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U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Gentlemen:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response To SALP Report

GNRO-91/00081

On behalf of the Grand Gulf management and staff I wish to express our appreciation for the exceptional recognition given to our efforts in the NRC's April 25, 1991 letter and the May 14, 1991 presentation of the initial SALP report.

We have found this recognition to be both a satisfying and humbling experience. Satisfying, because positive recognition of the results of sustained hard work is probably the best motivation for continued strong performance. And humbling, because we know from experience that sustaining a superior level of performance is a greater challenge than attaining success.

We have enclosed our comments on the SALP report.

In large measure we have used this opportunity to comment upon ourselves, and explore the principles and activities necessary for an improved level of performance in the future. As the new SALP period commences, we welcome and value your continued feedback and insight.

Yours truly,

WTC

WTC/cg

cc: (See Following Page)

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ENTERGY OPERATIONS COMMENTS

1991 INITIAL SALP REPORT

I. General

Through recognition of the superior performance of the Grand Gulf organization, the SALP report reinforces the significant challenge facing us in the future. As we noted in our Pre-SALP self assessment presented to the NRC in January:

How well does an organization deal with success? Does it continue to mature and grow? Become self-satisfied? Maintain a questioning attitude?

Perhaps more than any other, these types of questions occupied Grand Gulf management attention throughout this SALP period. We found that managing success is, in many ways, more difficult than dealing with adversity.

We continue to ask ourselves these same questions in many different forms and don't foresee an end to the process. Although we are still learning, we believe that we have identified at least some of the fundamental elements on which to base our future development:

Continuous improvement - Continuous improvement requires an enthusiasm for innovation, good communications, an empowered workforce and strong technical skills. Trying to merely maintain a level of performance will eventually result in complacency and degraded performance.

Strengthening safety culture - A healthy respect for nuclear safety coupled with a willingness to promptly identify and correct safety issues is an essential component in long-term successful operation of a nuclear facility. Grand Gulf management recognizes that a safety culture can be a fragile creature requiring continuous emphasis and encouragement. The "care and feeding" of this culture is the essence of the Safety Assessment/Quality Verification functional area.

Self-assessment - continuous improvement requires a strong management commitment to a self-assessment program that is effectively used to identify areas/issues for improvement.

Learning from the best - Although Grand Gulf has evolved many strong programs, evolution can be a lengthy and painful process. Large performance increases can be obtained in relatively shorter periods of time through identification, adoption and improvement of successful practices at other nuclear facilities worldwide.

Investment in our personnel - While it is almost a cliché to mention these days, it is a fact that the success at Grand Gulf is solely due to the dedication of our personnel - their sense of responsibility, safety consciousness and ownership for the plant. Our degree of success in the future will be a function of management's ability to provide our personnel the training, tools and authority necessary for continuous improvement.

Good regulatory communications - Good licensee/regulator communications are based on a professional attitude, safety-consciousness and strong technical bases culminating in mutual respect. Lack of candor and adversarial relationships only result in mistrust and wasted resources which could have been applied to constructive activities.

II. Selected Initiatives

Grand Gulf is translating the fundamentals discussed above into concrete programs expected to provide major contributions to future improvement. It is worthwhile to briefly review some recent initiatives.

Total Quality Improvement - This program may be the most important initiative currently underway because it is intended to be integrated into all Grand Gulf activities. Simply put, Total Quality is founded on continuously improving everything we do. Each employee is responsible for, and is given the training and delegated authority for, continuous process improvement. The direction and measure of improvement is determined through our definition of quality: "Improving every day in the eyes of the customer." For us, the NRC is a customer and the SALP report is a key measure of our progress. With strong management endorsement and participation, we expect the Total Quality program to provide a self-sustaining culture and drive for continuous improvement at all levels of the organization.

Human Performance Monitoring - This initiative is intended to promptly identify and correct any adverse trend in this area. The Quality Programs department closely monitors the number of Quality Deficiency Reports generated at Grand Gulf and has been directed by management to initiate a detailed assessment if the number exceeds a low threshold. Management is promptly notified of any adverse trend so that immediate corrective action may be taken. In addition, monitoring results are reviewed in monthly management meetings with the Entergy Operations CEO as well as monthly site business meetings.

Benchmarking - To meet the Entergy Operations goal of world class excellence, we have established a set of regulatory (safety), production and cost benchmarks derived from the best performers in the industry. Grand Gulf performance is compared to these benchmarks on a quarterly basis with the results reported to executive management. Associated with the identification of the best industry performers is a program to investigate and determine the source of the strong performance for adoption at Entergy Operations facilities.

Professional Management Program - This is an instructional program aimed at improving the management and communications skills of all supervisory (and higher) personnel at Grand Gulf. Recently, plant superintendents and managers completed this program. With few exceptions, current site supervisory personnel should complete the program by the end of the year. For new supervisors and above our goal is completion of the program within six months of their selection.

Technical Exchange Program - Grand Gulf has initiated a personnel exchange program with a goal to identify innovative approaches to the resolution of technical and operational problems. In July, Grand Gulf will be sending a system engineer and a chemist to the Leibstadt plant for six months. Upon their return, Leibstadt will send similar personnel to Grand Gulf for six months. This is the first of what we intend to be a continuing technical exchange program.

Incentive Programs - Every permanent Grand Gulf employee is covered by a yearly incentive program tied to overall plant performance. Nuclear safety, plant availability and cost control goals are used to measure effective performance in determining the payout under this program.

While a number of other initiatives are underway, we feel that these are typical of the activities necessary for Grand Gulf to continue to improve our overall level of performance.

III. Challenges

Even though the SALP Report contained no specific recommendations, Grand Gulf management as well as NRC management recognize that there are challenges remaining. The fundamental challenges and initiatives necessary to fuel continued improvement are discussed above. Specific challenges in each functional area are reviewed below. It is our intent that these challenges be met and overcome.

- A. In the Operations Area, the three recognized challenges are: attention to detail, EOP's and housekeeping.

We have addressed "attention to detail" under "Human Performance Monitoring", above, and will continue to monitor this area closely.

During a recent NRC inspection of the Grand Gulf emergency operating procedures several concerns and/or recommendations were identified. The more significant issues were in the human factors area and documentation supporting the current format. Changes will be made to the plant procedure to address this area, including a clearer definition of the Procedures Generation Package and an improved process for documenting/ justifying changes or deviations. Other discrepancies identified during the NRC Followup Inspection on the EOPs were addressed during the inspection and specific actions are being tracked to completion. Grand Gulf is currently working to resolve these issues with an expected completion date of December 1991.

With regards to housekeeping, Grand Gulf is committed to maintaining the facility at the highest level possible. With this in mind, and the identification that out-of-the-way areas need more attention, we are increasing our efforts to improve housekeeping in general and will place special attention on the less accessible areas. For instance, Supervisor inspection of relatively inaccessible rooms is now conducted on at least a weekly basis.

- B. In the Radiological Controls and Chemistry Areas there are two recognized challenges.

One of the challenges, which falls within the Chemistry Section, is the tritium analysis. The Section took a hard look at themselves after being notified of the out-of-tolerance analysis on the last cross-check sample. Both the Inter- and Intra-Laboratory Comparison Programs were reviewed to determine any trends in this area. This review did not reveal any adverse trends but increased management and Chemistry Section attention to the comparison programs will continue until we are confident that any problems have been identified and corrected.

The other challenge falls within the Radiological Controls and Maintenance Area. This challenge is to reduce and to maintain the contaminated floor area to the lowest possible size.

The Radiological Controls Section, Plant Services Section, and Grand Gulf management recognize the importance of this parameter and continuously monitor its status. An ambitious goal for the amount of contaminated floor space has been set (2% of the RCA) against which performance is judged. Grand Gulf's desire to achieve this goal was demonstrated recently through our willingness to reduce power to make leaking secondary system valves accessible for repair. Additionally, during a recent scheduled outage for replacement of recirculation pump seals, special attention was given to stop additional leaks. These efforts have led to achieving reduced radwaste influx comparable to those achieved during the first cycle of operation, and have made available more space for decontamination. Radwaste influx goals have been explicitly included in the yearly incentive programs for Operations and Health Physics management.

- C. Recognized challenges for the Maintenance/Surveillance Functional Area are: attention to detail, reliability centered maintenance (RCM) and systems important to safety.

We have addressed "attention to detail" under "Human Performance Monitoring," above, and will continue to monitor this area closely.

In regards to the RCM Program, System Engineering is actively pursuing the implementation of this concept. Systems already evaluated include Standby Service Water and Instrument Air. Plans are to perform the RCM evaluation next on the Feedwater and Turbine Building Ventilation Systems. System Engineering is also using this opportunity to prioritize those systems important to safety for the RCM process. By combining the need to pay more attention to systems important to safety and the RCM process, improved performance is expected with minimal impact on personnel resources. As we become more familiar with using and applying RCM concepts, we expect additional benefits as well. For instance, we may find that RCM can provide us with a useful tool to assess the safety effect of voluntary entry into LCOs for the purpose of elective maintenance activities.

- D. For the Emergency Preparedness Area, drill scenario development is a recognized challenge.

Drill scenario development has been given the highest attention by the Emergency Preparedness Organization. Improved scenarios are expected through the assignment of an experienced plant SRO to the organization and the change in philosophy from contracting the development of the scenarios to doing it in house. During the developmental phase for the 1991 Emergency Exercise, Emergency Preparedness personnel drafted a scenario early in the process and recently met with Region II personnel to discuss the drill. Based on this discussion, we now feel we have a better understanding of the expectations of Region II. Grand Gulf will use this understanding to improve future scenarios while ensuring that the 1991 Exercise Scenario demonstrates significant improvement. Increased management involvement will continue to ensure this challenge is met.

- E. In the Security Functional Area, control of vital area doors is a recognized challenge.

To meet this challenge will require the attention of all plant staff employees. Increased management involvement will be given until an acceptable level of performance is obtained. Continued monitoring and trending by the Security Department will be utilized to keep management informed of the status while we are assessing the long-term corrective actions necessary to fully resolve this issue.

- F. For the Engineering/Technical Support Functional Area, two recognized challenges are reliability centered maintenance and systems important to safety.

The methods for meeting these challenges are addressed under the Maintenance/Surveillance Functional Area.

- G. In the Safety Assessment/Quality Verification Functional Area, the NRC has identified two challenges: support for Technical Specification changes and improved 10CFR50.59 Reviews.

Grand Gulf and the NRC have been engaged in extensive discussions over most of the last year concerning the generation, review and approval of Technical Specification changes. Numerous disagreements and misunderstandings (such as the Technical Specification support issue raised in the SALP report) have been successfully addressed. As we look to the future, we are encouraged by the continuing convergence of viewpoint in resolving these issues through a more focused attention to the safety issues involved.

In the area of 10CFR50.59 reviews, Grand Gulf is continuously striving to improve. The 50.59 procedure and guidelines have been significantly upgraded to incorporate lessons learned and NSAC 125, and address previous problem areas. An improved training program based on the upgraded procedure/guidelines is currently being delivered, including detailed instructions on the license basis and safety analysis basics, and challenging examples, workshops and examinations. Once sufficient time has elapsed to provide enough data points, Nuclear Licensing in conjunction with Quality Programs, will perform an assessment of 50.59's for improved quality.