



May 5, 1994

Docket Nos. 50-213
50-245
50-336
50-423
B14810

Re: Performance Enhancement
Program

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Performance Enhancement Program Update

The purpose of this letter is to provide the Staff with information on the progress of and substantive changes to the Northeast Utilities (NU) Performance Enhancement Program (PEP) and to report on the status of our associated engineering integration effort.

Summary

Described herein are the substantive PEP Action Plan (AP) changes that have occurred since the last update was provided. Presented separately are those AP Manager and Contributor changes resulting from the implementation of engineering integration and other management changes. Also included is a summary of key accomplishments for the third and fourth quarters of 1993 and the first quarter of 1994. The Verification & Validation (V&V) process continues and the results of these activities are summarized. Finally, we have performed an evaluation to determine the correlation of PEP AP activities to the long-term recommendations of the Independent Review Team for the Millstone Unit No. 2 "CH-442" valve event. The conclusions of this study are included as an additional attachment.

Background

In a submittal dated June 4, 1992,⁽¹⁾ NU transmitted the Phase II Completion Report for the NU PEP. We noted that the PEP is a living program which would be updated, as warranted, to implement improvements, enhance the integration of the various APs, and reflect conditions that might change over the course of the

(1) J. F. Opeka letter to T. T. Martin, "Performance Enhancement Program," dated June 4, 1992.

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implementation phase. In several letters, NU has informed the Staff of numerous PEP AP changes approved or in process. The most recent update letter, dated August 10, 1993,⁽²⁾ was supplemented by a letter dated September 10, 1993,⁽³⁾ which specifically described the engineering integration effort as part of the overall implementation of PEP.

Discussion

The PEP continues to proceed as planned. Thus far, 29 of the 41 active action plans have been completed, and validation has been completed for 9 of these. In keeping with the practice of informing the Staff of PEP AP changes, Attachment 1 to this letter provides a summary of additional substantive changes since August 10, 1993, either approved or in progress. Key PEP accomplishments for the period July 1993 through March 1994 are summarized in Attachment 2.

With respect to engineering integration, Phase II of the process, Analysis and Recommendations, was completed on schedule and provided the detailed recommendations for organizational structure and staffing requirements. A restructuring of engineering to include four unit engineering directors and one engineering services director was approved for implementation. Phase III, Implementation Plans, was successfully completed in the fourth quarter of 1993, and the resulting integration plans for the engineering organization have been implemented. We are already seeing the benefits of integrating, streamlining, and consolidating our engineering resources and processes as evidenced by the engineering support performance during the recent Haddam Neck Plant service water piping repairs, and the current Millstone Unit No. 1 refueling outage. The engineering integration and restructuring within the Nuclear Group has resulted in some AP Manager and Contributor changes for the PEP. These are identified in Attachment 3.

The PEP V&V process is working well. We expect to continue to incorporate "lessons learned" into this process as we complete additional validations. A status of the AP validation progress is included herein as Attachment 4.

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- (2) J. F. Opeka letter to J. T. Wiggins, "Performance Enhancement Program Update," dated August 10, 1993.
- (3) J. F. Opeka letter to U.S. Nuclear Regulatory Commission, "Performance Enhancement Program - Engineering Integration," dated September 10, 1993.

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Other programs and performance improvements are being implemented throughout the Nuclear Group. As we transition from PEP AP implementation to self-sustaining long-term operational excellence, we are increasing our reliance on the line organizations to identify and implement any corrective or improvement actions that may be appropriate. Many of these may be selectively linked to elements of the PEP. To gain an understanding of how PEP impacts one important and specific issue, we have performed a correlation study of PEP AP activities to the long-term recommendations of the Independent Review Team for the Millstone Unit No. 2 "CH-442" valve event. The results of this study, which concluded that PEP APs play a significant role in six of the nine recommendation closures, are summarized in Attachment 5.

Conclusion

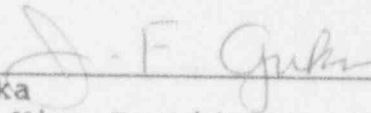
The PEP is moving towards completion of implementation, as illustrated in the enclosed attachments. As PEP progress continues to meet the established program goals, we have formulated a plan to integrate the remaining PEP action items into our 1995 and beyond Business Plans. This will be addressed in more detail in subsequent correspondence.

As with our previous updates, we are not requesting that any action be taken by the Staff based on changes described herein.

Should you require additional information on these or any other PEP matters, please contact Mr. Richard M. Kacich, at (203) 665-3298, or me.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Executive Vice President

cc: See Page 4

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cc: T. T. Martin, Region I Administrator
J. P. Durr, Acting Deputy Director, Region I Division of
Reactor Projects
A. B. Wang, NRC Project Manager, Haddam Neck Plant
J. W. Andersen, NRC Acting Project Manager, Millstone Unit
No. 1
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
V. L. Rooney, NRC Project Manager, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant
P. D. Swetland, Senior Resident Inspector, Millstone Unit
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Attachment 1

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Performance Enhancement Program
PEP Action Plan Changes Since August 10, 1993 Update

May 1994

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Performance Enhancement Program
Action Plan Changes Since August 10, 1993 Update

The following revisions have been approved:

Action Plan

Revision

2.3.2 — Design Control
Processes

As a result of engineering integration and the subsequent organizational changes, a decision was made to extend the completion date of the Design Control Manual to provide an opportunity to revise the manual to reflect the current organizational structure. The manual is now scheduled to be issued in final form on July 1, 1994.

2.3.5 — Procedures

This Action Plan has been revised to take the implementation of the NEO Policies and Procedures upgrade outside the scope of the Action Plan. Many of the weaknesses of the NEO procedures have been addressed in the Design Control Manual development process. The remaining issues will be addressed as part of normal business in the review of NEO procedures.

This revision also reduces the scope of the Administrative Control Program for 1994 by removing a degree of the standardization originally planned between the Haddam Neck Plant and Millstone Station.

The scope of the Technical Procedure update at Millstone remains the same, but the rate of the effort for 1993 and 1994 is reduced and the overall schedule completion date is extended by six months to December 1996.

The following revision is in process:

Action Plan

Revision

1.1.2 — Objectivity

This Action Plan is undergoing the process of significant revision to replace the originally envisioned Fairness and Equity Group with a Cultural Advisory Council. This change is reflective of the results of the cultural analysis survey taken earlier this year and the need to provide additional clarity within the organization.

The Cultural Advisory Council is chaired by the Executive Vice President - Nuclear, and meets on an approximately monthly basis in the short term to discuss emerging cultural issues within the Nuclear Group with the objective of addressing key cultural issues of importance to the organization.

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Attachment 2

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Performance Enhancement Program
Key Accomplishments — July 1993 Through March 1994

May 1994

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Performance Enhancement Program
Key Accomplishments — July 1993 Through March 1994

PEP Accomplishments

- The Management Development Program is progressing well with the competency model used to assist in personnel selections for Engineering Integration (Action Plan 1.2.3)
- The Nuclear Group Core Values have been reviewed, finalized, and communicated to the Nuclear Group (Action Plan 1.4.1)
- Revised Policies and Expectations have been developed and communicated to the Nuclear Group (Action Plan 2.3.5)
- Acceptance of the proposal to form a Cultural Advisory Council was obtained and membership selections were made (Action Plan 1.1.2)
- The development of standard facility reports providing busbar costs for each nuclear unit has been completed. The reports are now part of monthly cost reporting (Action Plan 2.2.2)
- The Configuration Management Program Manual has been revised and issued (Action Plan 2.3.1)
- The Phase I hiring for system engineers has been completed (Action Plan 2.3.4)
- The milestone to complete 70% of the Phase II of the Technical Procedure Upgrades was met (Action 2.3.5)
- Process mapping of the material control process has been completed (Action Plan 2.3.5)
- The Current Licensing Basis computerized search system was declared fully operational (Action Plan 2.3.7)
- The backlog reduction for Millstone Unit 2 has been completed (Action Plan 2.3.9)
- Preliminary trend reports are being issued for review and feedback (Action Plan 3.4.1)
- The STA initial and continuing training program description has been completed (Action Plan 4.1.3)

- A model has been developed to communicate culture changes identified via periodic employee surveys (Action Plan 1.4.1)
- A process evaluation report on the first quarter results of the Cultural Advisory Council has been drafted and is undergoing final review (Action Plan 1.4.1)
- The Management Development Program Manual has been finalized and issued (Action Plan 1.2.3)
- Team Building training is being implemented (Action Plan 1.2.3)
- A draft Design Control Manual is being revised to reflect the results of engineering integration, with the final manual to be issued for use in July 1994 (Action Plan 2.3.2)
- The application review process has been completed, and remaining major activities for the Licensing Basis Action Plan have been identified (Action Plan 2.3.7)
- Backlog reduction was completed for Millstone Unit 1 (Action Plan 2.3.9)
- The quarterly analysis of the Nuclear Trend report has begun (Action Plan 3.4.1)
- The Millstone Unit 1 Material Equipment and Parts List and Bill of Material evaluations were completed (Action Plan 4.1.1)
- The new requirements for chemical and hazardous material control training have been identified, and integrated into appropriate training programs (Action Plan 4.2.2)
- The Millstone Unit 2 component evaluations were completed (Action Plan 4.1.1)
- The Control Room Design Review, Phase 2, results were incorporated into training programs (Action Plan 4.1.3)
- Enhancements to the Millstone Unit 1 operator training program were completed (Action Plan 4.1.3)
- The Millstone Station staffing enhancements have been completed (Action Plan 4.2.1)

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Attachment 3

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Performance Enhancement Program
Action Plan Manager and Contributor Changes

May 1994

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Performance Enhancement Program
Action Plan Manager and Contributor Changes

The following Contributor and Action Plan Manager changes have been made:

- Action Plan 1.2.2, Empowerment: F. C. Rothen replaces G. L. Johnson. This Action Plan is completed and has been validated.
- Contributor 1.3.0, Policy: S. E. Scace replaces W. D. Romberg as sponsor for the Action Plans in this area.
- Action Plan 1.3.1, Recruitment: S. E. Scace replaces G. D. Baston. This Action Plan is completed but has not yet been validated.
- Action Plan 1.3.3, Training and Development: L. A. Chatfield replaces J. M. Black. This Action Plan is completed but has not yet been validated.
- Action Plan 1.4.1, Cultural Analysis: L. A. Chatfield replaces J. M. Black. This Action Plan is active.
- Action Plan 2.2.1, Business Plan: R. M. Kacich replaces D. J. Ray. This Action Plan is completed and has been validated.
- Action Plan 2.3.2, Design Control Processes: P. P. Necci replaces R. T. Harris. This Action Plan is active.
- Action Plan 2.3.5, Procedures: G. B. Bregg replaces F. R. Dacimo. This Action Plan is active.
- Action Plan 2.3.6, Maintenance Rule/RCM: C. H. Clement replaces K. B. Hastings. This Action Plan is active.
- Contributors 3.1.0, People/Organizational; 3.2.0, Assessment Implementation; and 3.4.0 Data Analysis: J. F. Opeka replaces W. D. Romberg as sponsor for the Action Plans in these areas.
- Action Plan 3.1.2, Assessment Personnel Enhancements: J. M. Solymossy replaces D. O. Nordquist. This Action Plan is active.
- Action Plan 3.2.1, Communications: J. M. Solymossy replaces D. O. Nordquist. This Action Plan is completed, has been validated, and a recommendation is being evaluated.

- Action Plan 3.2.2, Finding Significance: J. M. Solymossy replaces D. O. Nordquist. This Action Plan is completed and is being validated.
- Action Plan 3.3.1, Assessment Philosophy: J. M. Solymossy replaces D. O. Nordquist. This Action Plan is active.
- Action Plan 3.3.2, Corrective Action Execution: J. M. Solymossy replaces J. S. Keenan. This Action Plan is active.
- Action Plan 3.4.1, Nuclear Tracking & Trending System: J. M. Solymossy replaces D. O. Nordquist. This Action Plan is active.
- Action Plan 3.4.2, Root Cause Evaluation & Assessment: G. H. Bouchard replaces D. O. Nordquist. This Action Plan is completed and awaiting validation.
- Contributor 4.1.0, Nuclear Operations Services: S. E. Scace replaces W. D. Romberg as sponsor for the Action Plans in this area.
- Action Plan 4.1.1, MEPL/BOM: A. L. Pollock replaces G. D. Baston. This Action Plan is active.
- Action Plan 4.1.3, Nuclear Training Enhancement: M. B. Brown replaces J. M. Black. This Action Plan is active.
- Contributor 4.2.0, Millstone Point: D. B. Miller replaces S. E. Scace as sponsor for the Action Plans in this area.
- Action Plan 4.2.1, Station Organization: D. B. Miller replaces S. E. Scace. This Action Plan is active.
- Action Plan 4.4.3, Employee Concerns Program: L. A. Chatfield replaces D. G. Diedrick. This Action Plan is completed and has been validated.

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Attachment 4

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Performance Enhancement Program
Action Plan Validation Progress

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Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Performance Enhancement Program
Action Plan Validation Progress

VALIDATION PROGRESS

1. Status of additional completed Action Plan validations.

Action Plan 2.1.1 — Strategic Planning

- Validation report issued September 21, 1993.
- The Action Plan can be closed; the intended effect has been achieved.
- Four recommendations were provided.

Action Plan 2.2.1 — Business Plan

- Validation report issued September 30, 1993.
- The Action Plan can be closed; the intended effect has been achieved.
- Two recommendations were provided.

Action Plan 2.3.10 — Design Consolidation

- Validation report issued October 20, 1993.
- This Action Plan remains open; the intended effects of the Action Plan have not yet been achieved in their entirety.
- Five recommendations were provided, three of which need to be addressed prior to Action Plan closure.

Action Plan 3.2.1 — Communications

- Validation report issued October 20, 1993.
- The Action Plan can be closed; the intended effect has been achieved.
- One recommendation was provided.

Action Plan 4.4.2 — Measures of Performance

- Validation report issued December 2, 1993.
- This Action Plan remains open; the intended effects of the Action Plan have not yet been achieved in their entirety.
- Four recommendations were provided, two of which are prerequisites to Action Plan closure.

Action Plan 4.4.3 — Employee Concerns Program

- Validation report issued August 12, 1993.
- The Action Plan can be closed; the intended effect has been achieved.⁽¹⁾
- One recommendation was provided.

2. Action Plan validations completed in draft form.

Action Plan 1.2.2 — Empowerment

- A draft of the Validation Report is undergoing final review.
- The Action Plan will be closed when the report is issued.
- There are three observations for Action Plan Manager consideration.

Action Plan 2.2.2 — Budget

- A draft of the Validation Report is undergoing final review.
- The Action Plan will not be closed until the recommendations are addressed.
- There are three recommendations for the Action Plan Manager to address.

(1) As discussed during meetings with the Staff on April 20 and April 21, 1994, activities and initiatives in the employee concerns area continue as summarized in the 1994 Business Plan.

3. Schedule of other Action Plans to be validated in 1994.

• In Process

Action Plan 1.2.1 — Vision
Action Plan 1.3.1 — Recruitment
Action Plan 1.3.2 — Standardization
Action Plan 1.3.3 — Training and Development
Action Plan 3.2.2 — Finding Significance

• Second Quarter

Action Plan 1.1.3 — Motivation
Action Plan 2.3.3 — Engineering Programs
Action Plan 4.1.2 — Shutdown Risk Management
Action Plan 4.2.1 — Station Organization (Millstone)
Action Plan 4.3.1 — Station Organization
(Connecticut Yankee)
Action Plan 4.4.1 — Site Compliance Licensing

• Third Quarter

Action Plan 1.1.2 — Objectivity
Action Plan 3.3.1 — Assessment Philosophy
Action Plan 3.4.2 — Root Cause Evaluation and Assessment
Action Plan 4.1.4 — Emergency Preparedness Organization

• Fourth Quarter

Action Plan 1.1.1/1.2.3 — Management Skills/Talent
Development
Action Plan 3.1.2 — Assessment Personnel Enhancement
Action Plan 3.3.2 — Corrective Action Execution

4. Summary of results to date.

• The validation process for nine Action Plans has been completed. Three of these Action Plans remain open as a result of validation findings, with additional work underway.

• Recommendations are being tracked to closure.

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Attachment 5

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Performance Enhancement Program
Correlation Study to CH-442
Independent Review Team (IRT) Recommendations

May 1994

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Performance Enhancement Program
Correlation Study to CH-442 Independent Review Team (IRT)
Recommendations

IRT RECOMMENDATION NO. 1

- ITEM: Develop a method to assess the effectiveness of corrective actions.
- ASSOCIATED PEP ACTION PLANS:
 - 3.3.2 — Corrective Action Execution
 - 3.4.1 — Nuclear Tracking and Trending System
 - 4.4.2 — Measures of Performance
 - 3.2.1 — Communications
- CORRELATION SUMMARY OF ASSOCIATED ACTION PLANS:

General —

The Series 3 Action Plans focus on improving the effectiveness of the NU performance assessment process, including the effectiveness of corrective actions. PEP has provided a systematic approach to the identification and resolution of problems identified with various corrective action systems in place at NU. Collectively the Action Plans are designed to improve the way in which the Nuclear Group addresses the scope of corrective actions as well as their effectiveness.

3.3.2 — Corrective Action Execution

One of the objectives of this Action Plan is to evaluate the effectiveness of corrective action implementation. Programmatic improvements developed through this Action Plan include the requirement to perform self-verification of corrective action implementation within the organization taking the corrective action.

3.4.1 — Nuclear Tracking and Trending System

The methodology developed in this Action Plan is suitable to establish the success of corrective actions in the short term.

4.4.2 — Measures of Performance

This Action Plan addresses the long-term monitoring of Nuclear Group performance effectiveness. Actions are assigned to address ineffective or declining performance as measured by this system.

3.2.1 — Communications

Included in the objectives for this Action Plan is the determination that assessment reports need to contain an effectiveness statement, and must be distributed directly to the individual who can fix the problem. A standardized assessment report format which includes an effectiveness statement has been developed, and the distribution of these reports has been addressed to ensure that each report is provided to that individual who can resolve the issue.

IRT RECOMMENDATION NO. 2

- ITEM: Develop actions to instill a more conservative operating philosophy.

- ASSOCIATED PEP ACTION PLANS:

- 2.3.5 — Procedures

- 3.4.1 — Nuclear Tracking and Trending System

- CORRELATION SUMMARY OF ASSOCIATED ACTION PLANS:

- 2.3.5 — Procedures

- The Nuclear Group Policies and Expectations Document, which is a derivative of the Procedures Action Plan, sets an overall series of Expectations espoused by the Executive Vice President - Nuclear. In this document, the objectives of conservative decision-making are identified to the Nuclear Group.

- 3.4.1 — Nuclear Tracking and Trending System

- The continued implementation of a more conservative operating philosophy and its impact on the performance of the Nuclear Group will be monitored and trended by the use of periodic cultural surveys which are being administered as part of this Action Plan.

IRT RECOMMENDATION NO. 3

- ITEM: Define specific conditions and duration for acting manager positions.

- ASSOCIATED PEP ACTION PLANS:

 - 1.2.3 — Management Development

- CORRELATION SUMMARY OF ASSOCIATED ACTION PLANS:

 - 1.2.3 — Management Development

The PEP has not set specific conditions and duration for acting managers. As part of the Management Development Action Plan, the use of competency based personnel selection is being implemented within the Nuclear Group. This approach provides a means of assessing the capabilities of management personnel as well as their ability to perform in new management positions. With this competency based approach, the need to place managers in an acting position for extended periods of time is significantly reduced. Results to date illustrate this improvement.

IRT RECOMMENDATION NO. 4

- ITEM: Consider breadth of perspective and diversity of experience when filling vacancies.

- ASSOCIATED PEP ACTION PLANS:

 - 1.2.3 — Management Development

- CORRELATION SUMMARY OF ASSOCIATED ACTION PLANS:

 - 1.2.3 — Management Development

Diversity of experience is an element in selecting personnel to fill vacancies. The Nuclear Management Development Program User's Manual (a product of Action Plan 1.2.3) provides requirements for Managers, Directors, and Vice Presidents which include cross-function (i.e., diversity of experience) as one of the elements for selection. Each candidate is assessed against

this criterion as part of the selection process. Recent selections of management personnel within the Nuclear Group reflect consideration of this criterion.

IRT RECOMMENDATION NO. 5

- ITEM: Independently assess effectiveness of corrective actions for valve mispositionings.

- ASSOCIATED PEP ACTION PLANS:

- 3.4.2 — Root Cause Evaluation and Assessment
- 3.3.1 — Assessment Philosophy
- 3.4.1 — Nuclear Tracking and Trending System
- 4.4.2 — Measures of Performance

- CORRELATION SUMMARY OF ASSOCIATED ACTION PLANS:

General —

The PEP Series 3 Action Plans provide a framework to enhance both "independent assessments" as well as organization "self-assessments." The implementation of these assessments, beginning in 1994, will provide the mechanism within the Nuclear Group to address the need for enhanced independent assessments.

3.4.2 — Root Cause Evaluation and Assessment

This Action Plan provides the overall closest association to the recommendation in that it provides for the consistent use of Root Cause Evaluation and Assessment methods as part of the normal assessment process of the Nuclear Group. This methodology is directly applicable to addressing issues such as valve mispositioning events.

3.3.1 — Assessment Philosophy

Self-assessment philosophy and implementation are both addressed in this Action Plan. The internal assessment process for the unit has been addressed, and independent assessment requirements and methods are included in the deliverables.

3.4.1 — Nuclear Tracking and Trending System

This system has been developed to monitor and trend the success of corrective actions in the short term.

4.4.2 — Measures of Performance

This Action Plan addresses the long-term monitoring of Nuclear Group performance effectiveness. Actions are assigned to address ineffectiveness of corrective actions as tracked by this system.

IRT RECOMMENDATION NO. 6

- ITEM: Develop guidelines which specify requirements for performing safety assessments when performing work on safety barriers.

- ASSOCIATED PEP ACTION PLANS:

There is no activity in the PEP which addresses this item.

IRT RECOMMENDATION NO. 7

- ITEM: Develop a method to gauge performance on a real-time basis.

- ASSOCIATED PEP ACTION PLANS:

- 4.4.2 — Measures of Performance
- 3.4.1 — Nuclear Tracking and Trending System

- CORRELATION SUMMARY OF ASSOCIATED ACTION PLANS:

4.4.2 — Measures of Performance

The monthly Measures of Performance report, which evolved from this Action Plan, addresses the overall performance of the Nuclear Group, but not on a true "real-time" basis. This report is reviewed on a monthly basis by the officers and directors of the Nuclear Group. Discussion focuses on those items where the trend of performance is declining and not meeting the expectations of the Executive Vice President - Nuclear.

3.4.1 — Nuclear Tracking and Trending System

Another related performance gauge is a monthly trend report implemented through this Action Plan. This report is issued by the Nuclear Quality and Assessment Services group which provides additional trend data relating to the performance of the Nuclear Group in a number of quality-related areas. This trend report is being modified to more directly complement the report described in 4.4.2, above.

IRT RECOMMENDATION NO. 8

- ITEM: Evaluate and monitor the organizational impacts of the many ongoing changes.

- ASSOCIATED PEP ACTION PLANS:
There is no activity in the PEP which addresses this item.

IRT RECOMMENDATION NO. 9

- ITEM: Share lessons learned throughout Northeast Utilities, and the industry.

- ASSOCIATED PEP ACTION PLANS:
There is no activity in the PEP which addresses this item.