DAIRYLAND POWER COOPERATIVE

LA CROSSE BOILING WATER REACTOR

REGULATORY IMPROVEMENT PROGRAM

A. 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 has been reviewed, and is found to be manageable.

b. The difficulty of the radiation protection engineer to concentrate his time on matters related to health physics has been resolved by the appointment of a full-time Emergency Preparedness Coordinator for a six month period.

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 has been addressed as follows:

d. Assignment of specific duties to the individual H. P. Technicians and with an assigned backup person.

e. Emergency Preparedness Coordination duty has been assigned outside the department.

f. We will increase the frequency of QA audits of H.P. department activities.

The following items have been addressed:

a. The workload of the mechanical engineer has been reviewed; an additional person of this discipline has been employed and began work at LACBWR on Dec. 6, 1982.

b. Additional support is being provided to the Radiation Protection and Health Physics department by the Dept. of Environmental Affairs.

c. 1983 budget for seminars and technical training has been increased 72% over 1982. This money will be spent mainly on off-site training.

d. An audit of management structure and plant technical organization has been made. A recommendation to appoint a plant technical manager has been considered, but found not necessarily cost effective or beneficial under the present operation mode, because:

e. Projects are assigned to individuals who take lead responsibility for coordination and execution using both on-site and contractor furnished resources.

f. Outside contractor-consultants provide short-term high technology not available on staff. QA furnished by qualified contractor organization after LACBWR QA review.

g. The position of Manager, Special Nuclear Projects has been established at the Dairyland Headquarters office in La Crosse. This function will handle such things as:

1) Nuclear Property Insurance
2) Waste Disposal Contracts
3) Other matters which can relieve plant staff from time consuming involvement of an administrative nature.

B. 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 was prepared and implemented in December 1982. (ACP. 2.1)

The establishment of periodic supervisor's meetings with the superintendent provide an informal basis for coordination of plant activities and improved communications between departments. Progress of improvements will be monitored.

Control room access is available to those whose duties require access. Existing policies provide authority to remove people from the control room when conditions warrant this action.

C. 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 issued April 1, 1983. All tags will identify the individual placing them and the original date placed.

Task: Provide for additional training of operations personnel on the understanding of 'operability' and how to recognize when a system should be declared inoperable.

Action: A special training syllabus will be prepared which will include conditions affecting operability and especially those introduced by TMI requirements.

Task: Provide communication of status of security system operation to the security guard force.

Action: A status board showing the availability/condition of security system components will be provided in the CAS or SAS for review by security guards. Completion by June 1, 1983.

Task: Thorough review of operating logs by shift supervisor(s) at time of shift turnover must be assured.

Action: We will emphasize by training the importance of thorough log review by oncoming and offgoing shift supervisor. There is no apparent surefire checkoff method that does not introduce other opportunities for error.

D. 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 and by means of improved record keeping be able to trend equipment maintenance activities which may indicate impending failure and allow prior repair or replacement. An Administrative Control Procedure (ACP 12.2) has been developed to trend certain critical systems performance during testing to identify the need for preventative maintenance activities.

Task: Improve the attitude of and adherence to health and safety and security requirements by maintenance personnel.

Action: Through periodic supervisor and staff meetings, emphasis will be placed upon the need for adherence to all rules regarding safety, security and radiological protection by all maintenance operating and staff personnel. This action has shown improved results. Dairyland Policy No. 37 (2/18/83) has been adopted to ensure compliance with safety rules including Federal and State mandates.

E. 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 assist in coordinating outages and will be available for utilization during the 1983 refueling outage (September 1983). Routine staff meetings will be held as often as necessary to provide more coordination outside of outage periods. This effort was started in November 1982.

Staff meetings are held on as frequent a basis as needed, and frequency will increase as pre-planning activities increase.

Task: Ensure compliance with Tech Spec requirements during maintenance activities.

Action: The Maintenance Request (MR) forms will be amended to include space for notation of possible entry into limiting condition for operations (LCO) by June 1, 1983.

Specified retest of equipment will be reviewed by QA. The type of test required will be noted on the MR form by June 1, 1983.

F. 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 performed an audit to determine that the procedures were available to maintenance departments. An audit to determine adherence to procedures will be conducted by QA by July 1, 1983. The need for supervisory control on a day-to-day basis is reemphasized by the superintendent in meetings with key supervisors.

Increased involvement of quality assurance in all areas of operation and maintenance should assure better conformance to procedures. Superintendent memo of January 4, 1983 states requirement for complete documentation of work prior to returning equipment to service. QA Department will review need for additional procedures as determined by ANSI 18.7 (ongoing, complete by 1983 refueling outage).

G. 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 completed. Eventually all drawings will indicate either controlled or non-controlled. This task was completed by February 1, 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.

H. 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, 'milestones' for completion of specific tasks 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 as frequently as necessary 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.

Health Physics activities will be coordinated with outage activities to insure ALARA in all phases of the maintenance outage work.

I. 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 and will be completed in 1983. This program will expand to include new employees and be made a part of OJT and apprenticeship programs. Step-up in grade will be contingent upon completion of the training requirements.

J. 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 will include a method of documenting deviations.

Radiological Protection and craft supervisors are charged with the responsibility of reviewing the activities through plant tour, inspection and review of documentation.

A Safety responsibility policy adopted by Dairyland Management (DPC Policy 47) provides disciplinary action for violation of DPC safety rules and/or Federal rules and regulations concerning safety and health of employees.

K. 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 include emphasis on individual responsibilities and will be implemented by July 1, 1983.

L. 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 by May, 1983 which is prior to routine first half 1983 whole body counts. An annual recalibration requirement will be established in April 1983.

M. 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 film, and PIC readings to identify basis problems.

Action: LACBWR will perform a monthly comparison of individual TLD results, film 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 has been implemented.

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.

N. 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 are under continuing review Special attention will be given to minimizing the spread of avoidable contamination and confining the area for decontamination of affected equipment tools or components.

Task: Establish methods to improve personnel monitoring when exiting contaminated work areas and the radiological controlled area. Require whole-body frisking when leaving contaminated or potentially contaminated areas.

Action: LACBWR will institute a policy of increased frisking of personnel when leaving contaminated or potentially contaminated areas during 1983.

Consideration for locating friskers closer to source of potential contamination in order to limit areas of contamination spread will become part of routine H. P. Job planning. Additional friskers were purchased in late 1982; more are budgeted for 1983.

Funds have been earmarked for a replacement portal monitor if it is found that the existing monitor is inadequate.

O. 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 April 1983.

Task: Modify chemistry log sheets to include administrative limits for all applicable parameters. Utilize this information when plotting data to facilitate trend analysis.

Action: LACBWR has reviewed all chemistry and log sheets. Modifications have been made where needed to help ensure timely identification, notification and corrective action for plant chemistry parameters that have exceeded specified limits.

P. 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. This program is in place.

Q. 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 radiological and non-radiological 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 has established 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. LACBWR will be assisted by the DPC central chemistry lab and chief chemist in this effort. Unknown sample analysis indicates need for in-depth evaluation of lab.

LACBWR has assigned a health physics technician to be responsible to ensure that the prepared chemicals having limited shelf life are so marked and replaced as needed. A list of chemicals with limited shelf life will be prepared and the chemicals will be periodically inventoried and replaced as needed.

NRC spiked samples will be analyzed and reported within 60 days of receipt at our plant laboratory. Differences between known value and analyzed value will be resolved. Samples will be submitted for referee analysis by a check laboratory as necessary.

LACBWR will identify an individual to be responsible for the radio chemistry lab. Administrative controls and lab results will be placed in this responsibility (April 1983).

Sr^{90} analysis when done by LACBWR (starting second half 1983) will be annually cross checked by an outside lab.

LACBWR is working to complete its commitments LAC-8725 which is a response to an I&E Notice of Violation with the following exceptions:

1. We have not yet completed the development of the procedure for analysis of strontium 89 and 90. Further review of information will be required. In the interim and off-site laboratory is existing within our system.

2. We have not established a cross check program during the first quarter of 1983. This will be accomplished during the second quarter of 1983.

3. The Effluent Report submitted for 1982 was compared to previous years' reports rather than compared with standard values published in various technical reports.

R. 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. A tracking system is now in manual form.

Responsibility for timely response, however, lies with the plant technical staff. The effectiveness of the commitment tracking and general regulatory response is under the ultimate review of the Assistant General Manager for Power.

The Assistant General Manager (AGM) for Power is in the review-checkoff sequence for all submittals to NRC.

The AGM is a member of the Safety Review Committee (SRC).

The AGM receives and reviews minutes of:

a. Operations Review Committee (ORC)

b. Safety Review Comments (SRC)

c. All audits by QA Department and outside contractor-consultants.

d. Facility change documents.

e. Reviews written annual performance reviews of salaried LACBWR employees.

The AGM has requested a quarterly report on status of all commitments, performance and open items.

S. 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

j. electrical test & maintenance

Q.A. training will be given to all off-site service personnel as needed prior to first work activities at plant.

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.

A free communication between plant staff and headquarters keeps available headquarters staff people involved in ongoing work. Special engineering or other project assistance requests are handled on assignment basis. All safety related nuclear plant project work is reviewed by Quality Assurance, and outside support works under the direction of a plant 'nuclear-oriented' individual.

The primary technical support staff is plant-based and can be supported by in-house staff services and outside contract consultants as needed.

T. 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 Facility (EOF) and Technical Support Center (TSC).

Action: Improved procedures outlined with check points and written in clearer, more precise language will be completed by early 1983. Emergency Preparedness clearly needs the direct involvement of Health Physics Department personnel. The Emergency Planning Coordinator 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 Planning Coordinator. 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. This data is undergoing a technical evaluation.

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 now partially functional it will be completed during 1983. The system transmits plant data to TSC and EOF.

f. Field survey kits will be improved by April, 1983.

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.

i. Observers will be included in practice drills in order to sharpen skills of a larger number of potential participants.

j. In-house critiques are used to improve on deficiencies detected in practice drills.

k. A full-time Emergency Preparedness Coordinator reporting to the Assistant General Manager - Power Group has been assigned the responsibility for coordinating all emergency preparedness activities. This individual will coordinate emergency preparedness policy, will assure commitments in that area are tracked and satisfied, and will serve as liaison with the NRC, the States of Wisconsin and Minnesota, and other regulatory agencies on matters relating to emergency preparedness. This position will be a full-time position for at least six months and will continue to be a full-time position until there is evidence of effective program management and a cohesive emergency preparedness program. This position will be staffed by 4/1/83.

l. The Emergency Plan will be revised to resolve differences between the plan and implementing procedures. The revised plan will be submitted to Region III by June 1, 1983.

m. Management controls have been improved to assure that meteorological data submitted to the NRC receive peer review prior to submission.

U. 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.

V. 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 have been 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.

W. 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 have established 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, with the approval of Plant Manager and/or QA supervisor.

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

Audit Response Policy (ACP 19.0) is now implemented. Quality assurance tracks audit response, and reports deficiencies to the Plant Superintendent and the Assistant General Manager for Power.

Regulatory review (SALP) and INPO assessments are directed to the Assistant General Manager for Power and necessary responses are generated from that level.

The plant QA Department reports to plant management, but has access directly to AGM for special cases, deviations or nonresponsiveness to audit findings. This system works well for us.