.

## 7.5.1 Correlate Items From Task 6.0

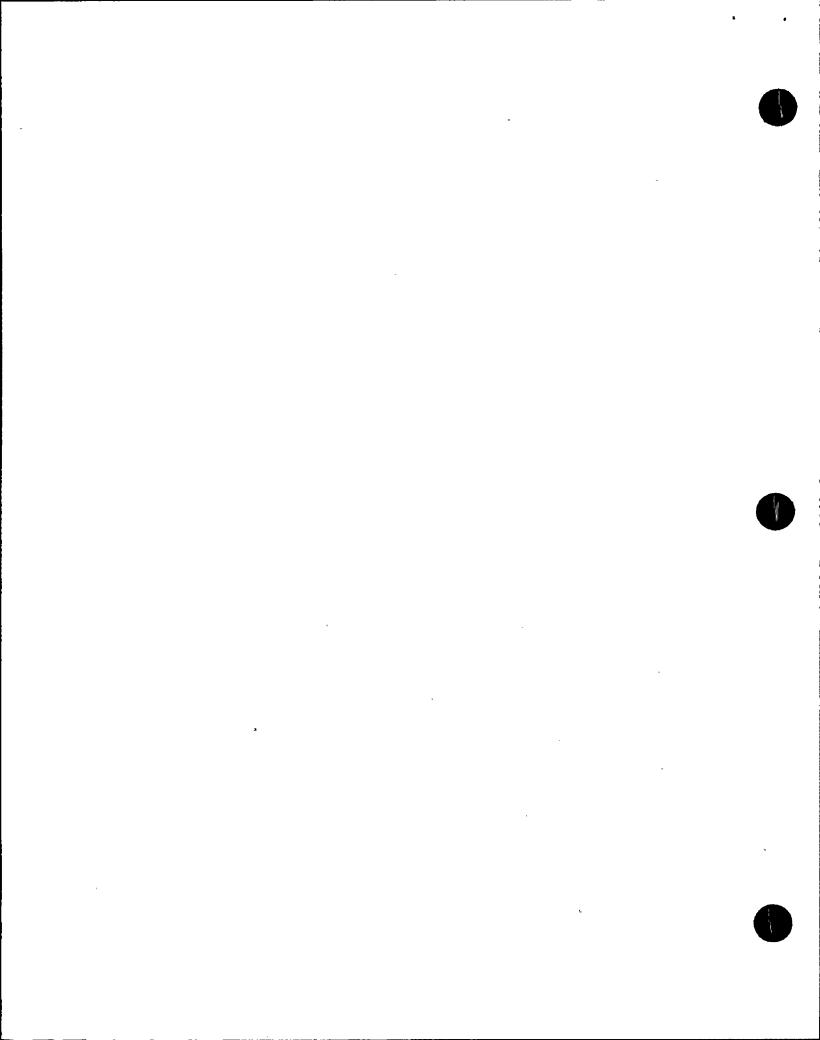
Same as paragraph 7.1.1, page 21.

## 7.5.2 Review Communications Flow

The flow of communications between engineering, maintenance and operations will be evaluated. Engineering's responsiveness to problems identified by operations and maintenance will be reviewed. The considerations of the applicability of requests or recommendations to other plant equipment or systems will be assessed. Methods for Engineering to provide input on procedures or operations practices will be reviewed.

# 7.5.3 Review Reporting Relationships and Responsibilities

The structure of the engineering organizations will be reviewed. Job descriptions, administrative procedures and engineering staffing will be evaluated.



# 7.5.4 Review Design Change Packages

A sample of design change packages will be reviewed to evaluate adequacy of documentation, reasonableness of assumptions, and completeness. The procedures governing preparation of design change packages will be evaluated. Distribution of the design change packages will be reviewed to assure that all organizations potentially affected by the design change are cognizant of the change. Control of design documents such as drawings, specifications, etc. will be evaluated.

# 7.5.5 Evaluate Utilization of Operating Experience

Same as paragraph 7.2.6, page 28.

# 7.5.6 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.

#### 7.5.7 Review Safety Evaluations

A sample of the safety evaluations performed in support of the design change process will be reviewed along with the completeness of documentation provided for the safety evaluations. Training provided to personnel responsible for completing or reviewing safety evaluations will also be reviewed.

## 7.5.8 Conduct Department Interviews

Interviews with a sample of engineering personnel will be conducted. The interviews will focus on plant operations, engineering activities, regulatory compliance, procedural compliance and interface with other plant organizations and scope

of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used if appropriate

## 7.5.9 Assess Training Effectiveness

Training provided to engineering will be reviewed, including both technical and managerial and supervisory training. Comments from interviews completed under subtask 7.5.8 and items identified in Task 6.0 which are related to training will be utilized. Training materials as well as how engineering personnel identify additional training needs will be examined.

### 7.5.10 Assess Personnel Management

Same as paragraph 7.2.11, page 30.

# 7.5.11 Senior Evaluation Team Review

Same as paragraph 7.1.13, page 25.

## 7.5.12 Meet FP&L Review Board

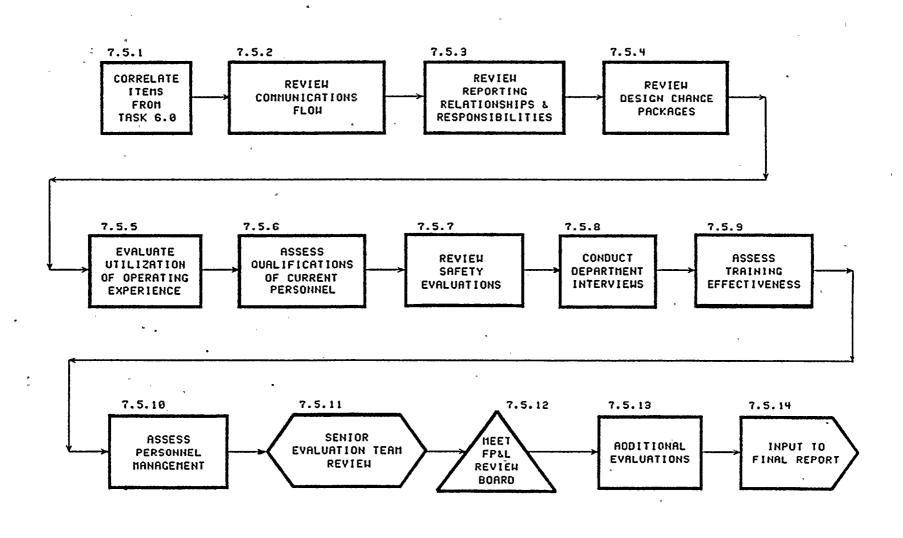
Same as paragraph 7.1.14, page 25.

# 7.5.13 Additional Evaluations

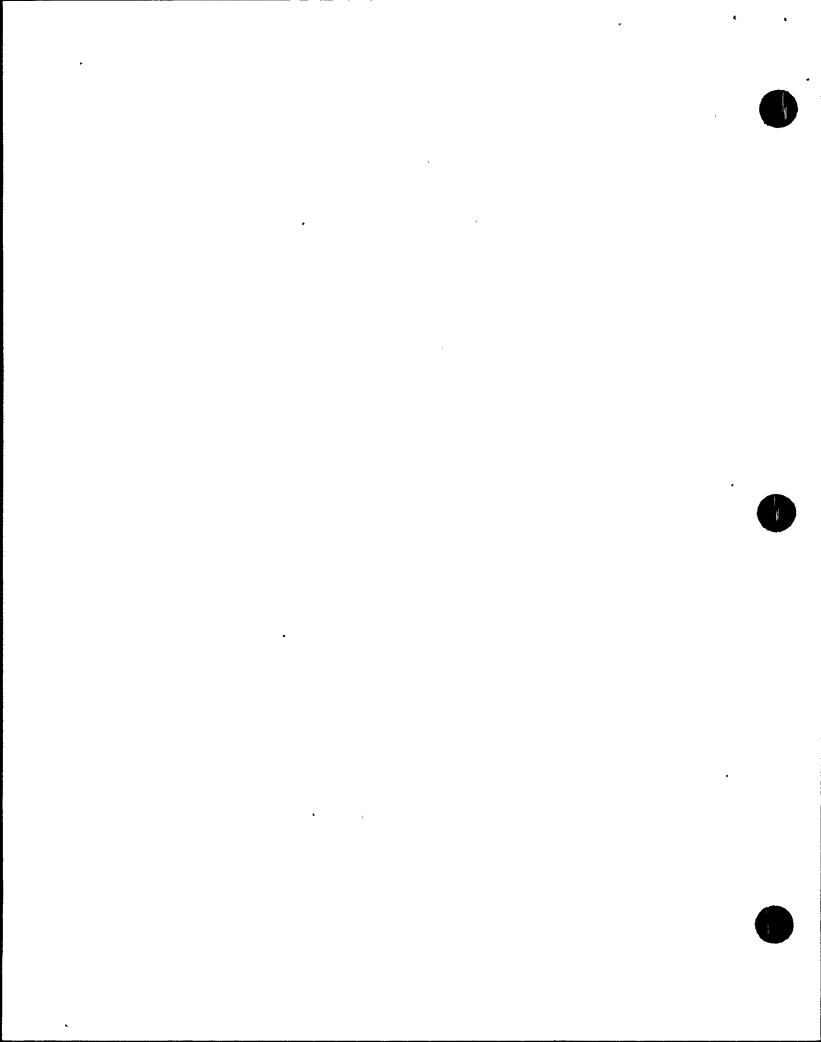
Same as paragraph 7.1.15, page 25.

## 7.5.14 Input to Final Report

## SUBTASK 7.5 ENGINEERING



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## TASK 7.0 CONDUCT OF EVALUATIONS (Continued)

#### SUBTASK 7.6 SECURITY AND SAFEGUARDS

The Security Safeguards Evaluation Team will evaluate and performance of the security organization, structure of the organization, communications, security procedures, resolution techniques and effectiveness of training. Interviews will be conducted with a cross section of security personnel, and the Evaluation Team will observe security activities. Staffing levels and the qualifications of security personnel will also be reviewed.

# 7.6.1 Correlate Items from Task 6.0

Same as paragraph 7.1.1, page 21.

# 7.6.2 Review Communications Flow

The flow of communications between security and other organizations will be evaluated. The processes for security to request maintenance of security equipment will be reviewed. The procedures by which operations and maintenance notify security of personnel access requirements will be examined.

## 7.6.3 Review Reporting Relationships and Responsibilities

The structure of the security organization will be evaluated. The security plan, job descriptions, staffing levels and administrative procedures will be reviewed.

# 7.6.4 Review Security Procedures

A sample of security procedures will be reviewed to evaluate clarity, level of detail and consistency. The requirements for periodic review and update of security procedures will be examined along with provisions for security personnel to identify and implement improvements to procedures.

## 7.6.5 Conduct Onsite Observations

Security activities onsite such as shift turnover, posting of guards, roving patrols, and guard force training will be observed by the Evaluation Team.

# 7.6.6 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.

# 7.6.7 Conduct Department Interviews

Interviews will be conducted with a sample of guards, shift supervisors and security management. The interviews will focus on security activities, interfaces with other plant organizations, plant operations, procedural compliance, regulatory compliance, and scope of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used as appropriate.

## 7.6.8 Assess Training Effectiveness

The Evaluation Team will assess the training provided for security personnel. Technical and managerial and supervisory training will be assessed. Comments from interviews completed under subtask

7.6.7, and items identified in Task 6.0 which are related to training will be utilized. The evaluation will include observation of security training, a review of training materials and the methods security personnel use to identify additional training needs and improvements.

# 7.6.9 Assess Personnel Management

Same as paragraph 7.2.11, page 30.

# 7.6.10 Senior Evaluation Team Review

Same as paragraph 7.1.13, page 25.

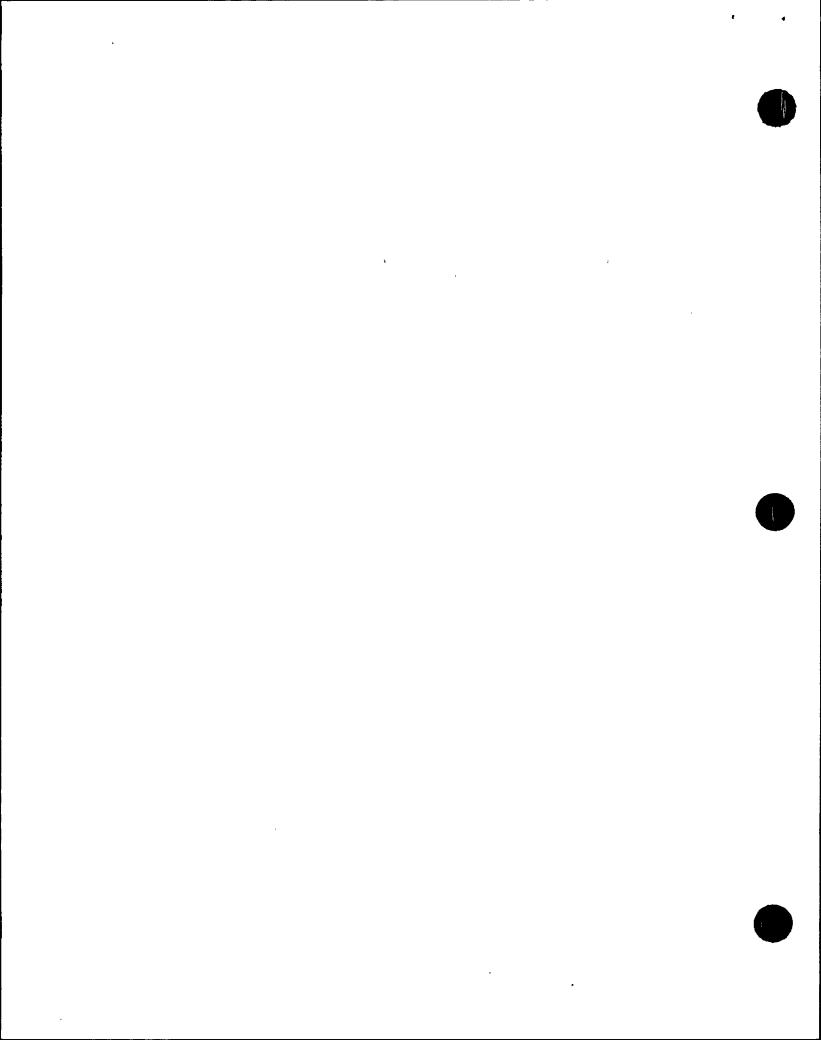
## 7.6.11 Meet FP&L Review Board

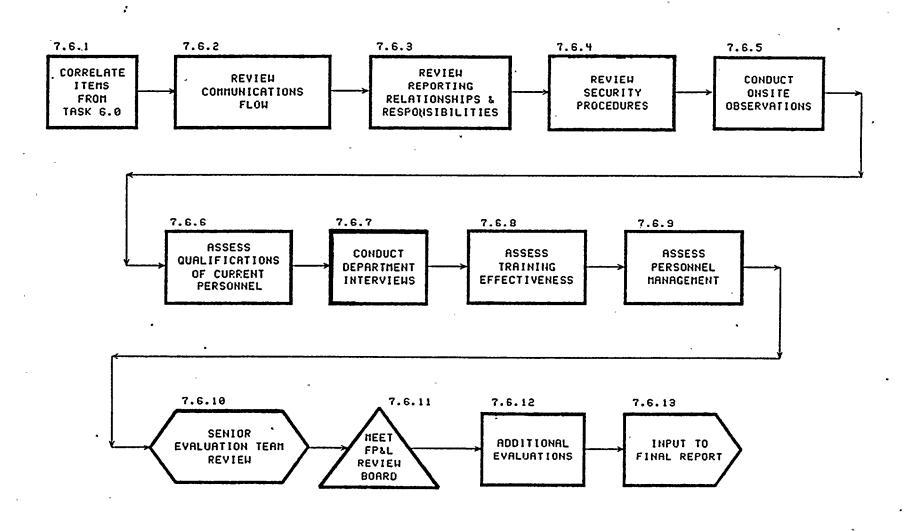
Same as paragraph 7.1.14, page 25.

# 7.6.12 Additional Evaluations

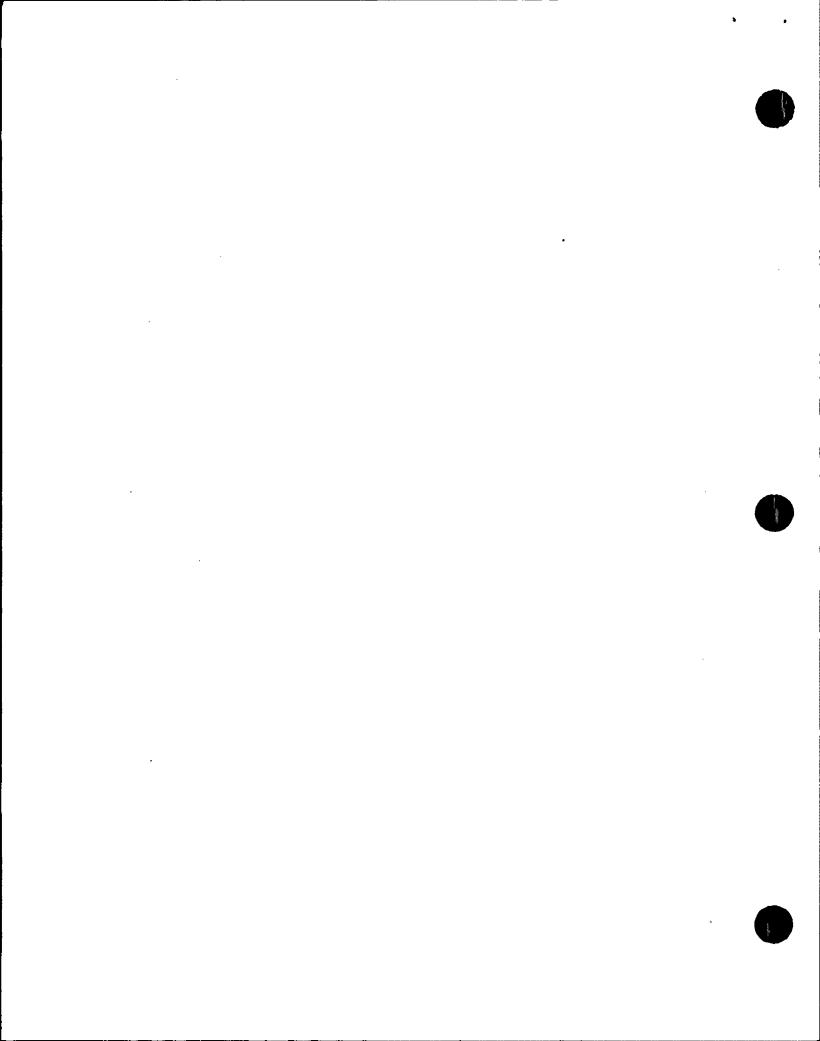
Same as paragraph 7.1.15, page 25.

# 7.6.13 Input to Final Report





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### TASK 7.0 CONDUCT OF EVALUATIONS (Continued)

#### TASK 7.7 REGULATORY INTERFACE

The Regulatory Interface Evaluation Team will evaluate information flow to and from the licensing organization, organizational structure, responses to selected issues and the effectiveness of commitment management. The effectiveness of the interface between corporate and plant licensing organizations and the NRC will be evaluated. Interviews will be conducted with licensing personnel. Interviews with NRC personnel may also be requested. Staffing levels and qualifications of licensing personnel will be evaluated.

#### 7.7.1 Correlate Items From Cask 6.0

Same as paragraph 7.1.1, page 21.

### 7.7.2 Review Information Flow

Evaluation Team will evaluate the methods for providing information to the licensing organization and the normal practices licensing organization to disseminate the to other plant organizations. The methods for information notifying Licensing of pending design or procedural changes which may effect licensing commitments or the content of the Safety will be evaluated. Normal distribution of Analysis Report enforcement bulletins and notices, inspection inspection and reports and other regulatory information will be examined. Methods for assuring concurrence and approval of plant organizations with the contents of licensing submittals will be evaluated.

### 7.7.3 Review Reporting Relationships and Responsibilities

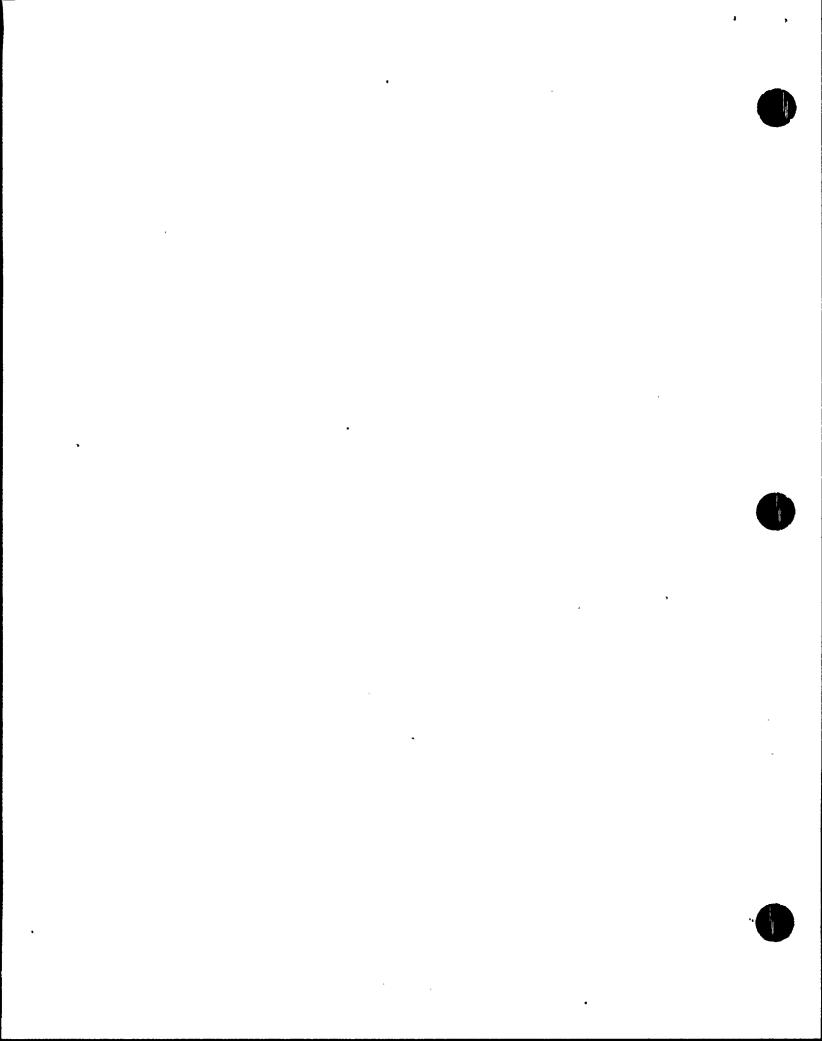
The Evaluation Team will review the organizational structure of the licensing organization. Staffing levels, job descriptions and administrative procedures will be reviewed.

#### 7.7.4 Review Licensing Response to Issues

A sample of licensing issues which have required integrated response from several FP&L organizations will be selected. The Evaluation Team will complete an evaluation of FP&L responses to these issues including the timeliness of responses. The evaluation will include an examination of the process from problem definition through development of a response, as appropriate. The Evaluation Team will also evaluate the assessment of the relevance of the issues to other aspects of plant operations, and the process of incorporating "lessons learned" to enhance licensing performance.

## 7.7.5 Evaluate Interface with Resident Inspector

The Evaluation Team will evaluate the relationship between plant licensing personnel, other site personnel, and NRC resident inspectors. Interviews with the inspectors may be requested. The Evaluation Team will review the process by which information is supplied to the inspectors. Practices regarding routine briefings and meetings with resident inspectors will also be evaluated, as will procedures for notifying the resident inspectors of plant events.



### 7.7.6 Evaluate Effectiveness of Commitment Management

The Evaluation Team will evaluate FP&L's commitment management program. Procedures for verification of commitment closure will be evaluated. The Evaluation Team will evaluate the availability of the commitment data to user organizations. Methods for controlling commitments will also be reviewed. The process for identifying and controlling new commitments will also be evaluated.

### 7.7.7 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.

#### 7.7.8 Conduct Department Interviews

The Evaluation Team will conduct interviews with a sample of licensing personnel including supervisors and managers. The interviews will focus on licensing activities, interfaces with other plant organizations, plant operations, regulatory compliance, and scope of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used as appropriate.

### 7.7.9 Assess Training Effectiveness

The training provided to licensing personnel will be evaluated. Technical and managerial and supervisory training will be assessed. Comments provided during interviews completed under subtask 7.7.8 and items identified in Task 6.0 which are related to training will be utilized. Training materials, and how licensing personnel identify additional training needs and improvements will be assessed.

### 7.7.10 Assess Personnel Management

Same as paragraph 7.2.11, page 30.

### 7.7.11 Senior Evaluation Team Review

Same as paragraph 7:1.13, page 25.

### 7.7.12 Meet FP&L Review Board

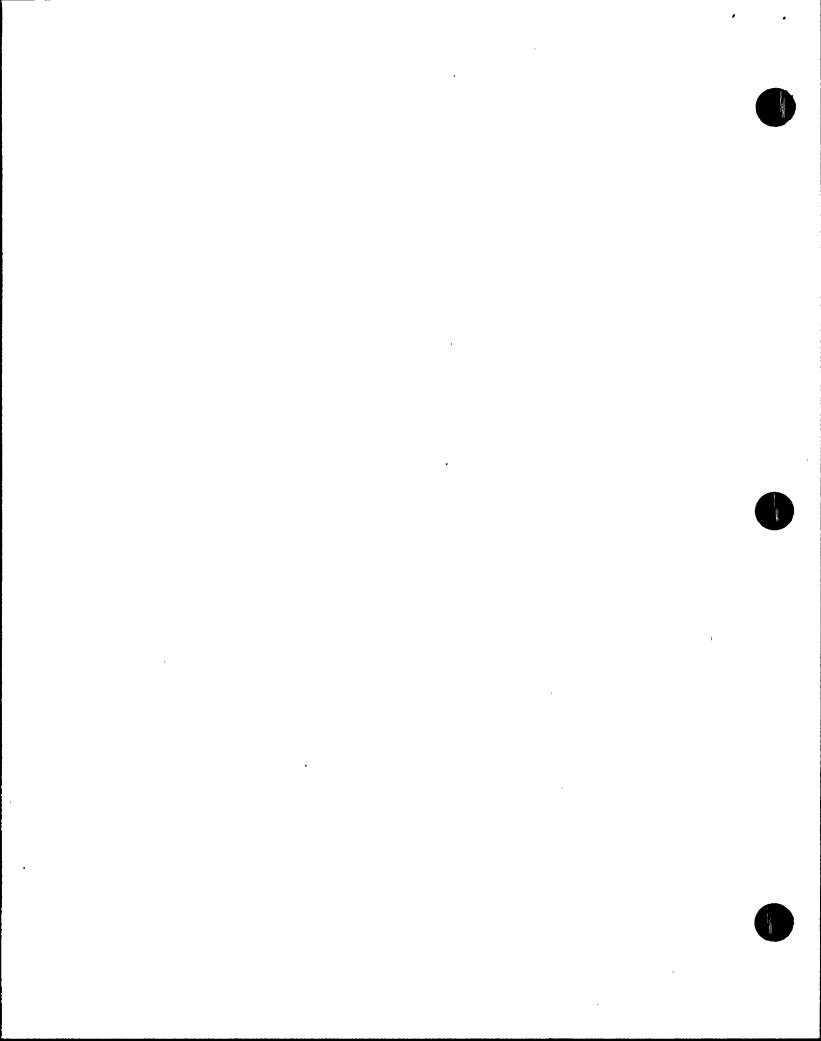
Same as paragraph 7.1.14, page 25.

### 7.7.13 Additional Evaluations

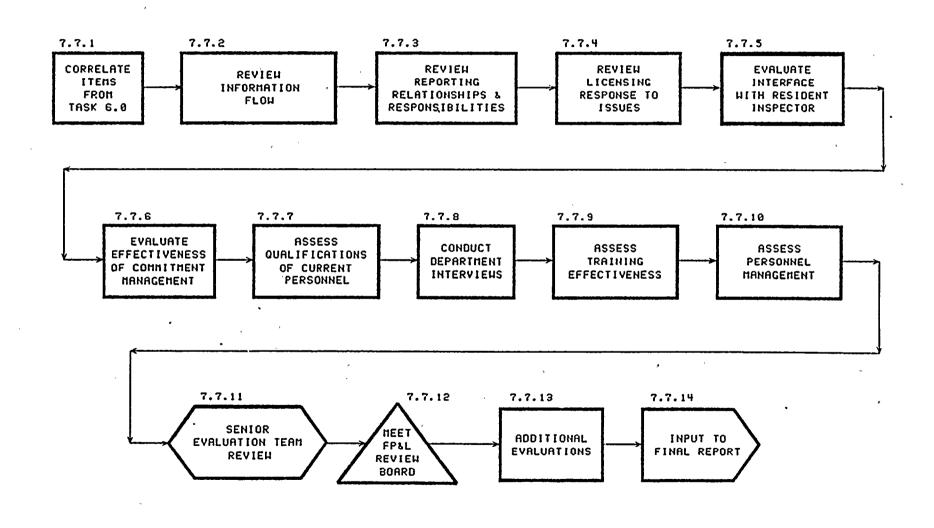
Same as paragraph 7.1.15, page 25.

### 7.7.14 Input to Final Report

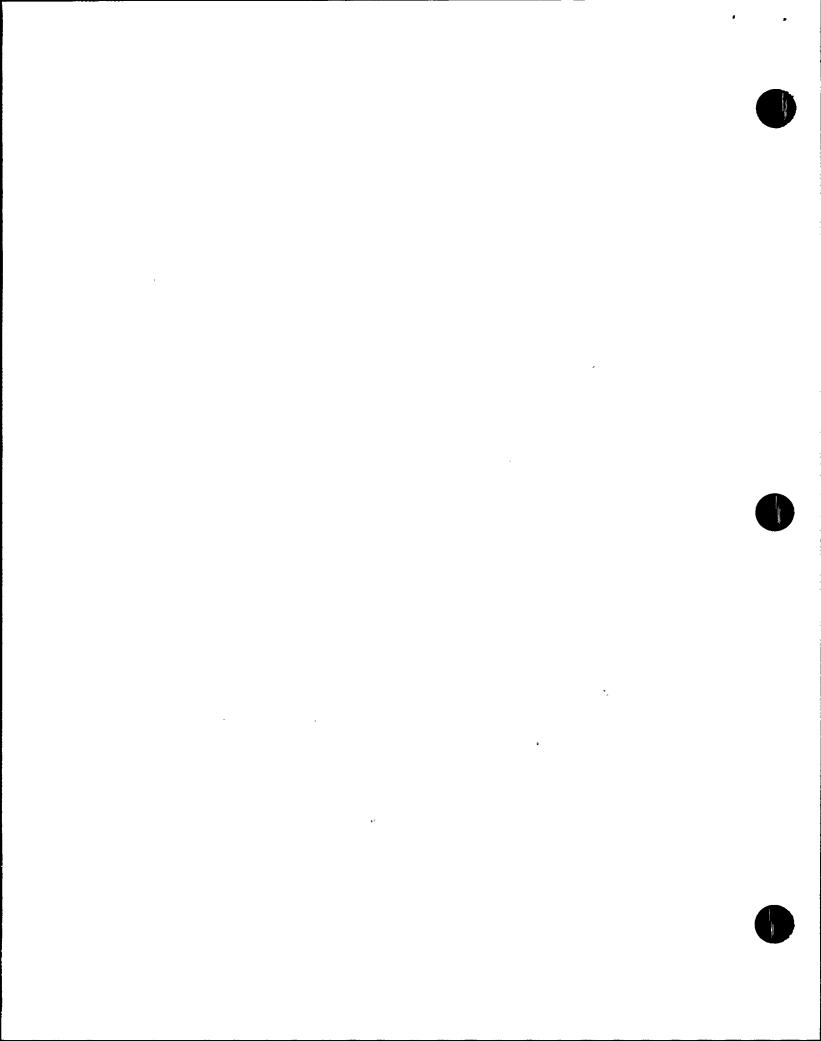
Same as paragraph 7.1.16, page 25.



# SUBTASK 7.7 REGULATORY INTERFACE



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#### TASK 7.0 CONDUCT OF EVALUATIONS (Continued)

#### TASK 7.8 QUALITY PROGRAMS

The Quality Programs Evaluation Team will evaluate non-conformance reporting, the auditing and surveillance process, follow-up on audit findings, integration of operations experience and effectiveness of training. Interviews will be conducted with Quality Assurance personnel. Staffing levels and qualifications of quality assurance personnel will be reviewed.

### 7.8.1 Correlate Items From Task 6.0

Same as paragraph 7.1.1, page 21.

# 7.8.2 Review Non-Conformance Reporting

The Evaluation Team will evaluate both reporting and dispositioning of items of non-conformance. Procedures for reporting non-conformances will be reviewed. The dispositioning of a sample of non-conformances will also be reviewed.

### 7.8.3 Review Reporting Relationships and Responsibilities

The structures of the Quality Assurance and Quality Control organizations will be evaluated. FP&L's Quality Assurance Program, job descriptions, staffing levels, and administrative procedures will be reviewed.

### 7.8.4 Evaluate OA/OC Surveillance

The Evaluation Team will evaluate Quality Assurance audits, audit findings, and Quality Control inspections. The evaluation will assess the audit checklists, nature of audit findings and recommendations. The Quality Control process applicable to such things as welding, testing, component receipt inspection, etc. will be reviewed.

### 7.8.5 Evaluate Follow-Up of Audit Findings

The Quality Assurance program for following audit findings and verifying closure will be evaluated. Methods to verify implementation of corrective action will be reviewed to assure they provide for root cause identification. Methods used to identify systemic problems from audit findings will also be evaluated.

### 7.8.6 Assess OA Response to Operating Events

The Evaluation Team will evaluate the response of quality assurance and quality control organizations to operational events. Programs for evaluating operating events at Turkey Point and at other commercial plants to identify potential improvements in quality programs will be evaluated. Periodic internal assessments of overall quality programs performance will be reviewed to insure that "lessons learned" are adequately incorporated in quality programs.

# 7.8.7 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.

### 7.8.8 Conduct Department Interviews

The Evaluation Team will conduct interviews with a sample of Quality Assurance and Quality Control technicians, auditors, supervisors, and managers. The interviews will focus on quality assurance and quality control activities, interfaces with other plant organizations, plant operations, regulatory compliance, and scope of responsibilities and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may also be used as appropriate.

### 7.8.9 Assess Training Effectiveness

The training provided to Quality Assurance and Quality Control personnel will be evaluated. Both technical and managerial and supervisory training will be assessed. Comments provided during personnel interviews completed under subtask 7.8.8 and items identified in Task 6.0 which are related to training will be utilized. Training materials as well as how personnel identify additional training needs and improvements will be evaluated.

#### 7.8.10 Assess Personnel Management

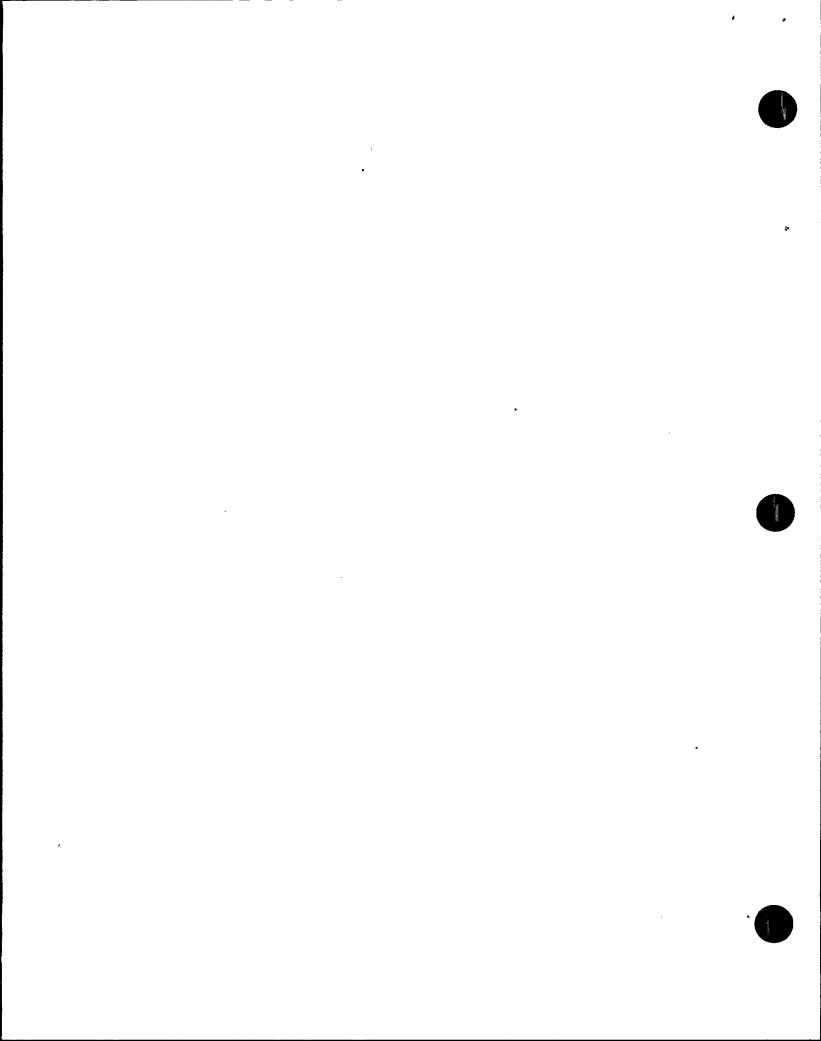
Same as paragraph 7.2.11, page 30.

### 7.8.11 Senior Evaluation Team Review

Same as paragraph 7.1.13, page 25.

### 7.8.12 Meet FP&L Review Board

Same as paragraph 7.1.14, page 25.

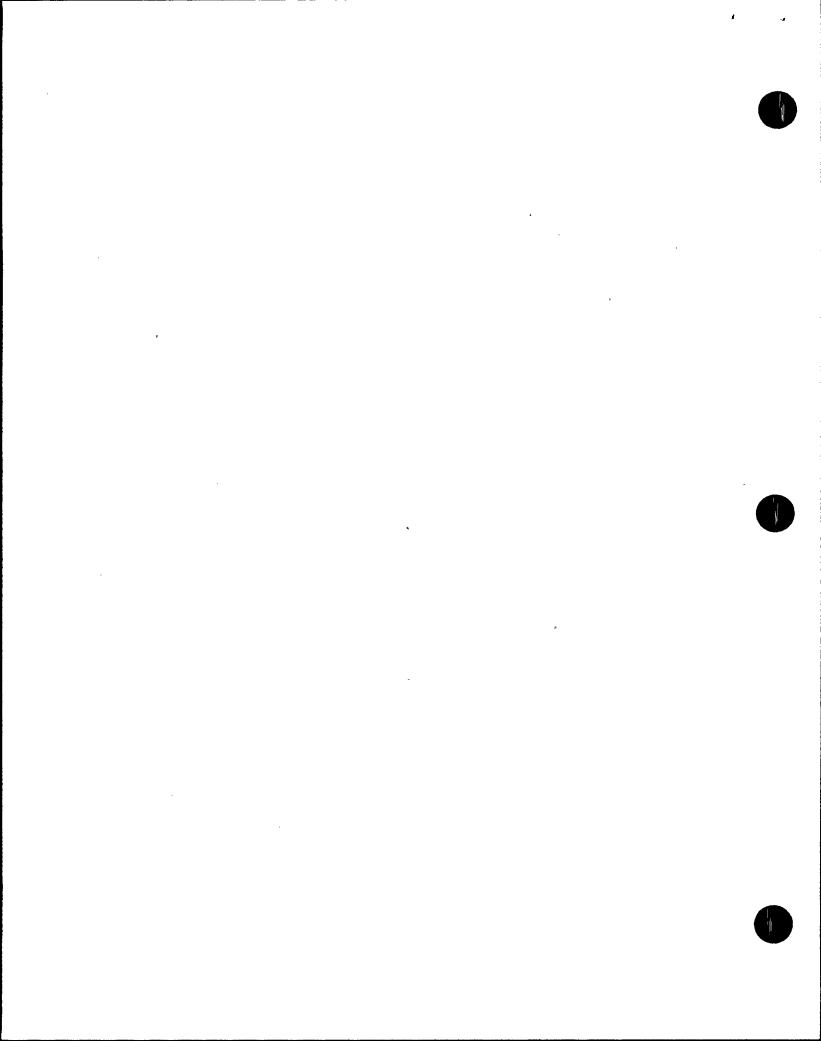


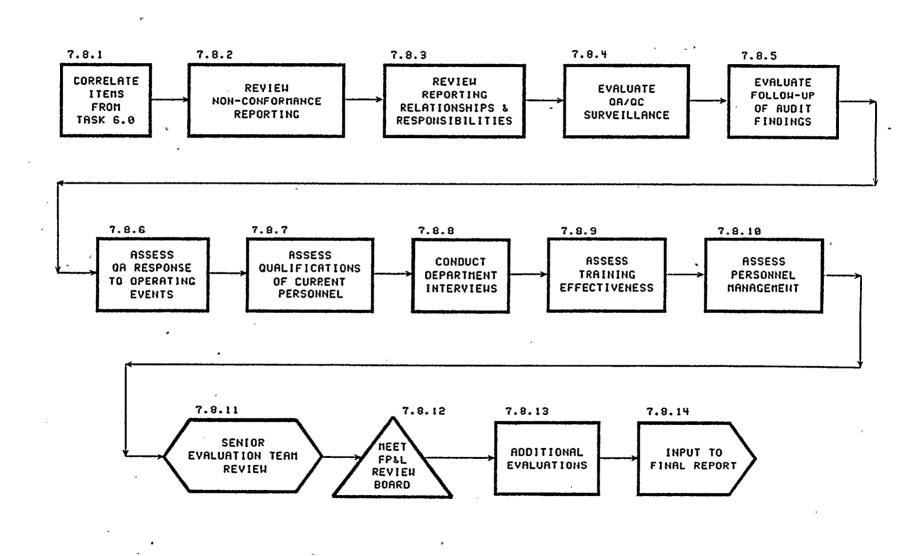
# 7.8.13 Additional Evaluations

Same as paragraph 7.1.15, page 25.

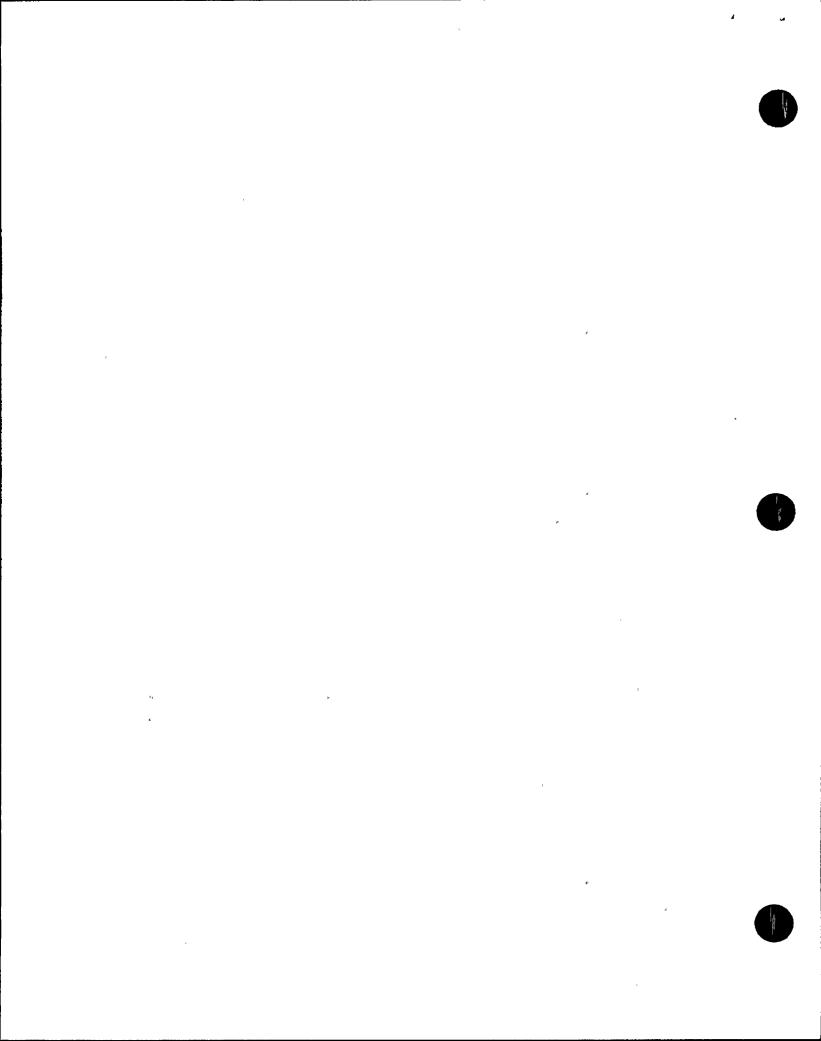
# 7.8.14 Input to Final Report

Same as paragraph 7.1.16, page 25.





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#### TASK 7 CONDUCT OF EVALUATIONS (Continued)

#### TASK 7.9 RADIATION PROTECTION AND CHEMISTRY

Protection and Chemistry Evaluation Team will The Radiation chemistry organizations, radiation protection and communications flow, procedures, and programs. Interviews will be levels of personnel, and radiation conducted with several protection and chemistry activities onsite will be observed. Radiation protection and chemistry staffing and the qualifications of personnel will be evaluated.

### 7.9.1 Correlate Items from Task 6.0

Same as paragraph 7.1.1, page 21.

### 7.9.2 Review Communications Flow

The flow of communications between radiation protection and chemistry and operations, maintenance and engineering will be evaluated. The processes for radiation protection and chemistry to identify potential improvements in operations practices and procedures, maintenance work practices and procedures, and engineering design will be reviewed. Responsiveness of other organizations to radiation protection and chemistry initiatives will be assessed. In addition, responsiveness by the radiation protection and chemistry organizations to requests for support by other plant organizations will be evaluated.

# 7.9.3 Review Reporting Relationships and Responsibilities

The Evaluation Team will review the radiation protection and chemistry organizations. Job descriptions, job task analyses, staffing levels and administrative procedures will be evaluated.

### 7.9.4 Review Radiation Protection Procedures

A sample of radiation protection and chemistry procedures will be reviewed. Types of procedures which will be reviewed will include routine area surveying, access control, identification of contamination, ALARA evaluations, chemical analyses, and process sampling. The requirements for periodic review and update of radiation protection and chemistry procedures will be examined along with provisions for radiation protection and chemistry personnel to identify and implement improvements to the procedures.

# 7.9.5 Conduct Onsite Observations

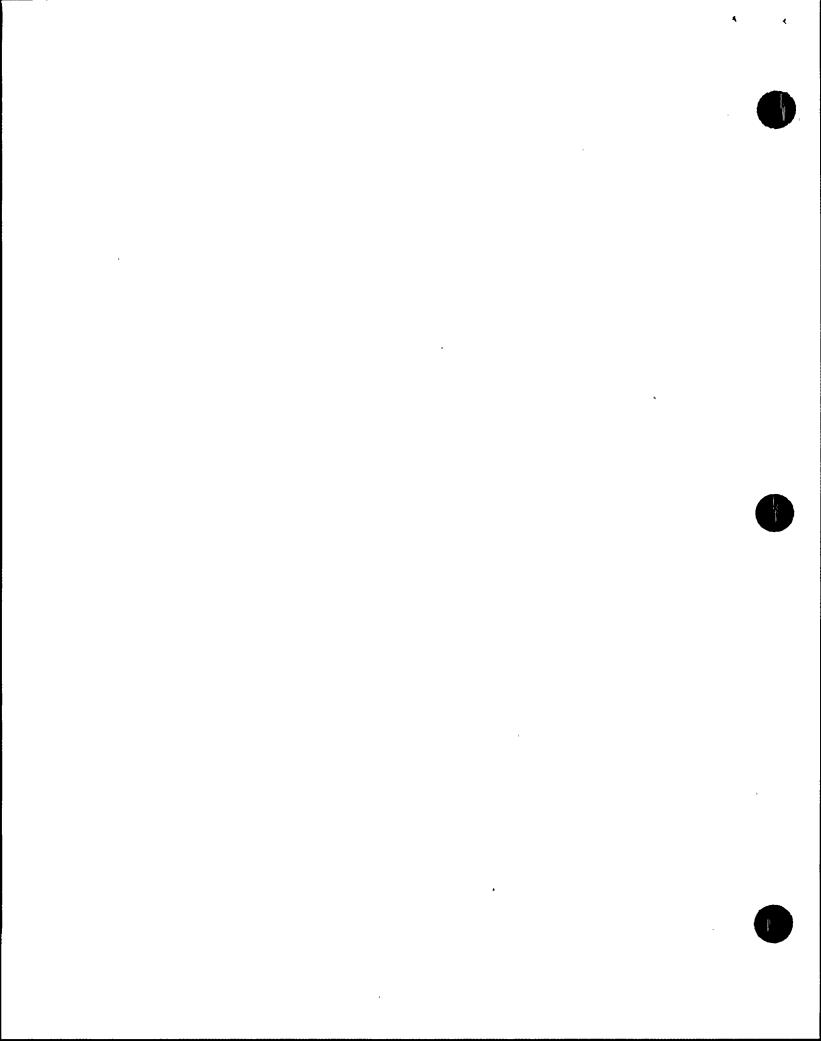
The Evaluation Team will conduct onsite observations of radiation protection and chemistry activities. The Evaluation Team will observe activities such as conduct of radiation surveys, radworker training, utilization of radiation work permits, chemical analysis, process sampling, and general practices of radiation protection and chemistry technicians.

### 7.9.6 Evaluate Utilization of Operating Experience

Same as paragraph 7.2.6, page 28.

#### 7.9.7 Assess Qualifications of Current Personnel

Same as paragraph 7.2.7, page 29.



## 7.9.8 Conduct Department Interviews

The Evaluation Team will conduct interviews with a sample of radiation protection and chemistry technicians, senior technicians, engineers, supervisors and managers. The interviews will focus on radiation protection and chemistry activities, interfaces with other plant organizations, plant operations, regulatory compliance, and scope of responsibility and authority. The interviews will be structured to encourage open discussion. The results from each interview will be documented. Surveys may be used as appropriate.

### 7.9.9 Assess Training Effectiveness

Training provided to radiation protection and chemistry personnel will be evaluated. Both technical and managerial and supervisory training will be reviewed. Comments from the interviews completed under subtask 7.9.8 and items identified in Task 6.0 which are related to training will be utilized. Training materials as well as how radiation protection and chemistry personnel identify additional training needs and improvements will be reviewed.

### 7.9.10 Assess Personnel Management

Same as paragraph 7.2.11, page 30.

# 7.9.11 Senior Evaluation Team Review

Same as paragraph 7.1.13, page 25.

# 7.9.12 Meet FP&L Review Board

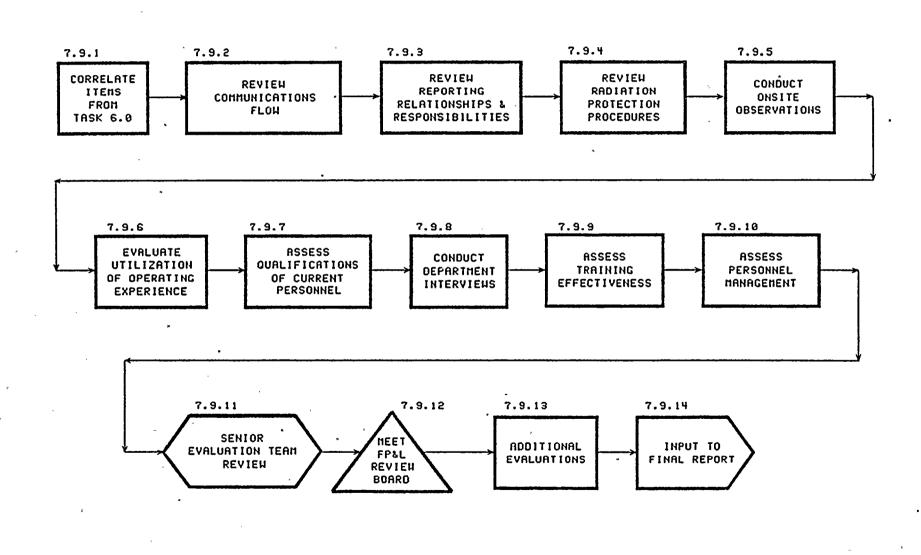
Same as paragraph 7.1.14, page 25.

# 7.9.13 Additional Evaluations

Same as paragraph 7.1.15, page 25.

### 7.9.14 Input to Final Report

Same as paragraph 7.1.16, page 25.



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### V. SCHEDULE

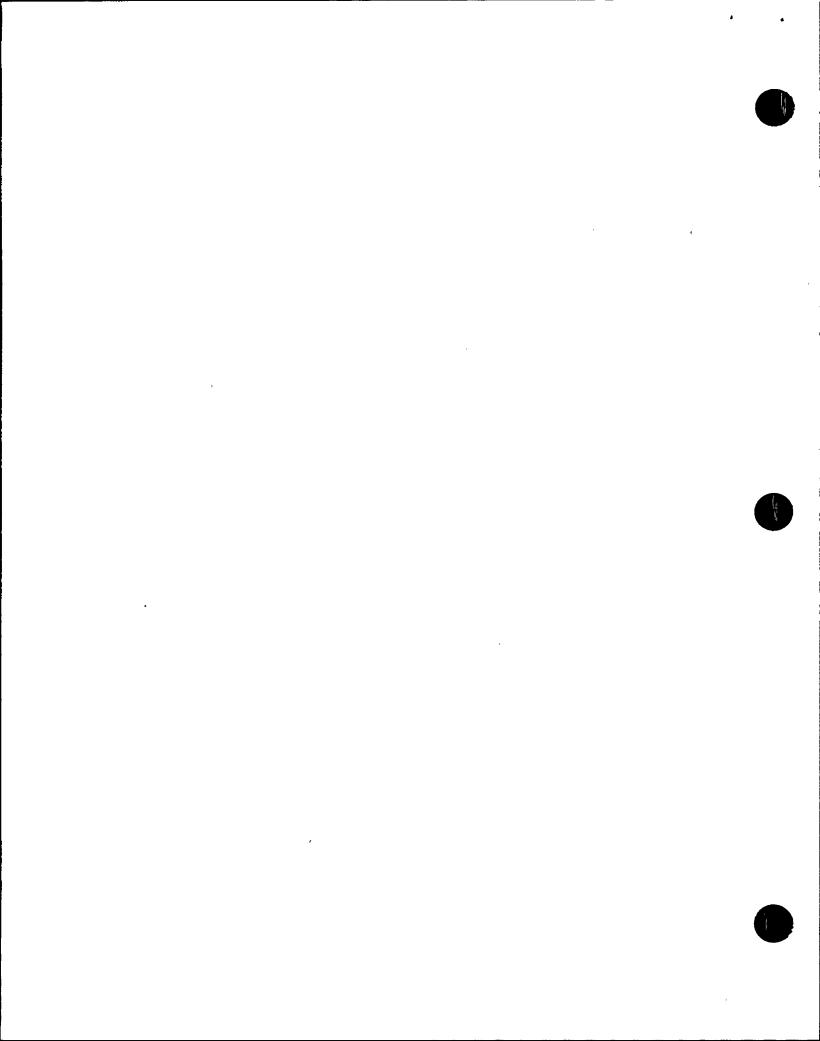
A schedule showing major milestones for the appraisal has been developed and is included in this section. Milestone completion dates will not be extended without good cause and the concurrence of the NRC Region II Administrator.

APPRAISAL TASK		ноvember	DECEMBER	JANUARY	FEBRUARY	MARCH	APRIL
1>	HARD CONTRACT	11/18					1
5>	PREPARE PROGRAM PLAN	⊣	*			,	-
3)	SUBMIT PROGRAM PLAN TO NRC	11/18					
4>	NRC APPROVAL	11/25			,		
5>	DEVELOP PROCEDURES AND CONDUCT TRAINING	<u> </u>					
6>	INITIATE APPRAISAL AND IMPLEMENT PROTOCOL		12/14				
7)	CONDUCT INFORMATION REVIEW		H-O-	<del></del>	-		
8)	INITIATE EVALUATION			\( \frac{1}{\sqrt{7}} \)			
9)	CONDUCT EVALUATION			<del></del>	<u> </u>	O	:
10>	INTEGRATE AND EVALUATE DATA			н		<b> </b>	h
11>	PREPARE FINAL REPORT						
15)	SUBMIT FINAL REPORT TO FP&L AND NRC	·					4/19 <b>♦</b>

APPRAISAL MILESTONE

O APPRAISAL STATUS MEETING

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# ADDENDUM

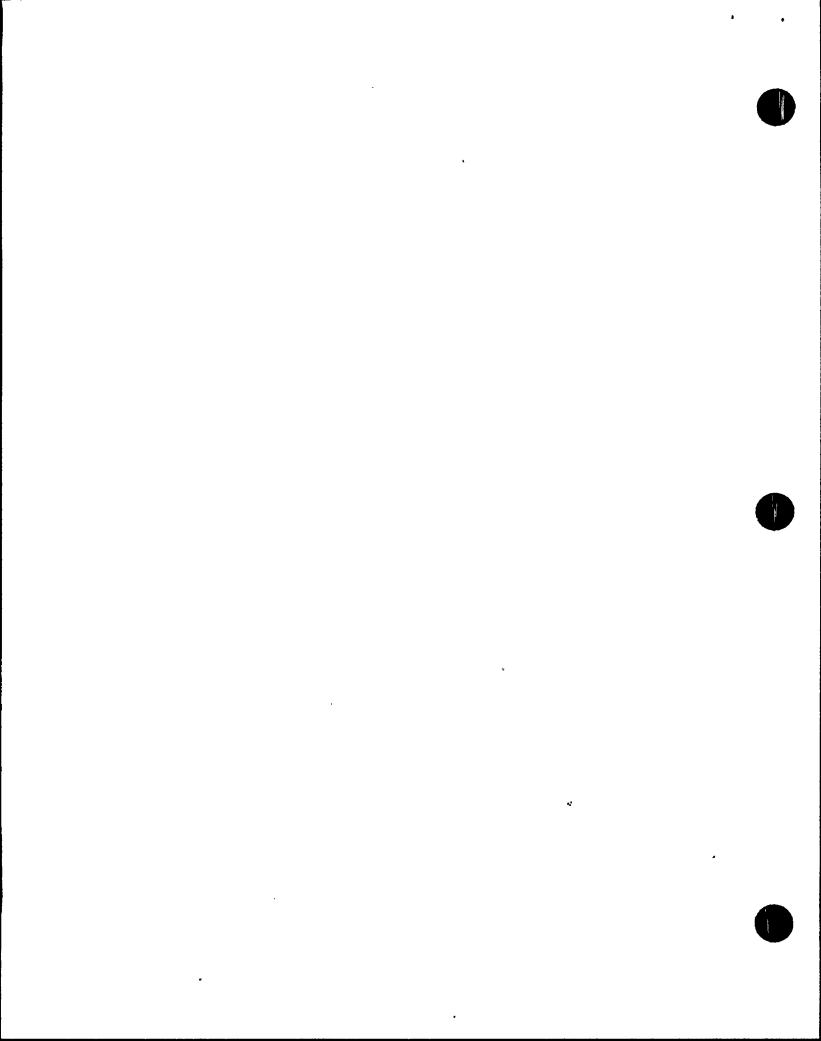
QUALIFICATIONS OF KEY APPRAISAL TEAM MEMBERS

#### AFPRAISAL TEAM ORGANIZATION SENIOR FP&L VICE PRESIDENT SENIOR-LEVEL **OPERATIONS** REVIEW BOARD J. MARTIN SENIOR EVALUATION TEAM J. MARTIN, CHAIRMAN H. CAHILL H. MEYERS J. HENDRIE W. HEEL **PROJECT** MANAGER FP&L LIAISON E. STROUPE MANAGEMENT & EVALUATION **EVALUATION EVALUATION** EVALUATION HUHAH ORGANIZATION TEAM TEAH TEAL TEAM BEHAVIORAL SPECIALISTS LEADER LEADER LEADER LEADER **SPECIALISTS** T. HOUGHTON T. Mc SHEEN R. COHLEY G. WALKE P. HAYES J. RICHARDSON T. MARTIN J. SAVAGE MANAGEMENT & - OPERATIONS - ENGINEERING - QUALITY ORGANIZATION - MAINTENANCE - REGULATORY **PROGRAMS** - TRAINING INTERFACE - RADIATION PROTECTION & CHEMISTRY - SECURITY & SAFEGUARDS

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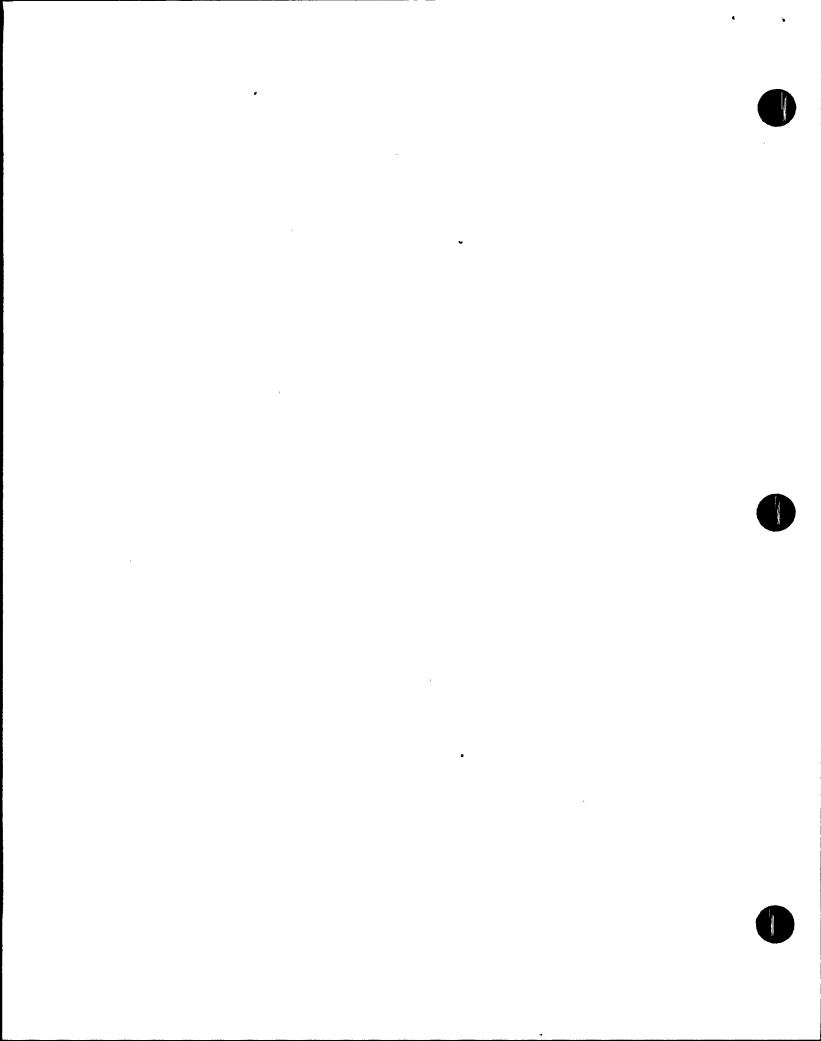
# Jerry K. Martin - Corporate Management/SET Chairman

- o 20 years of diverse Technical and Management Commercial Nuclear experience
- o Nuclear Utility, Vendor, Architect-Engineer, and Consulting experience
- o Extensive Corporate Management Experience
- Extensive Project Management experience including several large utility projects.
- o Extensive Line, Project, and Program Management
- M.S. Mechanical Engineering, Registered Professional Engineer



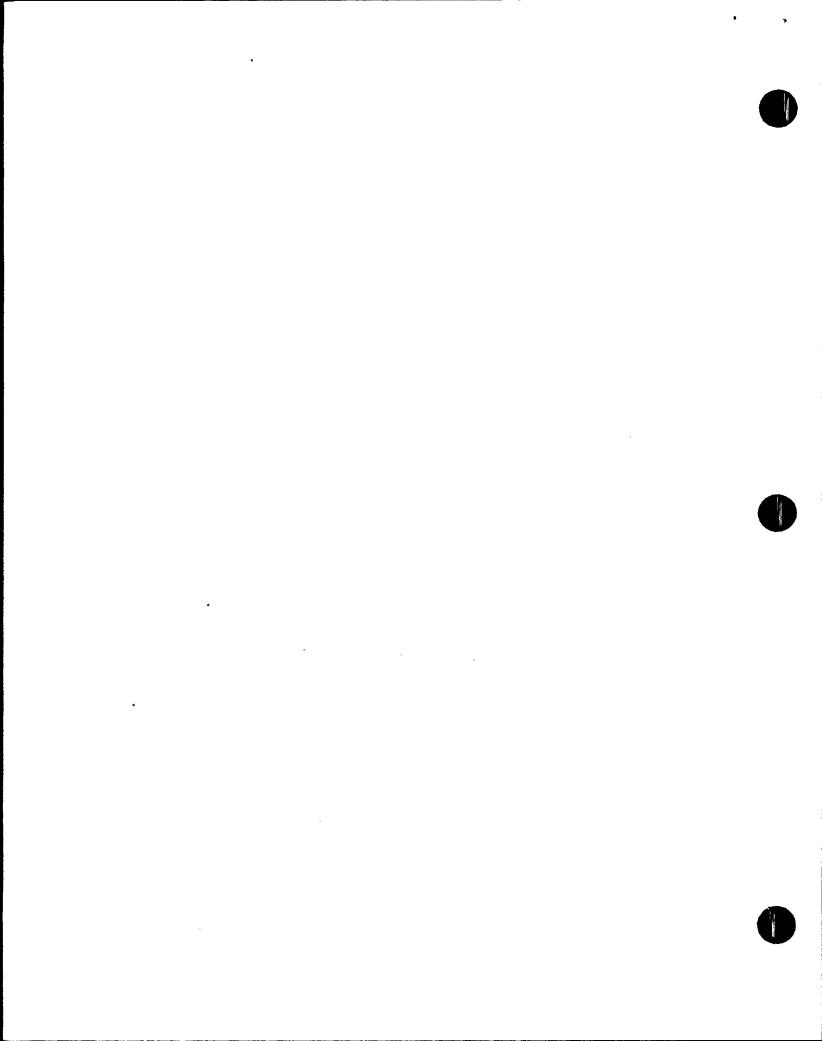
# William J. Cahill, Jr. - SET Member

- o 38 years power plant design, construction and operations experience
- o 33 years commercial nuclear power experience
- o PWR and BWR Nuclear Utility Executive Experience (Consolidated Edison Co. and Gulf States Utilities)
- o Recognized in Industry for successful plant performance
- o B.S. Mechanical Engineering, Registered Professional Engineer



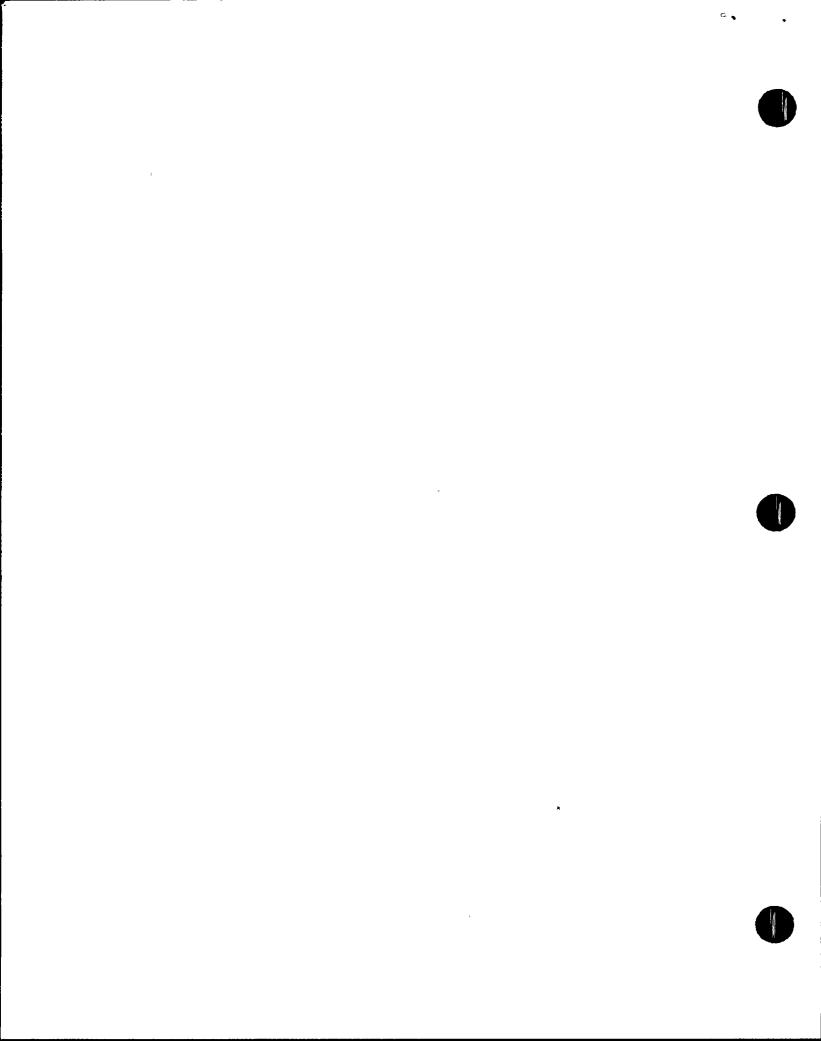
# Joseph M. Hendrie - SET Member

- o Former Chairman and Commissioner, Nuclear Regulatory Commission
- o Member of several Utility Corporate Safety Review Committees
- o Management Consultant to a number of utilities
- o Participated in several utility management/organization evaluations
- o Senior Scientist, Brookhaven National Laboratory
- o Member, Advisory Council, INPO
- o Former member and Chairman ACRS
- o Ph.D., Columbia University



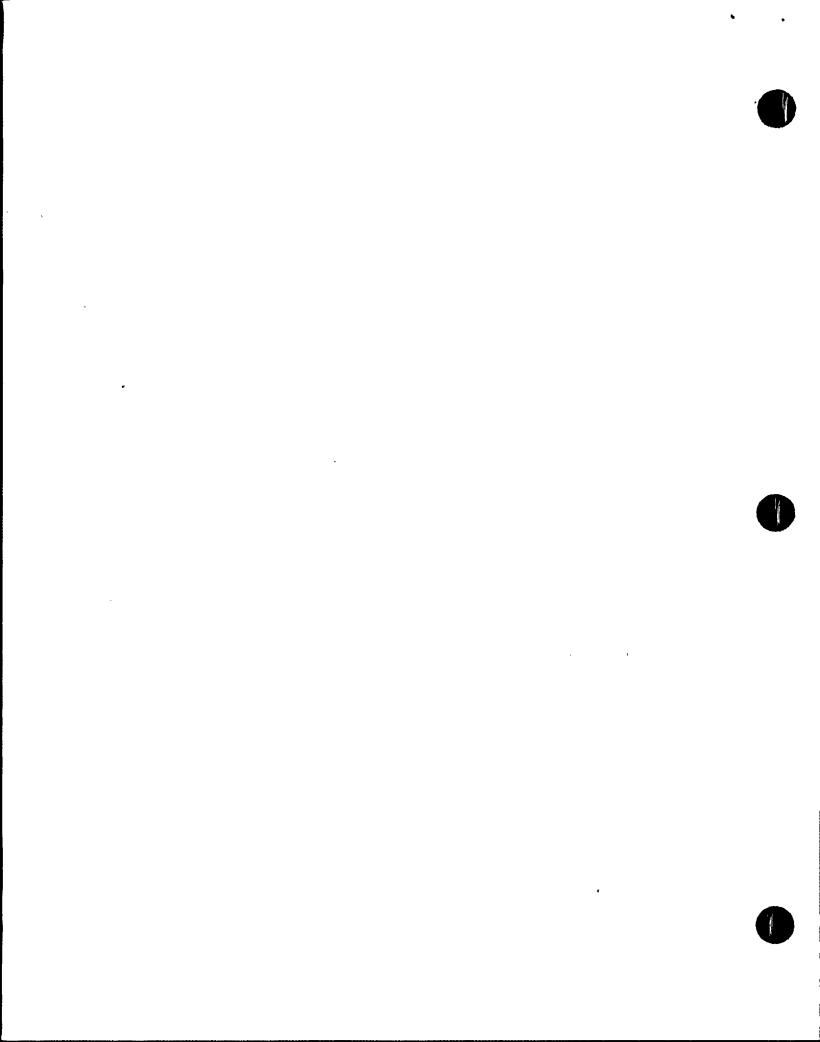
Wanda Myers - Human Behavior Specialist/SET Member

- o Executive Director and founder of Behavioral Consultant Services, Inc. in Beaumont, Texas and Wilmington, Delaware
- o Conducted assessments, training and/or special management projects for over 50 of the Fortune 500 companies
- Designed the training process for strategic, leadership and operational levels - which has been delivered to 100,000 persons in major corporations
- o M.S. in Education and Psychology, 20 years clinical, administrative and management experience
- o Assisted E. I. du Pont in their Business Excellence Process for past six years



#### William Neel - SET Member

- o Retired Rear Admiral, United States Navy
- o Naval Nuclear Propulsion Plant Command Experience
- o Numerous Navy Commendations
- o Personally Supervised training of Senior Naval Officers who were prospective commanding officers of nuclear powered ships
- o Extensive inspection and audit management experience
- o B.S., United States Naval Academy



# E.P. (Woody) Stroupe - Project Manager

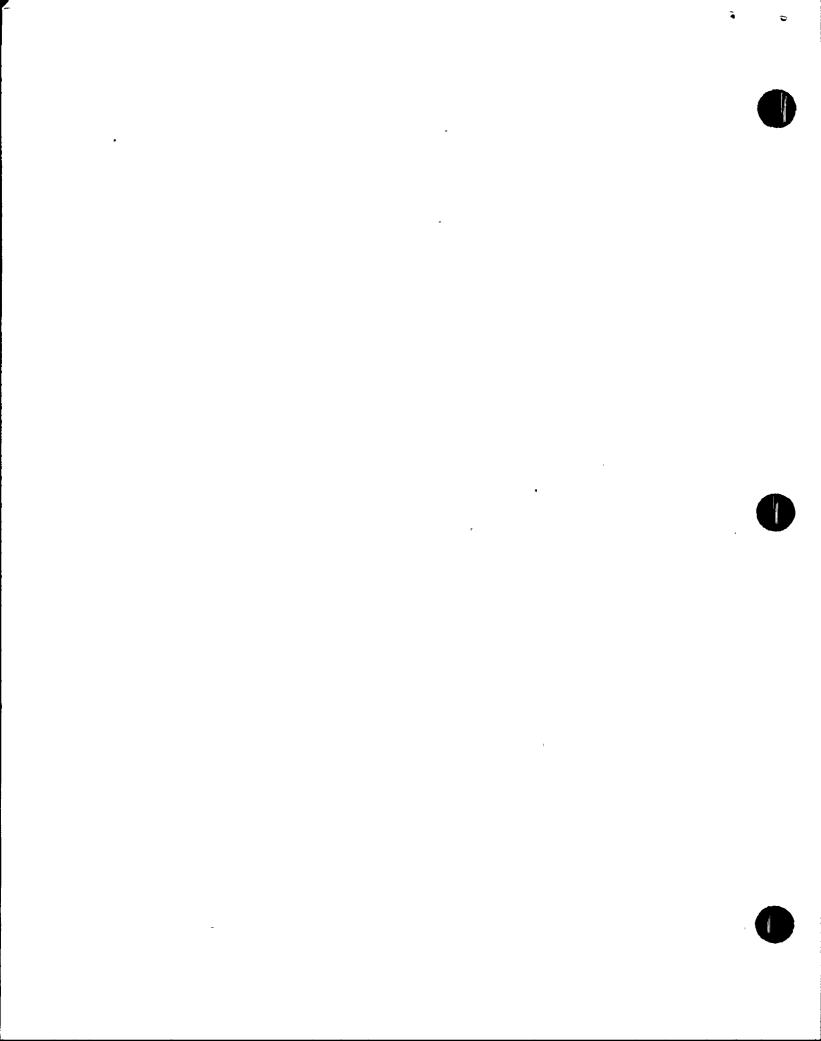
- o 23 years of technical and management experience in the commercial nuclear power industry
- o Extensive experience managing large projects and large organizations
- o Extensive NRC interface experience
- o Prepared/reviewed numerous reports for submittal to the NRC
- o BS/MS Chemical Engineering
- o J.D., Law

## Ron Cowley - Evaluation Team Leader

- o 26 years business management experience
- o 12 years Nuclear Utility experience
- o 20 years Project Management Experience
- o Seven management audit projects
- o Project Leader on 5 audit projects
- o B.S. Business Management

#### Gerald J. Walke - Evaluation Team Leader

- o 30 years experience in nuclear power plant design, analysis, and plant operation
- o Management of nuclear power plant operations and maintenance activities
- o Directed all technical aspects of nuclear plant operations for a BWR and PWR plant
- o 8 years management consulting experience
- o Conducted Management Assessments for 9 utilities
- o Certified Lead Auditor
- o B.S., Mechanical Engineering
- o M.S., Public Health Environmental Sciences



#### John D. Richardson - Evaluation Team Leader

- o 12 years technical and management nuclear plant PWR and BWR experience
- o Utility plant operations, licensing and engineering experience
- Utility Operations Superintendent and Manager of Safety and "
   Licensing
- o Extensive experience interfacing with NRC Region and Headquarters
- o Certified SRO
- o MBA
- o B.S., Electrical Engineering, Registered Professional Engineer

#### Paul Hayes - Evaluation Team Leader

- o 18 years nuclear power plant experience
- o Utility Radiation Protection Supervisor for BWR and PWR plants
- o Certified INPO Evaluator for Radiation Protection, Chemistry, and Emergency Preparedness
- o Project Team Leader for 10CFR50.54(t) evaluations
- o Conducted over 20 in-depth operational nuclear power plant evaluations in radiological protection and chemistry

Thomas C. Houghton - Management and Organization Specialist

- o Extensive experience in nuclear plant operations, training utility organizations, engineering, and nuclear regulation
- o Directed numerous projects to identify and solve complex utility technical and management challenges
- Participated in construction and operational prudence reviews
- o Prepared testimony and appeared as expert witness before regulatory commission
- o Licensing Project Manager at NRC
- o M.S., Management Science
- o MBA

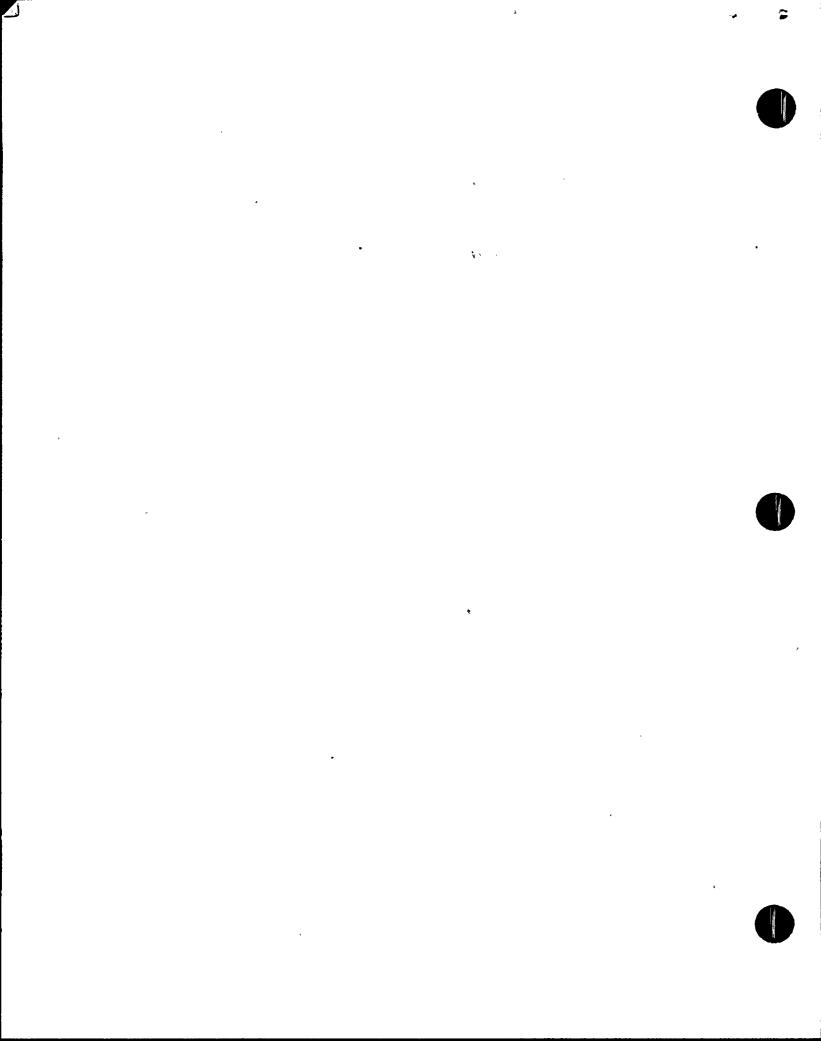
Tim D. Martin - Management and Organization Specialist

- Extensive experience in all aspects of nuclear power industry
- o Broad experience in nuclear plant engineering, operations and utility management consulting services
- o President of firm specializing in evaluation of utility management issues such as staffing and cost
- o Provided expert testimony on utility management issues
- o Directed many utility management evaluation projects
- o Managed many major engineering modifications and developed and implemented major plant operational programs
- o B.S., United States Naval Academy
- o MBA

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## Terry McSween - Human Behavior Specialist

- o Director, Consulting Services, Behavioral Consultant Services, Inc.
- o 6 years, consulting and training in industry
- o Has conducted over 10 Performance Assessments in a variety of industries
- o Has extensive publications and formal presentations in the area of Behavior Analysis in Business and Industry
- o Ph.D., Psychology/Applied Behavior Analysis



## Joe Savage - Human Behavior Specialist

- o Director and Performance Analyst, Behavior Consultant Services, Inc.
- o 3 years consulting and training to industry
- o 3 years grants-evaluation and Title XIX facility certification experience
- o 9 years clinical and administrative management experience in Human Services
- o Extensive background in Behavior Analysis and Performance Management
- o M.A., Psychology/Applied Behavior Analysis