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Mr. James G. Keppler, Director
 U. S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: La Crosse Boiling Water Reactor
 Regulatory Improvement Program

Dear Mr. Keppler:

We are transmitting with this letter two copies of the Regulatory Improvement Program developed by Dairyland Power Cooperative to meet the acknowledged areas of needed improvement in our operations and regulatory performance.

We believe this program addresses items of concern to the Nuclear Regulatory Commission, Institute of Nuclear Power Operations, and Dairyland management. We will appreciate your critical review of this program and comments thereupon.

Sincerely,

James W. Taylor

JWT:daj

Enclosures

cc: NRC Resident Inspector

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DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR
REGULATORY IMPROVEMENT PROGRAM

STATION ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: Station organization and administrative systems should ensure effective implementation and control of station activities.

Task: Perform an evaluation of the current organizational responsibilities, management controls and staffing levels. Establish an appropriate plan of action after reviewing the results of this evaluation.

Action: LACBWR will conduct an overall review of the organizational structure and will specifically address the following by the date indicated:

- a. the span of control of the plant superintendent (February 1983)
- b. the difficulty of the radiation protection engineer to concentrate his time on matters related to health physics (November 1982)
- c. the ability of the Health and Safety Department to effectively implement the radiation protection and chemistry programs and to evaluate and improve the standards of the program (December 1982)

The following items have been addressed:

- a. The workload of the mechanical engineer has been reviewed; an additional person of this discipline will be obtained. Recruitment started in October 1982.
- b. The administrative section workload has been analyzed. The position of administrative assistant has been created and filled. A replacement secretarial position has been filled.

CONDUCT OF OPERATIONS

PERFORMANCE OBJECTIVE: Operational activities should be conducted in a manner that achieves safe and reliable plant operation.

Task: Formalize guidance regarding personnel authorized to operate controls and acknowledge annunciators. Supervisors should routinely monitor control room activities to ensure that only authorized personnel operate the controls.

Action: A formal policy that directs that no one is permitted to operate controls without the express permission of the operations person assigned that watch will be prepared and implemented by November 1982.

PLANT STATUS CONTROLS

PERFORMANCE OBJECTIVE: Operational personnel should be cognizant of the status of the plant systems and equipment under their control, and should ensure that systems and equipment are controlled in a manner that supports safe and reliable operation.

Task: Review outstanding Special Information Tags (SITs) on a periodic basis for applicability, readability and proper placement.

Action: An administrative control procedure covering SITs that requires logging every tag in the book and a review for applicability, readability and proper placement at least quarterly will be prepared in January 1983. All tags will identify the individual placing them and the original date placed.

MAINTENANCE ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: The maintenance organization and administrative systems should ensure effective control and implementation of department activities.

- Task: Evaluate and adjust the administrative workload of the mechanical maintenance section. Particular attention should be given to repetitive reports and delegation of administrative tasks to appropriate personnel.
- Action: An assistant mechanical maintenance supervisor position has been created and has been filled effective September 13, 1982. This new position will oversee record maintenance and assist in documentation update and administration tasks, thus relieving the maintenance supervisor for closer job supervision. The assistant mechanical maintenance supervisor will also assist on job supervision.

WORK CONTROL SYSTEM

PERFORMANCE OBJECTIVE: The control of work should ensure that identified maintenance actions are properly completed in a safe, timely and efficient manner.

- Task: Implement scheduling and coordination techniques for maintenance activities that will improve the coordination of radiation protection, operations and other functions required to support maintenance. Periodic management information meetings, improved schedules and more effective use of back-shift personnel should be considered.
- Action: A computer program for planning needs is being developed to coordinate outages well in advance of scheduled start dates. Routine staff meetings will be held to provide more coordination outside of outage periods. This effort will be started in November 1982.

CONDUCT OF MAINTENANCE

PERFORMANCE OBJECTIVE: Maintenance should be conducted in a manner that ensures efficient and effective plant operation.

- Task: Ensure through periodic observation by supervisory personnel that procedures are used properly. Emphasize to mechanical, instrument and electrical personnel the importance of adhering to procedures.
- Action: The concern of not utilizing procedures on the job is under review and, if deemed necessary, will be resolved by additional personnel training. The quality assurance department will perform an audit to determine the degree of procedure utilization by January 1983. The need for supervisory control on a day-to-day basis will be reemphasized by the superintendent in a meeting with key supervisors. This will be accomplished in November 1982.

PLANT MODIFICATIONS

PERFORMANCE OBJECTIVE: Plant modification programs should ensure proper review, control, implementation and completion of plant design changes in a safe and timely manner.

- Task: Improve the drawing control program to ensure operators have access to current drawings of acceptable quality to perform plant evolutions and that uncontrolled drawings are removed from use or upgraded to controlled status.
- Action: A program of purging and establishing new and controlled drawing files is underway. Eventually all drawings will indicate either controlled or non-controlled. This task is estimated for completion by July 1983.
- Task: Follow the established facility change procedure to ensure that all design changes to the plant receive an appropriate technical review.
- Action: All future applicable design changes will be governed by the Facility Change Procedure and receive a technical review and appropriate document update.

OUTAGE AND MAINTENANCE ACTIVITIES COORDINATION

- Task: There is a lack of long range planning on outages and this leads to a lack of coordination between the different groups in the plant.
- Action: Plan and develop an outage coordinating program which will list the many activities to be carried out during an outage, how many persons are required at a given time and what restrictions within our Technical Specifications prohibit simultaneous activities. This will be updated regularly and all departments will have an input into it. The printout will be posted before the outage.
- Outage planning discussions will be scheduled at an increased frequency to ensure timely development of procedures well before they are needed in an outage and to make sure that everyone from operations and maintenance personnel to radiological protection personnel are aware of the goals and missions of a particular outage.

MAINTENANCE PERSONNEL TRAINING AND QUALIFICATION

PERFORMANCE OBJECTIVE: The maintenance personnel training and qualification program should develop and improve the knowledge and skills necessary to perform assigned job functions.

Task: Develop and implement structured training in plant systems and administrative requirements for mechanical maintenance personnel.

Action: LACBWR will develop and implement a training program covering plant-specific systems and administration requirements for all mechanical maintenance personnel, all instrument and electrical personnel and all quality assurance personnel. This program will be started in February 1983.

RADIOLOGICAL PROTECTION ORGANIZATION AND ADMINISTRATION

PERFORMANCE OBJECTIVE: The organization and administrative systems should ensure effective control and implementation of the radiological protection program.

Task: Ensure that all supervisory personnel are made aware of their responsibility to enforce radiological protection procedures and practices. Stress the need to adhere to radiological protection procedures and practices in the training and retraining of plant personnel.

Action: Plant personnel are being reinstructed to comply with radiological protection procedures and requirements. A continuing policy of ensuring adherence to radiological requirements by all personnel will be expanded in year 1983. This includes a method policy of documenting deviations.

A timer has been added to the portal monitor to ensure that individuals stand in it the required ten seconds or receive an audible alarm.

GENERAL EMPLOYEE TRAINING IN RADIOLOGICAL PROTECTION

PERFORMANCE OBJECTIVE: General employee training should ensure that plant personnel, contractors and visitors have the knowledge and practical abilities necessary to effectively implement radiological protection practices associated with their work.

Task: Require each employee to perform a satisfactory demonstration of practical radiological protection skills such as donning and removing protective clothing, frisking, using step-off pads and reading pocket ion chambers. Expand the scope of written tests to provide a more accurate evaluation of employee knowledge of the radiological protection program.

Action: LACBWR is revising the general employee radiological training, which will include these recommendations. This revision will be completed in November 1982, and will be implemented in 1983.

INTERNAL RADIATION EXPOSURE

PERFORMANCE OBJECTIVE: Internal radiation exposure controls should minimize internal exposures.

Task: Implement a program to verify the Whole-Body Counter (WBC) calibration on an annual or more frequent basis.

Action: The whole-body counter will be calibrated in December 1982. An annual recalibration requirement will be established in December 1982.

PERSONNEL DOSIMETRY

PERFORMANCE OBJECTIVE: The personnel dosimetry program should ensure that radiation exposures are accurately determined and recorded.

Task: Establish criteria and conduct appropriate individual evaluations to detect dosimeter problems or errors in recorded dose. Continue with periodic, overall evaluations of TLD and PIC readings to identify basis problems.

Action: LACBWR will perform a monthly comparison of individual TLD results and pocket dosimeter results. Differences between these results that exceed a predetermined level will be reviewed by the radiation protection engineer, and an evaluation will be performed and documented. This program will be implemented by December 1982.

Task: Establish guidance for the use and placement of dosimeters when detailed radiation surveys indicate that extremity, skin or multiple whole-body monitoring may be appropriate. Ensure that the point of highest exposure is monitored.

Action: LACBWR will modify the procedure for the use and placement of extremity and whole body dosimeters and will ensure that the procedure is followed by December 1982.

RADIOACTIVE CONTAMINATION CONTROL

PERFORMANCE OBJECTIVE: Radioactive contamination controls should minimize the contamination of areas, equipment and personnel.

- Task: Contamination control practices need to be reviewed and upgraded. Changes should address the points discussed above.
- Action: The problems in contamination control will be reviewed and corrective action initiated in 1982.
- Task: Establish methods to improve personnel monitoring when exiting contaminated work areas and the radiologically controlled area. Require whole-body frisking when leaving contaminated or potentially contaminated areas.
- Action: The problems identified with personnel monitoring will be reviewed for corrective action in October 1982. LACBWR will institute a policy of increased frisking of personnel when leaving contaminated or potentially contaminated areas in March 1983.

CHEMISTRY CONTROL

PERFORMANCE OBJECTIVE: Chemistry controls should ensure optimum chemistry conditions during all phases of plant operation.

- Task: Establish a plant program to provide effective controls for storage, use, transfer and disposal of chemicals. This includes chemicals used both in the laboratories and in the plant by the maintenance group and by the operations group. Consider assigning responsibility for oversight of chemical storage, use and disposal to the health and safety group.
- Action: LACBWR will develop a plant program for the control, storage, transfer and disposal of corrosive and hazardous chemicals. LACBWR will assign responsibility for oversight and management of this program, which will be implemented by January 1, 1983.
- Task: Modify chemistry log sheets to include limits for all applicable parameters. Utilize this information when plotting data to facilitate trend analysis.
- Action: LACBWR will review all chemistry and log sheets by December 1982 and make modifications where needed to help ensure timely identification, notification and corrective action for plant chemistry parameters that have exceeded specified limits.

CONDITION OF THE FUEL AND PRIMARY RADIOACTIVE CHEMISTRY PARAMETERS

PERFORMANCE OBJECTIVE: Tighter surveillance of reactor primary water chemistry and radio chemistry is needed especially during warm-up and start-up conditions; trending of the parameters is needed to avoid exceeding limits during transition.

Task: Plant primary fuel condition chemistry will be monitored by performing necessary surveillance tests and alerting operations personnel when problems are evident.

Action: A plot of all technical specifications required primary system radiochemistry parameters will be established in the control room. The limits will be visually indicated on them so that any person walking into the control room can readily recognize a deviation from the regulatory requirements.

LABORATORY ACTIVITIES

PERFORMANCE OBJECTIVE: Laboratory and counting room activities should ensure accurate measuring and reporting of chemistry parameters.

Task: Expand the quality control program to provide appropriate checks on the quality of analyses. Known standards should be analyzed in conjunction with routine plant samples. Periodically, unknown samples should be substituted for known samples to provide a check of technician performance, laboratory procedures, reagents and instrumentation. All reagents used in the laboratory should be labeled with expiration dates. Reagents with expired shelf lives should not be used.

Action: LACBWR will establish a program for quality control in the chemistry lab including, but not limited to, routine analysis of unknown spike samples and use of standards in conjunction with samples in March 1983. LACBWR will be assisted by the DPC central chemistry lab and chief chemist in this effort.

LACBWR will assign a health physics technician to be responsible to ensure that all chemicals having shelf life are so marked and then inventoried monthly in writing and replaced as needed in October 1982.

ADMINISTRATIVE CONTROL

PERFORMANCE OBJECTIVE: Provide a means of tracking commitments to ensure that responses to agency requests are submitted on time.

Task: Establish an improved records management system, document control and commitment-response system.

Action: Computerized systems for records management are planned for implementation in 1983. Document control and commitment-response tracking are the duties of newly appointed LACBWR administrative assistant.

TECHNICAL SUPPORT

PERFORMANCE OBJECTIVE: Provide sufficient resources to carry out the technical programs imposed by Systematic Evaluation Program (SEP), licensing activities, plant improvements and operational problems.

Task: Improve and expand the technical support to the LACBWR operations and engineering activity.

Action: Technical support from the DPC central office staff has, heretofore, been only lightly utilized. Personnel are available and trained to perform in several areas such as:

- a. materials procurement
- b. chemistry and analytical services, non-radiological
- c. health physics
- d. turbine generator operations, maintenance and performance improvement
- e. electrical engineering projects
- f. drafting services
- g. meteorological monitoring
- h. data processing
- i. maintenance support

Greater utilization of these supportive resources has begun and will be expanded until fully utilized. Dependence on outside consulting firms will be reduced proportionately as in-house resources are more fully utilized.

EMERGENCY PREPAREDNESS

PERFORMANCE OBJECTIVE: Improvements are needed in emergency response activities, procedures, communications and support.

Task: Recent emergency preparedness drills have revealed weaknesses in the Emergency Operations Facilities (EOF) and Technical Support Center (TSC).

Action: Improved procedures outlined with check points and written in clearer, more precise language will be completed by year end, 1982.

Emergency Preparedness clearly needs the direct involvement of Health Physics Department personnel. The on-site Emergency Preparedness Director will be supported by the Director, Environmental Affairs in the development of improved procedures. Once accomplished, the maintenance of documentation and execution of emergency exercises can be directed by the on-site Emergency Preparedness Director. There is ample staff to maintain a high level of emergency preparedness once the procedural and communications aspects are improved.

Several specific improvements are planned, underway or completed:

- a. Meteorology data communication forms have been designed, printed and are available for use.
- b. A 10 meter on-site meteorological tower now provides ground level data in addition to elevated level data on the LACBWR stack
- c. Regional scale backup meteorological data system two miles east of LACBWR accessible by telecommunications from the EOF is now available.
- d. A Quality Control Plan (QCP) for meteorological data, collection, reduction and analysis has been acquired and implemented.
- e. LACBWR TSC to EOF data acquisition and transmission system is being installed now and expected to be available in 1982. The system will transmit plant data to TSC and EOF.
- f. Field survey kits will be improved by end of 1982.
- g. In-field radiological sampling system has been upgraded by procedure to:
 1. provide check list of required equipment and actions
 2. provide field calculation forms to simplify data reduction
 3. include additional specialized training in emergency procedures
- h. Additional practice drills will be scheduled prior to next emergency demonstration drill.

STAFF MORALE

PERFORMANCE OBJECTIVE: Create an atmosphere of positive 'can-do' spirit among employees faced with difficult tasks and hard decisions.

Task: The topic of staff morale is a significant factor in regulatory improvement. It is necessary that the attitude of the staff be as positive as possible towards regulations. The following items will be conducted to ensure this goal is met.

Action: The staff's uncertainty regarding the future of this facility will be minimized. The superintendent will communicate to the staff through memos, information about the licensing of this facility, information regarding the purchase of fuel and any other major incidents which indicate either in a positive or a negative light precisely what Dairyland's plans are in the operation of the LACBWR facility.

The staff will be involved in budget formulation. It is particularly important to involve each engineer and the department heads in a manner that can ensure attention to problems. It is important that they have an ownership in the budget and the facility itself, so that they understand fully LACBWR's operational objectives.

The superintendent will delegate more responsibility and authority to subordinate levels at LACBWR. Responsibility for regulatory compliance must be a personal one.

STAFF COMMUNICATIONS

PERFORMANCE OBJECTIVE: Ensure that all facets of the LACBWR organization perform in a harmonious, coordinated manner.

Task: It is necessary that the staff at LACBWR have a mechanism for communication between department heads and staff engineers which does not require the formal use of the Operations Review Committee or the Safety Review Committee.

Action: Starting with the month of October, twice monthly meetings of first line supervision and once monthly meetings of engineers will be held. This will give the plant superintendent the opportunity to find out precisely what the problems are before they become problems of concern to the regulatory agency.

AUDITS

PERFORMANCE OBJECTIVE: Audits should be used as an aid in identifying and eliminating weaknesses in all important areas of operation.

Task: Audit findings of Safety Review Committee audits and our Quality Assurance Program audits should receive follow-through.

Action: We will establish a policy that first responses to findings of internal audits must be responded to within 30 days.

Once commitments are made to follow a recommendation of an audit and take corrective action, that corrective action will be taken unless the commitment itself is changed by the person who made it.

These audits will be given the weight of a management directive to be followed in the plant.