

Brunswick Improvement Program

NOVEMBER 1982



Carolina Power & Light Company

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This document presents the Brunswick Improvement Program and as such is divided into eight sections -- the Introduction section and seven additional sections each devoted to one of the seven objectives of the Improvement Program.

INTRODUCTION

This section introduces the Brunswick Improvement Program and presents background to and purpose of the program, reviews the program structure, and describes CP&L's implementation approach.

Background and Purpose

In July, August, and September CP&L undertook a comprehensive self-appraisal of the Brunswick Plant. As a result of this analysis, a number of needed improvements were identified. Rather than view each improvement as a separate action item, CP&L elected to consolidate all of the elements into a single program. The benefits of consolidation were to promote rapid attention to all improvements, to facilitate implementation, and to provide an appropriate vehicle through which management could monitor progress.

The principal purpose of the Brunswick Improvement Program is to:

- Ensure safety and operating efficiency at Brunswick
- Strengthen management control
- Reinforce discipline of operations, procedural compliance, and regulatory sensitivity
- Focus attention and resources on long-term needs
- Ensure implementation of specific improvements

The program's scope is broad and covers most aspects of plant operation. The focus is on Brunswick, though, where appropriate, its results and lessons learned will be applied at Robinson and Harris.

Program Structure

The program consists of the seven major objectives listed below, each of which is further amplified by individual action items.

- I. Ensure full and timely compliance to all surveillance requirements, regulatory commitments, and regulatory requirements
- II. Ensure that all necessary procedures (including those resulting from plant modifications and new requirements) exist and are clear, unambiguous, precise, complete, and of high technical quality
- III. Increase frequency and scope of QC surveillance and corporate auditing program activities
- IV. Ensure the maintenance activities do not degrade or

7. Increase the proficiency of plant personnel by means of expanded training programs
- 7I. More effectively utilize the technical expertise of the ONS and CNS staff in enhancing the safety and reliability of plant operations
- VII. Undertake actions to enhance and strengthen the management control and organizational discipline necessary to provide for safe and reliable operation

Implementation Approach

Mr. P. W. Howe, Vice President of the Brunswick Nuclear Project, has total responsibility for ensuring that the program is implemented and all desired results are achieved. Responsibility for each of the seven objectives has been assigned to an appropriate CP&L manager. Similarly, each action item has been assigned to a specific CP&L employee.

Implementation progress will be reported monthly by those individuals responsible for individual action items to the CP&L manager responsible for the overall objective, who will in turn provide Mr. Howe with a monthly status report. In addition, the Brunswick Improvement Program will be a standard agenda item at monthly Brunswick Senior Management meetings. As required, other methods such as special presentations will be utilized to ensure complete and timely implementation.

Document Organization

The remainder of this document is divided into seven sections each devoted to one of the seven objectives. Each section contains a statement of the objective, associated action items, plans for implementing each action item, and an identification of personnel accountabilities.

BSRP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: I

OBJECTIVE: ENSURE FULL AND TIMELY COMPLIANCE TO ALL SURVEILLANCE REQUIREMENTS, REGULATORY COMMITMENTS, AND REGULATORY REQUIREMENTS.

OBJECTIVE RESPONSIBILITY: K. E. ENZOR (DIRECTOR, REGULATORY COMPLIANCE)

ITEM
RESPONSIBILITY

SPECIFIC ACTION ITEMS

- | | |
|---|-----------------|
| 1. ESTABLISH CENTRALIZED SYSTEMATIC PROGRAM UNDER DIRECTOR OF REGULATORY COMPLIANCE FOR IDENTIFYING, SCOPING, SCHEDULING, TRACKING, AND CLOSING OF ALL SURVEILLANCE REQUIREMENTS AND REGULATORY COMMITMENTS AND REQUIREMENTS. (PROGRAM TO INCLUDE PROVISION FOR PROMPT NOTIFICATION OF NONCONFORMANCE TO APPROPRIATE PLANT MANAGEMENT.) | K. E. ENZOR |
| 2. DOCUMENT CORPORATE PROCEDURE TO ADDRESS ALL NRC CONFIRMATION OF ACTION LETTERS. (PROGRAM TO INCLUDE DEVELOPMENT OF MANAGEMENT PLAN AND ENDORSEMENT OF ACTIONS BY VICE PRESIDENT - NUCLEAR OPERATIONS.) | S. R. ZIMMERMAN |

SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER 1 OBJECTIVE RESPONSIBILITY K. E. Enzor
ACTION ITEM NUMBER 1 ACTION ITEM RESPONSIBILITY K. E. Enzor

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
1-1	Establish centralized systematic program under Director of Regulatory Compliance for identifying, accepting, scheduling, tracking, and closing of all surveillance requirements and regulatory commitments and requirements.	<ol style="list-style-type: none"> 1. Submit organization change request and obtain approval for filling requested position of Sr. Specialist. 2. Fill Sr. Specialist position and begin development of procedures for surveillance scheduling and controls under the responsibility of the Director of Regulatory Compliance. 	10-82	E. Enzor	Complete
		<ol style="list-style-type: none"> 3. Finalize and issue AI-33, Technical Specification and Surveillance Test Cross Reference. 	12-82	E. Enzor	Authorization has been submitted for approval.
		<ol style="list-style-type: none"> 4. Implement revised procedures for surveillance scheduling and controls under the responsibility of the Director of Regulatory Compliance. 	12-82	E. Enzor	

**SUBSIDIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER 1 OBJECTIVE RESPONSIBILITY K. E. ENZON
 ACTION ITEM NUMBER 2 ACTION ITEM RESPONSIBILITY S. H. ZIMMERMANN

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
-2	Document Corporate Procedure to address all NRC Confirmation of Action Letters.	<ol style="list-style-type: none"> 1. Draft Corporate Procedure. 2. Coordinate review of comments on draft Corporate Procedure. 3. Issue Corporate Procedure for signature. 4. Issue signed Corporate Procedure to Action Addressors Procedure LAP-1.12 dated 10-1-82. 	<p>9-82</p> <p>9-82</p> <p>9-82</p> <p>10-82</p>	<p>S. Zimmermann</p> <p>S. Zimmermann</p> <p>S. Zimmermann</p> <p>S. Zimmermann</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: II

OBJECTIVE: ENSURE THAT ALL NECESSARY PROCEDURES (INCLUDING THOSE RESULTING FROM PLANT MODIFICATIONS AND NEW REQUIREMENTS) EXIST AND ARE CLEAR, UNAMBIGUOUS, PRECISE, COMPLETE, AND OF HIGH TECHNICAL QUALITY.

OBJECTIVE RESPONSIBILITY: B. G. RIECK (PLANNING AND PERFORMANCE SPECIALIST)

ITEM
RESPONSIBILITY

SPECIFIC ACTION ITEMS

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|--|-------------------|
| 1. ESTABLISH A NUCLEAR OPERATIONS PROCEDURE GOVERNING THE STANDARDIZATION AND PREPARATION OF PLANT PROCEDURES. | B. G. RIECK |
| 2. UTILIZE THE SERVICES OF A QUALIFIED CONSULTANT TO MODIFY OR DEVELOP NECESSARY PLANT OPERATING PROCEDURES. (EFFORT TO BE CONDUCTED IN CONCERT WITH "USERS" AND SUBJECT TO PROCEDURE IN ITEM II-1.) | C. W. MARTIN |
| 3. INCREASE CNS SURVEILLANCE ACTIVITY TO INCLUDE: | J. D. E. JEFFRIES |
| A. REVIEW 100% OF EXISTING AND NEW SURVEILLANCE PROCEDURES USED TO MEET REGULATORY REQUIREMENTS FOR TECHNICAL ADEQUACY. | |
| B. REVIEW CHANGES IN REVISED OPERATIONAL PROCEDURES FOR TECHNICAL ADEQUACY; I.E., 100% FOR SAFEGUARDS PROCEDURES AND SELECTED SCREENING FOR OTHERS. | |

**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER II OBJECTIVE RESPONSIBILITY B. G. Rick
 ACTION ITEM NUMBER I ACTION ITEM RESPONSIBILITY B. G. Rick

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
II-1	Establish a Nuclear Operations procedure governing the standardization and preparation of plant procedures.	1. Review existing plant manuals, procedure preparation manuals, and interview cognizant plant personnel. 2. Analyze data and determine uniform manual organization and format. 3. Draft procedures Administrative Manual. 4. Review draft, provide comment. 5. Finalize procedures Administrative Manual.	9-82 9-82 10-82 10-82 11-82	B. Rick B. Rick B. Rick B. Rick B. Rick	Complete Complete Complete

SECONDARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER 11 OBJECTIVE RESPONSIBILITY B. G. Rieck
 ACTION ITEM NUMBER 2 ACTION ITEM RESPONSIBILITY C. M. Martin

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
2	Utilize the services of a qualified consultant to modify or develop necessary plant operating procedures (effort to be conducted in concert with "Bucca" and subject to procedure in Item 11-1).	<ol style="list-style-type: none"> 1. Review safety-related procedures to determine adequacy according to Technical Specifications, Reg. Guide 1.33, ANSI 18.7, NUREG 6737, and NUREG/CR-2005. 2. Develop procedures format using above regulations and IAP0 Guidelines (to be incorporated into Item 11-1). 3. Modify or develop operating procedures, general operating procedures, annunciator procedures, operating work procedures, and periodic tests. Technical input to be conducted in concert with operators; format according to Task 2 above. 	8-82	M. Joyce	Complete
			11-82	B. Rieck	
			12-83	M. Martin/B. Tucker	Develop separate procedures for Bulletin 1 and 2.

**SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER 11

OBJECTIVE RESPONSIBILITY H. G. Bieck

ACTION ITEM NUMBER 3

ACTION ITEM RESPONSIBILITY J. D. E. Jeffries

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
1-1A	Review 100% of existing and new surveillance procedures used to meet regulatory requirements for technical adequacy.	<ol style="list-style-type: none"> 1. Develop scope of work and set criteria for technical review. 2. Determine composition of review task force. 3. Implement review process and coordinate questions/responses. 4. Prioritize results according to significance. 5. Feed back action items to plant staff for resolution. 6. Follow up to ensure corrective action was taken. 7. Review new/revised surveillance procedures related to T.S. requirements on continuous basis. 	8-82	G. Hilligan/R. Wallace	Complete
			8-82	G. Hilligan/R. Wallace	Complete
			8-82	R. Wallace	Complete
			9-82	R. Wallace	Complete
			10-82	R. Wallace	Complete
			Ongoing	R. Wallace	Tasks 6 and 7 will be continuing activities.
			Ongoing	J. Hammond/G. Hilligan	

SECONDARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER 11

OBJECTIVE RESPONSIBILITY B. G. Nleck

ACTION ITEM NUMBER 1

ACTION ITEM RESPONSIBILITY A. D. E. Jeffries

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
11-38	Review changes in revised operational procedures for technical adequacy; i.e., 100% for safeguards procedures and selected screening for others.	<ol style="list-style-type: none"> 1. Conduct baseline review of ECCS/safeguards operating procedures and other selected procedures. 2. Review changes to all operating procedures covered in the "Baseline" Group. 3. Review procedure development plan and program for upgrading operating procedures. 4. Review operating procedures as they are developed as part of the upgrade program. 	<p>7-82</p> <p>Ongoing</p> <p>11-82</p> <p>12-83</p>	<p>M. Jones</p> <p>J. Hammond/G. Hilligan</p> <p>G. Hilligan</p> <p>G. Hilligan</p>	<p>Complete</p> <p>This will be a continuing activity.</p>

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: III

OBJECTIVE: INCREASE FREQUENCY AND SCOPE OF QC SURVEILLANCE AND CORPORATE AUDITING PROGRAM ACTIVITIES.

OBJECTIVE RESPONSIBILITY: C. H. MOSELEY, JR. (MANAGER - OPERATIONS QA/QC)

SPECIFIC ACTION ITEMS	ITEM RESPONSIBILITY
1. EXPAND SURVEILLANCE OF ISI, APPENDIX J, TECHNICAL SPECIFICATIONS, AND REGULATORY REQUIREMENTS TO ENHANCE COMPREHENSIVENESS AND INCREASE FREQUENCIES.	C. H. MOSELEY, JR.
2. ESTABLISH PROGRAM FOR QA TO MONITOR PLANT'S IMPLEMENTATION OF TECHNICAL SPECIFICATION REVISION AND REGULATORY REQUIREMENTS.	C. H. MOSELEY, JR.
3. REQUIRE QA TO PERFORM 100 PERCENT REVIEW OF TECHNICAL SPECIFICATION REQUIREMENTS EVERY THREE YEARS.	C. H. MOSELEY, JR.
4. ESTABLISH PROGRAM FOR PERIODIC REVIEW OF ITEMS III.1, 2, and 3 BY CORPORATE AUDITING.	I. A. JOHNSON
5. MODIFY CORPORATE QA AUDIT PROGRAM TO INCLUDE AN ESCALATION MECHANISM; THREE LEVELS OF NONCONFORMANCE: FINDINGS, CONCERNS, AND COMMENTS (ONLY COMMENTS WILL NOT REQUIRE RESPONSE.)	I. A. JOHNSON

**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER III

OBJECTIVE RESPONSIBILITY C. H. Housley, Jr.

ACTION ITEM NUMBER 1

ACTION ITEM RESPONSIBILITY C. H. Housley, Jr.

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
11-1	Expand surveillance of ISI, Appendix J, Technical Specifications, and Regulatory Requirements to enhance comprehensiveness and increase frequency.	<ol style="list-style-type: none"> 1. Develop procedures to fulfill surveillance commitments <ol style="list-style-type: none"> a. ISI/Appendix J b. Technical Specifications c. Regulatory Requirements 2. Approved procedures <ol style="list-style-type: none"> a. ISI/Appendix J b. Technical Specifications c. Regulatory Requirements 3. Implement procedures <ol style="list-style-type: none"> a. ISI/Appendix J b. Technical Specifications c. Regulatory Requirements 	<p>9-82</p> <p>8-82</p> <p>8-82</p> <p>10-82</p> <p>8-82</p> <p>8-82</p> <p>10-82</p> <p>8-82</p> <p>8-82</p>	<p>D. Rudoff</p> <p>W. Dorman</p> <p>R. White</p> <p>C. Housley</p> <p>C. Housley</p> <p>C. Housley</p> <p>R. Coburn</p> <p>N. Coburn</p> <p>R. Coburn</p>	<p>New procedures were developed for BSEP OQA/QC Surveillance. They are:</p> <p>QAP-105, Inservice Inspection Surveillance Program;</p> <p>QAP-102, Technical Specification Surveillance Program;</p> <p>QAP-103, Regulation Surveillance; and</p> <p>QAP-104, Regulatory Commitment Surveillance Program.</p>

**SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER 111

OBJECTIVE RESPONSIBILITY C. H. Haseley, Jr.

ACTION ITEM NUMBER 2

ACTION ITEM RESPONSIBILITY C. H. Haseley, Jr.

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
11-2	Establish program for QA to monitor plant's implementation of technical specification revision and regulatory requirements.	<ol style="list-style-type: none"> 1. Develop procedure to fulfill commitment 2. Approve procedure 3. Implement procedure 	<p>8-82</p> <p>8-82</p> <p>8-82</p>	<p>R. White</p> <p>C. Haseley</p> <p>M. Coburn</p>	<p>QAP-303, Regulation Surveillance, was developed to meet this commitment.</p>

DIAGNOSTIC ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER 111

OBJECTIVE RESPONSIBILITY C. H. Hooeley, Jr.

ACTION ITEM NUMBER 3

ACTION ITEM RESPONSIBILITY C. H. Hooeley, Jr.

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
111-3	Require QA to perform 100 percent review of technical specification requirements every three years.	<ol style="list-style-type: none"> 1. Develop procedure to fulfill commitment 2. Approve procedure 3. Implement procedure 	<p>8-82</p> <p>8-82</p> <p>8-82</p>	<p>W. Dorman</p> <p>C. Hooeley</p> <p>R. Coburn</p>	<p>Procedure QAP-102, Technical Specification Surveillance Program, was written specifically to address this commitment. (See Paragraph 1.0 of Procedure.)</p>

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SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER 111

OBJECTIVE RESPONSIBILITY C. H. Houley, Jr.

ACTION ITEM NUMBER 5 - Part 1

ACTION ITEM RESPONSIBILITY I. A. Johnson

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
111-5	Hobby Corporate QA Program to include an escalation mechanism.	<ol style="list-style-type: none"> 1. Prepare revision of Procedure CQAD 80-1 to include escalation 2. Coordinate review of the revision. 3. Include review comments in the revision. 4. Obtain concurrence of units working with CQAD 80-1. 5. Present to CQAD Manager for approval. 6. Approved. 	<p>9-82</p> <p>9-82</p> <p>9-82</p> <p>9-82</p> <p>9-82</p> <p>9-82</p>	<p>I. Johnson</p> <p>I. Johnson/H. Love</p> <p>I. Johnson/H. Love</p> <p>I. Johnson/H. Love</p> <p>H. Love</p> <p>H. Banks</p>	<p>Complete</p>

SUBMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER III

OBJECTIVE RESPONSIBILITY C. H. Hootley, Jr.

ACTION ITEM NUMBER 5 - Page 2

ACTION ITEM RESPONSIBILITY I. A. Johnson

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
III-5	Modify Corporate QA Program to include three levels of nonconformance.	<ol style="list-style-type: none"> 1. Prepare revision of Procedure CQAB 80-1 to include findings, concerns, and comments. 2. Coordinate review of the revision. 3. Include review comments in the revision. 4. Obtain concurrence of units working with CQAB 80-1. 5. Present to CQAB Manager for approval. 	<p>10-82</p> <p>10-82</p> <p>10-82</p> <p>10-82</p> <p>11-82</p>	<p>I. Johnson</p> <p>I. Johnson/H. Love</p> <p>I. Johnson/H. Love</p> <p>I. Johnson/H. Love</p> <p>H. Love</p>	<p>Complete</p> <p>Complete</p>

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: IV

OBJECTIVE: ENSURE THE MAINTENANCE ACTIVITIES DO NOT DEGRADE OR RENDER INOPERABLE ANY COMPONENT, SYSTEM, OR INSTRUMENT.

OBJECTIVE RESPONSIBILITY: J. P. DIMMETTE (MANAGER - MAINTENANCE BSEP)

SPECIFIC ACTION ITEMS

ITEM
RESPONSIBILITY

1. CONTINUE THE "POSTMAINTENANCE TESTING PROGRAM" ESTABLISHED AS PART OF THE PRESTARTUP ACTION LIST (CONTINUE TO EVALUATE)

J. P. DIMMETTE

SECONDARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER IV

OBJECTIVE RESPONSIBILITY J. P. Dimmette

ACTION ITEM NUMBER 1

ACTION ITEM RESPONSIBILITY J. P. Dimmette

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
IV-1	Continue the post maintenance testing program established as part of the prestart-up action plan (continue to evaluate).	<ol style="list-style-type: none"> 1. Develop concepts and methods for post maintenance testing program. 2. Develop maintenance procedures and procedure revisions to implement post maintenance testing requirements. 3. Develop supporting engineering and operations procedures. 4. Train operations and maintenance personnel in post maintenance testing program. 5. Present program and procedures to management and the Plant Nuclear Safety Committee for review and approval. 	<p>8-82</p> <p>9-82</p> <p>9-82</p> <p>9-82</p> <p>9-82</p>	<p>J. Dimmette</p> <p>J. Dimmette</p> <p>J. Dimmette/A. Bishop/ B. Tucker</p> <p>J. Dimmette</p> <p>J. Dimmette/A. Bishop/ B. Tucker</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete. (HP-14, Rev. 13; HP-10, Rev. 16; and HP-16, Rev. 4 approved and distributed. All supporting document also supplied to Reg. Compliance prestart-up package).</p>

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: 7

OBJECTIVE: INCREASE THE PROFICIENCY OF PLANT PERSONNEL BY MEANS OF EXPANDED TRAINING PROGRAMS.

OBJECTIVE RESPONSIBILITY: S. E. THORNDYKE (SUPERVISOR - TRAINING BSEP)

SPECIFIC ACTION ITEMS	ITEM RESPONSIBILITY
1. UPGRADE PROGRAM FOR THE TRAINING OF APPROPRIATE PERSONNEL IN THE POST-MODIFICATION ASPECTS OF PLANT SYSTEMS AND COMPONENTS.	W. M. TUCKER & J. P. DIMMETTE (LEAD)
2. DEVELOP AND INCORPORATE A FILM INTO THE GENERAL EMPLOYEE TRAINING PROGRAM TO COVER THE DISCIPLINE OF OPERATIONS, PROCEDURAL COMPLIANCE, AND THE PHILOSOPHY OF CONSERVATISM WITH RESPECT TO REGULATORY COMPLIANCE.	J. R. BOHANNON/ S. E. THORNDYKE
3. DEVELOP A TRAINING FILM ON QUALITY PERFORMANCE AND INCORPORATE INTO GENERAL EMPLOYEE TRAINING.	H. J. LOVE, JR.
4. REPEAT THE PREVIOUSLY GIVEN CORPORATE POSITION ON DISCIPLINE OF OPERATIONS, PROCEDURAL COMPLIANCE, AND REGULATORY PHILOSOPHY ON AN ANNUAL BASIS, INCLUDING TESTING AS PART OF THE REBADGING PROCESS.	S. E. THORNDYKE
5. UPGRADE THE PROGRAM FOR PROVIDING TRAINING IN INDUSTRY-WIDE EVENTS, INCIDENTS, AND OPERATING EXPERIENCE REPORTS.	S. E. THORNDYKE
6. TRAIN SELECTED UNIT MANAGERS AND SUPERVISORS IN BSEP SPECIFICS:	J. R. BOHANNON/ S. E. THORNDYKE
A. THREE WEEKS OF CLASSROOM TRAINING ON SYSTEMS OPERATIONS AND DESIGN.	
B. ONE WEEK OF PLANT AND EQUIPMENT ORIENTATION.	
C. ONE WEEK OF BWR SIMULATOR TRAINING.	

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: 7 (CONTINUED)

OBJECTIVE: INCREASE THE PROFICIENCY OF PLANT PERSONNEL BY MEANS OF EXPANDED TRAINING PROGRAMS.

OBJECTIVE RESPONSIBILITY: S. E. THORNDYKE (SUPERVISOR - TRAINING BSEP)

SPECIFIC ACTION ITEMS

ITEM
RESPONSIBILITY

7. ESTABLISH A FORMALIZED SYSTEM TO ENSURE THAT TIMELY TRAINING IS PROVIDED APPROPRIATE PERSONNEL REGARDING NEW PROCEDURES AND PROCEDURAL REVISIONS.

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**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER V

OBJECTIVE RESPONSIBILITY S. E. Thorndyke

ACTION ITEM NUMBER 1

ACTION ITEM RESPONSIBILITY J. P. Dimmette/M. H. Tucker

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-1	Upgrade program for the training of appropriate personnel in the post modification aspects of plant systems and components.	<ol style="list-style-type: none"> 1. Identify existing methods and resources and recommend additional requirements. 2. Secure approval for additional requirements. 3. Implement. 	<p>10-82</p> <p>12-82</p> <p>1-83*</p>	<p>J. Dimmette/B. Tucker</p> <p>J. Dimmette/B. Tucker</p> <p>J. Dimmette/B. Tucker</p>	<p>Prestart-up items were completed.</p> <p>The upgraded policy of procedure adherence established the base for the program.</p> <p>Implementation for operations is considered complete. A new function to be developed which will ensure methodical review of plant modifications, etc.</p> <p>Maintenance personnel have requested additional resources in the form of senior operators and two operators to provide the increasing and necessary follow-up to modification and revisions.</p> <p>*Pending upon recruitment.</p>

SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER V

OBJECTIVE RESPONSIBILITY S. E. Thorndyke

ACTION ITEM NUMBER 2

ACTION ITEM RESPONSIBILITY J. B. Bohannon/S. E. Thorndyke

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-2	Develop and incorporate a film into the General Employee Training Program to cover the Discipline of Operations, procedural compliance and the philosophy of conservatism with respect to regulatory compliance.	<ol style="list-style-type: none"> 1. Revise Lesson Plan. 2. Prepare new films. 3. Incorporate into GET. 4. Distribute to plant. 	<p>10-82</p> <p>10-82</p> <p>10-82</p> <p>10-82</p>	<p>J. Bohannon/ S. Thorndyke</p>	<p>Films have been delivered to plant.</p>

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**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER V

OBJECTIVE RESPONSIBILITY S. E. Thorndyke

ACTION ITEM NUMBER 3

ACTION ITEM RESPONSIBILITY H. J. Love, Jr.

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-1	Develop a training film on quality performance and incorporate into General Employee Training.	1. Develop a script which verbally and visually describes the concept of quality performance.	9-82	H. Love	Complete
		2. Obtain script approval from Manager - Corporate Quality Assurance and coordinate script with participants.	9-82	H. Love	Complete
		3. Coordinate videotaping session and assist Visual Services Section during production.	9-82	H. Love	Complete
		4. Review production videotape with Manager - CQA and obtain approval for release.	9-82	H. Love	Complete
		5. Deliver copies of approved videotape to General Managers of Brunswick and Robinson Plants for the GET program.	10-82	H. Love	Complete

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**SECONDARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER V OBJECTIVE RESPONSIBILITY S. E. Thorndyke
 ACTION ITEM NUMBER 4 ACTION ITEM RESPONSIBILITY S. E. Thorndyke

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-4	Repeat the previously given corporate position on Discipline of operations, procedural compliance, and regulatory philosophy on an annual basis, including testing as part of the retraining process.	<ol style="list-style-type: none"> 1. Review Lesson Plan. 2. Have film made. 3. Incorporate into GET. 	<p>10-82</p> <p>10-82</p> <p>10-82</p>	<p>S. Thorndyke</p> <p>S. Thorndyke</p> <p>S. Thorndyke</p>	<p>Lesson Plan revised</p> <p>Film made</p> <p>Incorporated into GET</p>

SUBSIDIARY ACTION PLAN
FAST START UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER V OBJECTIVE RESPONSIBILITY: S. E. Thorndyke
 ACTION ITEM NUMBER 2 ACTION ITEM RESPONSIBILITY: S. E. Thorndyke

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-5	Upgrade the program for providing training to industry-wide owners, facilities, and operating experience reports.	<ol style="list-style-type: none"> 1. Identify additional methods and resources and make appropriate changes. 2. Develop recommendations for enhancing the training. 	10-82	S. Thorndyke	Improvement in the program is evidenced by three levels of review of the incoming information. Additions to the maintenance staff are proposed to serve as a contact for the incoming applicable information.
			12-82	S. Thorndyke	The goal of achieving six shifts for operations will provide opportunities for timely review of these items.
					Shift trainer to educate shift personnel in their roles.

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**SUPPORT ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER V

OBJECTIVE RESPONSIBILITY S. E. Thorndyke

ACTION ITEM NUMBER 6

ACTION ITEM RESPONSIBILITY J. R. Bohannon/S. E. Thorndyke

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-6	<p>Train selected unit managers and supervisors in BSEP specific:</p> <p>A. Three weeks of classroom training on systems operations and design.</p> <p>B. One week of plant and equipment orientation.</p> <p>C. One week of BWR Simulator Training.</p>	<p>1. Identify and schedule individuals to be trained.</p> <p>2. Conduct training sessions.</p>	<p>7-82</p> <p>7-83</p>	<p>S. Thorndyke</p> <p>S. Thorndyke</p>	<p>Managers have been selected and commenced training. Simulator time is scheduled for two groups in December, 1982, and the others will be scheduled in 1983.</p> <p>Some personnel have already attended simulator training.</p> <p>Three weeks of classroom are scheduled to start November, 1982.</p> <p>In addition, four STA's and three other management personnel are attending Hot License Class with the objective of instant SER Licensing.</p>

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SECONDARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER V OBJECTIVE RESPONSIBILITY S. E. Thorndyke
ACTION ITEM NUMBER 7 ACTION ITEM RESPONSIBILITY

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
V-7	Establish a formalized system to ensure that timely training is provided appropriate personnel regarding new procedures and procedural revisions.	See Item V-1.			

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: VI

OBJECTIVE: MORE EFFECTIVELY UTILIZE THE TECHNICAL EXPERTISE OF THE ONS AND CNS STAFF IN ENHANCING THE SAFETY AND RELIABILITY OF PLANT OPERATIONS.

OBJECTIVE RESPONSIBILITY: J. D. E. JEFFRIES (MANAGER - CORPORATE NUCLEAR SAFETY)

SPECIFIC ACTION ITEMS	ITEM RESPONSIBILITY
1. REASSIGN SOME OF THE INDEPENDENT REVIEW FUNCTION RESPONSIBILITIES OFF SITE TO PROVIDE INCREASED OPPORTUNITY FOR DIRECT PLANT OBSERVATION.	J. D. E. JEFFRIES
2. INITIATE A PROGRAM OF PERIODIC REVIEWS OF SAFETY SYSTEM CHALLENGES AND REACTOR TRANSIENTS.	J. D. E. JEFFRIES
3. INCREASE EMPHASIS ON DIRECT SURVEILLANCE AND WALK-THROUGH ACTIVITIES. THIS ACTIVITY WILL INCLUDE FREQUENT REVIEW OF OPERATIONS' LOGS, DIRECT OBSERVATION OF INDIVIDUAL ACTIONS, ADVANCED IDENTIFICATION OF ACTIVITIES TO BE REVIEWED, AND WRITTEN REPORTS WHICH SUMMARIZE ACTIVITIES AND RESULTS AS WELL AS NOTED DEFICIENCIES AND RECOMMENDATIONS.	J. D. E. JEFFRIES
4. INCREASE EFFORT ON SPECIAL INVESTIGATIVE ACTIVITIES. THIS ACTIVITY WILL INCLUDE PROMPT REVIEW OF INCIDENT AND HUMAN FACTORS SUMMARY REPORTS WITH FOLLOW-UP EVALUATIONS AS NEEDED. IT WILL ALSO INCLUDE INCREASED SENSITIVITY TO THE CONDUCT OF SPECIAL INVESTIGATIONS AS ESTABLISHED BY CNS OR OPERATIONS WITH FOLLOW-UP WRITTEN REPORTS AND RECOMMENDATIONS.	J. D. E. JEFFRIES
5. HOLD QUARTERLY NUCLEAR SAFETY REVIEW MEETINGS TO DISCUSS SELECTED ISSUES ARISING FROM THE ROUTINE INDEPENDENT REVIEW PROGRAM AND THE ISEG PROGRAM. SELECTED MANAGERS FROM OTHER CP&L ORGANIZATIONS AND OUTSIDE CONSULTANTS WILL BE INVITED.	J. D. E. JEFFRIES

**SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER VI

OBJECTIVE RESPONSIBILITY J. D. E. Jeffries

ACTION ITEM NUMBER 1

ACTION ITEM RESPONSIBILITY J. D. E. Jeffries

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VI-1	Reassign some of the independent review function responsibilities off site to provide increased opportunity for direct plant observation.	<ol style="list-style-type: none"> 1. Develop organizational changes and justification for responsibility realignment. 2. Submit organizational changes and revised position descriptions for Senior Management approval. 3. Revise procedures and administrative guidelines to reflect reassignment of responsibilities. 4. Implement transition of independent review off-site with exception of procedure and modification reviews. 	<p>10-82</p> <p>10-82</p> <p>11-82</p> <p>12-82</p>	<p>J. Jeffries</p> <p>J. Jeffries</p> <p>J. Jeffries/C. Wright</p> <p>ONS Directors/ J. Hammond/ J. Jeffries</p>	<p>Complete</p> <p>Approved by Senior Management</p>

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**SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER VI
ACTION ITEM NUMBER 3

OBJECTIVE RESPONSIBILITY J. D. E. Jeffries
ACTION ITEM RESPONSIBILITY J. D. E. Jeffries

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VI-3	<p>Increase emphasis on direct surveillance and walk-through activities - to include frequent review of operators' logs, direct observation of individual actions, advanced identification of activities to be reviewed, and written reports which summarize activities and results as well as noted deficiencies and recommendations.</p>	<p>1. Issue verbal directive to increase priority of "field observations" portion of the OMS program.</p>	9-82	J. Jeffries	The organizational changes discussed in VI-1 will provide additional resources for this activity.

SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER VI

J. D. E. Jeffries

OBJECTIVE RESPONSIBILITY

ACTION ITEM NUMBER 5

J. D. E. Jeffries

ACTION ITEM RESPONSIBILITY

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VI-4	<p>Increase effort on special investigative activities - to include prompt review of incident and human factors summary reports with follow-up evaluations as needed. It will also include increased sensitivity to the conduct of special investigations as established by CNS or operations with follow-up reports and recommendations.</p>	<p>1. Issue verbal directive to increase priority of the special investigative activities.</p>	9-82	J. Jeffries	The organizational changes discussed in VI will provide additional resources for this activity.

**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER VI
ACTION ITEM NUMBER 5

OBJECTIVE RESPONSIBILITY J. D. E. Jeffries
ACTION ITEM RESPONSIBILITY J. D. E. Jeffries

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VI-5	<p>Hold quarterly nuclear safety review meetings to discuss selected issues arising from the routine independent review program and the ISEG program. Selected managers from other CP&I organizations and outside consultants will be invited.</p>	<ol style="list-style-type: none"> 1. Determine composition of the Board and define concept of operation. 2. Publish memo describing Board function, membership, and tentative schedule-- solicit comments from affected parties. 3. Hold first 'Board' meeting. 	<p>9-82 10-82 10-82</p>	<p>J. Jeffries J. Jeffries T. Eileman</p>	<p>Complete Complete Complete</p>

BSEP POST-STARTUP IMPROVEMENT PROGRAM

NUMBER: VII

OBJECTIVE: UNDERTAKE ACTIONS TO ENHANCE AND STRENGTHEN THE MANAGEMENT CONTROL AND ORGANIZATIONAL DISCIPLINE NECESSARY TO PROVIDE FOR SAFE AND RELIABLE OPERATION.

OBJECTIVE RESPONSIBILITY: P. W. HOWE (VP - BSEP NUCLEAR PROJECT)

SPECIFIC ACTION ITEMS	ITEM RESPONSIBILITY
1. MANAGEMENT ANALYSIS COMPANY HAS BEEN RETAINED TO PERFORM REVIEW OF CORPORATE QA PROGRAM.	H. R. BANKS
2. INITIATE STUDY TO REDUCE OUTSIDE DEMANDS AND BURDENS ON PLANT STAFF TO ALLOW MORE ATTENTION TO OPERATIONS AND MAINTENANCE.	C. R. DIETZ
3. COMMENCE INPO ASSESSMENT OF OPERATIONAL ACTIVITIES, CNS, CORPORATE/PLANT INTERFACES, AND PNSC ACTIVITIES BY 9-7-82.	C. R. DIETZ
4. DEVELOP IMPLEMENTATION SCHEDULE FOR APPROPRIATE RECOMMENDATIONS OF THE SHIFT FOREMAN TIME UTILIZATION SURVEY.	C. R. DIETZ
5. DEVELOP IMPLEMENTATION SCHEDULE FOR APPROPRIATE RECOMMENDATIONS OF THE ESSEX CORPORATION HUMAN FACTORS STUDY (CONTROL ROOM).	C. R. DIETZ
6. PREPARE A "CONDUCT OF OPERATIONS" MANUAL TO PROMOTE CONSISTENCY AMONG OPERATING NUCLEAR PLANTS.	B. J. FURR

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**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER VII
ACTION ITEM NUMBER 1

OBJECTIVE RESPONSIBILITY F. W. Howe
ACTION ITEM RESPONSIBILITY H. S. Banks

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-1	Management Analytels Company has been retained to perform review of Corporate QA Program.	<ol style="list-style-type: none"> 1. Begin study. 2. Complete study and present report. 3. Review recommendations and implement as appropriate. <ol style="list-style-type: none"> a. Review to be complete 45 days after receipt of final report. b. Implementation to be pursued as feasible. 	<p>8-82</p> <p>12-82</p>	<p>H. S. Banks</p> <p>H. Banks</p> <p>H. Banks</p>	<p>All recommendations and CPA's disposition of each to be reviewed with Mr. E. E. Hiley.</p>

**SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER VII
ACTION ITEM NUMBER 2

OBJECTIVE RESPONSIBILITY P. M. Howe
ACTION ITEM RESPONSIBILITY C. H. Dietz

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-2	Initiate study to reduce outside demands on plant staff to allow more attention to operations and maintenance.	<ol style="list-style-type: none"> 1. Develop task scope and select contract support. 2. Perform study and prepare final report and recommendations. 3. Develop Approval Procedure for recommendations. 4. Coordinate review of all recommendations. 5. Prepare final position on recommendations. 6. Obtain approval of final position from Vice President - Brunswick Nuclear Project. 7. Assign responsibility for implementing. 8. Define implementation requirements, resources, and schedule for each recommendation. 9. Obtain approval of implementation plan for Vice President - Brunswick Nuclear Project. 10. Implement plan and schedule. 	<p>9-82</p> <p>11-82</p> <p>11-82</p> <p>12-82</p> <p>1-83</p> <p>1-83</p> <p>1-83</p> <p>3-83</p> <p>3-83</p> <p>3-83</p>	<p>P. Meek</p> <p>B. Meek</p> <p>C. Dietz</p>	<p>HAC selected to perform study.</p> <p>In progress.</p>

SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER VII

OBJECTIVE RESPONSIBILITY P. W. Howe

ACTION ITEM NUMBER 3

ACTION ITEM RESPONSIBILITY C. R. Dietz

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-3	Commence INPO assessment of operational activities, CMS, corporate/plant interface, and PMSO activities.	<ol style="list-style-type: none"> 1. Obtain INPO concurrence to conduct assessment. 2. Define scope and assemble assessment team. 3. Conduct assessment per the action item statement. 4. Prepare and submit final report summarizing findings and recommendations. 5. Coordinate review of all recommendations. 6. Prepare final position on acceptability of recommendations. 7. Obtain approval of final position from Vice President - Brunswick Nuclear Project. 8. Assign responsibility for implementing. 9. Define implementation requirements, resources, and schedule for each recommendation. 10. Obtain approval of implementation plan for the project. 	<p>7-82</p> <p>9-82</p> <p>9-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>12-82</p> <p>12-82</p>	<p>E. Utley</p> <p>INPO</p> <p>E. Utley/INPO</p> <p>INPO</p> <p>C. Dietz</p> <p>C. Dietz</p> <p>C. Dietz</p> <p>C. Dietz</p> <p>C. Dietz</p> <p>C. Dietz</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p> <p></p>

SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER VII

OBJECTIVE RESPONSIBILITY P. M. Howe

ACTION ITEM NUMBER 3 (Cont'd)

ACTION ITEM RESPONSIBILITY C. H. Dietz

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
1-3 Cont'd		11. Implement plan and schedule.	12-82	C. Dietz	

SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER VII

OBJECTIVE RESPONSIBILITY P. G. HARRIS

ACTION ITEM NUMBER 4

ACTION ITEM RESPONSIBILITY G. H. DIETZ

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-4	Develop implementation schedule for appropriate recommendation of the shift foreman time utilization study.	<ol style="list-style-type: none"> 1. Complete formal review of all study recommendations. <ol style="list-style-type: none"> a. Improve work scheduling. b. Standardize turnover routines and reschedule. c. Initiate recommendation of the Genex Study. d. Review scheduling of SGO coverage. e. Assess shift structure. f. Automate BBS. 2. Prepare final position on the acceptability of recommendations. 3. Obtain approval of final position from Vice President - Brunswick Nuclear Project. 4. Assign responsibility for implementing. 5. Define implementation requirements, resources, and schedule for each recommendation. 	<p>11-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>11-82</p> <p>12-82</p> <p>12-82</p> <p>12-82</p> <p>12-82</p>	<p>C. Dietz</p> <p>J. Harneus</p> <p>J. Harneus</p> <p>G. Dietz</p> <p>J. Harneus</p> <p>J. Harneus</p> <p>J. Harneus</p> <p>C. Dietz</p> <p>C. Dietz</p> <p>G. Dietz</p> <p>G. Dietz</p>	<p>Informal reviews have been completed.</p> <p>See VII-5.</p>

SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER VII
ACTION ITEM NUMBER 4 (Cont'd)

OBJECTIVE RESPONSIBILITY P. M. Howe
ACTION ITEM RESPONSIBILITY C. H. Dietz

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-4 Cont'd		<p>6. Obtain approval of implementation plan for Vice President - Brunswick Nuclear Project.</p> <p>7. Implement plan and schedule.</p>	<p>12-82</p> <p>1-83</p>	<p>C. Dietz</p> <p>C. Dietz</p>	

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SUMMARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM

OBJECTIVE NUMBER VII

OBJECTIVE RESPONSIBILITY P. W. Howe

ACTION ITEM NUMBER 5

ACTION ITEM RESPONSIBILITY C. R. Dietz

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-5	Develop implementation schedule for appropriate recommendations of the Essex Corporation Human Factors Study.	<ol style="list-style-type: none"> 1. Develop approval procedure for all recommendations. 2. Coordinate review of all Essex Corporation recommendations. 3. Prepare final position on acceptability of each recommendation. 4. Review and finalize with Vice President - Brunswick Nuclear Project. 5. Assign responsibility for implementing each recommendation to a specific individual. 6. Define implementation requirements, resources, and schedule for each recommendation. 7. Present to management for review and approval. 8. Prepare overall implementation plan and schedule. 	<p>11-82</p> <p>11-82</p> <p>12-82</p> <p>12-82</p> <p>12-82</p> <p>12-82</p> <p>1-83</p> <p>1-83</p>	<p>C. Dietz</p>	<p>Includes identification of appropriate individuals to be involved in review.</p>

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**SUBIARY ACTION PLAN
POST START-UP IMPROVEMENT PROGRAM**

OBJECTIVE NUMBER VII

OBJECTIVE RESPONSIBILITY B. J. Furr

ACTION ITEM NUMBER 6

ACTION ITEM RESPONSIBILITY B. J. Furr

ITEM	SPECIFIC ACTION ITEM	TASKS	COMPLETE BY	TASK RESPONSIBILITY	NOTES
VII-6	Prepare a "Conduct of Operations" Manual to promote consistency among operating nuclear plants.	<ol style="list-style-type: none"> 1. Prepare draft of Nuclear Operations Department charter and manual outline and review with Vice President - Nuclear Operations Department. 2. Review and assess existing management control programs and documents; interview key executives and managers to clarify matters of policy, priority, and practice. 3. Finalize manual outline and charter. 4. Develop individual segments of manual. 5. Review and comment. 6. Finalize manual. 	<p>8-82</p> <p>9-82</p> <p>9-82</p> <p>2-83</p> <p>3-83</p> <p>4-83</p>	<p>B. Rieck</p> <p>B. Rieck</p> <p>B. Rieck</p> <p>B. Rieck</p> <p>B. Rieck</p> <p>B. Rieck</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>