

15855

RELATED CORRESPONDENCE

Law Offices

DOCKETED

Duncan, Weinberg, Miller & Pembroke, P. C.

California Office

SUITE 800
1615 M STREET, N.W.
WASHINGTON, D. C. 20036
(202) 467-6370
TELECOPY (202) 467-6370

'94 OCT 26 P2:34

DUNCAN, WEINBERG, MILLER & PEMBROKE
620 McCANDLESS TOWERS
3945 FREEDOM CIRCLE
SANTA CLARA, CALIFORNIA 95054
(408) 988-4404

Northeast Regional Office

2700 BELLEVUE AVENUE
SYRACUSE, NEW YORK 13219
(315) 471-1318
THOMAS J. LYNCH
OF COUNSEL

WALLACE L. DUNCAN
EDWARD WEINBERG
JAMES D. PEMBROKE
RICHMOND F. ALLAN
ROBERT WEINBERG
JANICE L. LOWER
JEFFREY C. GENZER
THOMAS L. RUDEBUSCH
MICHAEL R. POSTAR
TANJA M. SHONKWILER

OF COUNSEL
FREDERICK L. M. LLER, JR.
RICHARD K. PELZ †
HAROLD K. MCCOMBS, JR.

October 24, 1994

HAND DELIVERY

† ADMITTED IN WASHINGTON ONLY

Mark J. Wetterhahn, Esq.
Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005

Re: Gulf States Utilities Company, (River Bend Station), NRC Docket No. 50-458-OLA

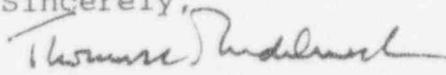
Dear Mr. Wetterhahn:

In accordance with the Licensing Board's order issued at the October 4, 1994 prehearing conference, enclosed please find Cajun Electric Power Cooperative, Inc.'s Follow-up Discovery Requests on Item 2-6.

As you are aware, we did not receive GSU/EOI's supplemental response to Item 2-6 on October 14, as provided for in the order and, in fact, we did not receive it until Wednesday, October 19. More importantly, we did not receive the purportedly "attached" documents to the response until Friday, October 21st.

In light of this delay, I requested from Mr. Levanway an additional twenty-four hours to propound discovery requests, which request was denied. Nonetheless, Cajun reserves the right to submit additional follow-up discovery requests in the next several days.

Please call if you have any questions.

Sincerely,

Thomas L. Rudebusch

cc: Honorable B. Paul Cotter, Jr. (by mail)
Honorable Peter S. Lam (" ")
Honorable Richard F. Cole (" ")
Ann P. Hoqgdon, Esq. (" ")
Robert B. McGehee, Esq. (" ")
John Schwab, Esq. (" ")

9411010169 941024
PDR ADOCK 05000458
G PDR

DS03

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
GULF STATES UTILITIES COMPANY, et al.) Docket No. 50-458-OLA
)
River Bend Station, Unit 1)
)

FOLLOW-UP DISCOVERY REQUESTS OF
CAJUN ELECTRIC POWER COOPERATIVE, INC.,
TO GULF STATES UTILITIES COMPANY,
ENERGY OPERATIONS, INC., AND ALL AFFILIATED COMPANIES

The general instructions and definitions from Cajun's first request continue to apply to all discovery requests set forth herein.

The following discovery requests are based on the RIVER BEND NUCLEAR STATION NEAR-TERM PERFORMANCE IMPROVEMENT PLAN:

2-6.1 MATERIAL CONDITION - Page 6, Item 1.1.3

- (a) Provide a current list of MWOs which are not "CLOSED" with a priority of 1 and 2. Provide the date when each MWO problem on the current priority 1 and 2 list was identified.
- (b) Provide information regarding the maintenance backlog. Specifically, identify and describe the maintenance backlog for each priority category of MWO and how that backlog has varied each month during the last 3 years. Provide information regarding the typical weekly workoff rate of MWOs during the last 3 years.

2-6.2 MATERIAL CONDITION - Page 6, Item 1.2.

Identify and describe the current prioritized list of long standing and recurrent equipment problems. Provide the list of problems to be resolved in the near term based on the 10/23/93 list and the current status of these problems. Provide the list of problems to be resolved since the RF5 outage based on the 10/23/93 list and the status of these problems if RF5 has been completed.

2-6.3 MATERIAL CONDITION - Page 7, Item 1.3.

Identify and describe the plant labeling standard. Provide information regarding the completion of painting and labelling in the HPCS Diesel Generator Room, EHC skid, and Auxiliary Building Crescent Area.

2-6.4 MANAGEMENT PROCESSES - Page 9, Item 2.1.2.

- (a) Identify and describe the procedures which assign material condition responsibilities, identify general inspection criteria, and specify inspection frequency. (Item 2.1.2.2) Identify and describe all reports which list the deficiencies identified during these inspections, corrective actions taken, and the workoff rate of the deficiencies identified.
- (b) Identify and describe the plant observation program and documents generated as a result of management oversight of selected plant activities and material condition. (Item 2.1.5.)

2-6.5 MANAGEMENT PROCESSES - Page 10, Item 2.1.3.

Indicate the percentage of the total number of individuals in the organization and number of supervisors and employees in each functional organization that have participated in the management development training focusing on the coaching and leadership program. (Item 2.1.3.1) Identify and describe the training material used to deliver the program.

2-6.6 MANAGEMENT PROCESSES - Page 15, Item 2.2.2.

Provide the INPO Work Management assist visit report including any recommendations identified in the report. (Item 2.2.2.2)

Provide the UESC maintenance evaluation report including any recommendations identified in the report. (Item 2.2.2.3.)

2-6.7 MANAGEMENT PROCESSES - Page 16, Item 2.2.3.

- (a) Identify and describe the written guidelines and conditions for classifying each priority level of MWO. (Item 2.2.3.3.)
- (b) For each weekly report to management since 12/1/93, detailing schedule deviations from the previous week, identify and describe i) the items that were scheduled and not started, and ii) the items that were scheduled and started but not completed. Identify the priority of the items identified on these reports. (Item 2.2.3.4.)

2-6.8 MANAGEMENT PROCESSES - Page 17, Item 2.2.4.

Identify and describe any documents generated by the steering council to review workloads and prioritize

problem solutions in the area of spare parts. (Item 2.2.4.1.d)

2-6.9 IMPROVING THE PLANT MODIFICATION PROCESS - Page 19, Item 2.3.2.

Describe the prioritized minor modification request (MR) list and provide a detailed descriptions of and justifications for the modifications listed based on the list published on 11/10/93. (Item 2.3.2.5) Provide the current status of the modifications listed on the list identified in Item 2.3.2.5).

2-6.10 STRATEGIC PLANNING - Page 20, Description of Program

Identify and describe the documentation generated by the conduct of any independent assessment and validation of plan actions and root causes of performance issues discussed in the Program Description paragraph under 3.0 - Strategic Planning.

2-6.11 STRATEGIC PLANNING - Page 21, Item 3.1.5

Provide the Performance Measure Report for the Near-Term Performance Improvement Plan (Item 3.1.5). Identify and describe each periodic report that provides information on the performance measures identified in the report.

2-6.12 STRATEGIC PLANNING - Page 21, Item 3.2

Identify and describe any documents generated by the systematic assessment identified in Item 3.2.4. shown as complete on 10/1/93.

2-6.13 STRATEGIC PLANNING - Page 22, Item 3.3.

- (a) Provide the Master Issues List - Issue 1993-Cycle 5/RP-5 MIL Approved Project List. (Item 3.3.4)
- (b) Identify and describe the contents of each monthly progress report of the MIL identified in Item 3.3.7.
- (c) Identify and describe the Issue Management Process for emerging issues identified in Item 3.3.9.
- (d) Provide any documents generated by the Strategic Planning Committee quarterly review of the MIL as noted in Item 3.3.10.

2-6.14 STRATEGIC PLANNING - Page 23, Item 3.4.

- (a) Identify and describe the Planning and Budget Assumptions (Environmental Assessment) identified in Item 3.4.2

- (b) Identify and describe the Strategy and Objectives, Critical Success Factors, Plan Objectives, Strategies, and Performance Indicators developed as a result of the Management Workshops completed by 11/8/93 as indicated in Item 3.4.3. Provide any revisions to these documents and the periodic information generated to track the performance indicators.

2-6.15 WORK PRACTICES - Page 25, Item 4.1

- (a) Provide information regarding the increase of time supervision spends in direct observation of work activities. What methods were established to increase supervision observation time of direct work activities? How is the time spent by each supervisor in direct observation of the work measured, reported and tracked? Identify and describe any documentation and data that indicates how much time each supervisor spends in direct observation of the work prior to and after the methods established in Item 4.1.2 were implemented. Provide the data that shows that the gains (if any) resulting from this initiative are continuing.
- (b) Identify and describe the ACAD-90-10 Maintenance Supervisor Training Program as it existed prior to the update and describe how it changed as a result of the review by the Assistant Plant Manager as identified in Item 4.1.4. Identify and describe all revisions of the documents since the re-issue following the review by the Assistant Plant Manager.
- (c) Identify and describe the Program developed for Chemistry and Radiation Protection which is similar to Mechanical Maintenance, for Supervisor Training identified in Item 4.1.5.

2-6.16 WORK PRACTICES - Page 26, Item 4.2

- (a) Item 4.2.1 indicates that briefings were completed in small group meetings with all maintenance workers and supervisors to stress procedural compliance as well as other issues. Describe how the level of procedural compliance is measured and tracked to determine the success of these briefings. What performance indicators have been developed, data gathered, tracked and reported to management on this issue. Identify and describe any performance indicators developed and all information which would indicate the success or failure of these briefings to increase procedural compliance.
- (b) Item 4.2.2 commits to an improved Observation program which will provide oversight and in-the-field coaching

on items such as procedural adherence. Describe the details of this program and the guidance given to individuals assigned to the coaching and observation activities. Identify the individuals assigned as coaches and their qualifications for this assignment. Provide all documentation associated with the implementation of this program and produced as a result of the coaching and observation activities. What performance indicators were established to measure the success of this coaching and observation program? Provide the performance indicators developed and all information which would indicate the success or failure of these briefings to increase procedural adherence.

- (c) Item 4.2.3.a indicates that the worker feedback process will be improved by including a feedback form in selected MWOs. Since the process was enhanced (12/15/93), how many feedback forms were issued in MWOs? How many forms were returned? How many of the returned forms contained comments that were accepted and improvements implemented? How many of the returned form's comments were rejected? Identify and describe all returned feedback forms.
- (d) Item 4.2.3.b indicates critiques will be performed of major jobs with planners and craft in attendance. Identify and describe critiques performed to date.
- (e) Item 4.2.4 indicates that workers will be assigned to the Planning Department on a rotating basis. Since 12/1/93 how many individuals have been rotated into and out of the Planning Department. What selection criteria was used to select the workers and what special training was provided to workers rotating into the Planning Department?

2-6.17 WORK PRACTICES - Page 27, Item 4.3

- (a) Provide information regarding the "Red Sheet " program as it existed before and after the revision identified in 4.3.2.
- (b) Identify and describe all critiques of high risk activities and lessons learned as a result of these critiques as indicated in Item 4.3.4.

2-6.18 WORK PRACTICES - Page 27, Item 4.4

Identify and describe the additional training provided to the operators as identified in Item 4.4.3. Describe in detail the training material developed to support this training. How many operators have received this training? What are the job responsibilities of the operators that

received this training? Has this additional training been incorporated into the Accredited Operator Training Program?

2-6.19 WORK PRACTICES - Page 28, Item 4.5

- (a) Identify and describe the TSP-0033 which existed prior to the revision identified in 4.5.1.2 and all revisions which occurred after the revision identified in 4.5.1.2.
- (b) Item 4.5.1.3. identifies a list of supervisors and workers to be briefed regarding the roles and responsibilities when working with system engineers. As of this date (10/24/94) how many workers and supervisors in each group have completed the briefings?

2-6.20 WORK PRACTICES - Page 29 & 30, Item 4.6

- (a) Identify and describe the assessment report generated by the Entergy Corporate Health Physics as indicated in Item 4.6.1.
- (b) Identify and describe the rad worker handbook as it existed prior to the simplification identified in Item 4.6.2 and all subsequent revisions.
- (c) Identify and describe all revisions of the rad worker supervisor handbook identified in 4.6.3.
- (d) Provide information on the number of individuals in each functional organization that took part in the review of Policy Statement/Management Directive pertaining to Radiation Protection Violations in the tool box type sessions (PS/MD-044). Identify and describe documents used to prepare for and conduct these sessions. (Item 4.6.4) What special training was provided to the individuals that lead these sessions. What were the qualifications of individuals assigned to conduct these sessions.
- (e) Provide information on the number of individuals in each functional organization that took part in the review of Standard and Expectations pertaining to radiation worker work practices, number 2. in the tool box type sessions. Identify and describe documents used to prepare for and conduct these sessions. (Item 4.6.5) What special training was provided to the individuals that lead these sessions. What were the qualifications of individuals assigned to conduct these sessions.

- (f) Provide information on the number of individuals in each functional organization that took part in the review of Standard and Expectations pertaining to the ALARA Program in the tool box type sessions. Identify and describe documents used to prepare for and conduct these sessions. (Item 4.6.6) What special training was provided to the individuals that conducted these sessions. What were the qualifications of individuals assigned to conduct these sessions.

2-6.21 EFFECTIVE CORRECTIVE ACTION - Page 31, Item 5.1

- (a) Provide the priority list of documents (significant corrective actions) meeting the criteria for selection of significant conditions adverse to quality. Identify and describe the documents identified on the list. Provide the criteria used to select the documents placed on the list. What, if any, actions were required based on the review of these documents to verify operability requirements? (Item 5.1.2)
- (b) Provide the goal and schedule for the reduction of priority list significant corrective actions established in Item 5.1.3. Provide information and data to show how the number and individual significant corrective actions have changed since the list was first established.

2-6.22 EFFECTIVE CORRECTIVE ACTION - Page 32, Item 5.2

- (a) Identify and describe RBNP-030 as it existed prior to the change indicated in Item 5.2.1 and all subsequent changes of the document.
- (b) Describe the policy identified in the letter from J. R. McGaha regarding policy for identification of problems/concerns (Item 5.2.2.).
- (c) Identify and describe the procedure used by the operating experience group to evaluate the corrective action database both for identifying trends and confirming corrective action effectiveness. Provide data generated to trend corrective actions and confirmation of corrective action effectiveness as required by the procedure.
- (d) Identify and describe the River Bend Station trending program identified in Item 5.2.5. Provide data generated to support the trending programs and documents which show status of the activities, documents, or indicators trended by this program.

2-6.23 EFFECTIVE CORRECTIVE ACTION - Page 33, Item 5.3

Identify and describe the interim process established for screening CR's for significant conditions adverse to quality that will require a root cause analysis (Item 5.3.1).

2-6.24 EFFECTIVE CORRECTIVE ACTION - Page 34, Item 5.4

(a) Identify and describe the initial recommendations of the Key Process Management Team (KPMT) for Corrective Action/Root Cause Analysis for an Ideal Process (Item 5.4.1).

(b) Identify and describe the RBNP-030 that reflects the changes recommended by the KPMT (Item 5.4.2).

2-6.25 EFFECTIVE CORRECTIVE ACTION - Page 35, Item 5.5

Identify and describe the matrix which describes and defines expectations of independent assessment functions, roles and responsibilities. (Item 5.5.1) Provide the schedule and description of the all planned, schedules, or required assessments or evaluations for River Bend. Provide a description of the River Bend Assessment or Evaluation programs including those performed by Quality Assurance, Independent Safety Engineering Group, NRB, and any self-assessments. Identify and describe all assessments performed at River Bend since January 1, 1993.

2-6.26 EFFECTIVE CORRECTIVE ACTION - Page 35, Item 5.6

(a) Identify and describe all documents generated by the Quality Assurance organization associated with audits, surveillances, corrective actions, training of personnel in the Quality Assurance, and procedures and schedules for performance of audits.

(b) Identify and describe the results of the combined Utility, Audit Group/Joint Utility Audit Group Audit completed by 3/1/94 as indicated in 5.6.4.

2-6.27 HUMAN PERFORMANCE EFFECTIVENESS - Page 37, Issue Description

Please identify and describe all events that were caused by significant personnel errors attributable to human performance effectiveness.

2-6.28 HUMAN PERFORMANCE EFFECTIVENESS - Page 38, Item 6.1

(a) Provide a detailed description and the results of the 30 day observation program identified in 6.1.3. How was the effectiveness of this program determined?

Identify and describe all documentation and training that was used to prepare the observers for assignment as observers.

- (b) Item 6.1.4 indicates that human performance is to be verified that it is at a level commensurate with safe and reliable power operation. What criteria has been established and performance indicators developed to determine when human performance is commensurate with safe and reliable power operation? Explain the basis for the criteria and performance indicators in this area. Provide the data that is being collected and trended to verify safe and reliable power operation.

2-6.29 HUMAN PERFORMANCE EFFECTIVENESS - Page 39, Item 6.2

Identify and describe all documentation associated with the conduct of the formal evaluation of the STAR training program. Provide all information generated as the result of the evaluation.

2-6.30 HUMAN PERFORMANCE EFFECTIVENESS - Page 39, Item 6.3

Identify and describe all Procedure Change Notices. Identify and describe how the backlog of Procedure Change Notices has changed over the last three years. Identify and describe all documents which identify procedure weaknesses. (Item 6.3.4)

2-6.31 ENGINEERING SUPPORT - Page 39 and 40, Item 7.1

Provide a list of high priority drawings that require upgrade as determined by Operations and Maintenance as identified in Item 7.1.4. Provide the title of each drawing on the list and the nature of the changes required to be made to each drawing. Provide the schedule for completing drawing changes as identified in Item 7.1.3. Provide the present status of the drawings that indicates if the scheduled changes have been completed in accordance with the original schedule. Please provide data used by EOI to monitor performance regarding timely revision of all drawings. Include criteria for determining update/revision priority and targets for completing the revisions on each type/priority of drawing. Provide EOIs method of monitoring performance in this area and the data generated by the program.

2-6.32 ENGINEERING SUPPORT - Page 41 and 42, Item 7.2

Provide the list of high priority vendor manuals that require upgrade as determined by the plant staff as identified in Item 7.2.4. Provide the title of each vendor manual on the list and the nature of the changes required to be made to each manual. Provide the schedule

for completing the vendor manual changes as identified in Item 7.2.4. Provide the present status of the vendor manuals that indicates if the scheduled changes have been completed in accordance with the original schedule. Please provide data used by EOI to monitor performance regarding timely revision of all vendor manuals. Include criteria for determining update/revision priority and targets for completing the revisions on each type/priority of vendor manual change. Provide EOI's method of monitoring performance in this area and the data generated by the program.

2-6.33 ENGINEERING SUPPORT - Page 42 and 43, Item 7.3.1

- (a) Identify and describe any performance indicators which show the effectiveness of the timely processing of Parts Verification Requests. Provide the procedure and program methods to accomplish this activity. Provide the criteria, data and periodic reports used by EOI to verify acceptable performance in this area. (Item 7.3.1.1) Provide information which shows the trends from January 1, 1993 to the present in the number of unprocessed requests and the mean time for completing requests.
- (b) Identify and describe performance indicators which show the effectiveness of the timely processing of Vendor Information Requests. Provide the procedure and program methods to accomplish this activity. Provide the criteria, data and periodic reports used by EOI to verify acceptable performance in this area. (Item 7.3.1.2) Provide information which shows the trends from January 1, 1993 to the present in the number of unprocessed requests and the mean time for completing requests.
- (c) Identify and describe the method developed for prioritization, tracking and timely disposition of emergent PVR's. (Item 7.3.1.3) Provide all data generated by the method developed and reports issued to date.
- (d) Identify and describe the method developed for prioritization, tracking and timely disposition of emergent VIR's. (Item 7.3.1.4) Provide all data generated by the method developed and reports issued to date.

2-6.34 ENGINEERING SUPPORT - Page 43, Item 7.3.2

Provide a list of all high priority Condition Reports assigned to engineering as identified in Item 7.3.2.1. Provide the information regarding each condition report on the list and the nature of the conditions that require

Engineering Action. Provide the schedule for completing CR actions as identified in Item 7.3.2.2. Provide the present status of the CR's requiring engineering action which indicates if the scheduled CR's have been completed in accordance with the original schedule. Identify and describe how EOI monitors performance regarding timely completion of engineering actions associated with CR's. Include criteria for determining engineering action priority and targets for completing these actions. Provide EOI's method of monitoring performance in this area and the data/reports which show this performance.

2-6.35 ENGINEERING SUPPORT - Page 43, Item 7.3.3.

Provide a priority list of uncompleted Modification Requests and a description of the nature of and reason for each modification requested. Describe EOI's method and criteria for monitoring acceptable performance of engineering in supporting plant modification requests. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.36 ENGINEERING SUPPORT - Page 43, Item 7.3.4.

Please provide information regarding the nature of the NSSS drawing problems identified in 7.3.4 and the safety significance of this problem.

2-6.37 ENGINEERING SUPPORT - Page 44, Item 7.3.5.

Provide a priority list of uncompleted Procurement Requisitions and a description of the nature of and reason for each requisition. Provide EOI's method and criteria for monitoring acceptable performance of engineering in supporting procurement requisitions. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.38 ENGINEERING SUPPORT - Page 44, Item 7.4.1.

Provide a priority list of requested Vendor Skids Upgrade P&ID's and a description of the nature of and reason for each requested upgrade. Provide EOI's method and criteria for monitoring acceptable performance of engineering in supporting P&ID upgrade for Vendor Skids. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.39 ENGINEERING SUPPORT - Page 44, Item 7.4.2.

Provide the near term list of Bill of Materials requested by Maintenance in Item 7.4.2.1 as of 9/30.93. Provide the current a status of the requested Bill of Materials. What is the backlog of the requests of Bill of Materials.

Provide EOI's method and criteria for monitoring acceptable performance of engineering in supporting the generation of Bill of Materials. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.40 ENGINEERING SUPPORT - Page 45, Item 7.4.3.

Provide a description of Engineering' Operability Tracking System. Provide the program description or procedure used to implement the system. Provide a list and description of each item being tracked in the system. Indicate the operability issues associated with each item tracked. Provide EOI's method and criteria for monitoring acceptable performance of engineering's use of and tracking of issues on the Operability Tracking System. Please provide information which shows the performance trends and the issues that were placed on and removed from the tracking system from January 1, 1993 to the present.

2-6.41 ENGINEERING SUPPORT - Page 45, Item 7.4.4.

Describe the priority list of Loop Calibration Reports (LCRs) established by Maintenance in Item 7.4.4.1. as of 10/31/93. Provide the current status of the requested LCR's. What is the backlog of LCR requests. Provide EOI's method and criteria for monitoring acceptable performance of engineering in completing the LCRs. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.42 ENGINEERING SUPPORT - Page 46, Item 7.5.1.

Provide a list of modifications required to implement recommendations of the Safe Shutdown Analysis discussed in Item 7.5.1.5. Describe the nature and approximate cost of these modifications. Provide the schedule for installing these modifications. Indicate how the installation, testing, and operation of these modifications is being tracked to ensure timely completion.

2-6.43 ENGINEERING SUPPORT - Page 46 and 47, Item 7.5.2.

Describe the rework of structural steel fire proofing in areas identified by the evaluation discussed in 7.5.2.2.

2-6.44 ENGINEERING SUPPORT - Page 47, Item 7.5.3.

Describe the rework of penetration seals as dispositioned on the Condition Reports discussed in 7.5.3.2.

2-6.45 ENGINEERING SUPPORT - Page 47, Item 7.6.

Describe the elevated drywell temperatures identified in 7.6.4 and the safety significance of this problem. Identify the potential modifications required to resolve this problem and the estimated cost of these modifications.

2-6.46 ENGINEERING SUPPORT - Page 48, Item 7.8.

Identify and describe all SSFI's on River Bend. Include all deficiencies identified by the SSFI. Do not limit your response to drawing deficiencies.

2-6.47 ENGINEERING SUPPORT - Page 49, Item 7.9.

Identify and describe all documentation generated by the Engineering Review Committee including the feedback forms discussed in 7.9.2. Provide data and trend information used to evaluate program performance as discussed in 7.9.4.

The following discovery requests are based on the RIVER BEND STATION LONG PERFORMANCE IMPROVEMENT PLAN (LTPIP), Rev 2 dated September 15, 1994:

2-6.48 CLOSURE - Page 7

The LTPIP provides for the use of a LTPIP Closure Form with attached documentation to demonstrate completion of LTPIP activities. Please identify and describe all instances where Closure Forms and attached documentation have been generated to date. Provide copies of additional Closure Forms as they are completed.

2-6.49 REVISIONS - Page 8

The LTPIP provides for the use of a LTPIP Revision Form with attached justification to document and describe a change to an activity in the LTPIP. Please identify and describe all Revision Forms and attached documentation/justification generated to date. Provide copies of additional Revision Forms as they are completed.

2-6.50 PERFORMANCE MEASURES - Page 8

(a) The LTPIP includes quantitative performance measures to track and determine the effectiveness of the LTPIP. Periodic management reports are to be developed to show performance against these performance indicators. Please identify and describe all management reports generated to date and provide future reports as they are issued.

- (b) The performance measures set forth in each program plan generally provide the goals established by each program plan. The LTPIP does not however, indicate the specific data to be obtained, the source of this data, and how the data is to be tracked, reported and monitored to determine satisfactory performance. Please describe the details associated with these performance measures including specific data elements to be used in the tracking and reporting on each program progress and effectiveness. If all these data elements have not yet been determined, provide those that are available at this time and transmit the remainder as they are developed. Provide an explanation regarding how the selected performance measures data elements relate to the goals established in the program plan. Also, please identify and describe all reports on the program plan performance measures issued to date and provide future reports as they are issued.
- (c) In addition to monitoring performance of the program plans within the LTPIP, plant management may have established other performance measures dealing with activities not associated with the LTPIP. Managements reports and review of this type of information is common in the nuclear industry and is encouraged by INPO and the NRC. Please provide a comprehensive list of all Performance Indicators that have been established to monitor performance at River Bend that are routinely reported to departmental management, site management, NRB, INPO, or the NRC. Provide copies of the performance indicator reports and the established goals to be achieved for each indicator. Identify and describe all management reports which address plant and organizational performance generated since January 1, 1993. Provide all future reports of this type as they are issued for review by management.

2-6.51 STRATEGIES AND PROGRAMS

The LTPIP Rev 2 indicates that many program plan activities are behind schedule. Please provide the remedial plans established to recover progress on all program plan activities that are shown behind schedule in Rev. 2 of the LTPIP. Provide an analysis regarding the impact to the success of the LTPIP if these program plan activities are not completed as scheduled.

20-6.52

Please provide all future revisions of the LTPIP as they are issued.