

APR 3 1989

MEMORANDUM FOR: William T. Russell, Regional Administrator, Region I
Thomas E. Murley, Director, Nuclear Reactor Regulation
Lawrence J. Chandler, Assistant General Counsel for
Enforcement

FROM: James Lieberman, Director
Office of Enforcement

SUBJECT: OI REPORT 1-87-003S1 PEACH BOTTOM ATOMIC POWER STATION
LICENSED OPERATORS SLEEPING ON DUTY/ADDITIONAL
INVESTIGATIVE EFFORT REGARDING CONSULTING WORK

The findings of this OI report indicate that no further enforcement action is appropriate with regard to the inattentiveness problem at Peach Bottom and management knowledge of or involvement in that problem. This report will be closed with regard to enforcement on April 13, 1989 if no written comments to the contrary are received prior to that date.

Original Signed By
James Lieberman

James Lieberman, Director
Office of Enforcement

cc: H. Thompson, DECS
S. Varga, NRR
B. Hayes, OI

Distribution

J. Lieberman

H. Wong

J. Luehman

Day File

OE File 89-40

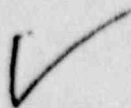
OI File 1-87-003S1

OE
JLuehman
3/ /89

OE
JLieberman
3/31/89

WHELAN

4/13/89



PEACH BOTTOM - STATUS OF IMPLEMENTATION OF TMI ACTION PLAN ITEMS

INFORMATION SOURCE: NRR Project Manager, Bob Martin

- ITEMS OUTSTANDING

1. Control Room Design Improvements. All "safety significant" (as defined by the licensee) items will be implemented prior to restart of each unit. The staff does not object to the licensee's method of categorizing which items are safety significant. Within 2 months of restart the licensee will provide an update report on the status and implementation schedule for the remaining items.
2. SPDS. An interim SPDS is installed on both units. It is not clear how close those systems meet NRC requirements. The final system has been developed and will be installed on Unit 2 in Dec. 1990 and on Unit 3 in Oct. 1989. Those final systems will then be run in parallel with the interim system for an operating cycle for validation purposes. They will be declared fully operable on Unit 2 in June 1992 and on Unit 3 in Jan. 1991.
3. INSTRUMENTATION FOR INADEQUATE CORE COOLING. Will be installed prior to restart of both units.

A/24

Robert's suggested
categories of
plants that are or
are not authorized
to run

A/25

PLANTS THAT REQUIRE SUBSTANTIAL IMPROVEMENT

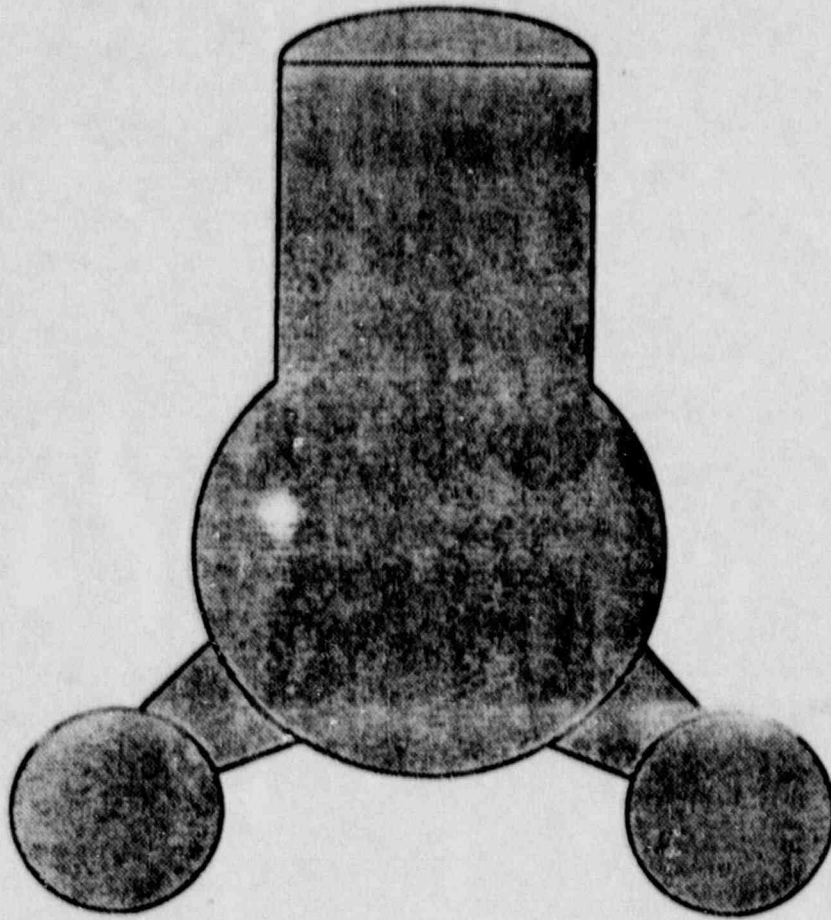
PLANTS IN THIS CATEGORY HAVE EXPERIENCED DEGRADATION IN PERFORMANCE, AND THE LICENSEE HAS YET TO FULLY ESTABLISH AND IMPLEMENT A VIABLE PROGRAM FOR CORRECTING THE PROBLEMS. THESE PLANTS ARE SHUTDOWN AND WILL REQUIRE NRC REVIEW AND APPROVAL FOR STARTUP. PRIOR TO APPROVAL FOR STARTUP, THE LICENSEE WILL HAVE TO ESTABLISH AN ACCEPTABLE PROGRAM TO ENSURE SUBSTANTIAL IMPROVEMENT.

PLANTS
REQUIRE
IMPROVEMENT
THAT IS
NECESSARY
TO BE
AUTHORIZED
TO RUN

- BROWNS FERRY 1, 2, 3
 - SEQUOYAH 1, 2
 - PEACH BOTTOM 2, 3
 - PILGRIM
 - RANCHO SECO - PREVENTIVE MAINTENANCE PROGRAM WILL BE DEFINED
MAY BE LATE WITH REEVALUATION
- PHYSICAL CONDITION OF PLANT BETTER NOW THAN WHEN DELIVERED
NEED TO FOCUS ON OPERATIONS - PROBLEM IN TRADITION

Can
12/15

Peach Bottom



**Containment
Venting**

A126

HS

Peach Bottom Containment Venting

Primary Containment Control Procedure T-102

- **Directs Actions to Control Key Primary Containment Parameters.**
- **Drywell Pressure Control DW/P - Directs Actions to Control Containment Pressure.**

Containment Venting Procedure T-200

Directs Specific Actions Required to Perform Containment Venting.

Primary Containment Control Procedure T-102

Tx Tx OX DP

Directs Actions to Control Key Primary Containment Parameters.

- Entry into T-102 Is Required When an Entry Condition for Any of Four Containment Parameters Is Exceeded
- Entry into T-102 Requires Concurrent Execution of Flow Paths to Monitor and Control All Four Parameters

Procedure T - 102 Drywell Pressure Control DW/P

Directs Actions to Control Containment Pressure

- Use of Normal Pressure Control Systems } DW P-4
- Isolation of Potential Pressure Sources } DW P-4
- Use of Torus Sprays DW P-5
- Use of Drywell Sprays (Only if Adequate Core Cooling can be Maintained) ✓
- Emergency RPV Depressurization ✓ DW P-4
- RPV Flooding DW P-5
- Use of Drywell Sprays (Without Regard to Adequate Core Cooling) ✓ DW P-22
- Containment Venting

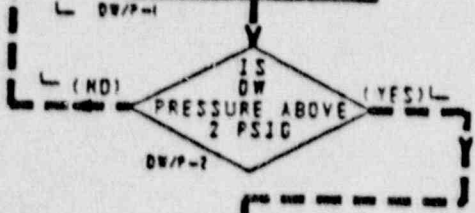
Venting is the last method employed to control containment pressure and is initiated only when required to prevent containment failure.

DRYWELL PRESSURE ABOVE 2 PSIG

CONCURRENTLY THIS PROCEDURE

DRYWELL PRESSURE DW/P

MONITOR AND CONTROL DW PRESSURE



IF WHILE EXECUTING THE FOLLOWING ANY OF THE FOLLOWING ALARMS ARE RECEIVED:

- DW CHILLED WATER LO FLOW
- DW CHILLED WATER LO LEVEL
- RBCCW SUPPLY LO PRESS.
- RBCCW HEADER TANK HI-LO LEVEL.

THEN ENTER GP-8 AND EXECUTE IT CONCURRENTLY WITH THIS PROCEDURE

GP-8

REDUCE DW PRESS. WITH THE FOLLOWING AS APPROPRIATE:

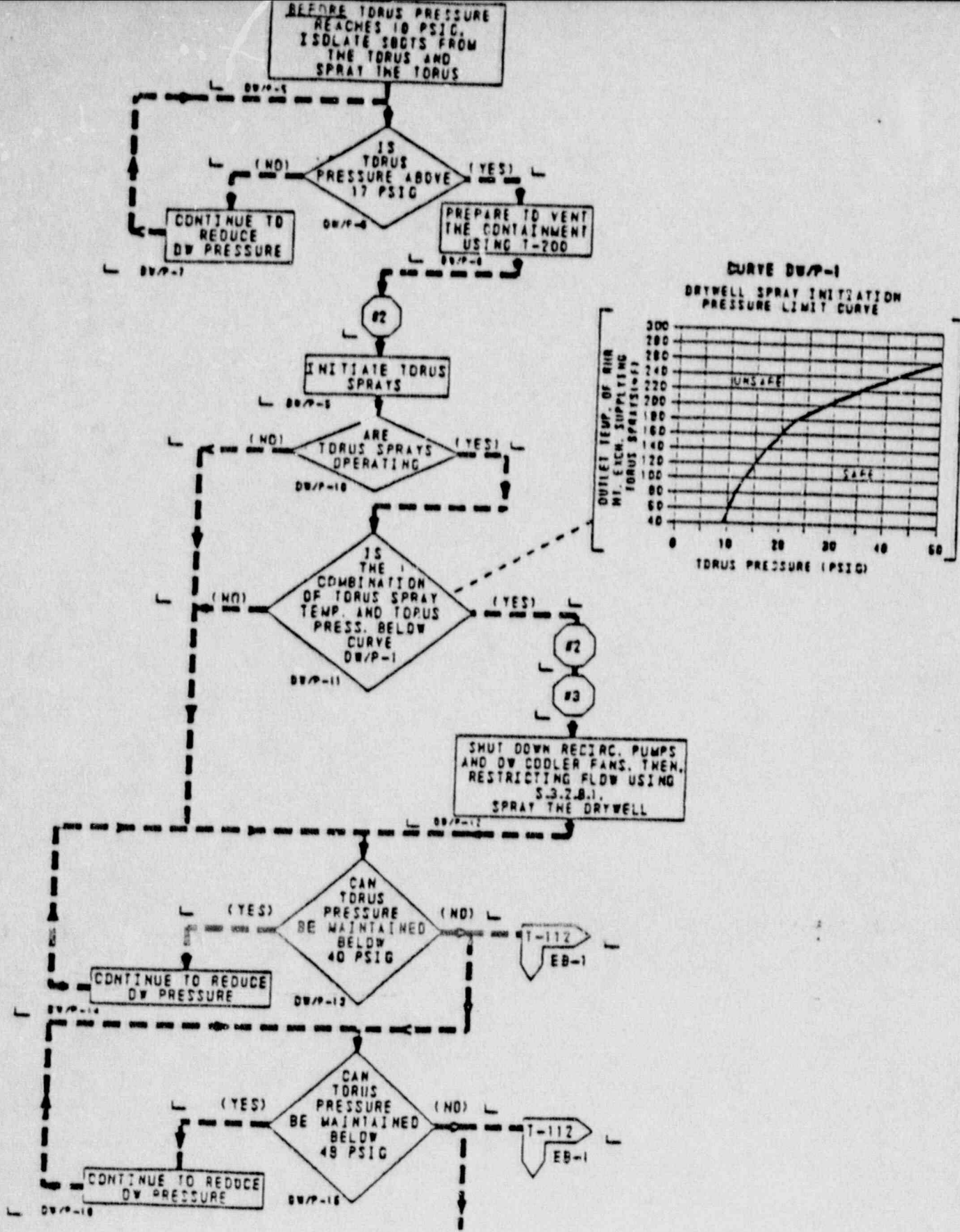
- ALL AVAILABLE DW COOLING (INCLUDING RBCCW) PAR TRIPS MAY BE BYPASSED USING 1-223
- SBGTS (ONLY WHEN DW TEMP. IS BELOW 212°F)
- ISOLATE FAILED RECIRC. PUMP SEALS
- BACKSEAT DW MOV. WITH HIGH ACOUSTIC MONITOR READINGS (EXCEPT RECIRC. MOVTS)
- ISOLATE RWCU, MAIN STM, SAMPLE/DRAIN LINES AND RECIRC. SAMPLE LINE
- NORMAL RPV DEPRESSURIZATION TO COLD SHUTDOWN (ONLY IF BORON INJECTION IS NOT REQUIRED)
- TORUS SPRAYS (ISOLATE SBGTS BEFORE SPRAYING)

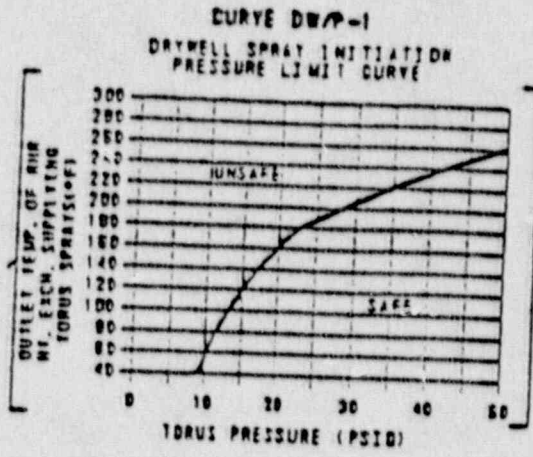
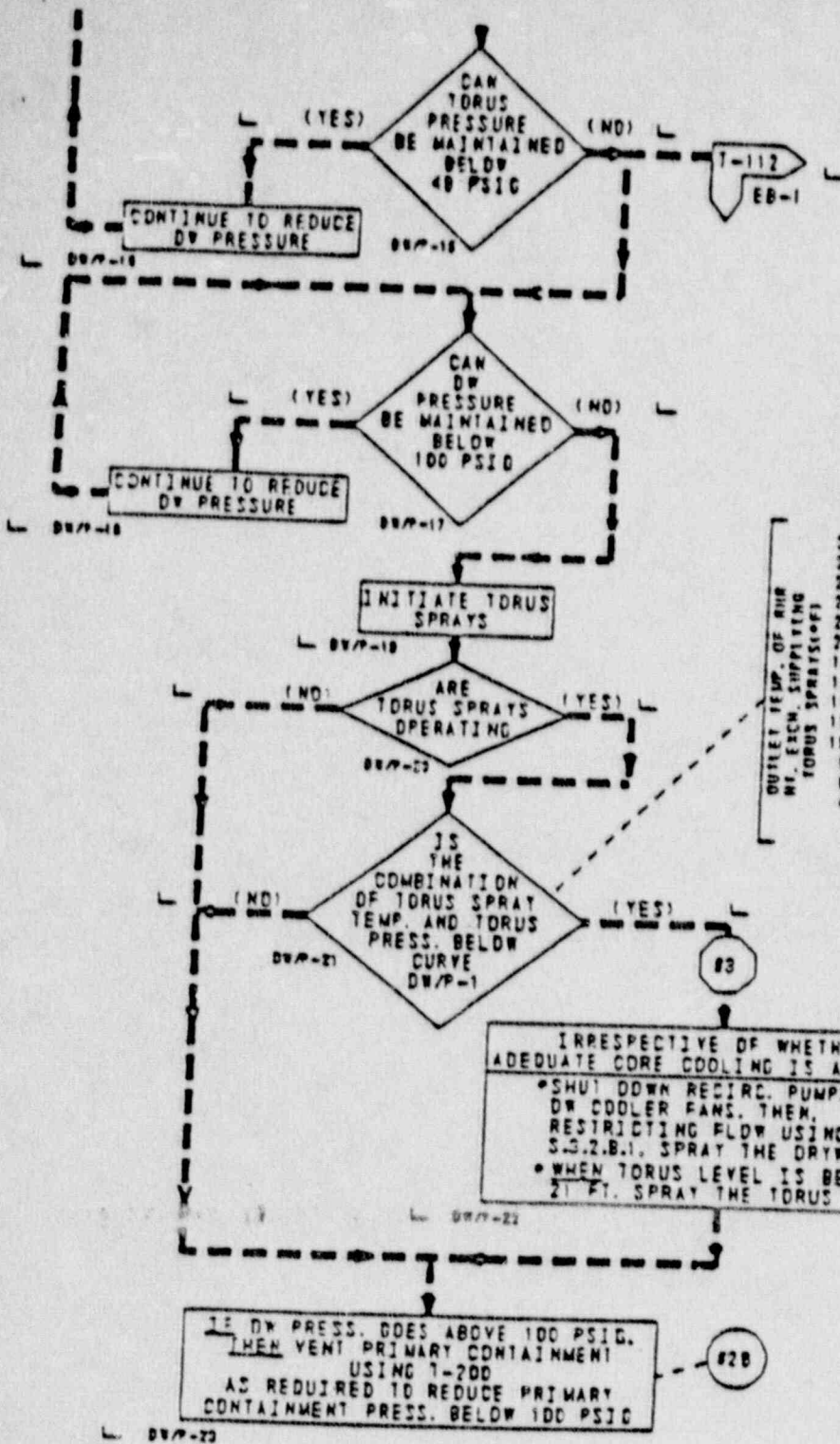
#18 #33

#31

#2

BEFORE TORUS PRESSURE REACHES 10 PSIG, ISOLATE SBGTS FROM THE TORUS AND SPRAY THE TORUS





Procedure T - 102
DW/P Containment Venting Action Points

17 PSIG Containment Pressure

Preparatory Actions Implemented

100 PSIG Containment Pressure

Venting Initiated

9% from required

62 psi
rated:

159 psi
Design

Containment Venting Procedure T-200

Directs Specific Actions Required to Perform Containment Venting

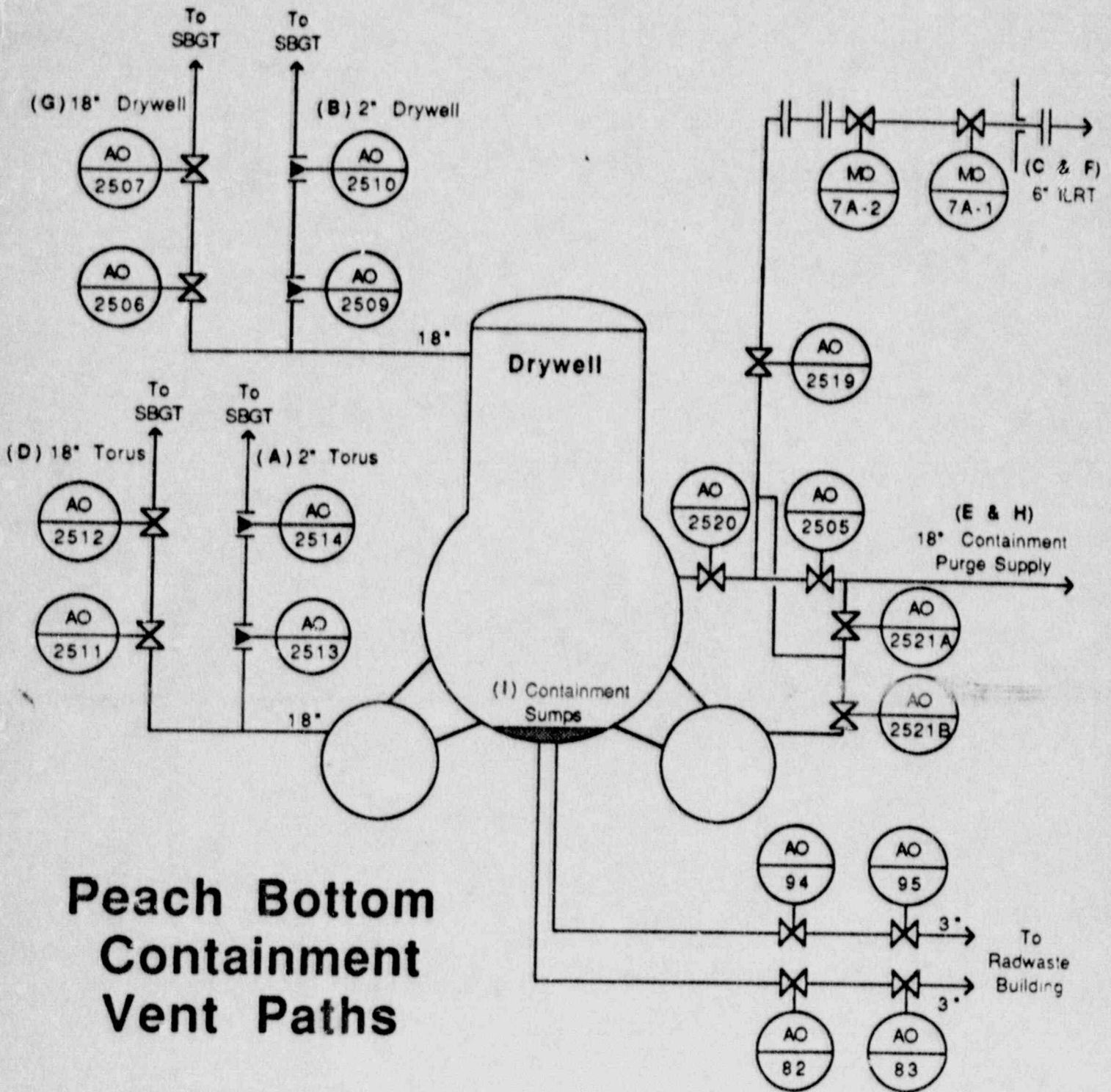
Procedure Features

- **Preparatory Actions**
 - **Primary Containment Isolation Signals Bypassed**
 - **Actions Required Outside of the Control Room Implemented Based on Rate of Containment Pressure Increase**
- **Use of Multiple Vent Paths**
- **Prioritization of Vent Paths**
- **Detailed Guidance for Use of Individual Vent Paths**

T-200 Containment Vent Paths

Vent Path Preferred Order

- **2" Torus to SBGT (A)**
- **2" Drywell to SBGT (B)**
- **6" ILRT from Torus (C)**
- **18" Torus Exhaust to SBGT (D)**
- **18" Torus Purge Supply (E)**
- **6" ILRT from Drywell (F)**
- **18" Drywell Exhaust to SBGT (G)**
- **18" Drywell Purge Supply (H)**
- **2(3") Containment Sumps (I)**



Peach Bottom Containment Vent Paths

T-200 Containment Vent Paths

Vent Path Prioritization Considerations

- Quantity of Radioactivity Released
 - Filtered Vent Paths
 - Torus Scrubbing
 - SBT
 - Vent Path Size
- Effects on Secondary Containment
 - Hard Piped Vent Paths *prior to ducted*

DISTRIBUTION

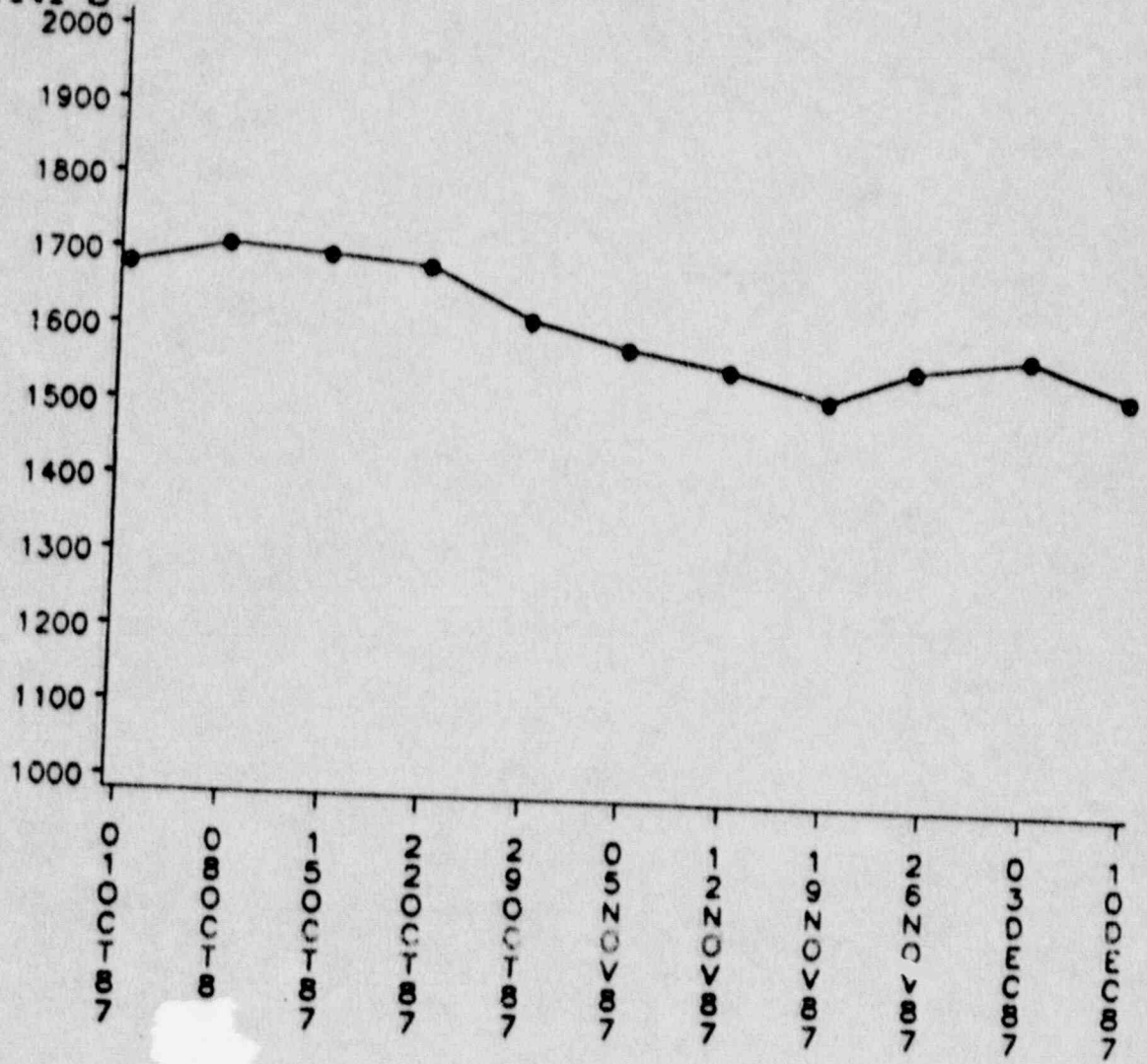
Case

- D. M. SMITH
 - J. B. COTTON
 - G. R. RAINEY
 - J. E. WINZENRIED
 - SHIFT MANAGER
 - G. F. DAWSON
 - M. B. RYAN
 - D. P. POTOCIK
 - J. F. MITMAN
 - A. A. FULVIO
 - D. L. OLTMANS
 - F. W. POLASKI
 - J. K. DAVENPORT
 - J. W. AUSTIN
 - B. L. CLARK
 - C. E. ANDERSEN
 - G. D. BURDSALL
 - J. J. HUFNAGEL
 - D. L. KEENE
 - T. F. GEYER
 - M. J. KELLY
 - F. J. MASCITELLI
 - J. T. BUDZYNSKI
 - N. P. GAZDA
 - C. B. PATTON
 - J. P. MCELWAIN
 - J. A. JORDAN
 - J. W. ROGENMUSER
 - C. L. LOVEALL
 - T. P. JOHNSON
 - A. B. DONELL
 - T. N. MITCHEL
 - J. COOK
 - K. MAY
 - J. WILSON
- FILE

MRF ≡ MAINTENANCE REQUEST FORM
(WORK ORDER)

O V F ≡ OPERATIONAL VERIFICATION FORM

Total MRFs



As of Date

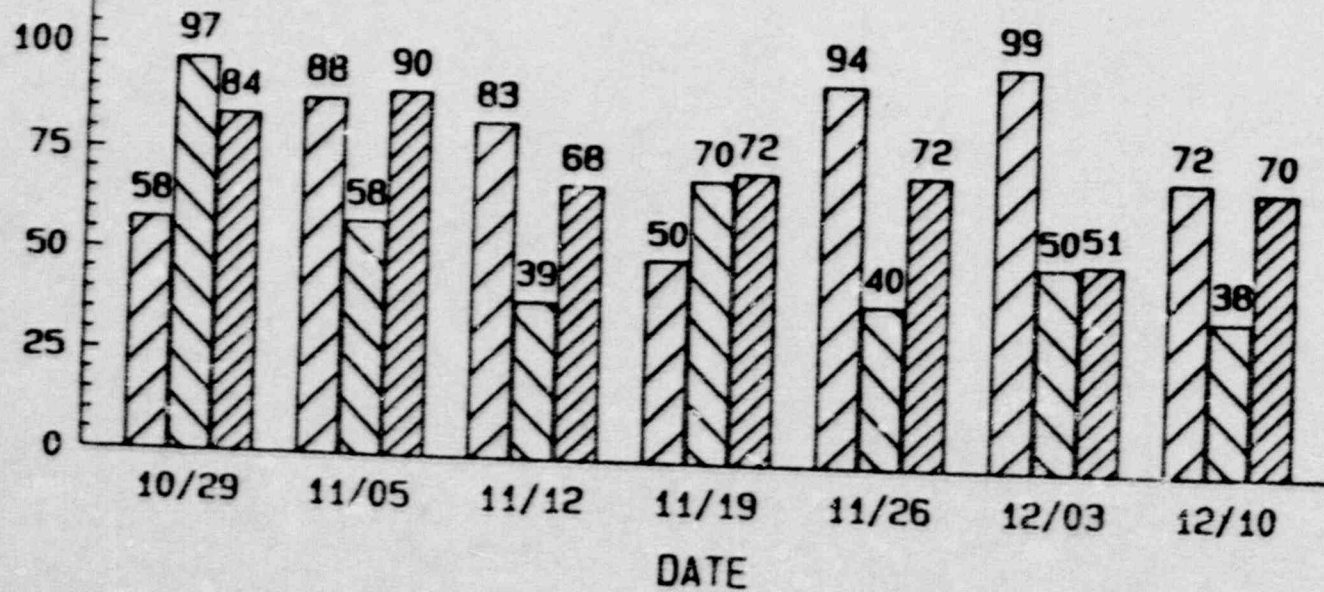
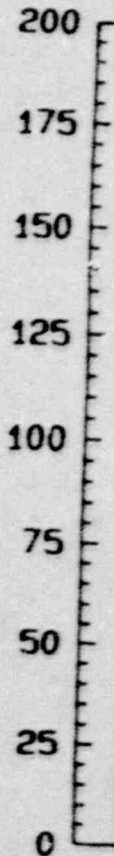
Peach Bottom Atomic Power Station

NON-OUTAGE CORRECTIVE MRF INPUT/OUTPUT CHART

ALL DEPARTMENTS, UNIT 2 and COMMON

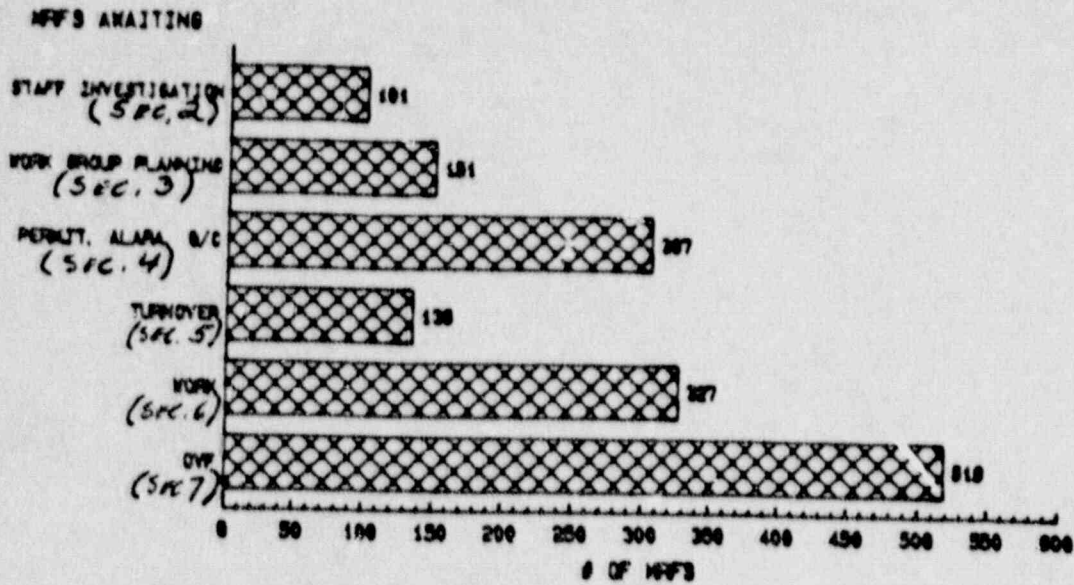
December 10, 1987

OF MRFS



PAGE 2

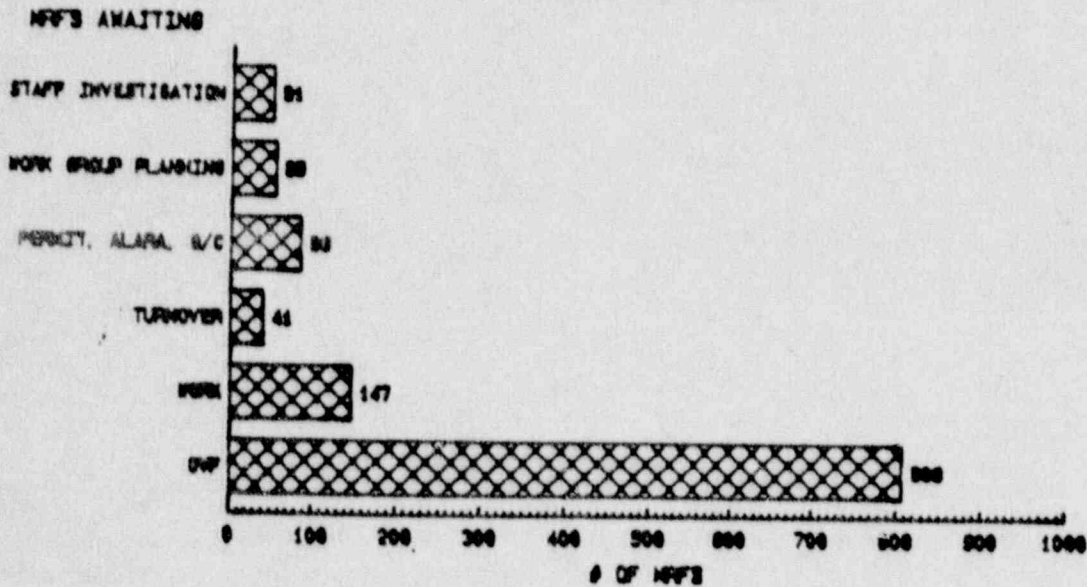
NON-OUTAGE CORRECTIVE MFF BACKLOG
 UNIT 2 and COMMON
 December 10, 1987



cy/cv.mdb
 rev 1

TOTAL MFF BACKLOG-1541

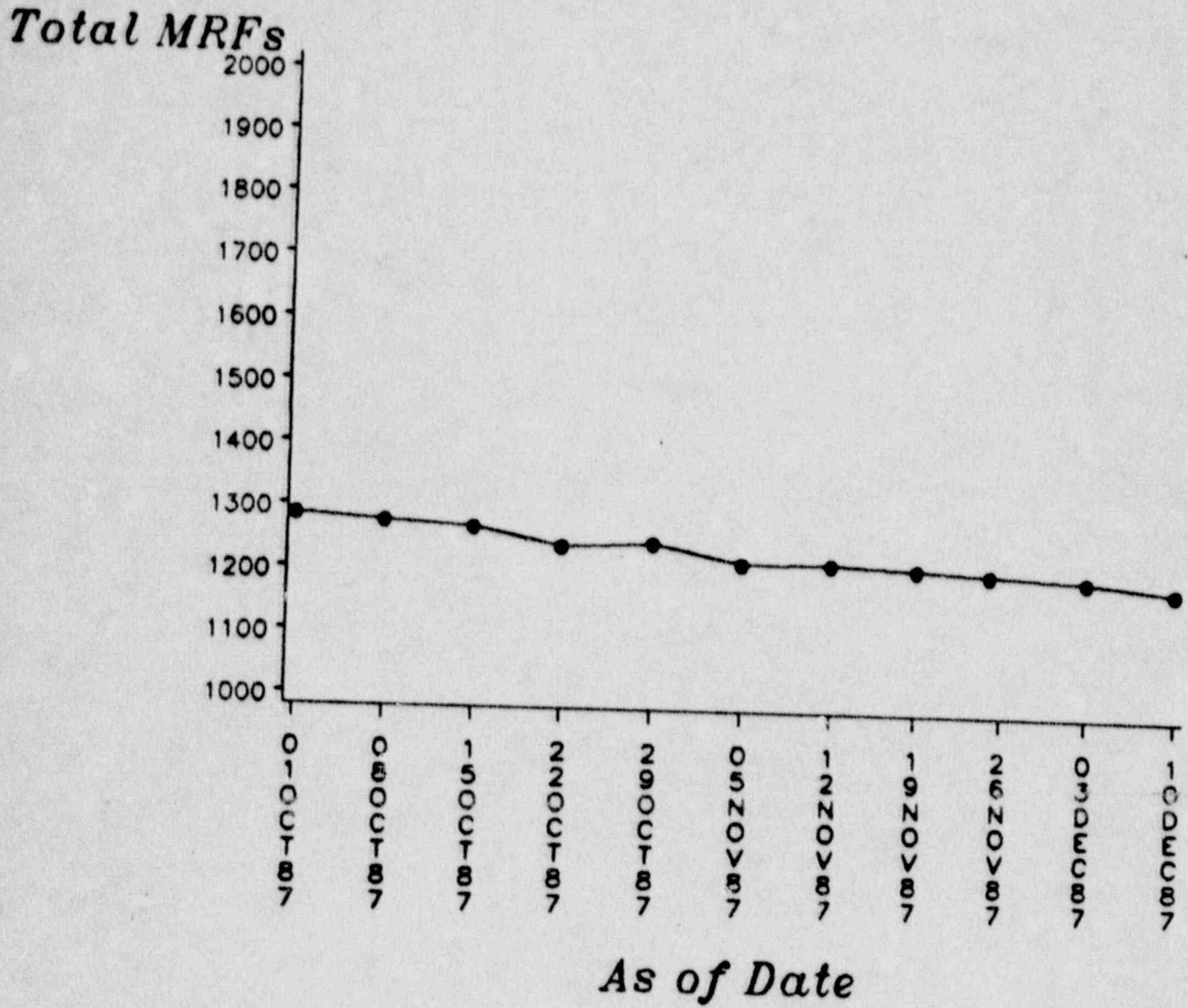
OUTAGE CORRECTIVE MFF BACKLOG
 UNIT 2 and COMMON
 December 10, 1987



cy/ech
 rev 1

TOTAL MFF BACKLOG-1188

Damage Corrective Mrj Backlog Trend Unit 2 and Common

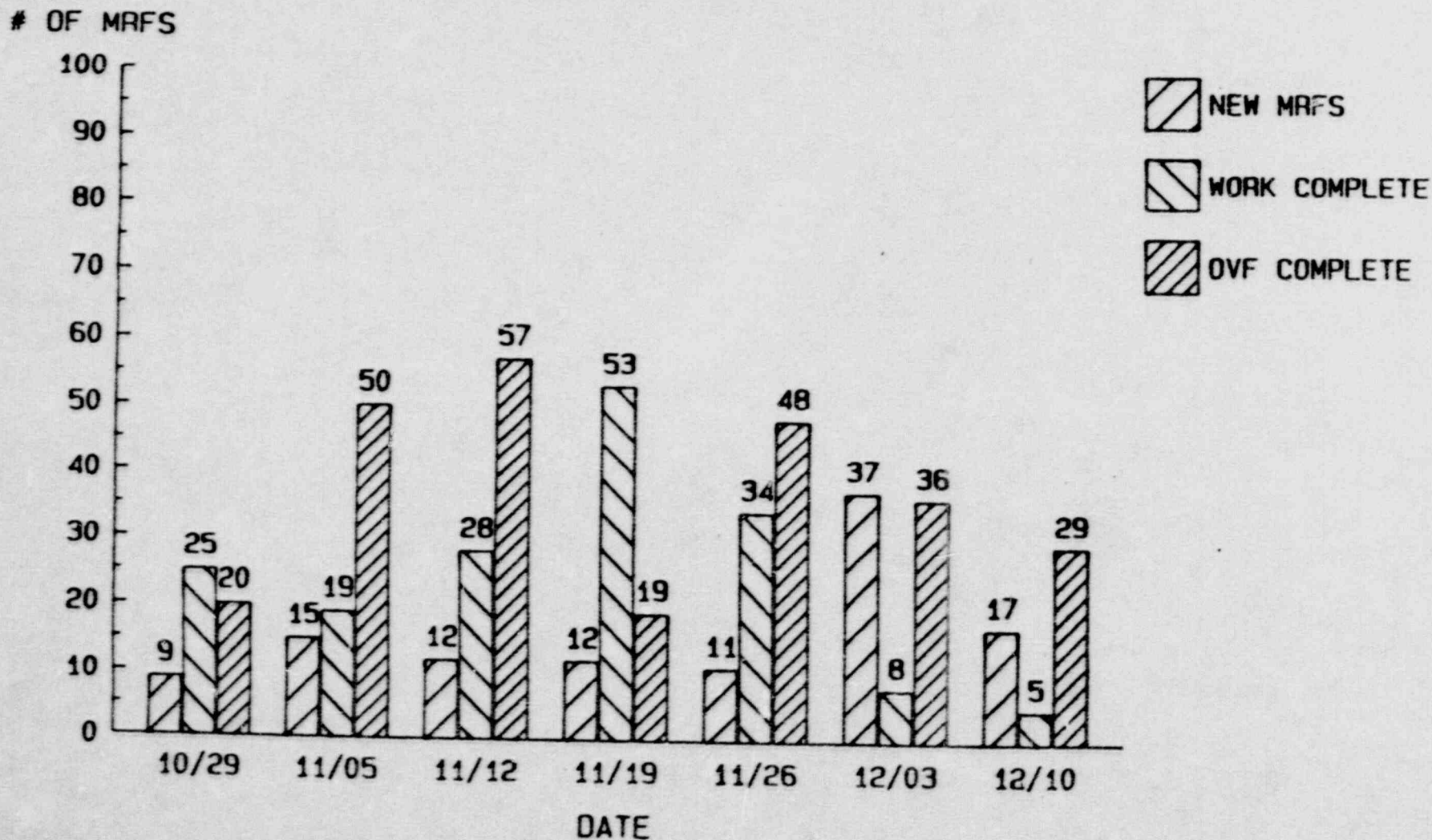


Peach Bottom Atomic Power Station

OUTAGE CORRECTIVE MRF INPUT/OUTPUT CHART

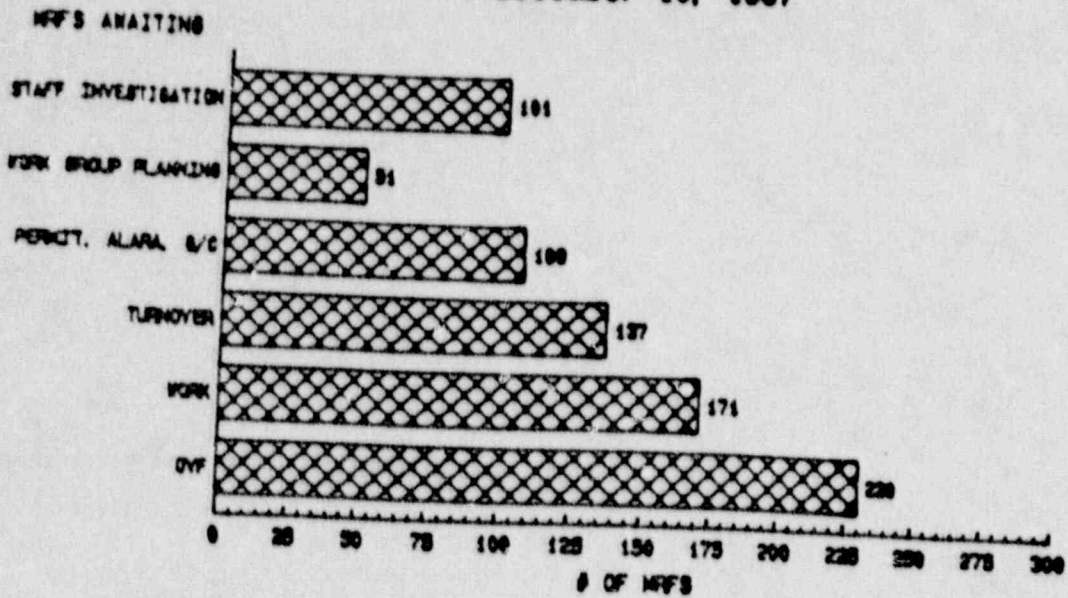
ALL DEPARTMENTS, UNIT 2 and COMMON

December 10, 1987



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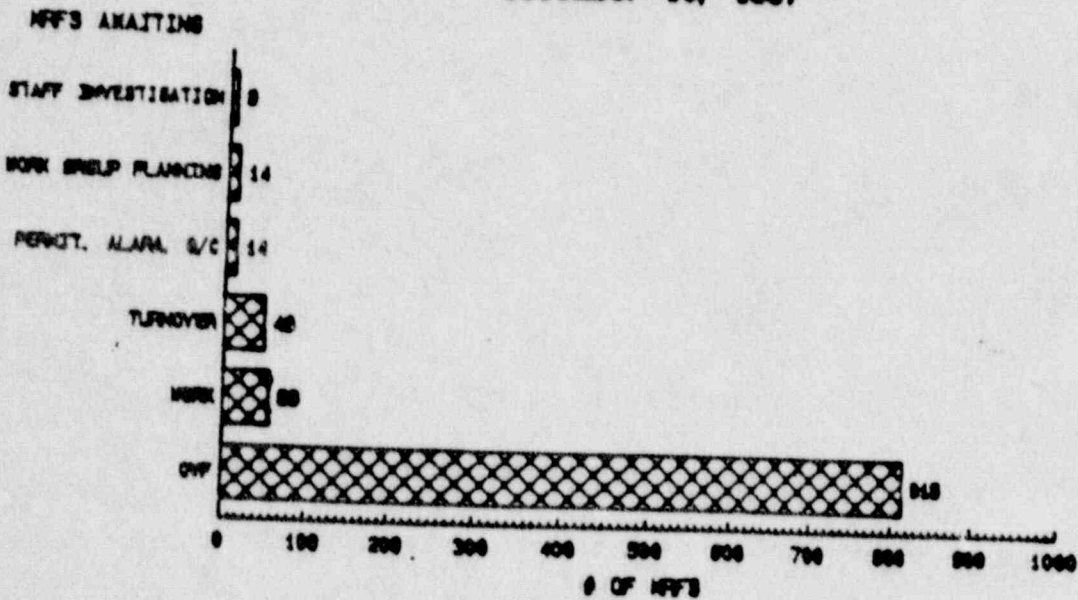
NON-OUTAGE PREVENTIVE MRF BACKLOG
 UNIT 2 and COMMON
 December 10, 1987



ev/nst

TOTAL MRF BACKLOG-788

OUTAGE PREVENTIVE MRF BACKLOG
 UNIT 2 and COMMON
 December 10, 1987

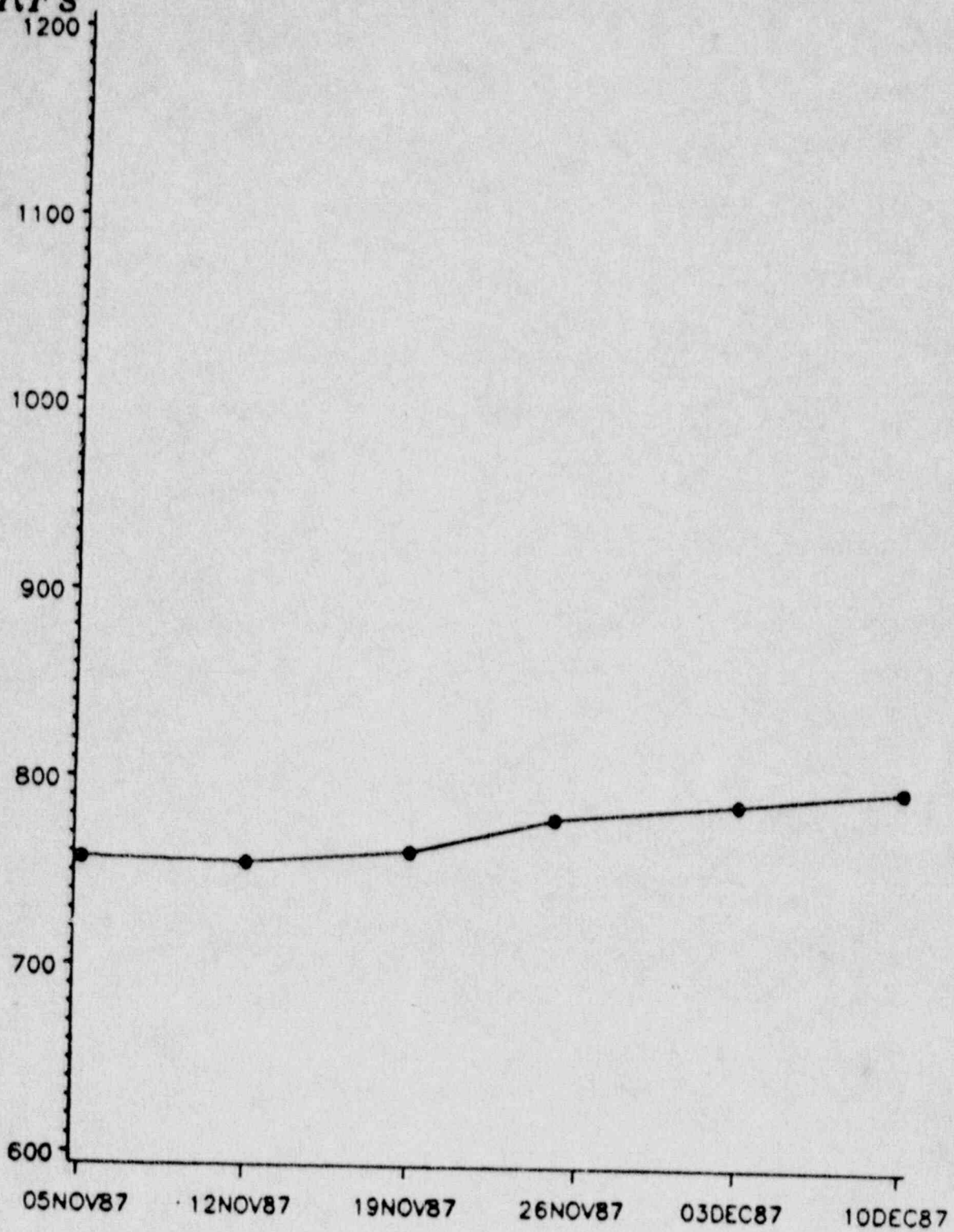


ev/nst
 Rev 1

TOTAL MRF BACKLOG-987

*Non-Damage Preventive MRF Backlog Trend
Unit 2 and Common*

Total MRFs

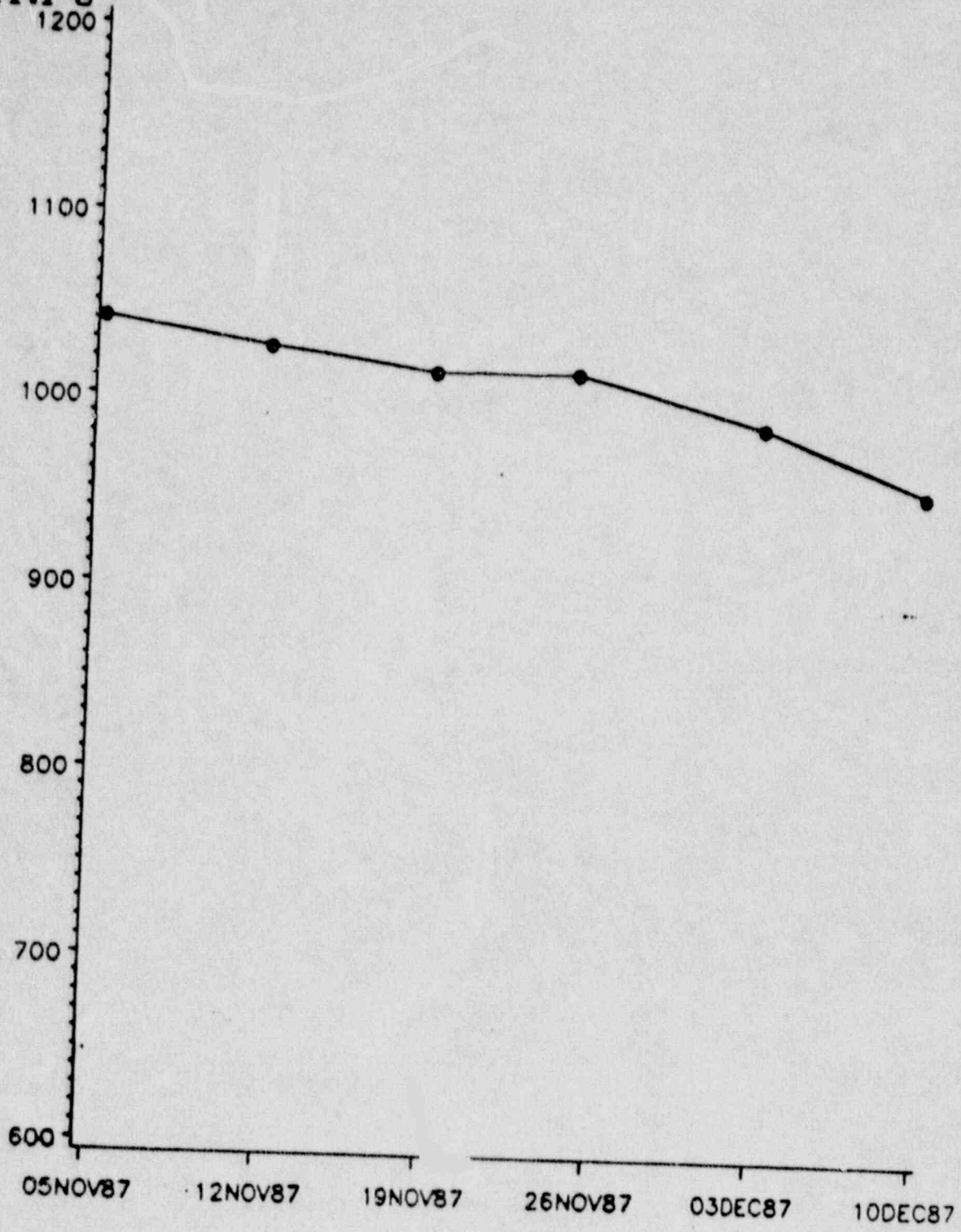


As of Date

Peach Bottom Atomic Power Station

Unit 2 and Common

Total MRFs



As of Date

Peach Bottom Atomic Power Station

NON-OUTAGE PREVENTIVE MRF BACKLOG
UNIT 2 and COMMON
December 10, 1987

	Sect 2	Sect 3	Sect 4	Sect 5	Sect 6	Ovf	Total
G. F. Dawson	101	0	1	1	0	33	136
J. K. Davenport	0	48	81	121	83	1	334
A. A. Pulvio	0	0	0	0	0	117	117
C. E. Andersen	0	1	20	15	85	0	121
J. W. Austin	0	0	0	0	0	0	0
M. B. Ryan	0	2	6	0	3	0	11
F. W. Polrski	0	0	0	0	0	75	75
C. B. Patton	0	0	0	0	0	0	0
J. F. Mitman	0	0	0	0	0	0	0
B. L. Clark	0	0	0	0	0	1	1
D. L. Oltmans	0	0	0	0	0	0	0
D. P. Potocik	0	0	0	0	0	0	0
Totals	101	51	108	137	171	227	795

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OPEN MAINTENANCE REQUEST FORMS
 UNIT 2 AND CORRIDOR
 REPORT SUMMARY
 December 10, 1987

	NON-OUTAGE				OUTAGE			
	Preventive 0	RMF Non-0	Corrective 0	RMF Non-0	Preventive 0	RMF Non-0	Corrective 0	RMF Non-0
Section 2	15	85	0	101	1	8	0	91
Section 3	19	32	32	119	8	6	25	30
Section 4	44	64	41	266	14	0	19	67
Section 5	41	96	16	120	41	8	19	22
Section 6	58	113	58	269	17	39	51	96
Open Ref Total	177	391	147	875	81	61	116	266
OVF Total	67	143	69	450	426	309	408	400
Sub Totals	244	556	216	1325	507	450	522	646
Non-Orig PM Total:	798		Non-Orig CM Total:	1541	Outage PM Total:	957	Outage CM Total:	1188

OUTAGE PREVENTIVE MRF BACKLOG
UNIT 2 and COMMON
 December 10, 1987

	Sect 2	Sect 3	Sect 4	Sect 5	Sect 6	Ovf	Total
G. F. Dawson	9	0	0	0	0	2	11
J. K. Davenport	0	7	9	34	22	0	72
A. A. Fulvio	0	0	0	0	0	587	587
C. E. Andersen	0	0	0	8	33	0	41
J. W. Austin	0	0	0	0	0	0	0
M. B. Ryan	0	7	5	7	1	0	20
F. W. Polaski	0	0	0	0	0	226	226
C. B. Patton	0	1	1	0	2	0	4
J. F. Mitman	0	0	0	0	0	0	0
B. L. Clark	0	0	0	0	0	0	0
D. L. Oltmans	0	0	0	0	0	0	0
D. P. Fotocik	0	0	0	0	0	0	0
Totals	9	15	15	49	58	815	961

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NON-OUTAGE CORRECTIVE MRF BACKLOG
UNIT 2 and COMMON
December 10, 1987

	Sect 2	Sect 3	Sect 4	Sect 5	Sect 6	Ovf	Total
G. F. Dawson	22	21	0	0	0	34	77
J. K. Davenport	2	43	153	93	240	3	534
A. A. Fulvio	68	18	1	2	0	144	233
C. E. Andersen	0	30	111	33	69	0	243
J. W. Austin	0	9	30	4	9	0	52
M. B. Ryan	7	23	10	2	2	16	60
F. W. Polaski	0	5	0	1	0	229	235
C. B. Patton	1	1	1	0	6	0	9
J. F. Mitman	1	1	1	0	0	17	20
B. L. Clark	2	0	0	0	0	16	18
D. L. Oltmans	0	0	0	0	0	38	38
D. P. Potocik	0	0	0	1	1	21	23
Totals	103	151	307	136	327	518	1542

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Construction
 500
 45% at least
 225000

PM's
 to have with
 to have with
 to have with

OUTAGE CORRECTIVE NEW ENCLICO
 -UNIT 2 and COMMON-
 -December 10, 1987-

150 unit
 350-
 850-
 300-
 700-
 700-
 700-
 700-

	Seat 2	Seat 3	Seat 4	Seat 5	Seat 6	OVF	Total
<i>CP</i> D. F. Dawson	29	0	0	0	0	0	37
J. K. Davenport	0	16	67	29	88	5	205
A. A. Pulvilo	16	2	0	0	0	503	521
C. E. Andersen	0	5	13	8	51	0	78
J. W. Austin	0	7	0	1	1	0	9
M. B. Ryan	5	23	5	0	5	6	44
F. W. Polanski	0	0	0	2	0	289	289
C. B. Patton	0	1	1	0	2	0	4
J. F. Mltman	0	0	0	0	0	0	0
B. L. Clark	1	0	0	0	0	0	1
D. L. Oltmans	0	0	0	0	0	0	0
D. P. Potoolk	0	0	0	1	0	2	3
Totals	51	55	86	41	147	807	1187

22

Good morning (afternoon), my name is William Kane. I am Director, Division of Reactor Projects, NRC Region I. With me are [James Lieberman, Director, Office of Enforcement], [James Luehman, Sr. Enforcement Specialist, Office of Enforcement], Bruce Boger, Assistant Director for Region Reactors, Division of Reactor Projects I/II, Office of Nuclear Reactor Regulation, and Jay Gutierrez, NRC Region I Regional Counsel.

As a licensed operator you are accountable not only to the Philadelphia Electric Company but to the NRC in assuring that requirements are followed and the facility operates safely. The public expects and we intend to take action as necessary to assure that utilities licensed to operate nuclear power plants and their licensed operators properly operate their reactors and comply with all NRC requirements.

As you are aware, PECO has conducted its own investigation into the circumstances that led up to the March 31, 1987 Shutdown Order. Based on our review of the company's investigation along with your own statements to PECO investigators, it appears that you were either involved in inattentive activities or condoned the involvement of others. Neither situation is acceptable for protecting the public health and safety. The purpose of this enforcement conference is to receive your views with respect to a) what was wrong with the performance of operators prior to the shutdown and why, (b) the broader implications of those actions, and (c) the corrective actions that have been taken or planned to be taken to prevent recurrence.

A/27

This is an enforcement conference. Based on these discussions, as well as on other information, the NRC may take enforcement action against your license. In accordance with the NRC Enforcement Policy such action may range from a written letter of reprimand to revocation of your license. Should we initiate enforcement action you will be formally notified and provided an opportunity to respond.

The format of this meeting will be to receive your opening statement addressing the issues that I discussed earlier. We will have questions for you to answer depending on the completeness of your statement. Should you need a question clarified or if you have any questions yourself, feel free to ask. As you can see this meeting is being formally transcribed. Because a number of our questions stem from your statement to PECO investigators, a copy of that statement will be attached to the transcript. A copy of the transcript can be made available to you should the NRC initiate enforcement action against your license or after a decision is made not to take such action.

Let us begin by identifying ourselves for the record. _____ Are the individuals with you today here on your behalf and at your request?



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

FILE
EA
85-01

Note to file

Brian Kildare, OAC

He informed me 8/15 that
giving the T12 to the Director's Office
operator does not require that
we put them in the PDR. Could
later deal with FOIA issue
if we get a request. Cf former
that info to Blake, Rex I

JH

8/15

A/28

QUESTIONS FOR PEACH BOTTOM
OPERATOR CONFERENCES

- I. What did you or the other operators do that was wrong?
 - Why was it wrong?
 - Did you or others condone others doing these things?
 - If so, why?
 - Is it acceptable to condone this type of performance?
 - What was its safety impact?
 - Was the prior performance of the operators acceptable?
- II. Given the performance of the operators what are the broader implications? e.g., not following procedures, inattentiveness, failure to correct obvious deficiencies on the part of others.
- III. How will the corrective actions you have taken and plan to take prevent recurrence for both you personally and for others in the plant?
 - If you are tired or groggy, what will you do about it when on shift? Why wasn't that done before?
 - If you observe others being inattentive, what will you do about it? And if it persists? Why wasn't that done before?
- IV. In closing we will be considering what you have said in determining whether, among other things, you should be allowed to continue to perform licensed duties. Is there anything else you would like us to add to assist us in reaching our decision?

A/29

W' Name:

Date of Enforcement Conference:

1. What was your impression of W's candor and demeanor? Was W' forthright and did he offer information, or only respond to direct questions?

2. Did W' admit to past misconduct relative to:
 - a. procedural adherence?

 - b. inattentiveness?

 - c. condoning the misconduct of others?

3. Did the W' demonstrate an understanding of the relationship between past misconduct and safe operation of the plant? If so, how?, to his license? If so, how?

4. When did the W' realize the significance of past misconduct and under what circumstances?

5. Does the W' demonstrate an understanding of the PECO restart plan? If so, how:
 - a. In the judgement of the W', what has PECO done to preclude recurrence?

 - b. What has W' done to preclude recurrence?

6. W' response to why NRC should believe W' will conform to terms of his license in light of past actions?

7. Impression of content/sincerity of W' opening statement:

QUESTIONS FROM OPERATORS TO MANAGEMENT

1. Accountability. Corbin McNeill's philosophy seems to indicate that he believes in a management style that makes each and every individual accountable for his own actions. Since this philosophy differs completely from the philosophy of PEco, would you please expound on the following?

- a. To what extent will you take accountability?
- b. Is this philosophy consistent and "UNDERSTOOD" through out the PE Management organization?
- c. Will you make management changes in order for management styles and philosophies to become consistent?

2. Work planning and co-ordination at P.B. is, at least, atrocious, if existant at all. Rarely are all parties involved in making a schedule date, or job consulted. What are your intentions, if any, for changing this situation?

3. Is there any intention on managements part at all, to involve the operators in any decisions that are made, that directly affect us. *I/P*

4. A post shutdown term has been generated here, which seems to stem from Tom Peters "in search of excellence". Don't you think it's time to start adopting some of Mr Peters ideas, and abandon this demesning military mentality that is destructive to morale, and ultimately to shutdown?

5. With the lack of licensed operators such a big issue, why is the quality of training so poor and also why are the instructors we need not asked to take part in this situation, ie, H.Hanson & J Lyter?

6. Why, when we have between 6 to 8 qualified H.P. Supervisors, aren't any of them working in a shift coverage rotation with the operators, primarily (night work) when this position is covered with a vendor? *DMS / W/L / Oms*

The answer given to us by Fred is that these people only work day and some afternoon because otherwise they can't communicate. Yet, we only have 6 floor foremen working in rotation and they communicate well (and make less money with 4 1/2 pages of responsibility as per operations manual. Our main concern is that the people now covering this position (vendors) don't have the experetece for such an important position in case of accident conditions where important decisions must be made.

7. Is the Company, NRC, PUC etc, in favor of, in the near future, 12 hour shifts? If so, will this effect all P.B. Personnel? Also, Will Operators have any input into this matter, such as a vote. Or will it matter? *Joe*

B. Some of the P.B. Non Licensed Operators have expressed some concern on the upcoming "Pre Licensing Class" were told that this course would be held at Windsor. This location causes some long rides for some operators. When expressing concerns of why it couldn't be here at P.B., we were told it's not in the budget. Looking at a class of 16 to 20 people, and considering travel time pay and overtime to drive, this comes out to approx 3 to 4 thousand dollars a week. Isn't this enough money to throw together a temporary classroom at P.B.?

9. Does Management care, or even have full acknowledgement of the fact that the company is preparing or already paying the full 7.5% bonus to "some" of it's second class operators, (AFD-Nuc-Navy) while more senior operators are being denied this bonus?

10/84
4/86 - 6/86

10. Does management honestly think that the things that got us to shutdown are behind us? You just can't throw a coat of paint on some of the real issues here, and expect us to "make believe" that things are all right.

11. We have heard for several months now that the vendors are leaving. Other than CBI pulling out, nothing's changed. When are the vendors leaving? CAM

12. Do you really think that if you cut my pay by reducing the amount of overtime that I'm permitted to work, that I'm going to stay and not look for greener pastures with "my" License?

13. When are you going to get some people that know "our" equipment to write permits. Nothing is more frustrating than having to go back to a P & ID to look up equipment titles, not numbers.

14. Why did it take so long to have a meeting like this? JDC

15. Once there are enough operators, do you think that we might be able to get the transfers that we applied for? Also, once people are allowed to transfer, what will be the method to determine who goes first?

16. If the company is in such a sad financial state that we could not get a pay raise this year, and we can not get classrooms here, and we can not get this or can not get that, how can you possibly justify spending \$67,000 on new hardhats?

17. It is a common belief that the only reason the LU's were not fired is because they are needed for restart. Is this true, and just what is in store not only for the RO's but for everyone in the operations group today? F. M.

18. Why hasn't management made any attempts to provide a light at the end of the tunnel for shiftworkers? Is there any "REAL" efforts being made along these lines? *VAD/Widener*
19. Why don't we have an Electrical Supervisor? There was a policy negotiated with management that established a mechanism for filling this position. The policy was made in good faith, by the manager at the time. Why is it not being followed? Is this a case of throwing out all of the policies that you just don't like, and keeping the ones that you do?
20. We all know that Charlin Fritz has retired, and someone new has been brought in to take his place. Can we expect the company to answer our grievances in a more timely manner, or is it still going to be business as usual? "
21. What happens to the vendors that refuse to take their drug test because it's not in their contract? *0*
22. Why can't we have the operators vehicles parked right outside the gate? *Dis*
23. Are the Operators ever going to get control of their Power Plant again? We still don't get the support from the other groups that we need in order to do our jobs.

24

What can we do to stop engineering from telling us what we are going to get? How can we get engineering to start asking for operator input, "BEFORE" they have all of their work completed and we get told "Its too late to change thing"

25

Is there anything else that management is committing to, that affects operators, but hasn't told us.

26

Why aren't we kept informed of the progress of Restarting Peach Bottom?

27

How does management evaluate the shift managers? Why isn't management asking us on how we feel about them?

28

How long are the G.E. Reactor Operators going to be here? Where are they going after this? Are they being hired by PECO?
CAN - NOT Imped. - Only Helping PECO

29

What is going to happen to the Plant Operator trainees who came back on shift to help out with the outage?

30

Since all of our upper management seems to be so tied up with making sure we meet other commitments at this time, when, if at all, are they going to have time to resolve the numerous problems operations has? (Both personal and personnel) Let's not forget the root causes of the shutdown order.

31

What attempts are being made to get more Chief Operators qualified? What will qualifications be, class time OJT? When and how many?

32

When is management going to settle the seniority list issue? It has been over 2 years!

33

Why don't our floor operators have the necessary keys to do their rounds/jobs? Especially since this is an ANI concern.

34

How exactly are the new overtime restrictions going to work? Who do they affect, and when will they take effect? Does the company expect the operators to just take a \$20,000.00/year pay cut?

35

With regard to procedural compliance, how far are we allowed to go without a procedure?

36

The new LO's filled out a class evaluation after completion of the course, not it seems as though it has disappeared, and a new one is being sought. What's going on here?

- Employee Concerns
- Maintenance Program
- Conditions Adverse to Quality Process
- Restart Acceptance Criteria Implementation
- System Valve Lineups

The NRC also planned 24-hour-per-day inspector coverage in the control room at various times during heatup and power ascension. This would provide additional assurance of TVA's readiness to conduct power operations at Unit 1.

(Editor's Note: TVA was authorized by the NRC to restart Unit 1 on November 5, 1988; criticality was achieved on November 6, 1988. Details of the events leading to the restart authorization, and a summary of operational experience as of December 31, 1988, will be described in the next report in this series, i.e., NUREG-0090, Vol 11, No. 4.)

TVA General Management and Personnel Issues

On July 1, 1988, Marvin Runyon, Chairman of the Board, TVA, announced a financial austerity program at TVA that included major cutbacks in personnel and funding. As a consequence of these cutbacks, TVA indefinitely deferred the licensing of Watts Bar Unit 2 and Bellefonte Units 1 and 2 and also delayed the licensing schedule for Watts Bar Unit 1 and the restart schedule for Browns Ferry Units 1 and 3. The staff has monitored the impact of these cutbacks on Sequoyah Units 1 and 2 and Browns Ferry Unit 2 and has observed no adverse impact on safety or schedule at these units at this time.

On September 8, 1988, TVA announced that Oliver D. Kingsley, Jr. would replace Steven A. White as the Senior Vice President, Nuclear Power, at TVA. This change was to be effective November 1, 1988. Mr. Kingsley was Vice President of Nuclear Operations at Systems Energy Resource, Inc., the generation subsidiary of Mid-South Utilities. Also, TVA announced the appointment of Warren (Bus) Cobean as Senior Advisor (Nuclear) to the TVA Board of Directors. Mr. Cobean had recently retired as President of Burns and Roe, a nuclear architect engineering company.

Future reports will be made as appropriate.

* * * * *

87-1 NRC Order Suspends Power Operations of Peach Bottom Facility Due to Inattentiveness of the Control Room Staff

This abnormal occurrence was originally reported in NUREG-0090, Vol. 10, No. 1, "Report to Congress on Abnormal Occurrences: January-March 1987," and updated in subsequent reports in this series (NUREG-0090, Vol. 10, No. 2 and Vol. 10, No. 3). It is further updated from August 1987 to mid-October 1988 as follows:

In early August 1987, a Peach Bottom Restart Panel, composed of management from NRC Region 1 and the NRC Office of Nuclear Reactor Regulation, was established to coordinate the planning and execution of NRC's activities on plant restart. There have been several panel meetings. A team assessment during the weeks of September 21, 1987, and January 5, 1988, focused on licensed operator performance and attitude training programs. Another inspection evaluated each of the

A/31

not related

six operating teams as they responded to events on the Limerick simulator. Team inspections have also been completed on the site Maintenance Program and Emergency Operating Procedures.

The licensee, Philadelphia Electric Company (PECo), has reorganized its entire nuclear program. The Nuclear Review Board reports directly to the Office of the Chief Executive and to the Board of Directors. PECo's nuclear operation is centralized under one executive vice president, one senior vice president, and four vice presidents. The NRC, on December 18, 1987, told the company it could proceed with the corporate management changes proposed in Section I of the Restart Plan. On January 4, 1988, PECo instituted their new nuclear organization. The Limerick Plant Manager became the new Plant Manager at Peach Bottom. On February 16, 1988, PECo named an Executive Vice President, Nuclear.

In April 1988, the licensee submitted Revision 1 to its corrective action plan for the restart of the plant. The revised plan reflected the new licensee management organization and responded to the NRC staff's concerns with respect to the root causes of the Peach Bottom issues and their relationship to the corrective action tasks. The NRC solicited comments on the revised restart plan from Pennsylvania and Maryland, and held public meetings near the plant in York and Lancaster Counties, Pennsylvania, and Harford County, Maryland, to receive public comments on the plan.

On October 19, 1988, the NRC staff issued a Safety Evaluation Report (Ref. B-7), which concluded that the licensee's corrective action plan, as revised, was acceptable to meet the requirements of the March 31, 1987 NRC shutdown order for a detailed and comprehensive plan and schedule to ensure that the facility will be operated safely and comply with all requirements. The licensee is continuing with its plans to prepare for plant restart. The NRC staff will continue to monitor the effectiveness of the licensee's implementation of the restart plan and associated activities.

To emphasize the seriousness of the violations that resulted in the NRC suspension of power operations, a significant civil penalty was imposed on the licensee; in addition, civil penalties were imposed on certain NRC licensed individuals who were members of the shift operations staff at Peach Bottom on or about the time of the NRC shutdown order. The individual enforcement actions were issued on August 9, 1988; the maximum civil penalty was \$1,000. On August 10, 1988, the NRC issued a proposed civil penalty of \$1,250,000 to PECo as well as an Order restricting activities of three former Peach Bottom managers (Ref. B-8). All civil penalties have been paid.

Future reports will be made as appropriate.

* * * * *

Reach Bottom Mtg of 1/27/88
Root causes

1. Lack of site management leadership and management skills.
2. Poor operator replacement program
3. Station culture
4. Failure of corporate management to recognize trouble and correct.

Root cause #4 addressed in Volume 1 submitted 11/25/87.

Root causes 1-3 to be addressed in Volume 2 to be submitted by 2/12/88 and discussed at 1/27/88 meeting. These two volumes will replace the CTE plan with regard to issues in the shutdown order. PECO will continue to use the CTE Plan internally.

Corrective actions (highlights)

Root cause #1: training for managers; required meetings; new philosophy (excellence, open communications, etc.); new trng. mgr. (E.A. Till - 30 yrs Navy + Ill. Power), site mgmt positions 11-34 including 20 from outside PECO

Root Cause #2: hired 15 last summer; in process of hiring 20 more; 4 GE operators + 3 Hope Creek; hiring above entry level.

Root Cause #3: alternate career path; education program for PC. → new philosophy; ability for reporting of problems; Tell it to the VP program; professional development specialist from ECI; assigning
A/30

organizational development specialists to each department
(to ensure POs, inter-departmental agreements, approval, commitments,
data, etc are done ordnet); training, coaching and team
building; survey to discover problem areas; reorganized
quality organization (departments of performance measurement
and ISEG included); new people in ~~the~~ A&Q including
Mike Pratt (from Royal Navy, Tass, etc.) and Dick Charles USNA + 30 y
previous change forms.

Summary: Sounds promising. This is the first
meeting where PECO has given us much more than
promises and plans. They are actually implemented
some programs, hired a lot of people, and seem
to be taking control of activities. There has been
feedback that some programs are having an effect
on operations and morale. The SRE, Tom Johnson,
Sergey Frong and the shift managers seem to
be successful in taking control and command functions.

Restart Assessment Panel Meeting Topics

License amendment for the PECO reorganization / request
for hearing from State of PA.

Format of restart SER.

Legality of restart with Cotton's limited SRO. (OK)

Enforcement conference questions. One operator on

leave until 20th - interview him later. (Hart)

Draft letter/memo regarding other individuals (not
using license).

Prep for Maryland Congressional briefing on 3/4.

Recent inspection findings.

PECO

Job
Pres. P. ^{of} ~~the~~ ~~the~~
TCE/KC

VP Mike Corbin, Mike Neil

5/3/88

1000

Major Milestones

1 AUG Maint. Completed
IAPD after PECO Self Assessment

JUNE Report to ~~3~~ Commission by PECO (POSSIBLE) *

Manpower Retention ~ \$ and People ~ Same Waste

1000 people in P. of ~~the~~ ~~the~~

Need to get a

handle on where

3200 on site daily,

Cuts are warranted ~ but we don't know
where is right place.

Squadron 16
71-73
CORBIN

Operator Morale - good and improving
Shift mgr. "Crisis"

End of July - Enticement rates dropped up.

Biggest = Maintenance Close Out.

Reviewing Japanese Start-up Testing Program

215-841-4221

A119

Revised

-
- Taylor, Jim
 - Murley, Tom
 - Boger, Bruce
 - Russell, Bill
 - Kawa, Bill

10-5-88

J. F. PAQUETTE

Summary
 - Proud of team
 & accomplishments

McNeill,
Restart time mid to late Dec.

A/22
17

COMMISSION MEETING
OCTOBER 5, 1988
PECO PRESENTATION AGENDA

J. F. PAQUETTE
CHAIRMAN AND CEO

OVERVIEW

*Since
March of this year
9 visits to Peach Bottom (?)
4 visits to Kemmerich*

C. A. MC NEILL, Jr.
EXECUTIVE VICE PRESIDENT
NUCLEAR

NUCLEAR ORGANIZATION
OVERSIGHT FUNCTIONS

D. M. SMITH
VICE PRESIDENT - PBAPS

SITE READINESS

C. A. MC NEILL, Jr.

RESTART SELF-ASSESSMENT
SUMMARY

John Cotton, Superintendent operations PECO

IMPROVED ORGANIZATIONAL EFFECTIVENESS

- Quality People
- Structure
- Culture
- Effective Oversight

NUCLEAR GROUP ORGANIZATION

- **Dedicated Organization**
- **Reduced Layers**
 - **Increased Span of Control**
- **On-Site Corporate Direction**
 - at **VP Level**
- **Accountability**
- **Improved Communications**

VISION, MISSION and VALUES

VISION

- World Class

MISSION

- Safe, Economical Reliable Power

VALUES

- Safety
- Quality
- Dynamic Business Focus
- Teamwork
- People
- Integrity

MANAGEMENT CONTROL

- **Goals**
- **Performance Monitoring**
- **Performance Appraisals**
- **Management By Walking Around**

OVERSIGHT

- Nuclear Committee of the Board
- Senior Management
- Nuclear Review Board
- Nuclear Quality Assurance

SENIOR MANAGEMENT

- **Corporate Commitment
to Effective Oversight**
- **Climate That Promotes
Self-Critical Analysis**

NUCLEAR REVIEW BOARD OVERSIGHT

- **Advisory Committee Reporting Directly to Executive Vice President, Nuclear**
- **Provides Independent Review and Audit in Areas Including:**
 - **Operations**
 - **Nuclear Engineering**
 - **Radiological Safety**
- **Assess PBAPS Readiness for Restart**

NUCLEAR QUALITY ASSURANCE OVERSIGHT

- Consolidated Four Separate Organizations
- Elevated Reporting Level
 - to Executives
 - to NRB and NCB
 - to Sites
- Added Outside Experience
- Increased Effectiveness



D. M. SMITH

OVERALL SITE READINESS

- People
- Plant
- Programs

PEOPLE

- **New Management**
- **Increased Nuclear Industry Experience**
- **Enhanced Leadership/Management Skills**
- **Improved Communications**

OPERATOR READINESS

- **Staffing**
- **Training**
- **Working Hour Restrictions**

OPERATOR STAFFING

- Current

- 6 Shifts

- Additional SRO on Shift

*shift mgr. 30 hrs
10 hrs*

- Goal

- Additional SRO and RO per Shift

- Additional Operators for Flexibility

early 1990

*shift mgr
3 SRO's
3 RO's*

OPERATOR TRAINING

- Simulator ^{of factor} and Classroom Training
- Personal Effectiveness Training
- Team-Building Training
- 5 Licensed ROs in Training
- 16 RO Candidates in Training
- 35 New Operations Helpers

Since shutdown
- initial or requal
training -
All except for ops.

? no course... for screening
32 former army enlisted w/5-6 yrs.
other 3 at least 2 yrs. college.

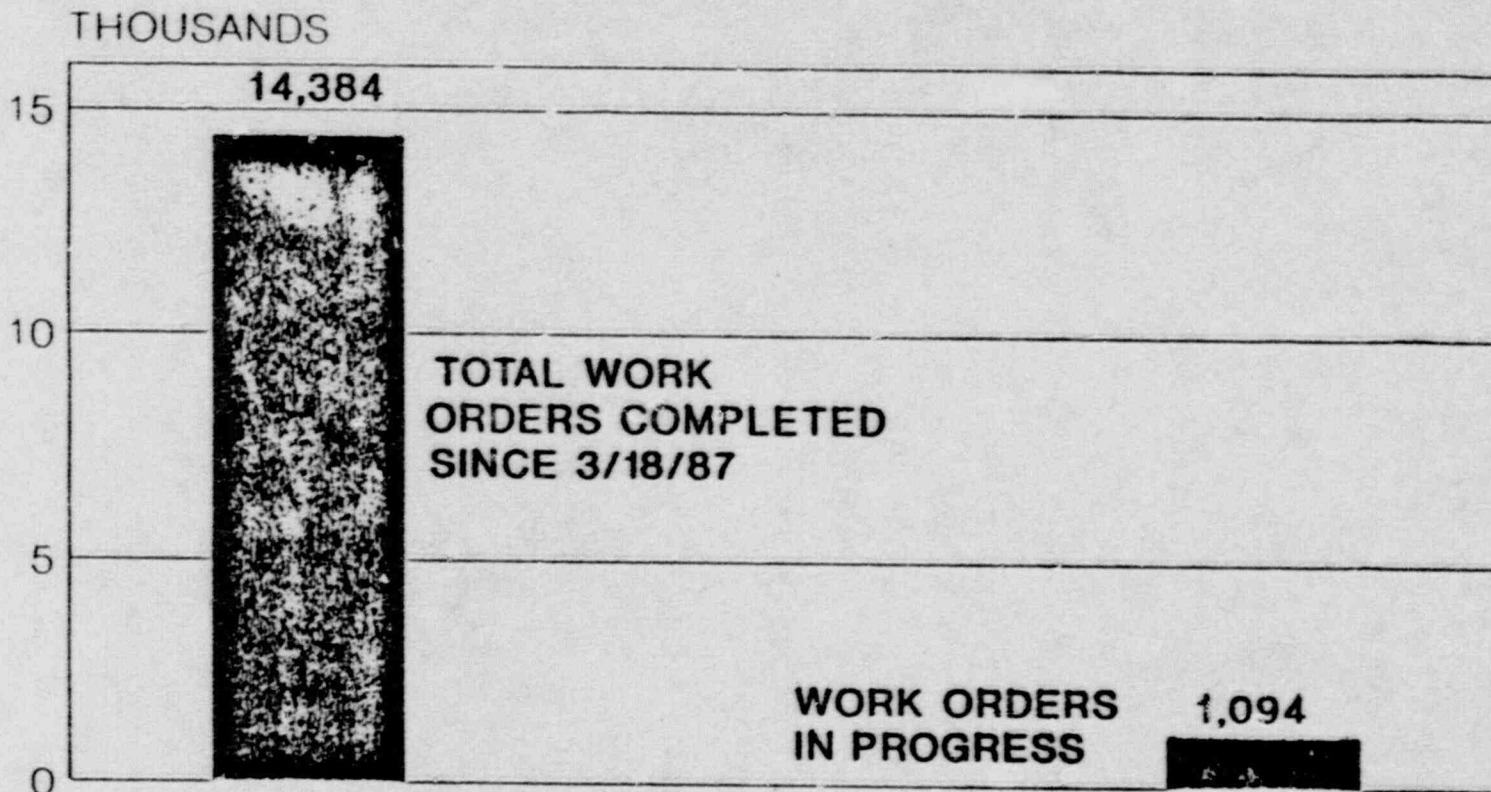
OPERATOR WORKING HOUR RESTRICTIONS

- **Tech Spec Amendment Submitted**
 - **Based on NRC Proposed Policy Statement**
 - **Short and Long Term Restrictions**
- **Administrative Controls**

PLANT READINESS

- **Corrective Maintenance**
- **Preventive Maintenance**
- **Modifications**
- **Decontamination and Painting**

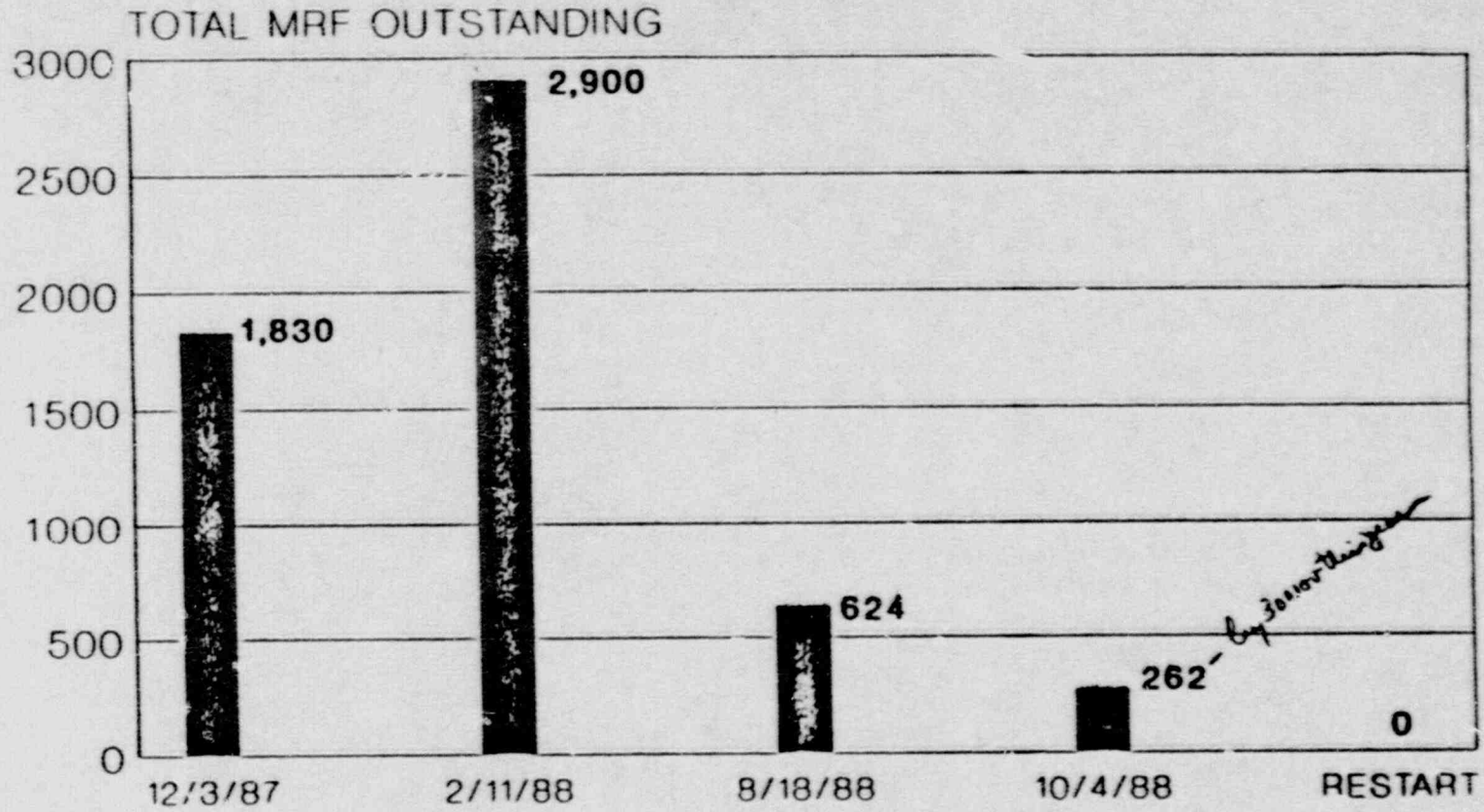
WORK ORDER PROGRESS UNIT 2 AND COMMON



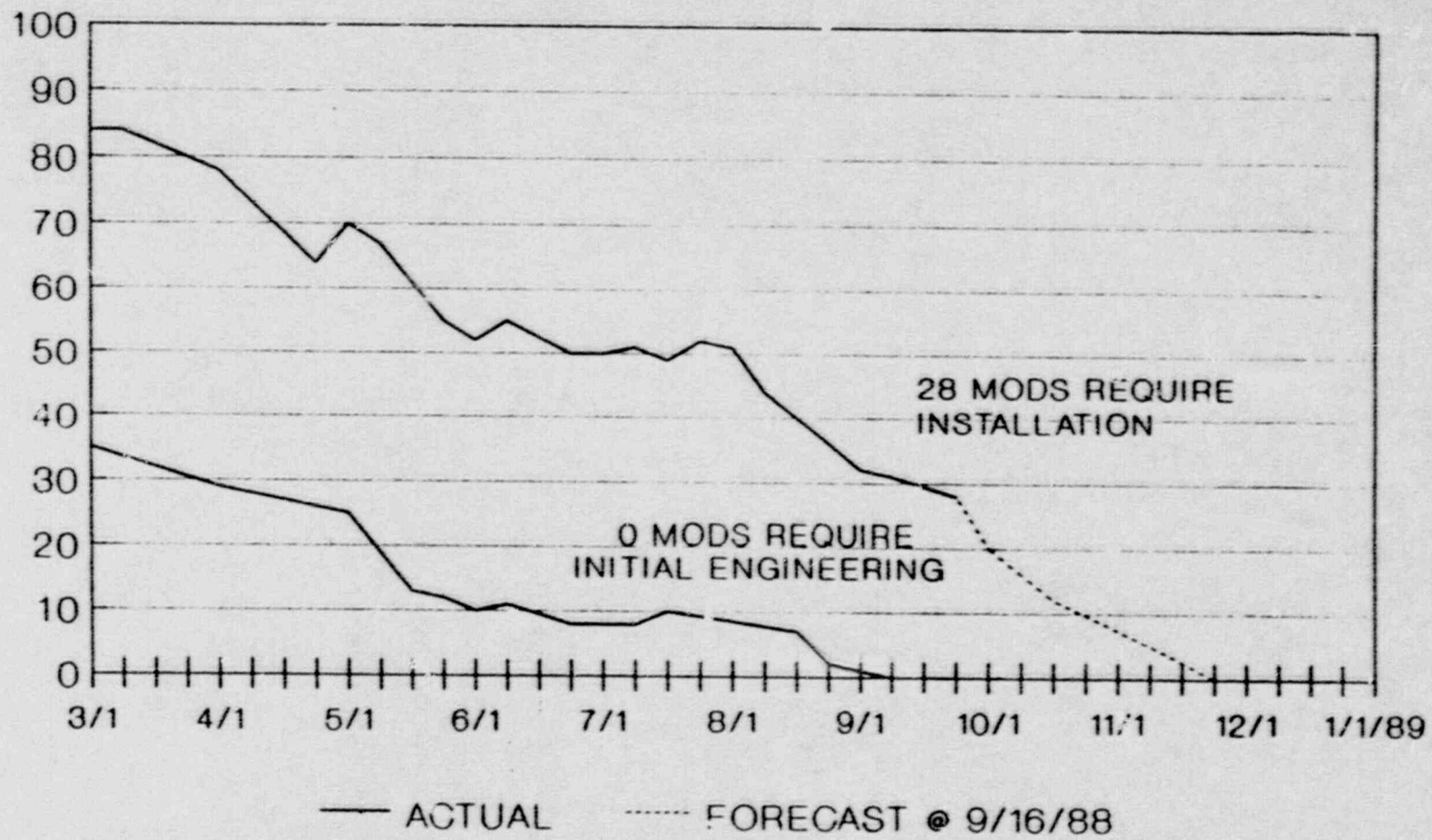
INCLUDES CN, CM, AND PM SECTION 6 WORK ORDERS

w/6002
↳ 200 *250*

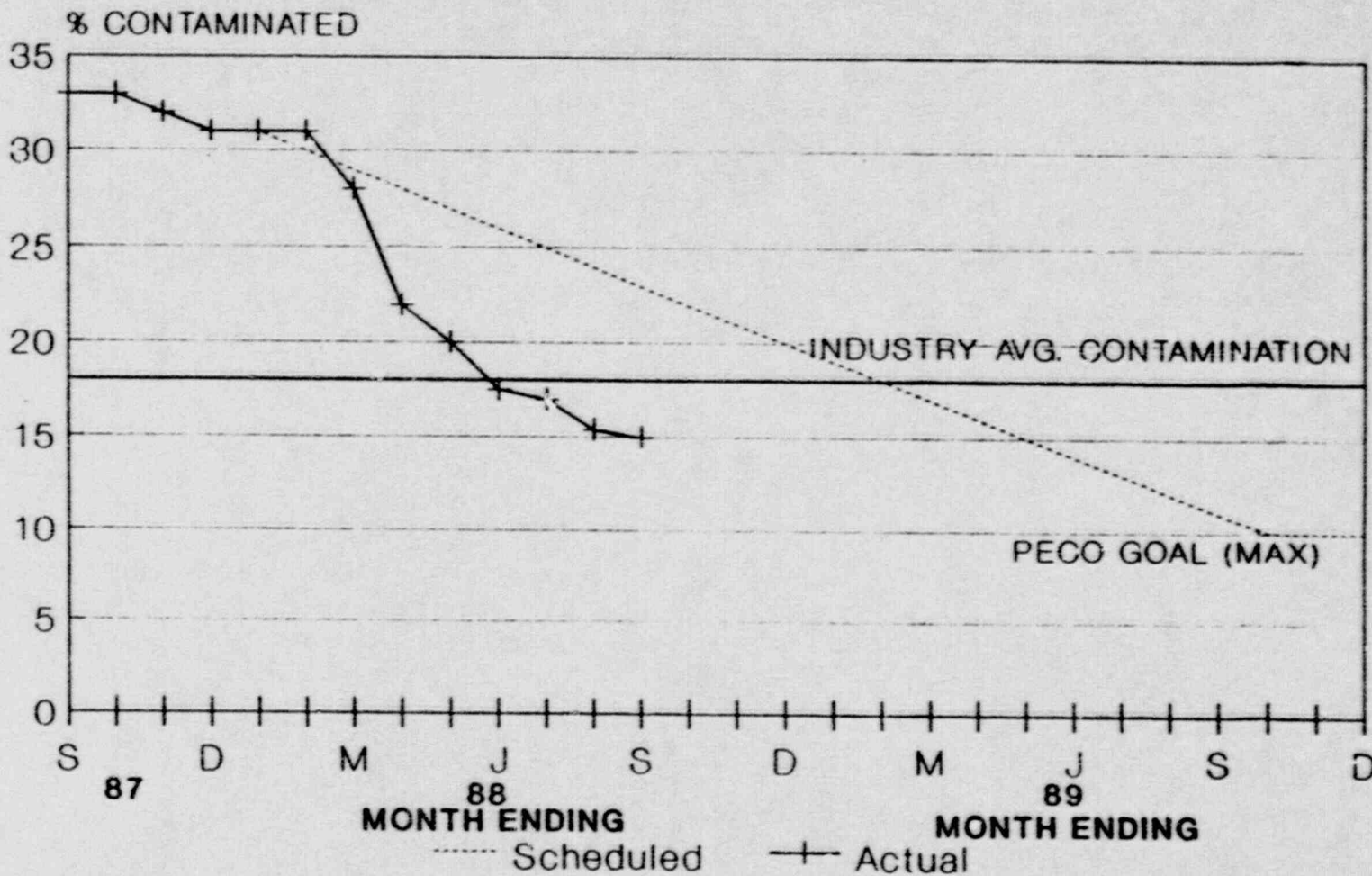
PREVENTIVE MAINTENANCE UNIT 2 AND COMMON



UNIT 2 AND COMMON OPEN RESTART MODIFICATIONS (TOTAL - 167)

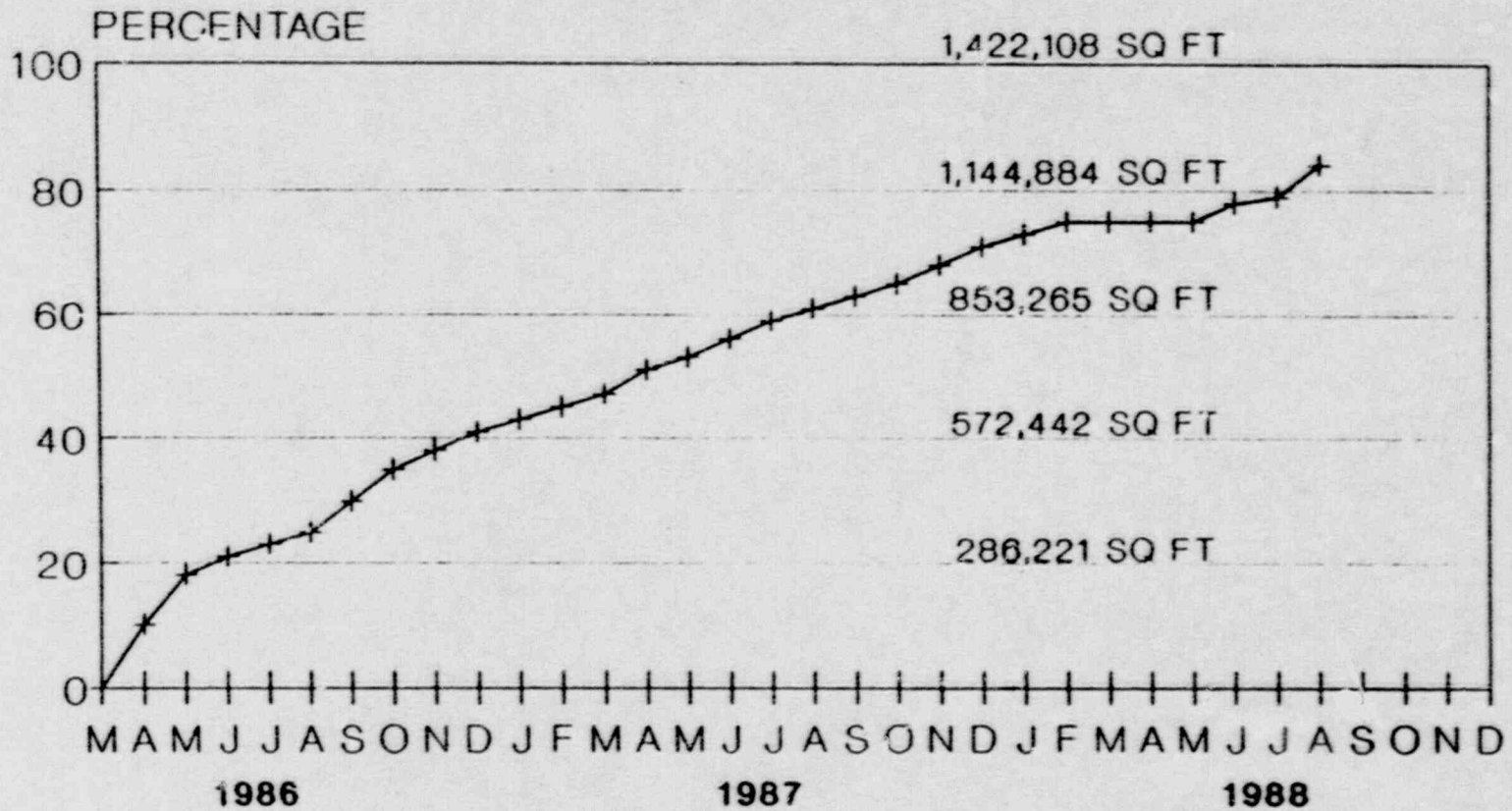


UNIT 2 & COMMON DECONTAMINATION PROGRESS



STATION PAINTING PROGRESS UNITS 2 AND 3

*"Detailed plant
cleaning program is
ongoing"*



PROGRAMS

- **Emergency Preparedness**
Ret. ing of reqs.
Dill
last yr
SoE.
- **Configuration Management**
2 pr. - pd - short & long term.
Incorporate design basis
- **Procedures and Document Control**
- **Security**
- **Operating Experience Assessment Program**
never
no road
yet.
- **Radwaste**
- **Commitment Tracking Program**
major chg here
- **Radiation Protection**

SECURITY (not yet ready for restart)

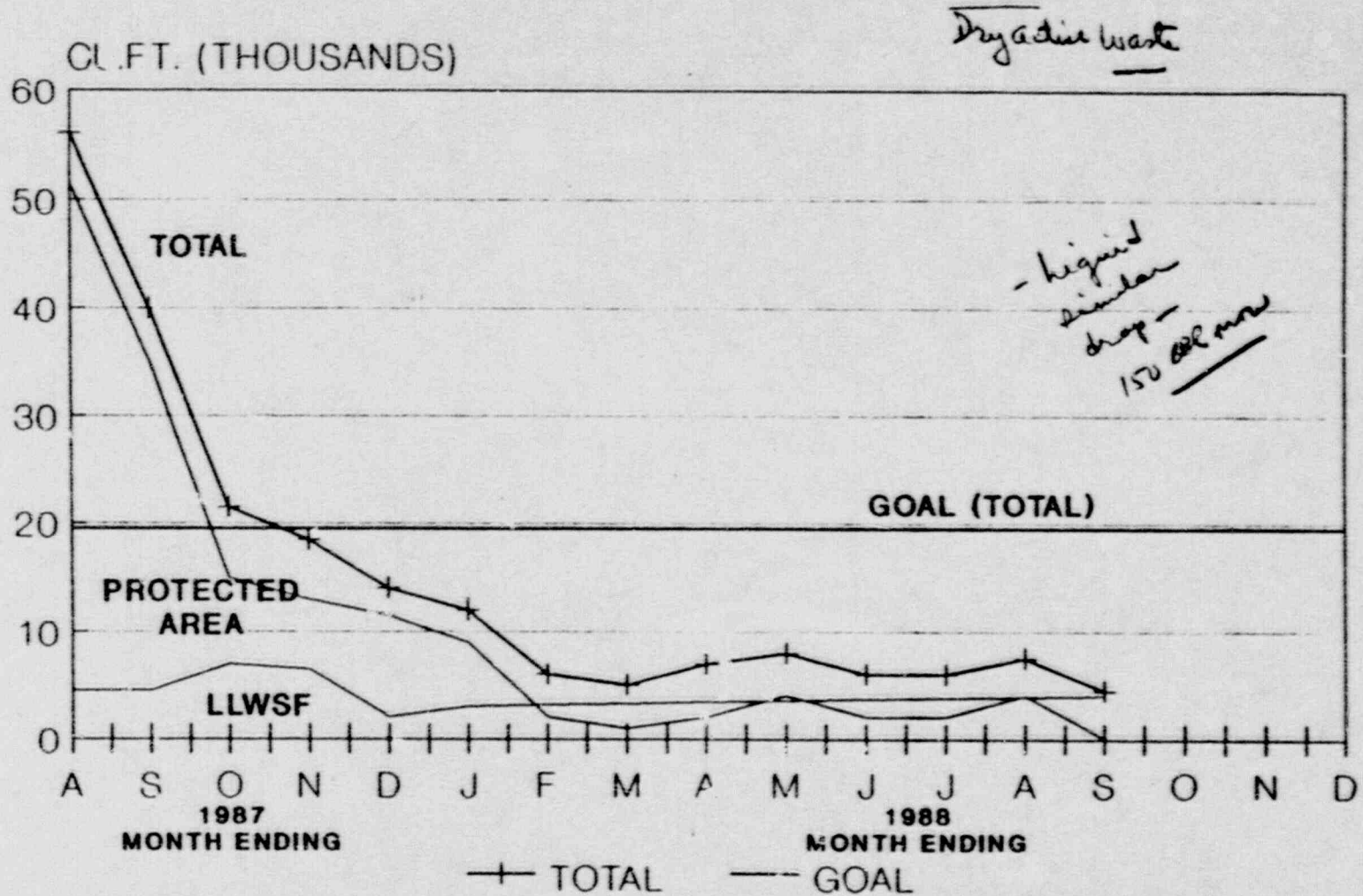
- Background

- Improvements

- Management Involvement
- Contractor Transition
- Equipment/Systems - Solo -
- Training - upgraded -

PECO involvement
new mgs. , new contractor pad of airport -
used at hinesville (saft 2)

UNITS 2 AND 3 RADWASTE INVENTORY-DAW

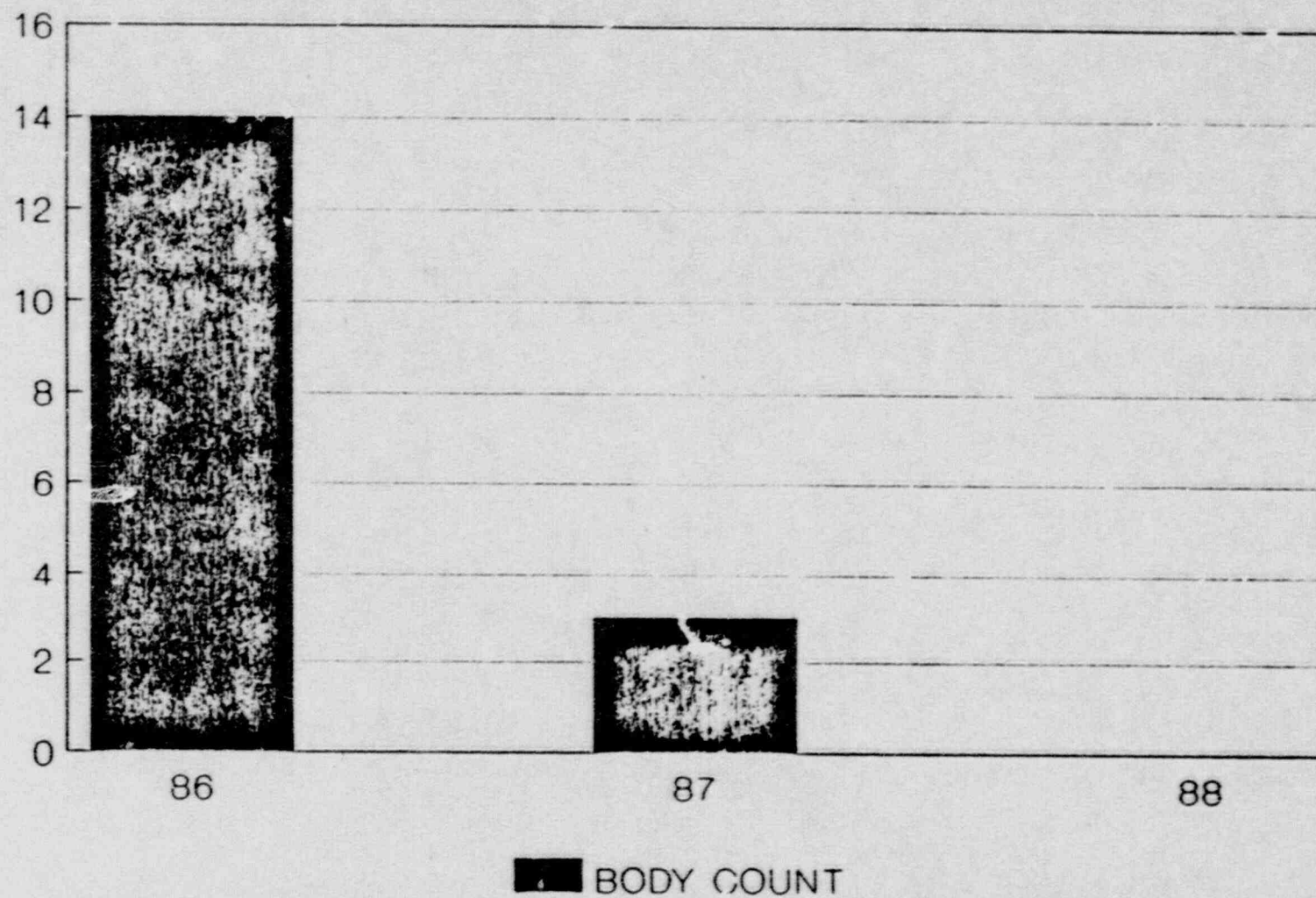


RADIATION PROTECTION

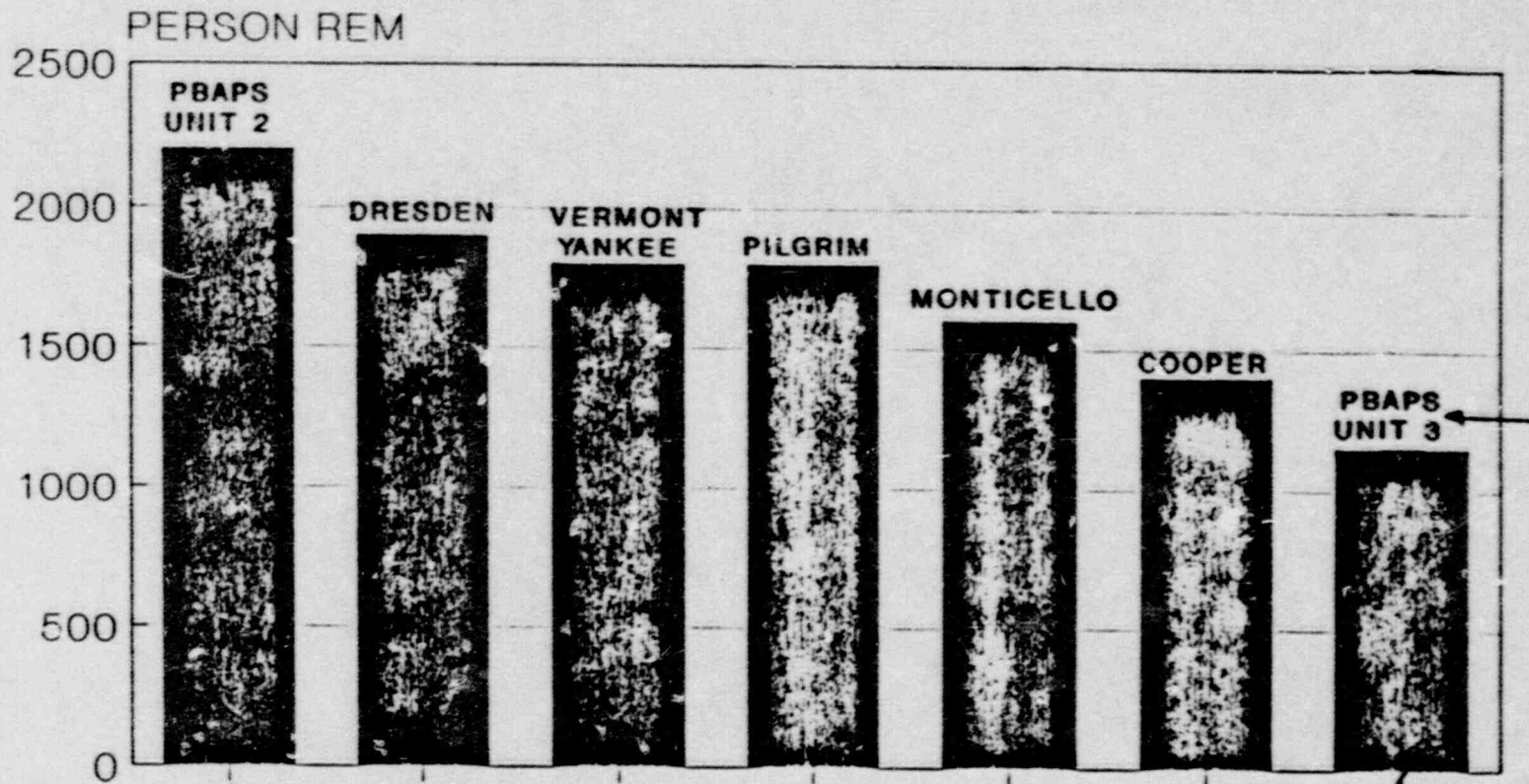
REDUCTION OF STATION RADIATION EXPOSURE

- 100% Dose Accountability - Achieved - Power Block
- Reportable Uptakes have Significantly Decreased from 1986 to 1988
- Unit 3 Pipe Replacement Exposure was an Industry Record Low for Plant Type

POSITIVE WHOLE BODY COUNTS



PIPE REPLACEMENT COMPARISON



1984

UNIT 3 99% COMPLETE

1988
at higher
level of effort.

OVERALL SITE READINESS

- PEOPLE - Simulator Training -
- PROGRAMS - Security - Master operations list, etc.
- PLANT - 1000 work orders

*Don't get too
overly
concerned
about
the
plant*

C. A. Mc NEILL

RESTART REVIEW PANEL MEMBERSHIP

C.A. McNEILL

J.S. KEMPER

G.M. LEITCH

D.R. HELWIG

E.C.KISTNER

E.P. WILKINSON

S. LEVY

L. BURKHARDT

FUNCTIONAL AREAS

- Nuclear Quality Assurance
- Human Resources
- Operations
- Technical Support
- Plant Support
- Maintenance
- Industrial Safety
- Emergency Preparedness
- Security
- Fire Protection
- Training and Qualifications
- Configuration Management
- Document Control
- Design Engineering
- Modifications
- Procurement and Material
- Outage Management
- Power Ascension
- Licensing and Commitment Tracking

IDENTIFICATION OF ISSUES

- Shutdown Order
- NRC Inspections, SALP, etc.
- INPO Evaluations
- Self - Evaluations
- Other External Evaluations

LINE MANAGEMENT ASSESSMENT

RESULTS

- Walkdowns
- Trending
- Statistical Analysis
- Observations
 - MBWA
 - By Outsiders

LINE MANAGEMENT ASSESSMENT

SUFFICIENCY OF RESULTS

- Walkdowns
- Comparisons with:
 - NRC
 - INPO
 - Industry Guidelines
 - Averages
- Observations
- Analysis

LINE MANAGEMENT ASSESSMENT

PERMANENCY OF CHANGE

- Proceduralization
- Budget
- Management Support
- Line and Field Acceptance
- Areas for Continuing Improvement

OVERALL RESTART STATUS

- Self Assessment
- INPO Assessment
- NRC Assessment
- PECO Anticipates Being Ready for the NRC Assessment by November 14, 1988

*Mayland agreement
B. working*

*Sep 30 1988
in the
items*

MEMORANDUM TO FILE

SUBJ: COMMISSIONER CARR'S VISIT TO THE PEACH BOTTOM SITE AND
SPEECH TO THE REGION 1 RESIDENTS AT KING OF PRUSSIA

Commissioner Carr, accompanied by Tom Elsasser, visited the Peach Bottom site on December 15, 1987. Region 1 Administrator, Bill Russell, and the Senior Resident, Tom Johnson, accompanied the Commissioner during his visit and tour of the site. Representing Philadelphia Electric Co. (PECO) during the visit was Dickenson Smith, Station Manager, Johan Cotton, Ops Superintendent and other members of station management. Agenda and other pertinent background information is attached.

The tour started with attendance at the shift turn over meeting in a small office adjacent to the combined Unit 2 & 3 control room. Following that, the Commissioner was briefed in the control room concerning the work being accomplished during extended shut down. Of particular interest was the extensive human factors modifications that had been completed on the Unit 2 control boards. The licensee accelerated completion of these modifications due to the protracted length of the shutdown period. These mods will also be completed on the Unit 3 side during the ongoing recirc piping replacement.

The remainder of the tour consisted of a visit to all accessible areas of Unit 2 and a walking tour of the Unit 2 & 3 portion of the site. (Mothballed Unit 1 is separated by a security fence and was not visited.) The mood of the facility was fairly upbeat considering the recent problems. One could sense a desire to do better and "strive for excellence". There have been extensive changes in the corporate, site and shift managerial structure. These are certainly for the better; however, the changes have not been in place long enough so that the full impact can be realized. There has been conscious effort to involve all workers at the site in the improvement process by encouraging constructive criticism and feedback.

There is also a conscious effort to improve the material condition of the site. Previously large areas of surface contamination have been cleaned up. There is a program in place to ship the relatively large quantities of low level waste that are/were being stored on site. There is also a program under way to reduce the previous large maintenance backlog. Management is positive about these initiatives and they are making progress.]

EXEMPTION
S/H
W/H

8811020144 (310)

B/1

} 4/

After completion of the tour, we joined the licensee for a working lunch. Topics of discussion included a 30 minute informative briefing on containment venting procedures and capabilities. (slides attached) Other briefing topics included the managerial reorganization, the radwaste reduction program and the efforts to reduce and track the maintenance backlog. These briefings were well done and presented an accurate picture of the current status of affairs at PECO and the Peach Bottom facility.

On December 16, the Commissioner addressd the Region 1 residents who were in attendance at the periodic regional resident counterpart meeting. The Commissioner's remarks (attached) were well received and a lively question and answer period followed.

*not responsive
to request*

not response
to request.

The Commissioner's formal time with the residents lasted about 1hr; however, he remained behind for about 20 mins talking informally with Bill Russell and several of the residents. The rotation policy for residents was the dominant topic of discussion.

I. Isaac

1/5/88

W/h bracketed
S

MEMORANDUM TO FILE

SUBJECT: COMMISSIONER CURTISS' VISIT TO THE PEACH BOTTOM
ATOMIC POWER STATION (PBAPS) ON MARCH 27, 1989

On March 27, 1989, Commissioner Curtiss and his Technical Assistant, Dave Trimble, visited the Peach Bottom facility.

Prior to the visit, to gain as broad a perspective of the licensee's status as possible, the Commissioner had met with the NRR Project Manager for Peach Bottom (Mr. Bob Martin). In that meeting, Mr. Martin reviewed key issues and resolution status. He pointed out the extensiveness of the changes made in the licensee's organization. He noted that the facility appeared to now have good leadership with a road map to follow. [

Mr. Martin did not identify any concerns that would adversely affect a restart decision.

The plant visit consisted of: (1) a meeting with the Resident Inspectors (Tom Johnson, Larry Myer, and Rick Urban) and their Section Chief (Jim Lindville), the team leader for the February 1989 NRC Integrated Assessment Team Inspection (IATI) at PBAPS; (2) a meeting with key licensee management personnel including John Kemper, Senior Vice President for Construction (Limerick 2), Dickinson Smith, Vice President, PBAPS, and John Franz, Plant Manager; (3) attendance at a morning licensee planning ("TRIPOD")

Bh

meeting; (4) a plant tour; (5) a brief meeting with operators; and (6) a working lunch with licensee management personnel.

The Resident Inspectors and licensee provided background information on root causes leading up to the shutdown order, management changes, principle corrective actions, and recent problem areas. The more significant actions taken by the licensee include:

- a. extensive changes in management personnel from the shift manager level up to the CEO (approximately half of the new managers came from outside of the PECO organization);
- b. a move from promotion by seniority to promotion based upon performance;
- c. beginning a performance appraisal program for employees;
- d. a focus on accountability including interface agreements on responsibilities where multiple groups are involved;
- e. establishment of a Shift Manager position (utilizing senior licensed personnel with degrees) to increase management presence on shift;
- f. an effort to change the culture from a "generate power" philosophy to a safety, reliability culture;
- g. a move away from operation in isolation to an organization which stays abreast of the industry and utilizes outside consultants on oversight committees;
- h. an emphasis on self assessment including wide use of performance indicators; and
- i. a raising of standards for entry level operations personnel

to require either two years of college or Navy Nuclear Program training.

The IATI team leader and Resident Inspectors see no significant impediments to restart. They indicated that it will still take time to change the attitudes of employees at all levels of the organization. They have seen improvements in recent problem areas such as security and ESF actuations. However they see a potential for the licensee to be too "tunnel visioned", giving the bulk of attention to the operator area perhaps at the expense of other programs.

During the plant and control room tour, the Commissioner noted that material condition and housekeeping were good. The licensee has significantly reduced the amount of contaminated area, thus providing excellent accessibility to equipment. Equipment labeling was very good. Operators pointed out that the control room has been upgraded including such human factors enhancements as control board mimics and paint schemes highlighting critical components. The control room was clean and well lighted. Operator professionalism was enhanced by use of uniforms. A number of scaffolds were in place to support ongoing maintenance. The licensee indicated that these would be removed prior to restart. The licensee pointed out features of the vent system for their Mark 1 Containments. Hardened 2 inch diameter vent paths (filtered, monitored, and elevated release) are available from both the torus and the drywell. A 6 inch hardened vent path

from both the drywell and the torus is available through their ILRT piping (unmonitored, unfiltered, and ground release outside the Reactor Building). The 18 inch vent paths are not hardened and their rupture would cause a release into the Reactor Building.

Following the tour the licensee indicated that significant modifications will not be necessary for them to meet the Station Blackout (SBO) rule. The licensee also indicated that they do not intend to use the NUREG 1150 PRA for Peach Bottom as their IPE. [

]

[

JT - FYI - draft questions to be used in
Peach Bottom operator enforcement
conferences.

BK
12/10/87

ENFORCEMENT CONFERENCE PACKAGE

Brent
Clarke

1. Sixteen proposed Enforcement Conference questions, including opening and closing statements; based on:
 - a) Thirty proposed Region I questions
 - b) V. Stello's and J. Lieberman's views on conduct of the conference
 - c) B. Boger's notes
 - d) PECO Internal Investigation records
 - e) Chairman Zech's views from September 14 meeting
 - f) LER 87-01 on the March 17, 1987 trip
2. Proposed Notice of Violation from Region I dated September 14, 1987 (based on OI Report No. I-87-003) and J. Taylor's September 29, 1986 memo "Guidance For Enforcement Actions Regarding Individuals."
3. One page summary notes on each of 24 operators.
4. Individual operator licenses
5. Regulations, Part 55, old and new versions
6. PBAPS Technical Specifications, selected section 6 pages; and Safety Guide 33, QA Program
7. PECO Procedure A-7, Shift Operation, dated 3/11/87
8. Fermi NOV and proposed CP letter dated 9/24/87 concerning inattention of operators which allowed unintentional heatup from Mode 4 to Mode 3 conditions

ENFORCEMENT CONFERENCE OUTLINE

It appears that prior to the issuance of the shutdown order the Peach Bottom operations staff was engaged, on a generally widespread basis, in activities which included giving at least the appearance of being asleep, reading non-technical materials and other examples of inattentiveness to the duties of licensed operating personnel.

1. With respect to these issues could you describe for us the environment in the control room and your participation in that environment prior to the shutdown order. In your answer please address your involvement in:
 - (a) sleeping
 - (b) assuming an inattentive appearance
 - (c) reading non-technical material
 - (d) engaging in other distracting activities
2. What was your view, prior to the shutdown, of the safety significance of these activities?
3. For [REDACTED] On March 17, 1987 Unit 3 scrambled on high neutron flux due to turbine control system fluctuations, while you were on duty, after having experienced pressure spikes for 1½ hours, what do you believe the role of the operator should be with respect to such an incident and why was no action taken by operators prior to the scram. (Reference A-7, Appendix 5, and 7.1.7)
4. What is your present view of the safety significance of such activities? (And why, if it has changed, has your view changed?).
5. What do you believe were the root causes of the problems which led to the shutdown order?
6. Did you have the support necessary to perform your job properly prior to the shutdown?
 - Administrative
 - Managerial
 - Technical
 - Procedures
 - Tools/Equipment
 - Manpower (licensed/non-licensed)
7. Will the changes made by PECO, in your view, provide you with the necessary support to properly perform your job in the future? If not what do you think is necessary?

8. What was your opinion prior to the shutdown of how procedures should be used? How did the licensee actually use the procedures? What is your opinion now of how procedures should be used?
 - Is step-by-step verbatim compliance always required?
 - Give examples of situations for which you would not use a procedure.
 - Give examples of situations for which you would not require your staff to use procedures (for supervisors).
9. What is your opinion as to the quality of the procedures used at Peach Bottom? Have you ever initiated or recommended a change?
10. What do you perceive the role of Shift Manager to be?
11. How will the Shift Manager change communications between operations and management?
12. How should you interact with non-operations staff; for example, QA/QC, HP, Maintenance, etc. in the efficient operation of the plant? How about external groups such as INPO, NRC, contractors? Were you aware of people who had legitimate business in the control room who were physically or verbally prohibited from control room access?
13. Have you been subject to any disciplinary action as a result of actions which led to the shutdown order?
14. Do you believe these actions were fair? How will this affect your future?
15. How much overtime have you typically worked, was it too much? Is it voluntary? Were you persuaded by someone to work overtime? How? Who? When?
16. The most important thing we can do today is to put into the proper perspective the significance of this issue. You individually hold, at this time, a license granted by the United States Government to operate the Peach Bottom Atomic Power Station. Accordingly, you have an individual responsibility, one that cannot be transferred or ascribed to others. You have that responsibility concurrently with the responsibility of your employer, the Philadelphia Electric Company, for the safe operation of the facility.

When you accept this license as the operator at the controls of that Nuclear Power Plant you accept a responsibility to the NRC and, as a citizen, to the people in the community in which you live to take every action possible to ensure the safe operation of that plant.

Your responsibility is specifically spelled out in the Commission's regulations in 10 CFR 50.54(K) which require that "An operator or senior operator licensed pursuant to Part 55 of this chapter shall be present at the controls at all

times during the operation of the facility." It logically follows that the requirement to be present embodies the requirement to be attentive to the duties of operating the plant.

The Facility Technical Specifications 6.8.1 requires that written procedures be implemented to prescribe the authorities and responsibilities for safe operation. The Philadelphia Electric Company's procedure A-7 sets forth requirements for Shift Operations for the Peach Bottom Atomic Power Station. Procedure A-7 explicitly requires that operators be particularly attentive at all times (7.1.7) and prohibits distracting activities.

The license, issued in your name requires that you shall observe the operating procedures and other conditions specified in the facility license.

With respect to the issues we have discussed today why do you believe the NRC should authorize the restart of Peach Bottom with you as an operator at the controls of the plant?

MEETING WITH NRC ON PBAPS RESTART

SEPTEMBER 29, 1988
AGENDA

INTRODUCTION C.A. MC NEILL

RESTART SELF-ASSESSMENT OVERVIEW C.A. MC NEILL

- Integrated Self Assessment
- Restart Review Panel Process

RESTART SELF-ASSESSMENT STATUS D.M. SMITH

POWER ASCENSION PROGRAM D.M. SMITH/
G.E. LIPSCY

IDENTIFICATION OF ANY REMAINING SER OPEN ITEMS C.A. MC NEILL

B/4

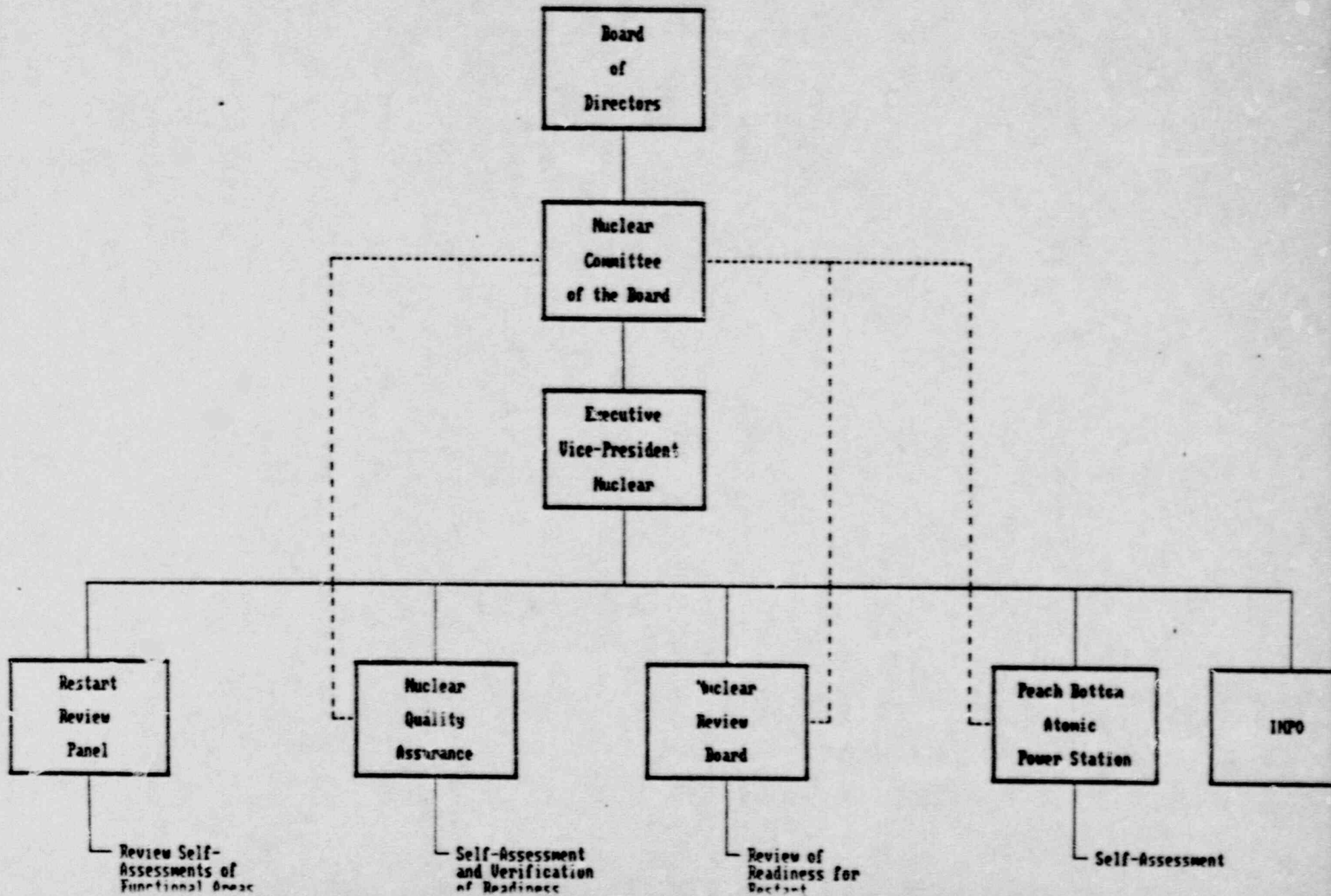
RESTART REVIEW PANEL MEMBERSHIP

C.A. McNEILL, JR.	- EXEC.VP, NUCLEAR
J.S. KEMPER	- SR.VP NUC. CONST.
G.M. LEITCH	- VP, LIMERICK
D.R. HELWIG	- GEN.MGR., NQA
E.C. KISTNER	- CHAIRMAN, NRB
S. LEVY	- NCB ADVISOR
E.P. WILKINSON	- NCB ADVISOR
L. BURKHARDT	- CONSULTANT

FUNCTIONAL AREAS

- Nuclear Quality Assurance
- Human Resources
- Operations
- Technical Support
- Plant Services
- Maintenance
- Emergency Preparedness
- Security
- Training and Qualifications
- Industrial Safety
- Fire Protection
- Configuration Management
- Document Control
- Design Engineering
- Modifications
- Procurement and Material
- Outage Management
- Power Ascension
- Licensing and Commitment Tracking

SELF ASSESSMENT PROCESS



LINE MANAGEMENT ASSESSMENT

RESULTS

- Walkdowns
- Trending
- Statistical Analysis
- Observations
 - MBWA
 - By Outsiders

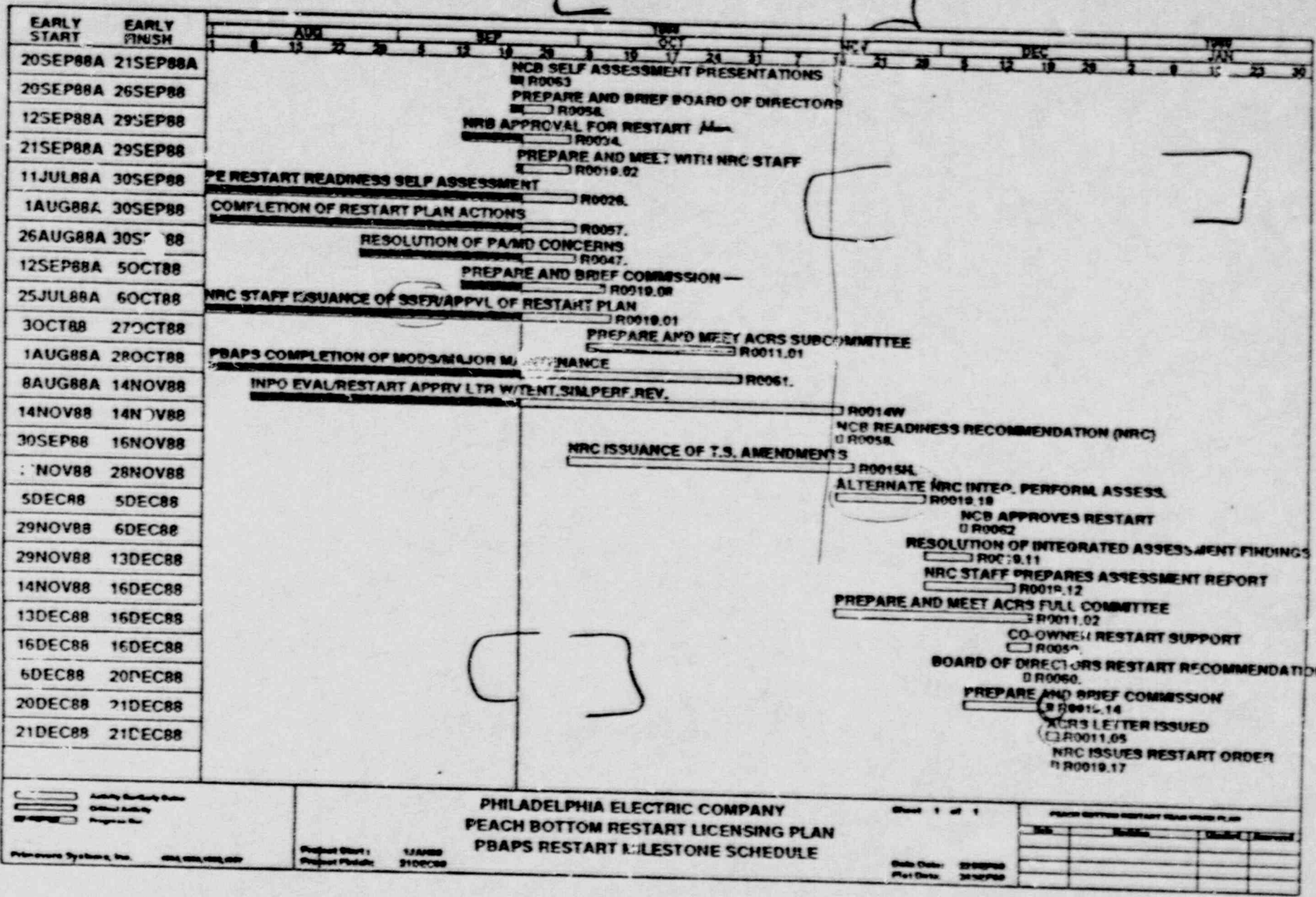
LINE MANAGEMENT ASSESSMENT

SUFFICIENCY OF RESULTS

- Walkdowns
- Comparisons with:
 - NRC
 - INPO
 - Industry Guidelines
 - Averages
- Observations
- Analysis

SELF ASSESSMENT STATUS

- RRP Assessment Results
- Issues Requiring Additional
Action Prior to Restart



Activity Start/End Date
 Critical Activity
 Milestone

Primavera Systems, Inc. 408.422.4222, 408.422.4227

PHILADELPHIA ELECTRIC COMPANY
PEACH BOTTOM RESTART LICENSING PLAN
PBAPS RESTART MILESTONE SCHEDULE

Sheet 1 of 1

Project Start: 11/1/88
 Project Finish: 31/12/88

Date: 2/20/89
 Plot Date: 2/20/89

PHILADELPHIA ELECTRIC COMPANY			
Rev	Revision	Created	Approved

RESTART POWER TESTING PROGRAM
(POWER ASCENSION)

RESTART POWER TESTING PROGRAM (POWER ASCENSION)

SUMMARY OF PROGRAM DESCRIPTION (Submitted to NRC on August 23, 1988)

- Logic Plan
- Management Assessment Points
- Organization
- Performance Assessment Process

PROGRESS AND PROPOSED ADDITIONS

- NRC Hold Points - S/U, 35%, 70%
- Hot to Cold Conversions of Licensed Operators
- Shift Support for Startup
- Industry Observers
- PBAPS Management Oversight Team
- Independent Assessment Groups
- Summary of Program Scope

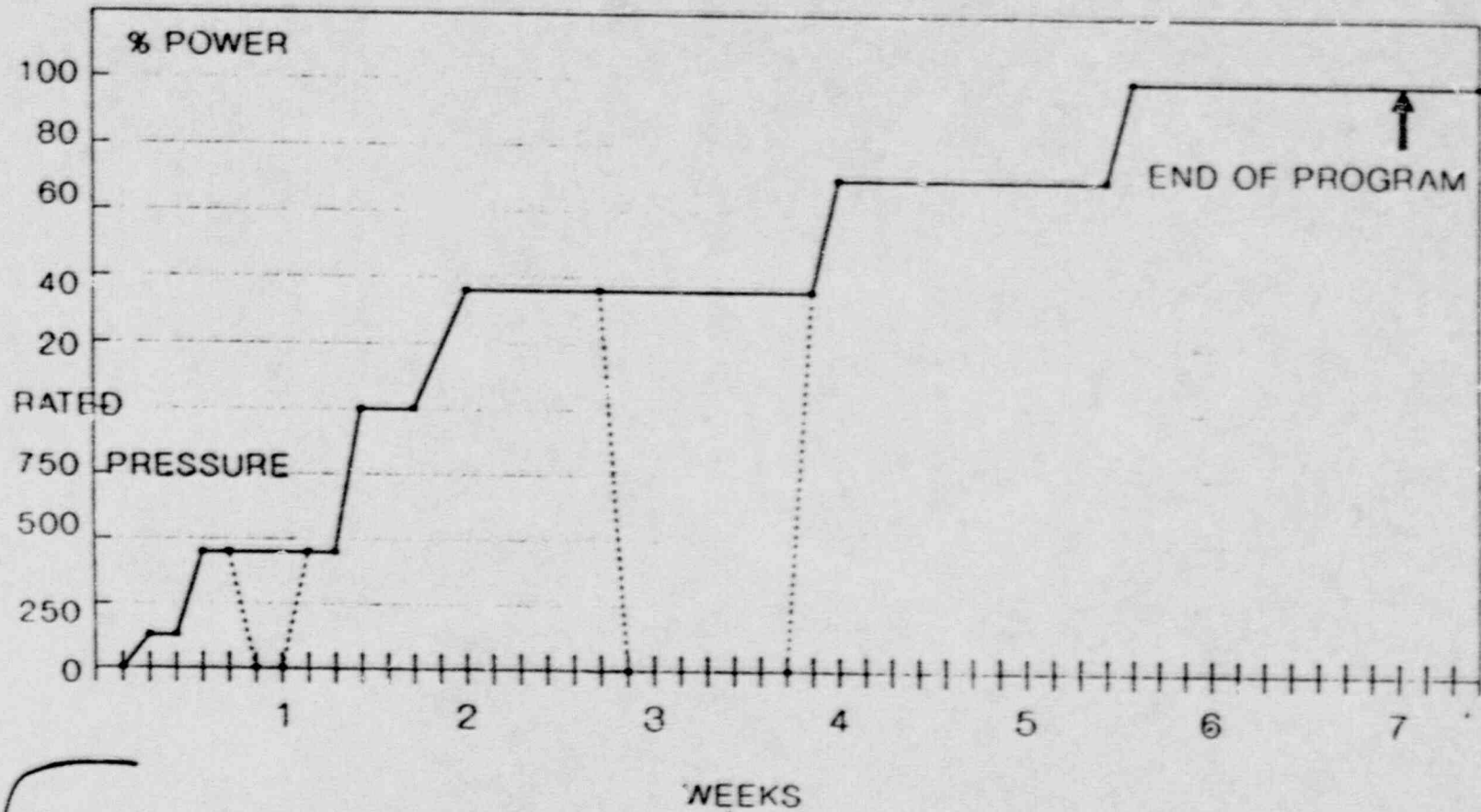
IDENTIFICATION OF ISSUES

- Shutdown Order
- NRC Inspections, SALP, etc.
- INPO Evaluations
- Self - Evaluations
- Other External Evaluations

RESTART REVIEW PANEL OPEN ISSUES

- Master Open Items List
- MRFs
- Security {
- Emergency Preparedness }
- Operator Readiness,

PBAPS RESTART POWER TESTING



MANAGEMENT ASSESSMENT POINTS

35% POWER

- Turbine on Line with Sufficient Load to Prevent Rotor Wheel Cooling
- Completion of Rod Group Notch Mode
- Feedwater Heating in Service
- Equipment Redundancy for Improved Availability
- Historical Data for Control System Tuning
- Normal Power Surveillance Testing

70% POWER

- Near Threshold for Fuel Preconditioning
- Optimum Point for Transient Testing
- Most Equipment in Service

100% POWER

- All Equipment Functioning for Full Power
- Completion of Power Ascension

NRC HOLD POINTS

- Mode Switch to Startup
- 35% (Management Assessment Point)
- 70% (Management Assessment Point)

PBAPS OPERATIONS SHIFT LINEUP

SHIFT
MANAGER

WARFEL

GELLRICH

MANNIX

SHIFT
SUPERVISOR

CROMWELL,E.
WEAVER

CLARK
STAMBAUGH

HOOPES
DUANE

CHIEF
OPERATOR

BALLANTYNE

DENI

FALCONE

REACTOR
OPERATOR

THARPE
DISHONG
(21)

MAC ENTEE
JOHNSON
SMYTHE (6)

KIRKHOFF
FISHER
(21)

PO(T)

BIRMINGHAM (RW PO)
JONES (IAO)

RESTART POWER TESTING SHIFT SUPPORT (MINIMUM/SHIFT)

MAINTENANCE/I&C

- CRAFT
 - 2 I&C Techs
 - 1 Maint Asst. Foreman
 - 2 Mechanical Craft
 - 1 Helper
- MAINTENANCE SUPPORT
 - 1 Maintenance/I&C Engineer
 - 1 Balance Crew (2 Shift Coverage)
 - 1 GE Rep for Turbine Roll

SERVICES (Full Service Coverage)

- Chemistry
- ALARA/RWP
- Health Physics
- Dosimetry

TECHNICAL

- 2 System/Test Engineers
- 1 Reactor Engineer (as required)

SUPPORT

- 1 NRMS Library

PROJECTS

- 1 Electrical Field Engineer
- 1 Scheduler
- 1 Storekeeper

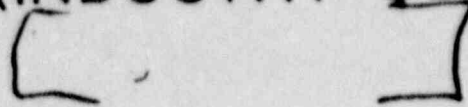
NUCLEAR ENGINEERING

- 1 Electrical Engineer
- 1 Mechanical Engineer

NUCLEAR QA

- 1 QC Inspector

PEER EVALUATION SUPPORT (INDUSTRY OBSERVERS)



- **Function**
 - Peer Evaluation of People and Program Performance During Restart Power Ascension

- **Qualifications**
 - Recent Operations Management Experience

- **Responsibilities**
 - Observe Plant Activities and Evaluate Performance and Programs Based on Industry Experience and INPO Guidelines
 - Provide Feedback to Line Management and to the PBAPS Oversight Management Team

PBAPS MANAGEMENT OVERSIGHT FOR RESTART POWER TESTING

SITE

- Vice President - PBAPS *P. Smith*
- PBAPS Plant Manager
- PBAPS Project Manager
- PBAPS Support Manager
- PBAPS Training Superintendent

CORPORATE

- Manager QA - PBAPS
- Manager Performance Assessment Division
- Manager Nuclear Engineering Division

INDEPENDENT

- Limerick Operations Superintendent
- Additional Peer Evaluation Support From Industry Observers

NQA INDEPENDENT ASSESSMENT ACTIVITIES

- PBAPS QA Section Audits
 - Post Modification/Maintenance Testing and Closure of Modification/Maintenance Activity
 - LCO Items Prior to Mode Change
- PBAPS ISEG
 - Review of Logs and Plant Status
 - Review of Significant Operating Incidents and Anomalies
- Performance Assessment Division
 - Assessments of Key Activities such as Testing, Initial Criticality, etc.
- PBAPS QC Section/Technical Monitoring
 - Verify Compliance with Station Procedures

SUMMARY OF PROGRAM SCOPE

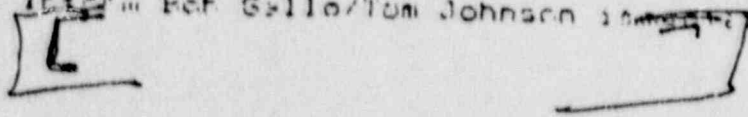
Modification Acceptance Tests	20
Surveillance Tests	62
Routine Tests	31
Control System Tuning Tests	7
Plant Transient Tests	4
Post Maintenance Tests	460
Detailed Schedule	
Program Procedures -	



maintain the Log, record in the Residents' Office. Record observations from your notes regarding the results of your Control Room inspections. DO NOT REMOVE FROM OFFICE!

- X. ~~Inspect the Control Room at LEAST every 15 minutes during each shift for 15 to 20 minutes. Ensure your supervisor RMB 3/25~~
- 3. Module to be used is 71715 (Sustained Control Room Observations) - copy in notebook.
- 4. Make log entries VERY specific, i.e.: Dates, times, who was there, observations, RC/SKD activity, & Shift Superintendent whereabouts, etc.
- 5. Review IE Notice 85-87 and IE Circular 81-82 for items of inspection & observation. (A copy of these are in the notebook.)
- 6. Review procedure A-7, "Shift Operations" (copy in the notebook).
- 7. Obtain a copy of the "Shift Briefing Attendance Sheet" from the Control Room SKD or the Shift Clerk each shift. File these in the notebook at the end of your shift.
- 8. Review Inspection Report (copy in notebook) and PECO response to the Inspection 80-270/85-22.

9. Inform Bob Gallo/Tom Johnson immediately of any violations and observed.



10. FOR THE 3 TO 11 AND 11 TO 7 SHIFT, INSPECTRESS MUST PROVIDE ESSENTIALLY FULL TIME OVERSEE IN THE CONTROL ROOM. BREAKS, NOT TO EXCEED 15 MINUTES PER HOUR, TO RETURN TO THE RESIDENT OFFICE ARE PERMITTED. RMB 3/25

11. DURING CR or other inspections, review surveillance tests, maintenance, shift coordination, blocking, outage activities, etc. Document results in the GREEN NOTEBOOK. (INCLUDE POSITIVE and NEGATIVE comments). TTY

12. IF YOU SEE SOMEONE SLEEPING, WAKE THEM UP THEN NOTIFY HIS MANAGEMENT. NOTIFY NRC MANAGEMENT NEXT. RMB 8/28/87

13. REVIEW RG 1.114 "AT THE CONTROL" COPY IN THE NOTEBOOK.

14. REVIEW NRC ORDER DATED 3-31-87

5-16-88

③ MEMORANDUM FOR COMMISSIONER CARR

- ② George *CEO 5/13*
- ① Steve *2013 5/13*
- ④ Mike *NW 5/18*
- ⑤ - *File Peach Bottom*

SUBJECT: TELEPHONE CONVERSATION WITH CORBIN MCNEIL OF PEED

On May 13, 1988 at 8:05 am, I received a telephone call from Corbin McNeill of PEED. He was aware that we had plans to visit the Governor of Pennsylvania on May 10, and was inquiring if the meeting did in fact take place. I explained to him that the meeting with the Governor was cancelled, but with respect to Peach Bottom restart issues we did meet with members of the Governor's Office of Policy Development. I told Corbin that the State, in particular Tim Searchinger of the office of General Counsel, strongly reiterated the State's request for a hearing on the Peach Bottom restart issue. This is a matter of public record in at least two pieces of correspondence from the State to the NRC.

I told Corbin that Commissioner Carr reiterated the NRC's position, that hearings were unnecessary in this case and that the authority and responsibility in this regard lies solely with the Commission. This is consistent with the Chairmans's letter to the Governor on this issue. However, the Commissioner did encourage the State to have direct dialogue with PEED over any matters of concern with respect to the restart of Peach Bottom. The Commissioner clearly stated that the NRC could neither direct or prevent such dialogue, at present, on the broad issue of Peach Bottom restart. He did, however, tell the State that if they had problems with the perceived effectiveness of PEED managerial changes, the best source of explanation would be PEED themselves.

In conclusion, Mr. McNeill stated that they, PEED, are continuing their efforts to have the kind of dialogue discussed above with the State Office of General Counsel. I explained that this approach was essentially consistent with the approach taken by Commissioner Carr at the meeting. No other matters pertaining to Peach Bottom restart were discussed.

T. Searchinger
5/13/88

~~88-11-20140 (4)~~

Also #4

JUL 10 1987

MEMORANDUM FOR: William T. Russell, Regional Administrator
Region I

FROM: Sharon R. Connelly, Director
Office of Inspector and Auditor

SUBJECT: INVESTIGATION OF ALLEGED NRC INSPECTOR MISCONDUCT

The attached Report of Investigation documents the results of an Office of Inspector and Auditor (OIA) investigation into allegations from the Philadelphia Electric Company (PECo) concerning possible NRC inspector impropriety. During a PECo investigation into reports that PECo reactor operators were sleeping while on duty in the control room of the Peach Bottom Atomic Power Station, information was developed that allegedly 1) during a back shift, a PECo reactor operator had to twice wake a sleeping NRC inspector who was on duty in the Peach Bottom control room, and 2) NRC inspectors were in the Peach Bottom control room socializing with operators and distracting them from their assigned duties.

Conclusions

OIA's investigation did not substantiate the allegation that a PECo reactor operator had to twice wake a sleeping NRC inspector who was on duty in the Peach Bottom control room. Information developed during this investigation disclosed that while on duty in the Peach Bottom control room, the NRC inspector became very tired and was in danger of inadvertently falling asleep. The inspector, acting in accordance with his instructions, left the control room and went to the NRC Resident Inspector's office to revive himself. During the time the inspector was out of the control room, a second NRC inspector monitored the operation of the control room.

Contact: George A. Mulley, Jr.
x24451

FREEDOM OF INFORMATION/PRIVACY ACT EXEMPTION (b)(5)(6)(7)(C)

~~8710230135~~

2pp

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A19

JUL 10 1987

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OIA did not substantiate the allegation that NRC inspectors were distracting reactor operators from their assigned duties. The lack of details by the allexer precluded an in-depth investigation of this matter.

Original signed by
Sharon R. Connelly

Sharon R. Connelly, Director
Office of Inspector and Auditor

Attachment:
Report of Investigation

cc: Commission (4), w/o attachment
M. Callahan, OCM, w/attachment
V. Stello, w/attachment

DISTRIBUTION
OIA READING FILE
File 87-21

memo to russell/mulley

OIA (GAM)
GAMulley/clw
07/8/87

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07/10/87

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SRConnelly
07/10/87

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