September 7, 1995

Florida Power Corporation
Crystal River Energy Complex
Mr. P. M. Beard, Jr. (SA2A)
Sr. VP, Nuclear Operations
ATTN: Mgr., Nuclear Licensing
15760 West Power Line Street
Crystal River, FL 34428-6708

SUBJECT: MEETING SUMMARY - CORRECTIVE ACTION PLAN
CRYSTAL RIVER 3 - DOCKET NO. 50-302

Gentlemen:

This refers to the meeting conducted at your request at the NRC Region II office in Atlanta, Georgia, on August 25, 1995. The purpose of the meeting was to discuss the status of your Corrective Action Plan for Crystal River 3. It is our opinion that this meeting was beneficial.

A list of attendees is provided in Enclosure 1 and the material you presented is provided in Enclosure 2. The agenda included discussions on the following topics: Safety Culture Enhancements; Engineering Interface and support Enhancements; and Other Initiatives to Improve Performance.

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 and its enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this letter, please contact us.

Sincerely,

Orig signed by Kerry D. Landis

Kerry D. Landis, Acting Chief
Reactor Projects Branch 2
Division of Reactor Projects

Docket No. 50-302
License No. DPR-72

Enclosures: 1. List of Attendees
2. FPC Presentation

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cc w/encls:
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cc w/encls: Continued see page 3

cc w/encls: Continued
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SEND TO PUBLIC DOCUMENT ROOM? (YES) NO						
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COPY?	(YES) NO	(YES) NO	YES NO	YES NO	YES NO	YES NO

OFFICIAL RECORD COPY DOCUMENT NAME: G:\CRMTGSUM.895

LIST OF ATTENDEES

Florida Power Corporation

P. Beard, Senior Vice President, Nuclear Operations
B. Hickle, Director, Nuclear Plant Operations
L. Kelley, Director, Nuclear Operations Site Support
P. McKee, Director, Quality Programs
K. Wilson, Manager, Nuclear Licensing

Nuclear Regulatory Commission

R. Butcher, Senior Resident Inspector, Crystal River
C. Casto, Chief, Engineering Branch, Division of Reactor Safety, Region II (RII)
S. Ebneter, Regional Administrator, RII
K. Landis, Acting Chief, Reactor Projects Branch 2, Division of Reactor Projects (DRP), RII
D. Matthews, Project Director, Office of Nuclear Reactor Regulation
E. Merschoff, Director, DRP, RII
L. Reyes, Deputy Regional Administrator, RII
R. Schin, Project Engineer, Reactor Projects Section 2B, DRP, RII

ENCLOSURE 1

AGENDA

FPC/NRC MANAGEMENT MEETING

August 25, 1995

I.	Introduction	Pat Beard
II.	Safety Culture Enhancements	Bruce Hickle
III.	Engineering Interface and Support Enhancements	Paul Tanguay
IV.	Other Initiatives to Improve Performance	Larry Kelley
V.	Summary	Pat Beard

Florida Power Corporation Participants:

P. M. (Pat) Beard	Senior Vice President, Nuclear Operations
B. J. (Bruce) Hickle	Director, Nuclear Plant Operations
P. R. (Paul) Tanguay	Director, Nuclear Engineering and Projects
L. C. (Larry) Kelley	Director, Nuclear Operations Site Support
P. F. (Paul) McKee	Director, Quality Programs
K. R. (Ken) Wilson	Manager, Nuclear Licensing

ACTION ITEM STATUS FROM THE MRP REPORT

- 49 actions assigned
- 44 actions (90%) were completed as of 7/1/95
- 3 actions (6%) will be completed before 12/31/95
- 2 actions (4%) are long-term
  - Procedure change process BPI (6/96)
  - Revise 163 procedures to modify hold points/witness points

SUMMARY OF KEY CORRECTIVE ACTIONS

- Enhanced communications with NRC and focus on fully meeting all regulatory requirements and commitments.

- Increased emphasis on safety including conservative decision making, questioning attitude, and use of STAR concept.

- Implement "Event Free Operations" in all departments.

- Increased line management accountability.

- Enhanced engineering support of plant and communications between all groups.

- Implementation of ongoing self-assessment process at Director and Manager levels.

EVENT-FREE OPERATIONS AND SAFETY CULTURE ENHANCEMENT

- All departments have implemented the program

- Early indications are showing a positive effect

- Safety culture enhancement initiatives

  - Risk assessments
  - PRC
  - Operability determinations
  - Screening criteria for MARs and procedures
  - Procedure upgrades
  - Self assessments
  - Troubleshooting and testing

HOW ARE WE DOING?

Making good progress with:

- Implementing Event Free Action Plans
- Reducing events that impact plant operations
- Identifying and assessing precursors
- Using and analyzing operating experience
- Procedure usage
- Pre-job planning
- Supervisors in field

Areas for additional attention:

- STAR
- Communications between groups
- Questioning attitude
- Human performance indicators

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Examples of Events Which Significantly Impact Plant Operations

Unexpected System Actuations

Unplanned Releases and Spills

Serious Injury

Technical Specification Violations

Operation Outside of Operating Limits

Degradation of Plant Safety Margins

Destruction of Equipment

Plant Trips

Excessive Radiation Dose

Mismanagement of Reactivity Control

PRECURSOR EXAMPLES

PC 95-0786
DATE 3/20/95
DESCRIPTION: RMG-27 "warning" alarms following CDP-1B power reduction could be indication of developing primary → secondary leak in "A" OTSG.

PC 95-0865
DATE 3/24/95
DESCRIPTION: During the performance of SP-907B, it was determined that if SLUR or FLUR relays fail to meet acceptance criteria, the required action of ITS 3.3.8 to trip "A" channel in one hour will not be met. Also, pre-start checks on "B" diesel was not ready for normal start due to fan gear drive oil low.

PC 95-0293
DATE 2/3/95
DESCRIPTION: EOP review indicated instrument error on RB flood level. May be too much to use as valid indication of RB level to verify adequate NPSH for long term cooling.

PC 95-1961
DATE 950822
DESCRIPTION: When letdown is selected to one of the 3 RCBTs, RML-1 count rate goes down. Because of the flow paths, RML-1 flow could be changing when we select bleed.

KEY EXPECTATIONS

Safety and Quality

Work must be performed safely and correctly first and foremost. There are no good reasons for short-cutting safety or quality.

Procedure Use

Procedures will be followed exactly as written. When a procedure cannot be followed as written, work will be stopped and the procedure will be interpreted or changed.

All manipulations, equipment alterations and evolutions will be performed with an approved procedure, work instruction or tagging order.

Human Performance Improvement Commitment

All personnel are expected to make a personal commitment to continuously improving human performance.

Operations Procedure Use

- Event Free Principle of enhanced "Procedure Use"

- Operations End User Committee formed with representative from each shift
  - define how procedures will be consistently used
  - develop policy for future operations

- Developed three categories
  - CAT 1 Evolutions must be documented with working copy
  - CAT 2 Evolutions need not be documented but procedure is in-hand and followed step-by-step
  - CAT 3 Evolutions need not be documented and procedures are not required to be in hand. These evolutions are simple in nature and frequently performed.

- Over 800 procedure sections categorized

- Interim guidance given to operations via Night Order for a trial period
  - period began May 3, 1995
  - trial period ends with revision to AI-500 due in fourth quarter

Operability Determinations

- Increased Scope includes equipment required to be operable by:
  - Technical Specifications
  - ODCM
  - Fire Protection Plan
  - Equipment having a safety function defined in the enhanced design basis document

- Improved Documentation of basis for call

- Role Clarification
  - Staff performs evaluations to present to SSOD
  - Shift supervisor on duty (SSOD) makes operability determination
  - SSOD accepts only complete information

- Improved Timing
  - Early referral and dispositioning of potential operability issues
  - Timeliness for evaluation established

- Conservative Approach
  - Aligning better with generic letter GL91-18.

- Better clarification of design basis/reportability/operability relationships

NEW NOD-14 & PORC PROCEDURE TO BE COMPLETED.

Self Assessments Performed

- Maintenance
- Quarterly Maintenance Shop
- AI-501, Control Room and Simulator
- Training Observations
- System Outage Critiques
- Reactor Building Jump Critiques
- Nuclear Shift Manager's Checklist:
  - Maintenance assessment of work in field
  - Operator rounds tours
  - Review of buildings, labs and shop logs
  - Plant spaces inspection
  - Foreign material exclusion inspections

- Quality Assurance Surveillances
- On-Line Maintenance vs. INPO Guidelines

- Quarterly Management
- Plant Review Committee
- Senior Management
- Nuclear General Review Committee
- Engineering, Licensing & Operations Interface

Screening Criteria for MARs and Procedures

1. Can this potentially reduce the level of safety of the plant?

2. Can this possibly lead to an event that would impact plant operation?

If "yes," requires PRC review and DNPO approval for activity.

PRC Enhancements

- Major issues and their status presented to PRC by Issue Managers, examples include:
  - Setpoints
  - EOP program upgrade
  - Make-Up Tank concerns
  - Habitability envelope
- Published PRC guidelines with goals and protocol
- Established subcommittees for key topics
- Require presentation of reportable and significant problem reports including human performance evaluations
- Chairman reports directly to DNPO for PRC and plant safety concerns
- Expectations presented at qualified reviewer training sessions
- Reviews of work being removed from the outage schedule by the applicable system engineer
- Active role in reducing significant issues such as EFIC Task Force recommendations

1995 PERFORMANCE INDICATOR TARGETS

INDUSTRY PERFORMANCE INDICATORS		1995 TARGET	STATUS TO DATE	GOAL ACHIEVED
a)	Unit Capability Factor [%]	>95	99.84	On Target
b)	Unplanned Capability Loss Factor [%]	<2.5	0.04	On Target
c)	Unplanned Automatic Scrams Per 7000 hours Reactor Critical	<1.0	0.00	On Target
d)	Safety System Performance:			
	(1) High Pressure Injection	<0.030	0.002	On Target
	(2) Emergency Feedwater	<0.025	0.003	On Target
	(3) Emergency AC Power	<0.025	0.0137	On Target
	(4) LPI/Decay Heat Removal	<0.025	0.006	On Target
e)	Thermal Performance [%]	>99.5	99.6	On Target
f)	Fuel Reliability [μCi/g]	<0.004	0.000365	On Target
g)	Chemistry Index	$\leq$1.55	1.33	On Target
h)	Collective Radiation Exposure [Rem][2]	<21	<5.0	On Target
i)	Volume of Low-Level Solid RadWaste [m^3][3]	<32	5.75	On Target
j)	Industrial Safety Accident Rate[4]	<0.275	3.40	Behind

ENGINEERING INTERFACES & SUPPORT ENHANCEMENTS

- CONVENED MANAGEMENT REVIEW PANEL TO ADDRESS ENGINEERING, LICENSING & OPERATIONS INTERFACES
  - AREAS IDENTIFIED AS NEEDING ATTENTION
    - * NEED TO STRENGTHEN COMMUNICATION ACROSS NUCLEAR OPERATIONS
    - * STRENGTHEN TEAMWORK CULTURE ACROSS ALL OF NUCLEAR OPERATIONS
    - * ENHANCE ENGINEERING SUPPORT FOR THE PLANT IN A MORE TIMELY MANNER
  - CONSISTENT WITH THOSE PREVIOUSLY NOTED BY BOTH THE NRC AND FPC SELF ASSESSMENTS
- INPO ASSIST VISIT PERFORMED TO ASSIST IN CONTINUOUS IMPROVEMENT PROCESS

ENHANCEMENTS TO ENGINEERING PROCESSES

- REVISED DESIGN CALC. PROCESS TO INCLUDE SYSTEM ENGINEERING AND OPERATIONS SIGNOFF ON DESIGN INPUTS, ASSUMPTIONS AND RESULTS

- IMPLEMENTED MULTIDISCIPLINE PROJECT TEAMS FOR ALL MAJOR PROJECTS
  - PROJECT MANAGER IS SINGLE POINT OF ACCOUNTABILITY
    - PERFORMS PLANT WALKDOWNS AS AN INTEGRAL PART OF THE MODIFICATION PROCESS
    - PERFORMS POST MODIFICATION CRITIQUE TO CAPTURE LESSONS LEARNED ~~FOR PROJECTS~~
  - PROJECT MANAGER MONITORS AND TRACKS REVISION OF OTHER PLANT DOCUMENTS WHICH REQUIRE CHANGE

ENHANCEMENTS TO ENGINEERING PROCESSES cont'd

- TEAMWORK HAS BEEN EMPHASIZED BY ALL ORGANIZATIONS
  - CLOSER WORKING RELATIONSHIPS APPEARS TO BE IMPROVING THE TEAMWORK AMONG ORGANIZATIONS
- ALL NUCLEAR ENGINEERING PERSONNEL HAVE BEEN RELOCATED TO CRYSTAL RIVER
- IMPLEMENTED MONTHLY DESIGN ENGINEERING PRIORITY MEETING
- ESTABLISHED A SINGLE POINT OF CONTACT WITHIN THE OPERATIONS ORGANIZATION FOR TECHNICAL ISSUES

ADDITIONAL ENHANCEMENTS TO ENG. SUPPORT

- IMPLEMENTED A DESIGN ENGINEERING REVIEW BOARD FOR PROJECTS
  - MULTIDISCIPLINE GROUP
  - REVIEWS DESIGN ACTIVITIES FOR TECHNICAL ACCURACY AND ADHERENCE TO REQUIREMENTS
  - REVIEWS POST PROJECT CRITIQUES AS A FEEDBACK MECHANISM TO ENHANCE THEIR EFFECTIVENESS
- COMBINED ALL ENGINEERING RESOURCES INTO ONE ORGANIZATION
- INCREASED FOCUS ON MORE TIMELY RESPONSE TO PLANT ISSUES
  - CONTRACTORS WERE BROUGHT ON BOARD TO ASSIST PERMANENT STAFF MEET SHORT TERM DEMANDS

NUCLEAR ENGINEERING DESIGN (NED) PRIORITIES

8/8/95

TOP 10 LIST

	DEPT	DESCRIPTION	DOC	NUMBER	DUE	OUTAGE	PRIORITY EVALUATION SAFE	ECON	REL	REG	HF	PRIORITY
1	NPTS/NED	SETPOINTS / SURV. PROC. EXTENSIONS	PR	94-0276	Nov-95							
2	OPS/NED	MUT / H2 OVERPRESSURE (STI)	PR	94-0267	Jun-96	10 R						
3	ALL	SWSOP! FOLLOW-UP ITEMS	CALCS	VARIOUS	Oct-96							
4	NED	SECURITY PROJ / VEHICLE BOMB THREAT	MAR	88-03-04-XX/95-02-01-01								
5	OPS/NED	CONTROL ROOM HABITABILITY (CREVS)	PR	94-0143								
6	NED	CHILLER - COOLING TOWER ADDITION	MAR	95-02-19-XX	Aug-95							
7	OPS/NPTS	TANK CALCULATIONS	EEPR	91-0013	Dec-96		2	0	1	3	3	35.5
8	OPS	EOP SETPOINT VALIDATION PROGRAM	REA	95-0162	Jun-96		4	0	3	4	2	55.9
9	CHEM	REPLACE RC OFF-GAS SAMPLE SYSTEM	REA	95-0155			3	3	4	1	3	54.1
10	NPTS	WD-301/2/3/4-LT-SILICONE	REA	94-1382		10R	2	1	4	3	4	53.4

ON-GOING PROGRAMS

	DEPT	DESCRIPTION	DOC	NUMBER	DUE	OUTAGE	SAFE	ECON	REL	REG	HF	PRIORITY
1	NED	ERROSION / CORROSION MONITORING				10 R						
2	NED	BORON CORROSION INSPECTIONS				10 R						
3	NED	REPAIR & REPLACE - SECTION XI										
4	NED	ELECTRICAL CALCULATION MAINTENANCE	CALCS	VARIOUS								
5	NED	HYDRAULIC CALCULATION MAINTENANCE	CALCS	VARIOUS								
6	NED	PEPSE HEAT BALANCE MAINTENANCE										
7	NED	DESIGN ENGINEERING REVIEW BOARD			Monthly							
8	NED	REA - LAN UPGRADE / MODIFICATION										

MUST DO ITEMS / PROJECTS

	DEPT	DESCRIPTION	DOC	NUMBER	DUE	OUTAGE	SAFE	ECON	REL	REG	HF	PRIORITY
1	FUELS	APSR REPLACEMENT	PEERE	1203		10R						
2	NED	CORE BARREL BOLT INSPECTION				10R						
3	LIC	TSI										
4	LIC/NED	SEPARATION	MAR	91-08-26-XX		10R						
5	NPTS/NED	THERMAL POWER UPGRADE	SP	92-031	Oct-95							
6	LIC/NED	USI A-46										
7	NED	PIPING / SUPPORT DESIGN BASIS ISSUES					2	0	3	4	0	41.3

OTHER INITIATIVES TO IMPROVE PERFORMANCE

Bi-Weekly Manager Meetings

- Increased Interdepartmental Communications
- Focus on key issues and priorities

Established Issue Sponsors and Managers for all Key Issues/Projects

- Single point of accountability
- Director level sponsor
- Visibility at Vice Presidential level

FOCUS ITEM / KEY ISSUES STATUS -- AUGUST 17, 1995				
Sponsor	Manager	Item / Issue	Latest Action Plan Status Date	% Completed
Bruce Hickle	Bill Stephenson	Improve Operability Determination Process (Senior Management Focus Item # 1)	08/15/95	Draft by 08/30/95
Gary Boldt	Dan Kurtz	Enhance Communications Daily (Senior Management Focus Item # 2)	08/16/95	60%
Pat Beard	Sarah Johnson	Improve Teamwork with Manager Level Emphasis (Senior Management Focus Item # 3)	08/23/95	10%
Larry Kelley	Ken Wilson	Improve Communications with NRC (Senior Management Focus Item # 4)	08/21/95	70%
Bruce Hickle	Jerry Campbell	Assess impact of 24 month operating cycle on long-term reliability (Senior Management Focus Item # 5)	08/21/95	50%
Larry Kelley	Bill Rossfeld	Thermo-Lag	08/16/95	60%
Paul Tanguay	Gary Becker	Make-Up Tank and Borated Water Storage Tank / Reactor Building Sump	08/18/95	61%
Bruce Hickle	Mike Collins	Control Room Habitability Envelope	08/11/95	63%
Paul Tanguay	Don Shook	Power Level Upgrade	08/15/95	25%
Jerry Campbell	Gary Williams	Instrument Air / Station Air	08/18/95	66%
Jerry Campbell	Mike Donovan	SWSOPA / Service Water	08/08/95	50%
Bruce Hickle	Gary Becker	Emergency Operating Procedures Upgrade	Interim..... Phase 2.....	100% In draft
Bruce Hickle	Steve Koleff	Extend surveillances to 24 months	08/23/95	75%
Larry Kelley	Steve Koleff	Improved Technical Specification Setpoints	08/07/95	60%
Pat Beard	Gary Boldt	NRC Management Issues (Poole Report)	08/09/95	90%
Paul Tanguay	Joe Maseda	Tank Levels and Volumes (other than MUT & BWST)	08/22/95	2%
Gary Boldt	Roger Murgatroyd	Maintenance Rule Implementation	08/22/95	10%
Paul Tanguay	Ron Bright	Mroczka Report Responses	08/09/95	86%
Paul Tanguay	Don Porter	Low Pressure Turbines Replacement	08/08/95	On schedule for 10R

Improved Regulatory Communication

- Communication guideline issued January 6, 1995
- Expanded and formalized guideline into a Nuclear Operations Department Procedure (NOD)
- Earn trust in our communication

Increased Participation In Licensing Activities by Other Departments

- Increased involvement by Engineering
- Enhance LER process

PERIODIC SELF-ASSESSMENTS

- Manager level self-assessment
- Director level review and analysis
- Focus Items

NUCLEAR OPERATIONS PRIORITIES FOR REMAINDER OF 1995

1. Continue attention on safe reliable operations by:

   - Keeping plant safety as our Number One priority - conservative decision-making
   - Enhancing communications and teamwork between groups
   - Achieving significant progress on material improvements in the plant

2. Experience no more events for duration of year, with special emphasis on:

   - Using STAR consistently
   - Extending the use of questioning attitude
   - Proper use and quality of procedures

3. Improve regulatory performance.

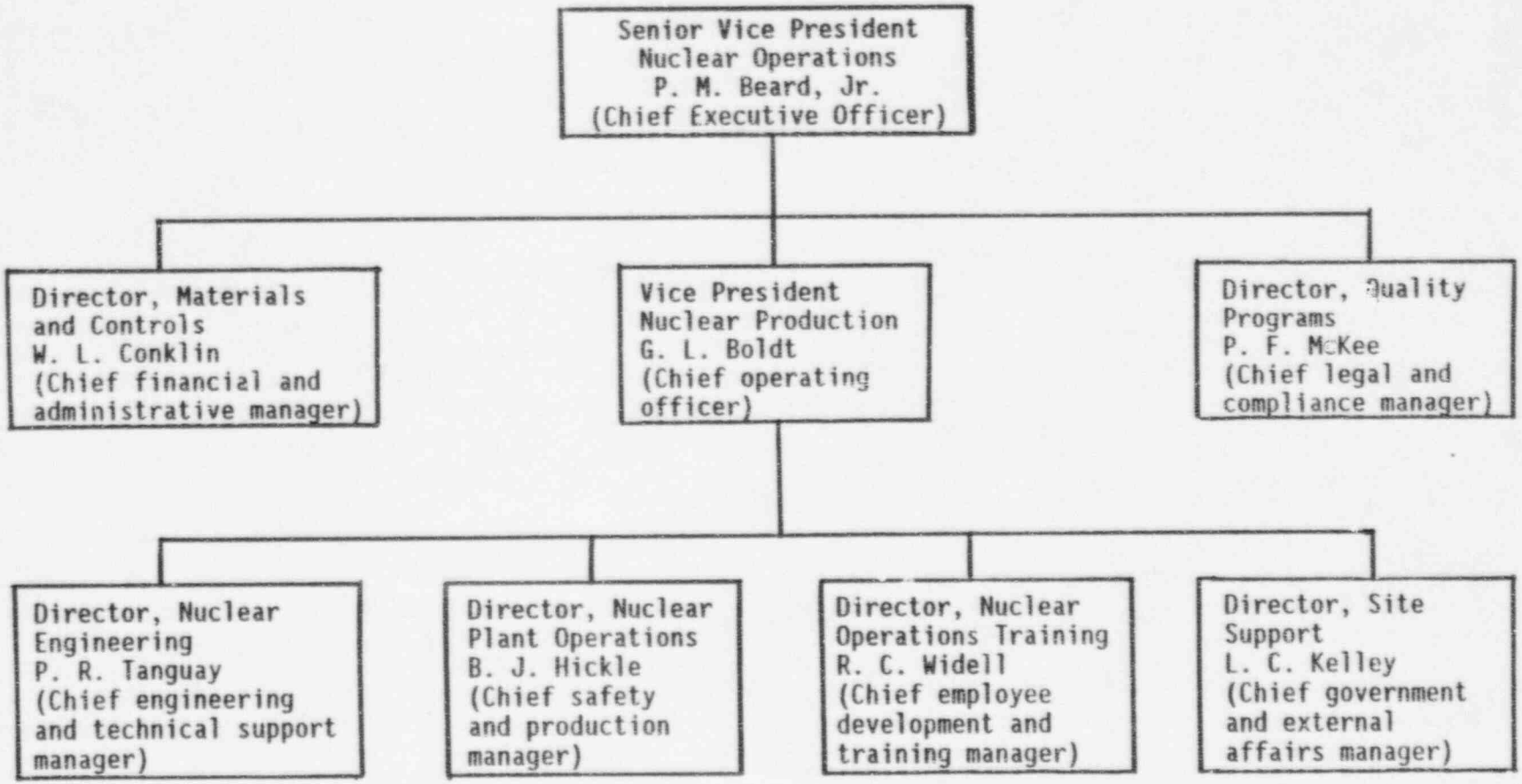
   - Meet all requirements and commitments
   - Better communications
   - Bring to closure significant regulatory issues such as MUT project and set point assessments

4. Pay careful attention to Refueling Outage preparations including:

   - Schedule development
   - Execution of pre-outage work

5. Reduce preventable industrial accidents by:

   - Aggressive supervisory involvement
   - Pre-job planning
   - Self checking and peer checking


Senior Vice President
Nuclear Operations
P. M. Beard, Jr.
(Chief Executive Officer)
Director, Materials and Controls
W. L. Conklin
(Chief financial and administrative manager)
Vice President
Nuclear Production
G. L. Boldt
(Chief operating officer)
Director, Quality Programs
P. F. McKee
(Chief legal and compliance manager)
Director, Nuclear Engineering
P. R. Tanguay
(Chief engineering and technical support manager)
Director, Nuclear Plant Operations
B. J. Hickle
(Chief safety and production manager)
Director, Nuclear Operations Training
R. C. Widell
(Chief employee development and training manager)
Director, Site Support
L. C. Kelley
(Chief government and external affairs manager)

BOLDT RESPONSE TO THE MRP REPORT

AS OF AUGUST 25, 1995

CURRENT STATUS:			
	Complete with Documentation (or N/A)	41	last report 39
	Complete, need Documentation	3	3
	Not Complete	5	7
		49	

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
	I. Initiate an aggressive effort to improve, from the top down, internal communication of the safety culture, including legal compliance aspects, of nuclear power operations.			
1	The Mission Statement was revised to place primary emphasis on nuclear safety.	Pat Beard/ Gary Boldt		COMPLETE Documents on File
2	The Long Range Plan identifies safety culture as the top priority and has established actions to go with it. This was also stressed in the 1995 plan.	Pat Beard/ Gary Boldt		COMPLETE Documents on File
3	Safety and conservative decision-making was emphasized by senior management at the "all hands" meetings in January. This will be continued in subsequent quarterly meetings. NRC COMMENTS (From Inspection Report 95-08) Residents attended the subject meetings. The importance of safe operation was emphasized to licensee personnel.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE. ALL-HANDS MEETINGS ARE CONDUCTED QUARTERLY. THESE TOPICS WERE DISCUSSED IN THE 1/95 AND 4/95 MEETINGS.
4	A change was made to the plan of the day to remove the number of continuous days on line.	Brent Moore		COMPLETE Documents on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
5	The Plant Manager wrote a bulletin describing the nuclear safety and event free operations program which was distributed to all Nuclear Operations personnel. NRC COMMENTS (From Inspection Report 95-08) The residents attended the DNPO's briefing of personnel. This program will be implemented by each manager reporting to the DNPO. This program is a living program and will be enhanced as operating experience is gained. The residents have reviewed the draft Plant Operations specific program. The residents monitored operator simulator exercises and noted the event free operations program elements were incorporated during the monitoring and critiquing of operator performance.	Bruce Hickle		COMPLETE Documents on File
6	Specific presentations were made to "all hands" on the event free operations program. This program will be implemented by the departments reporting to the Plant Manager by April 1, 1995. Each supporting department will fully implement this program by July 1, 1995. NRC COMMENTS (From Inspection Report 95-08) Residents attended the subject meetings. The importance of safe operation was emphasized to licensee personnel and the new initiative the event free operations program was presented.	ALL DIRECTORS + Jerry Campbell, Brent Moore		COMPLETE Documents on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
7	Line management directed that future audits include an assessment of safety culture in the departments audited. Performance criteria for this portion of the assessment will be based on FPC management expectations developed, in part, from consideration of IAEA bulletin 75-INSAG-4. NRC COMMENTS (From Inspection Report 95-08) The residents have discussed the safety culture audit program with responsible supervisors. The review criteria, for the audits, was reviewed by the inspectors.	Paul McKee		COMPLETE. PROCESS IN PLACE. Audit 95-02-MAKP made some observations. Audits 95-03-SSUP and 95-04-CREW provided more intense analyses of hp/sc parameters.
8	A letter documenting FPC senior management commitment to (and role in achieving) conservative decision-making was sent from FPC (Allen Keesler) to INPO (Zack Pate).	Gary Boldt		COMPLETE Document on File
9	An event response checklist for the Nuclear Shift Manager to use in responding to and investigating significant plant events has been implemented. This approach is one of several initiatives intended to emphasize the lead role of line (especially plant) management in nuclear safety and legal compliance. NRC COMMENTS (From Inspection Report 95-08) The residents have reviewed the event response checklist and found it to have the potential to be a useful tool. The residents verified the NSMs were aware of the checklist and were prepared to use it when needed.	Bruce Hickle		COMPLETE Document on File Other initiatives include line management becoming more involved in personal safety by attending plant safety meetings and PRC establishing guidelines and goals to strengthen its role as a safety review committee.

ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
II. Expand existing management procedural initiatives, including additional emphasis on procedure adherence. This should include efforts to improve ownership and the quality of procedure maintenance by users, making them more simple and usable. This should be done consistent with the communication of safety culture.			
10 Implementation of the event free operations program in all departments by July 1, 1995.	DUPLICATE ITEM TO # 6 WHICH APPLIES TO THIS AREA ALSO		COMPLETE. SEE ITEM # 6.
11 A formal business process improvement (BPI) evaluation will be performed on the procedure change process in 1995.	Bruce Hickle	6/~~97~~ 96	IN PROGRESS Kimberly Bowman and Dale Stevens are the Core Team leaders. Some enhancements have been implemented. The formal BPI will start in October 1995.
12 "All hands" meetings presented and discussed event free operations and procedure compliance policies.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE. SEE ITEM # 3
13 Procedure ownership is being transferred to end users on a trial basis (beginning in the I&C shop). The purpose of this effort is to enhance ownership and accountability among procedure users and to assure the level of procedure detail (or simplification) is commensurate with user needs. Such efforts, however, must maintain a proper balance of quality of technical input. Therefore, system engineering will remain a close partner in review and approval.	Bruce Hickle/ Ron Davis/ Jerry Campbell	12/31/95	IN PROGRESS The Manager, I & C Maintenance has been made the Interpretation Contact for procedures his shop performs. The next area of transfer will be the in the ISI section.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
14	A computer program (NUPOST) for recording and tracking procedure change recommendations was implemented. Operations led the development and implementation of this product.	Greg Halnon		COMPLETE System is operational. Contact is Earnie Gallion.
15	A training initiative to intentionally fault (or fail) a procedure during simulator exercises to verify that operators will use the procedure change process is being implemented.	Rolf Widell		COMPLETE Scenarios in each of the first two cycles of simulator requalification contained situations where procedures did not contain adequate guidance for correction of specific equipment problems. For each, MNPO policy regarding the use of 50.59 and 50.54 to determine appropriate corrective actions was developed and discussed. These types of activities will periodically occur during future requal. sessions.
16	When appropriate, new procedures and key changes to existing procedures are tested on the simulator.	Rolf Widell/ Jerry Campbell		COMPLETE. PROCESS IN PLACE. Examples include ITS required changes to SP-417 and loss of vital busses from 100% power. Also, simulator validation has been performed on EOP-7 and 8, SP-110, 113 and 130, and the new AP on Rapid Plant Shutdown.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
17	All I&C surveillance procedures are being re-validated by the I&C shop. NRC COMMENTS (From Inspection Report 95-08) The residents have discussed the review and re-validation of I&C surveillance procedures with I&C personnel. This effort could result in improved procedures with fewer events.	Bruce Hickle/ Ron Davis	11/17/95	IN PROGRESS An SP team has been established that will validate and re-write both SPs and PTs. Some SPs have been validated on the simulator. Note: the due date corresponds to the date committed in the Setpoint Action Plan presented to the NRC.
18	To simplify procedures and place more accountability on the performer and performing departments, some "hold points" have been replaced with "witness points" (second party verification), and some new witness points have been added.	Bruce Hickle	~~Due Date?~~ ON GOING	IN PROGRESS The task force has identified those discretionary hold points that will become second-party verifications, witness points, or just go away. Procedure revisions were dependent on approval of NOD-48, which was signed the week of 6/19/95. The final step in the process will be to revise existing procedures and make the changes to the affected hold points. Approximately 160 procedures are affected.

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
19	To further clarify procedure intent and improve procedure usability, "independent verification" and "concurrent verification" have been re-defined (in CP115). NRC COMMENTS (From Inspection Report 95-08) The residents reviewed the change in definition in CP 115. The operations personnel were concerned at first that the revised definition would inhibit their ability to perform tagging under unique circumstances (such as in high radiation areas) where exposures to other hazards would dictate concurrent tagging. The provisions in CP 115 alleviated this concern.	Bruce Hickle		COMPLETE CP-115 on File
20	To improve line ownership of the problem report and precursor processes, program and procedure responsibility was moved from the QA director to the plant manager. NRC COMMENTS (From Inspection Report 95-08) As noted above, the plant manager has assumed the responsibility for the precursor and problem report processes and has placed emphasis on the program. The number of reports submitted is part of a licensee trending program. The number of precursor cards submitted has increased dramatically since the first of the year and the results are very positive.	Bruce Hickle		COMPLETE CP-111 on File Additionally, CP-144 (Root Cause Analysis) has been revised.

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	III. Increase the management attention devoted to managing change. This includes configuration management, procedures and processes, and organizational change. Ineffective, or incomplete, management of changes was a significant contributor to many of the events or conditions reviewed by the MRP.			
21	The project manager/team approach to plant modifications was significantly strengthened, including operations representation.	Paul Tanguay		COMPLETE Revisions to NEP-102 and NEP-212 on File
22	Formal action plans (using a specific format) were implemented for significant issues.	ALL DIRECTORS		COMPLETE Need Examples
23	A computerized Ful/Text search capability was implemented to help manage change in procedures.	Bill Conklin		COMPLETE Need system description?
24	The System Engineering Manual was updated to include instructions for use of CMIS and Ful/Text and other available tools to verify documents requiring change.	Jerry Campbell		COMPLETE Document on File
25	A check-list was added to the MAR closure process to assure all documents requiring change are completed.	Paul Tanguay		COMPLETE See # 21 above
26	Maintenance of system histories in the Tech Support area will assist with continuity through organizational change. Some examples are the quarterly report, action plans, system libraries, and system outage critiques.	Jerry Campbell		COMPLETE Examples on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
27	A check-list for discussion items to be included in screening and selection of new supervisor candidates was implemented. This provides for senior managers to emphasize change management, safety culture, and conservative decision-making with new supervisory candidates prior to organizational change.	Bill Conklin/ Rolf Widell		COMPLETE TDP-205 Form 205.2 on File
28	The 1995 goals include reviewing the AI's and NOD's and other administrative procedures to make sure they are current. A portion of that review was completed in 1994.	Bruce Hickle	12/31/95	IN PROGRESS AIs and NODs are being reviewed.
29	Computer software controls are being audited with the purpose of improving change management.	Bill Conklin		COMPLETE Audit # 95-01-SQA completed this action. NOD-37 was revised to comply with the recommendations.
30	Nuclear Operations is taking over the in-processing and fitness for duty programs from Human Resources and has established a project team with a designated transition manager.	Larry Kelley		COMPLETE As of April 3, 1995, Nuclear Operations Access Control has been performing all tasks needed for unescorted access to CR3.
31	The Master Schedule, the fuel cycle action plan, the 90-day, weekly and daily schedules, have been implemented as instruments to regulate and control the rate of change.	Phil Skramstad/ Brent Moore		COMPLETE Need examples
32	A new section has been added to the quarterly performance indicators to look at changes occurring in fifteen different areas to arrive at an overall assessment of safety impact.	Paul McKee		COMPLETE Documents on File

	ACTION ITEM	ACTION ITEM RESPONSIBILITY	DUE DATE	STATUS
33	Changes recently made to the FPC QA Plan will allow the Nuclear General Review Committee (NGRC) and the Plant Review Committee (PRC) to focus on more safety significant (as opposed to routine) issues.	Paul McKee		COMPLETE Documents on File
34	NGRC-led targeted assessments (similar to the Management Review Panel Report) will be regularly performed.	Paul McKee		COMPLETE Document on File (E. Mroczka report)
35	Management directed that a quality audit be performed on the engineering process for making and changing engineering calculations and that the audit team include NGRC and/or other independent engineering calculation expertise.	Paul McKee		E. Mroczka report- same as # 34 above. Additionally, the planned Engineering Audit in November will include these elements. (Note: Mroczka items were tracked on P. Beard's Action Item List, now on NOTES)
36	Future significant change projects will require prior completion of an action plan, schedule, and contingency plan for potentially negative outcomes.	ALL DIRECTORS		COMPLETE. PROCESS IN PLACE. Recent examples: CCHE Action Plan; CR-3 Sepoint Action Plan.
	IV. Enhance the current initiatives to improve the working relationship with the NRC, by development of a more comprehensive plan. This plan would address philosophy and expectations as well as mechanics. It should stress recognition of the value added by the regulator in each interaction. Once developed, thorough internal and external communication will be required for it to be effective.			

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37	A revised plan regarding communication with the NRC was issued on January 6, 1995. It recognized the NRC's mission and value added by the regulatory process; however, further strengthening of this aspect is planned when the plan is converted to a nuclear operations directive (NOD).	Larry Kelley		COMPLETE Formal Draft NOD is in review by the Directors.
38	Senior management participation has increased in face-to-face phone conversations with Region II and NRR counterparts to share information and clarify expectations.	Pat Beard/ Gary Boldt		COMPLETE. PROCESS IN PLACE. Recent examples: TSI, SWOPSI, RPS setpoints. See also example in # 44 below.
39	Each executive direct report is increasing the frequency of contact with their NRC counterpart.	ALL DIRECTORS & Jerry Campbell		COMPLETE. PROCESS IN PLACE. Meetings have been held both at the NRC and on site. See also example in # 44 below.
40	The Senior Vice President has emphasized improvement in the timeliness, directness, and completeness of NRC communications with licensing management.	Pat Beard		COMPLETE Discussions with the Sr. VP were held at the Licensing staff meeting of May 4, 1995.
41	The Senior Vice President has emphasized the need for line management involvement in the NRC communication plan.	Pat Beard		COMPLETE
42	FPC will establish routine meetings between licensing and Region II staff similar to those we continue to hold with headquarters staff.	Larry Kelley		COMPLETE

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43	FPC will strengthen the participation of line management in safety, operability, and regulatory compliance discussions/meetings with the NRC. We must continue to emphasize, however, that licensing remains the single point of contact to arrange and facilitate FPC/NRC communications.	ALL DIRECTORS		COMPLETE. PROCESS IN PLACE. recent example: Bruce Hickle/Bill Stephenson contacted the NRC on May 16 re: NOD-14.
44	FPC will increase contact between mid- and upper-level management and their NRC counterparts.	ALL MANAGERS		COMPLETE. PROCESS IN PLACE. recent example: R. Widell, J. Lind and G. Halnon met with R II staff to discuss Licensed Operator Training on May 24, 1995. Minutes on file. OTHER EXAMPLES?
45	Clear objectives for safety/regulatory performance are being developed, as well as methods to monitor performance against these objectives.	Larry Kelley		COMPLETE (see PMB's 3/1/95 presentation to the NRC)
	V. The MRP also recommends improving the timeliness of design engineering response to plant needs.			

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46	Internal communications were enhanced to press issues to the forefront earlier. An example is the establishment of an operator workaround list in response to the Salem event. NRC COMMENTS (From Inspection Report 95-08) The residents have reviewed the licensee's operator work-around list. The list is a comprehensive list of outstanding work-around items and includes a status column so management can keep abreast of outstanding issues. For historical purposes, the operator workarounds that have been closed are attached to the back of the list under closed items. The licensee is placing increased emphasis on the PR/PC program. A significant rise in the number of PCs written has been noted by the inspectors. Several significant trends and issues have been identified by the licensee using this process.	ALL DIRECTORS		COMPLETE (the Nuc Ops newsletter, the Operations journal and naming issue managers for specific projects, e.g. Mike Collins for CCHE are examples)
47	Engineering established an initiative to assure their customers have direct input to project priority setting.	Paul Tanguay		COMPLETE NED Prioritization Program was established to better support day-to-day plant problems.

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48	Design engineering is in the process of relocating to, and consolidating all engineering employees and appropriate technical records at, the Crystal River Site. NRC COMMENTS (From Inspection Report 95-08) The residents have discussed the relocation efforts and its impact on engineering at this time. The relocation is scheduled to be completed by August 1995 and should result in improved internal communications within FPC.	Paul Tanguay		COMPLETE
49	Managers in both design and system engineering functions have begun to increase the frequency of communication with the NRC. It has been particularly emphasized that they do so at the start of new projects and initiatives in order to communicate action plans, schedules, and contingency plans (for potentially negative results) prior to implementation.	Paul Tanguay/ Jerry Campbell		COMPLETE. PROCESS IN PLACE. Recent example: J. Masada and K. Lancaster met with the NRC engineering counterpart Chuck Casto.