



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

FEB 11 1994

Dockets: 50-445
50-446
Licenses: NPF-87
NPF-89

TU Electric
ATTN: W. J. Cahill, Jr., Group Vice President
Nuclear Engineering and Operations
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

SUBJECT: PUBLIC MEETING ON THE COMANCHE PEAK STEAM ELECTRIC STATION NUCLEAR
OVERVIEW REALIGNMENT

This refers to the public meeting conducted at your request in the Region IV office on February 3, 1994. This meeting was attended by those listed in Attachment 1.

This meeting was held to discuss proposed changes to the Comanche Peak Steam Electric Station nuclear overview program. You determined that the nuclear overview functions needed to be aligned to concentrate on plant operations instead of construction activities. The current nuclear overview organization is aligned such that the program is optimized for the project environment.

The proposed changes to the overview program included the restructuring of the overview processes to strengthen the effectiveness of the evaluations while enhancing plant safety, reliability, and performance. Additionally, the changes should allow the nuclear overview functions to be more flexible in order to allow you to shift resources to emerging operational issues and provide timely feedback to all organizations.

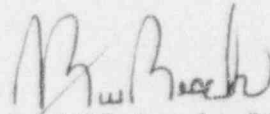
We understand your desire to reorganize the nuclear overview function to be more responsive to operational considerations. During the meeting, your organizational representatives stated that, under the proposed changes, all quality assurance commitments will be met and no reduction in the quality assurance plan requirements will be required. Furthermore, your staff indicated that only administrative and minor word changes will be needed for the FSAR and no changes to the Technical Specifications are anticipated.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

9402220063 940211
PDR ADOCK 05000445
P PDR

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,



A. Bill Beach, Director
Division of Reactor Projects

Attachments:

1. Attendance List
2. Licensee Presentation

cc:

TU Electric

ATTN: Roger D. Walker, Manager of
Regulatory Affairs for Nuclear
Engineering Organization

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President - CASE
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Jorden, Schulte, and Burchette
ATTN: William A. Burchette, Esq.
Counsel for Tex-La Electric
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1025 Thomas Jefferson St., N.W.
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TU Electric

-3-

Newman & Holtzinger, P.C.
ATTN: Jack R. Newman, Esq.
1615 L. Street, N.W.
Suite 1000
Washington, D.C. 20036

Texas Department of Licensing & Regulation
ATTN: G. R. Bynog, Program Manager/
Chief Inspector
Boiler Division
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Austin, Texas 78711

Honorable Dale McPherson
County Judge
P.O. Box 851
Glen Rose, Texas 76043

Texas Radiation Control Program Director
1100 West 49th Street
Austin, Texas 78756

FEB 11 1994

bcc to DMB (IE45)

bcc distrib. by RIV:
L. J. Callan
Section Chief (DRP/B)
MIS System
RIV File
Section Chief (DRP/TSS)

Resident Inspector (2)
Lisa Shea, RM/ALF, MS: MNBB 4503
DRSS-FIPS
Project Engineer (DRP/B)

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RIV:DRP/B
GEWerner;df
2/8/94

C:DRP/B
LAYande
2/10/94

D:DRP
ABBeach
2/11/94

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TU Electric

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MEETING: CPSES

SUBJECT: Nuclear Overview Function Realignment

DATE: February 3, 1994

ATTENDANCE LIST

NAME	ORGANIZATION	POSITION TITLE
DAVE MCAFEE	TUELECTRIC - NOD	QA MANAGER
DAVE DAVIS	TUELECTRIC - NOD	PWT ANALYSIS MGR
Jimmy Barker	TUElectric - NOD	ISEG MGR
RAY ADAMS	TUELECTRIC - NEU	LICENSING ENGINEER
Roger D. Walker	tuelectric - NEO	Regulatory Affairs Manager
Don Woodlan	TUElectric - NEO	Docket Licensing Manager
Douglas W. Snow	TU Electric NEO	Regulatory Affairs
FRED W. MOORE	TU ELECTRIC - ENGR	Mechanical Eng Mgr
Howard F. Bundy	NRC, RIV	Reactor Inspector
C. J. Paulk	NRC, RIV	Reactor Inspector
Les Constable	NRC, RIV	Ch. of Plan + Support
Jim Gagliardo	NRC/RIV	Section Chief
Gregory E. Werner	NRC/RIV	Acting Project Eng. Section B
Thomas A. Bergman	NRC/URR	PM
Suzanne Black	NRC/INR	Project Director
L. A. Yandell	NRC/RIV	Chief, Project Section B
Art T. Howell	NRC/RIV	Dep Dir, Div. of Reactor Safety
MIKE BLEVINS	TU/NOD	NUCLEAR OVERVIEW MGR

**FOCUSING
NUCLEAR
OVERVIEW
FOR
OPERATIONS**

OUTLINE OF DISCUSSION

- **Background**
- **Why Nuclear Overview Needs to be Focused**
- **Characteristics of the Overview Program in the Operations Phase**
- **The Plan**
- **Evaluation Process**
- **Organization**
- **NRC Review Summary**

NUCLEAR OVERVIEW EVOLUTION

**PHASE I Consolidate Overview Organizations into Single
Department (Complete - 1990)**

**PHASE II Integrate Activities of the NOD Organizations
to Improve Effectiveness and Efficiency
(Complete - 1993)**

**PHASE III Restructure the Overview Process and
Organization to Improve Effectiveness and
Efficiency in Support of 2 Unit Operations
(Next Step - 1994)**

**PHASE IV Enhance Overview Process for Long Term
Operations (Future)**

EVALUATION OF CURRENT OVERVIEW PROGRAM

Step 1 : Performed an Evaluation of the Effectiveness of the Current Overview Process and Organization

Step 2 : Determined How the Optimum Overview Process would Function

Step 3 : Determined the Optimum Overview Organization to Implement the New Process

WHY NUCLEAR OVERVIEW NEEDS TO BE REFOCUSED

- **Current Overview Program was Optimized for Project Environment**
 - ◇ **Large Organization - Diverse and Specialized**
 - ◇ **Overview Oriented Toward Compliance**
 - ◇ **Constant Change to Match Project Flow**

- **Plant Shift from Construction to Operation Phase**
 - ◇ **Type of Work Activities is Different**
 - ◇ **Type of Work Force is Different**
 - ◇ **Volume of Activity is Different**
 - ◇ **Nature of Problems / Challenges / Issues is Different**

- **The Need to Shift Focus of the Overview Program**
 - ◇ **Orient Toward Effectiveness Yet Assure Compliance**
 - ◇ **Able to Respond to the Changing Needs of an Operating Plant**
 - ◇ **Evaluate Long Range Effectiveness of Programs, Processes, Equipment and People**
 - ◇ **Communicate in Plant's Language**

CHARACTERISTICS OF THE OVERVIEW PROGRAM IN THE OPERATIONS PHASE

- **Sees the Big Picture**
- **Focused on Long Term Effective Performance of Personnel, Programs and Processes**
- **Assures Compliance with Regulations and Commitments**
- **Overview Resources are Optimized**
- **Maintains a Professional, Productive, Long Term Interface with the Plant Organization**
- **Maintains Flexibility to Respond to Plant Conditions, Issues and Management**
- **Maintains Independence and Objectivity**
- **Interfaces Well with External Organizations**
- **Enhances Plant Safety, Reliability and Performance**

ENHANCED OVERVIEW PROGRAM

THE PLAN

Part 1 : Restructure the NOD Processes (Audit, Assessment, Analysis, Surveillance, etc) to Enhance Overview of Plant Programs, Processes and Personnel

Part 2 : Reorganize the NOD Resources Along Plant Program / Process Lines to Enhance the Effectiveness of NOD Evaluations and Communication

OBJECTIVES FOR FOCUSING THE EVALUATION PROCESS FOR OPERATIONS

- **To Ensure That NOD Evaluations Determine that People, Programs and Equipment are Performing Up to Management Expectations
"Are We Getting the Desired Results"**
- **To Improve the Effectiveness of NOD Evaluations by Focusing Effort on Important Plant Programs and Processes**
- **To Improve the Effectiveness of NOD Evaluations by Providing a Comprehensive Overview Plan for Each Plant Program and Process**
- **To Enhance the Effectiveness and Flexibility of Evaluation Activities by Incorporating All the Overview Methods (Audit, Surveillance, etc) into Each Overview Plan**
- **To Enhance Feedback to Plant Management by Providing an Integrated Source of NOD Evaluation Feedback**
- **To Provide Real Time Feedback to Management on Emerging Issues**

OPTIMUM NOD EVALUATION PROCESS

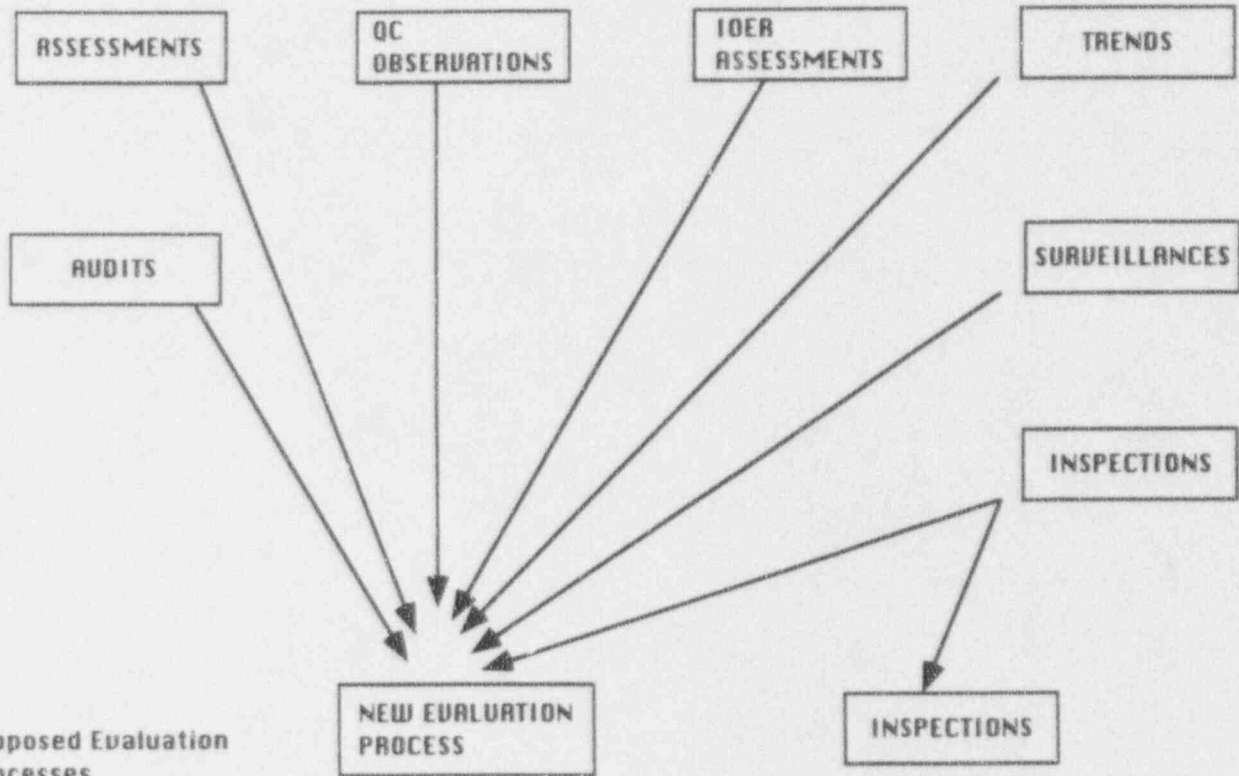
A Process that Focuses Evaluation Effort on Important Plant Programs and Processes Through Comprehensive Overview Plans for Each Program and Process.

- **Process Characteristics**

- ◆ **Focuses Management Attention on Emerging Issues**
- ◆ **Determines if We are Doing the "Right Things Right"**
- ◆ **Comprehensive Overview Plan for Each Major Plant Program and Process**
- ◆ **Reasonable, Non-Intrusive and Performance Based**
- ◆ **Techniques and Evaluation Criteria Understood by the Overviewed Organizations**
- ◆ **Facilitates Communication of Issues to Overviewed Organizations and Management**
- ◆ **Flexible to Adapt to Changing Plant Conditions**
- ◆ **Simplified Feedback Method to Communicate the Results of Evaluations (Usable and Informative)**
- ◆ **Monitors for Compliance with Regulations**

EVALUATION PROGRAM TRANSITION

Current Evaluation Processes



Proposed Evaluation Processes

Consolidated Overview Plans

Consolidated Activity Schedule

Capture Current Elements Required by Regulations

Identify Methodology for Performing Overview

Prioritizes Activity for Personnel

Facilitates Personnel Training

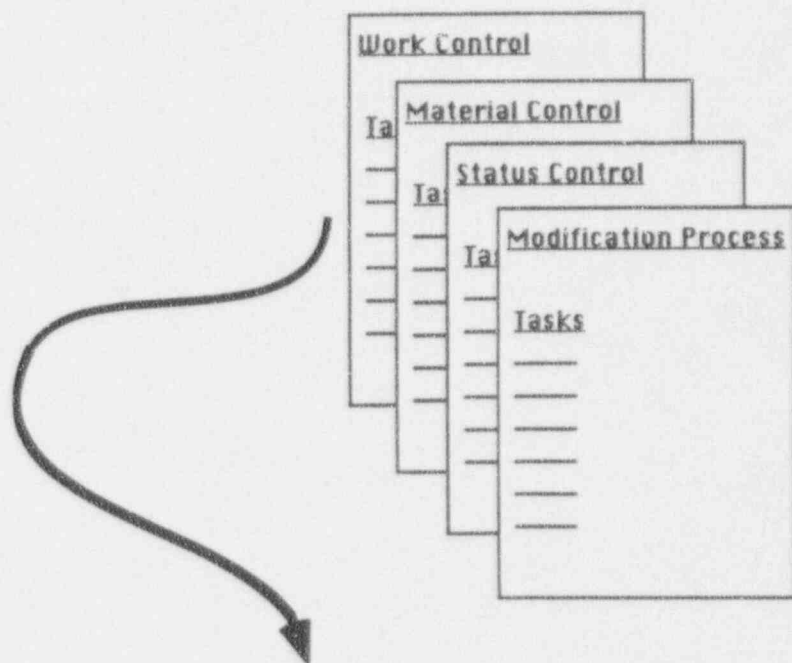
Reduced Scope of Inspection Attributes

Evaluation of Activities Replaces Inspection

"Inspection" used as a Tool for Overview of any area

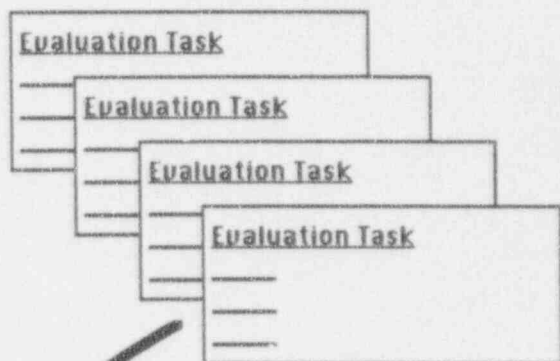
NOD Evaluation Process

OVERVIEW PLANS



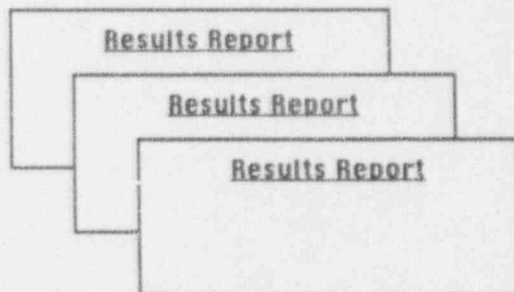
OVERVIEW CRITERIA FROM:

- Regulatory Requirements
- Commitments
- Lessons Learned
- Event Analysis History
- Technical Specification
- INPO Performance Criteria
- NRC Inspection Modules
- QA OMAPs
- Surveillance Checklists
- Management Expectations
- Industry Standards



Using Various "Types" of Overview Methods:

- Audit
- Surveillance
- Trending
- Inspection
- Assessment
- Observation



Reporting Results

- On the Program Area (Operations, etc)
- On the Program (Status Control, etc)
- On the Task (LCORR Tracking, etc)

OBJECTIVES FOR REORGANIZATION OF NUCLEAR OVERVIEW

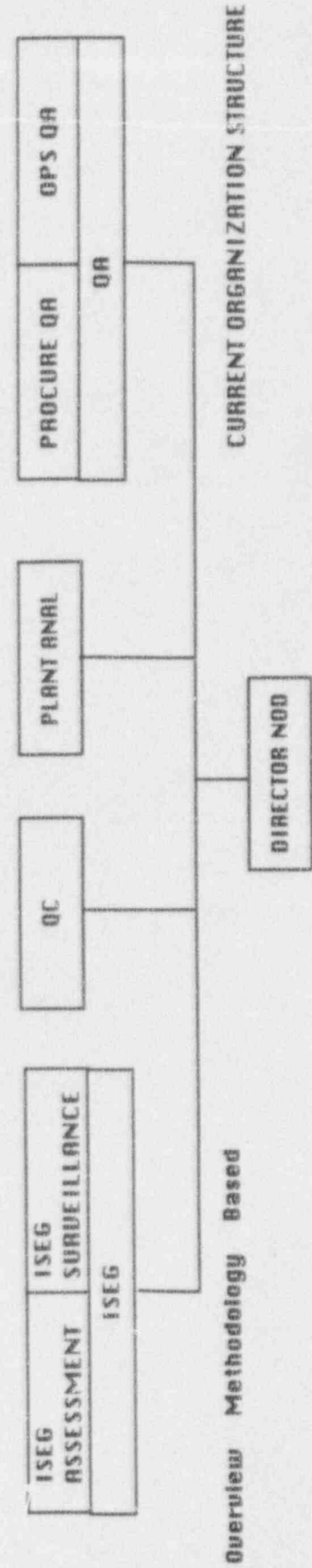
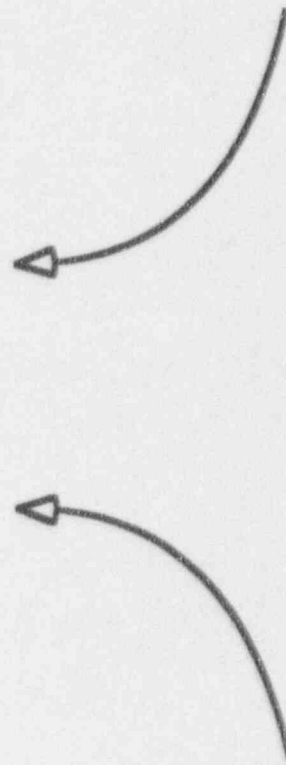
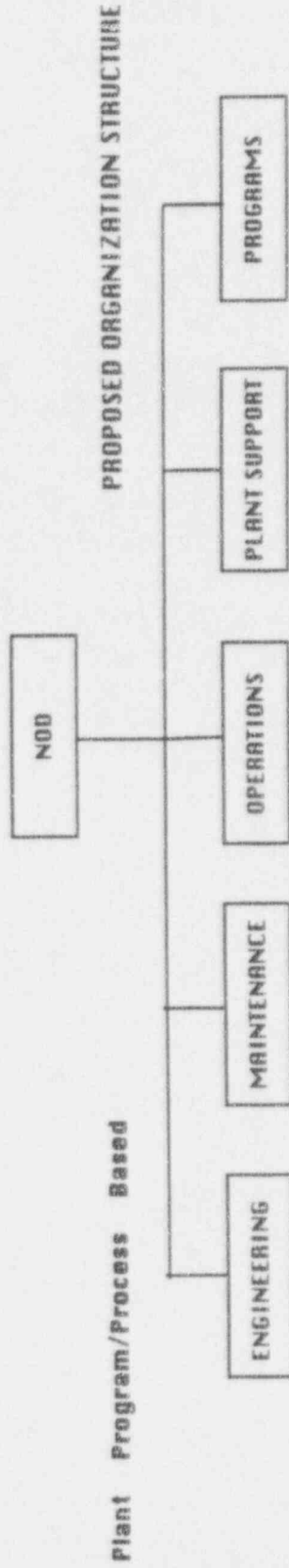
- **Align Resources in Order to Effectively Implement the New NOD Evaluation Process**
- **To Improve the Effectiveness of NOD Evaluations by Focusing Resources Capable of Using All of the Overview Tools (Audit, Surveillance, Assessment, Analysis, Inspection, etc)**
- **To Improve Individual and Management Responsibility and Accountability Within Nuclear Overview**
- **To Provide Clear Lines of Communication from Plant Functions to Overview Functions (Single Point of Contact)**
- **To Establish Professional Relationships which Promote Candid Communication of Emerging Issues**

OPTIMUM NOD ORGANIZATION

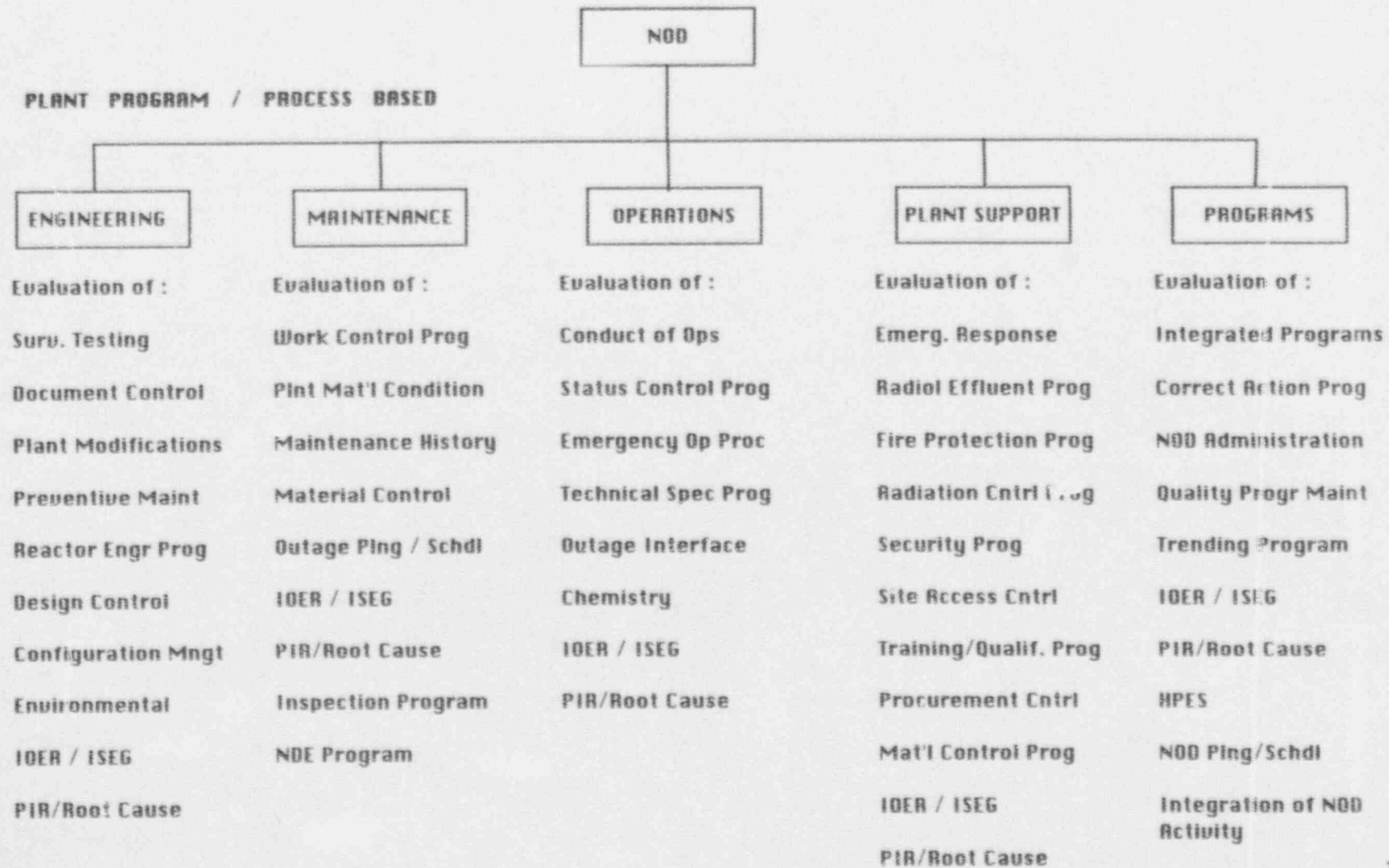
NOD Resources Aligned Along Same Lines as the Organization of Plant Programs and Processes to Facilitate Focused Overview of these Programs.

- **Organization Characteristics**
 - ◆ **Focuses Resources on Areas of Importance**
 - ◆ **Provides Focused Feedback to Management in a Form that is Usable**
 - ◆ **Clearly Defines Ownership and Accountabilities**
 - ◆ **Provides One-Stop Shopping for Management , Overviewed Organizations and External Organizations**
 - ◆ **Covers All Important Plant Functions (Programs and Processes)**
 - ◆ **Maintains Independence and Objectivity**
 - ◆ **Assures Regulatory Compliance**
 - ◆ **Facilitates Open and Candid Communication of Emerging Issues**
 - ◆ **Builds on Strengths**

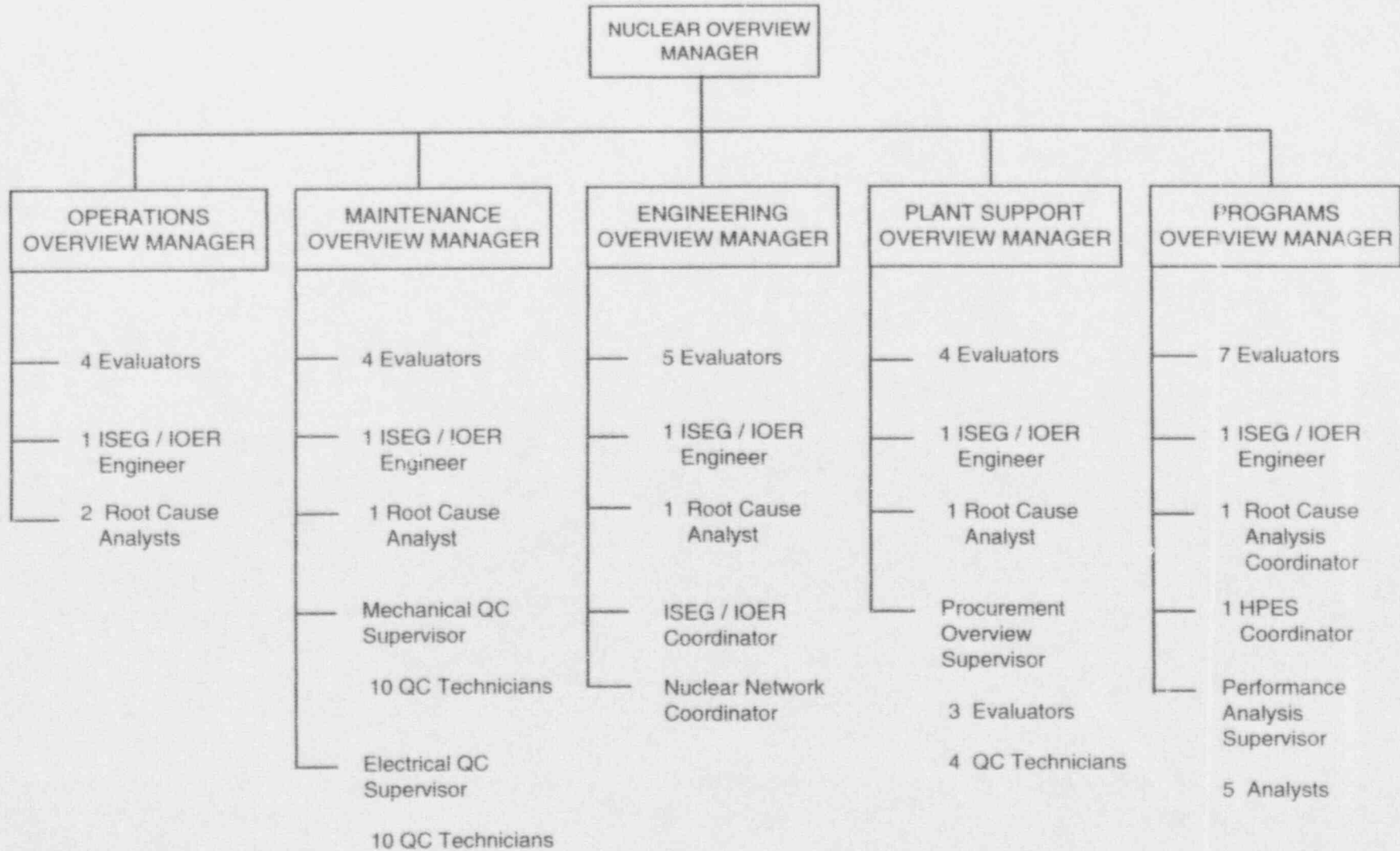
ORGANIZATION TRANSITION



FUNCTIONAL ORGANIZATION



NUCLEAR OVERVIEW



NRC REVIEW SUMMARY

- **Administrative Changes to FSAR and QA Plan to Reflect New Organization**

- **Minor Wording Changes in FSAR to Reflect Generalization of Overview Techniques**

- **No Reduction of QA Commitments**