

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N. W.

WASHINGTON, D. C. 20036

(202) 822-1000

TELECOPIER

(202) 822-1099 & 822-1199

RAPIFAX 100

(202) 822-1072

TELEX

89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

VIRGINIA OFFICE

1501 FARM CREDIT DRIVE

MCLEAN, VIRGINIA 22102

JOHN F. DEALY*

B. SCOTT CUSTER, JR.

RICHARD S. BEATTY

COUNSEL

RAMSAY D. POTTS, P.C.
 STEJART L. PITTMAN, P.C.
 GEORGE F. TROWBRIDGE, P.C.
 STEPHEN D. POTTS, P.C.
 GERALD CHARNOFF, P.C.
 PHILLIP D. BOSTWICK, P.C.
 R. TIMOTHY HANLON, P.C.
 GEORGE M. ROGERS, JR., P.C.
 FRED A. LITTLE, P.C.
 JOHN B. RHINELANDER, P.C.
 BRUCE W. CHURCHILL, P.C.
 LESLIE A. NICHOLSON, JR., P.C.
 MARTIN D. KRALL, P.C.
 JAY E. SILBERG, P.C.
 BARBARA M. ROSSOTTI, P.C.
 GEORGE V. ALLEN, JR., P.C.*
 FRED DRASNER, P.C.
 R. KENLY WEBSTER, P.C.
 NATHANIEL P. BREED, JR., P.C.
 MARK AUGENBLICK, P.C.
 ERNEST L. BLAKE, JR., P.C.
 CARLETON S. JONES, P.C.
 THOMAS A. BAXTER, P.C.
 SHELDON J. WEISEL, P.C.
 PATRICK HICKEY, P.C.
 J. THOMAS LENHART, P.C.
 STEVEN L. MELTZER, P.C.
 DEAN D. AULICK, P.C.
 JOHN ENGEL, P.C.*
 C. THOMAS HICKS III, P.C.*

CHARLES B. TEMKIN, P.C.
 STEPHEN B. HUTTNER, P.C.
 WINTHROP N. BROWN, P.C.
 JAMES B. HAMLIN, P.C.
 RANDAL B. KELL, P.C.
 ROBERT E. ZAWLER, P.C.
 ROBERT B. ROBBINS, P.C.
 STEVEN M. LUCAS, P.C.
 DAVID M. RUBENSTEIN, P.C.
 MATIAS F. TRAVIESO-DIAZ, P.C.
 VICTORIA J. PERKINS, P.C.
 JOHN H. O'NEILL, JR., P.C.
 JAY A. EPSTEIN, P.C.
 JEFFERY L. YABLON, P.C.
 JACK MCKAY, P.C.*
 ELISABETH M. PENDELETON
 HARRY H. GLASSPIEGEL
 THOMAS H. MCCORMICK
 WILLIAM P. BARR*
 CHARLES H. MONTANGE
 JEAN M. GALLOWAY*
 JOHN L. GARR, JR.
 PHILIP J. HARVEY
 ROBERT M. GORDON
 BONNIE S. GOTTLIEB
 HOWARD H. SHAFFERMAN
 DEBORAH B. SAUSER
 SCOTT A. ANENBERG
 CAMPBELL KILLEFER
 PAUL M. THOMAS

JOHN M. BRYSON, III*
 GEORGE F. ALBRIGHT, JR.**
 DAVID J. CYNAMON
 JACK A. HORN*
 LOUISE A. MATHEWS
 SETH M. WOODGASIAN
 SHEILA MCC. HARVEY
 DELISSA A. RIDGWAY
 KENNETH J. HAUTMAN
 DAVID LAWRENCE MILLER
 FREDERICK L. KLEIN
 STEVEN P. PITLER
 RICHARD J. PARRINO
 ELLEN A. FREDER
 ROBERT C. BOEHM
 MARIE N. COLAND*
 THOMAS C. HILL
 DIANE E. BURKLEY*
 L. DUANE CHEEK
 MICHAEL K. MADDEN
 HANNAH E. M. LIEBERMAN
 JUDITH A. SANDLER
 ANDREW D. ELLIS
 RICHARD A. SAMP
 THOMAS E. CROCKER, JR.
 VICKI R. HARDING
 PETER J. FERRARA
 HELEN TORELLI
 MARTHA BOONE ROWAN**
 KENNETH R. MILLER

JOHN H. MORE
 WENDELIN A. WHITE
 STANLEY M. BARG
 LESLIE K. SMITH
 VIRGINIA S. RUTLEDGE
 KATHERINE P. CHEEK
 TRAVIS T. BROWN, JR.
 STEPHEN B. HEIMANN
 SANDRA E. BRUSCA
 EILEEN L. BROWNELL
 PAMELA H. ANDERSON
 ALEXANDER D. TOMASZCZUK
 JEFFREY J. A. GIBBS
 LAURENCE W. COHEN
 DEREK W. LINDEN
 PHILIP D. PORTER
 MICHAEL A. SWIGER
 ELLEN SHERIFF
 ANITA J. FINKELSTEIN
 DAVID R. SAHR
 C. BOWDOIN TRAIN
 JEFFREY W. KAMPELMAN
 KENNETH A. GALLO
 DAVID R. EWIS
 A. PATRIC LEIGHTON III*
 KENNETH D. AUERBACH
 ALAN D. WASSERMAN
 DAVID K. RYAN
 RICHARD K. A. BECKER
 WILBERT WASHINGTON II
 DOROTHEA W. DICKERMAN

* NOT ADMITTED IN D.C.
 ** ADMITTED IN VIRGINIA

WRITER'S DIRECT DIAL NUMBER

August 9, 1984

(202) 822-1215

Administrative Judges
 Ivan W. Smith, Chairman
 Sheldon J. Wolfe
 Gustave A. Linenberger, Jr.
 Atomic Safety and Licensing Board
 U.S. Nuclear Regulatory Comisison
 Washington, D.C. 20555

In the Matter of
 Metropolitan Edison Company
 (Three Mile Island Nuclear Station, Unit No. 1)
 Docket No. 50-289 (Restart - Remand)

Dear Chairman Smith and Administrative Judges Wolfe and Linenberger:

In accordance with Licensee's practice of notifying the Licensing Board, the Appeal Board and the parties of new information on issues of potential interest, enclosed is a copy of the most recent status report on Licensee's progress towards completion of required actions identified in the February, 1983 BETA Report, along with the cover memorandum transmitting the report from Mr. P. R. Clark, President, GPU Nuclear, to the

DS03

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

Ivan W. Smith, Esquire
Sheldon J. Wolfe, Esquire
Mr. Gustave A. Linenberger, Jr.
August 9, 1984
Page 2

Chairman of the Board of Directors, GPU Nuclear. This status report constitutes the fourth such report prepared by Licensee. Earlier reports were transmitted to the Appeal Board and the parties by Licensee's counsel on July 26 and November 3, 1983, and March 15, 1984.

Sincerely,

Deborah B. Bauser

Deborah B. Bauser
Counsel for Licensee

DBB:jah
Enclosure
cc: Service List

RELATED CORRESPONDENCE

DOCKETED
USNRC

'84 AUG 10 110:59

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
METROPOLITAN EDISON COMPANY) Docket No. 50-289 SP
) Restart
(Three Mile Island Nuclear)
Station, Unit No. 1))

Service List

Administrative Judge
Ivan W. Smith
Chairman, Atomic Safety &
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Sheldon J. Wolfe
Atomic Safety & Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Gustave A. Linenberger, Jr.
Atomic Safety & Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Jack Goldberg, Esq.
Office of Executive Legal Dtr.
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety &
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Chairman, Atomic Safety &
Licensing Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Thomas Y. Au, Esq.
Office of Chief Counsel
Dept. of Environmental Resources
505 Executive House
P.O. Box 2357
Harrisburg, PA 17120

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Norman Aamodt
R. D. 5
Coatesville, PA 19320

Joanne Doroshow, Esq.
The Christic Institute
1324 North Capitol Street
Washington, D.C. 20002

Mr. Henry D. Hukill
Vice President
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Michael F. McBride, Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Suite 1100
Washington, D.C. 20036

Michael W. Maupin, Esq.
Hunton & Williams
707 East Main Street
P.O. Box 1535
Richmond, VA 23212

Administrative Judge
Christine N. Kohl
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Washington, D.C. 20555

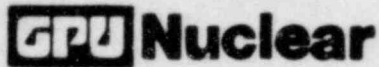
Ellyn R. Weiss, Esq.
William S. Jordan, III, Esq.
Harmon, Weiss & Jordan
2001 S Street N.W., Suite 430
Washington, D.C. 20009

Lynne Bernabei, Esq.
Government Accountability
Project
1555 Connecticut Avenue
Washington, D.C. 20009

Ms. Louise Bradford
TMI ALERT
1011 Green Street
Harrisburg, PA 17102

Administrative Judge
Gary J. Edles, Chairman
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
John H. Buck
Atomic Safety & Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555



Memorandum

Subject: First Half 1984 Status Update - GPUNC
 Responses to Recommendations of Basic
 Energy Technology Associates, Inc.
 Set Forth in Their Report dated February 28, 1983

Date: July 25, 1984

DOCKETED

'84 AUG 10 A10:59

From: P. R. Clark, President

Location: Parsippany

To: Chairman, GPU Nuclear Corporation
 Board of Directors

A commitment was made to the Board to provide a periodic report on progress toward completion of required actions identified in the BETA Report. The first half 1984 Status Update is attached, in which 3 additional items have been completed, leaving 29 of an original 156 recommended actions in progress or under evaluation. Of these, 20 are due for review or completion in the second half of 1984 and the remainder in 1985.

This Status Update will also be provided to the Atomic Safety and Licensing Appeal Board through the offices of Shaw, Pittman, Potts, and Trowbridge.

P. R. Clark
 P. R. Clark

PRC/FLD/ejp
 Attachment

cc: GPUNC Board of Directors

H. M. Dieckamp
 L. L. Humphreys
 E. E. Kintner
 W. G. Kuhns
 R. V. Laney
 J. R. Leva
 J. F. O'Leary
 F. J. Smith
 W. A. Verrochi
 W. F. Witzig

GPUNC Directors

R. P. Fasulo
 P. B. Fiedler
 I. R. Finfrock
 W. L. Gifford
 R. W. Heward
 H. D. Hukill
 B. K. Kanga
 R. L. Long
 F. F. Manganaro
 D. G. Murray
 R. F. Wilson



RESPONSES TO RECOMMENDATIONS OF
BASIC ENERGY TECHNOLOGY ASSOCIATES, INC.
AS SET FORTH IN THEIR REPORT DATED FEBRUARY 28, 1983

SORT BY BETA FINDING OF OPEN ITEMS

SEMI-ANNUAL STATUS UPDATE
ISSUE DATE: JULY 25, 1984

Preface

The review of current and projected expenditures and manpower utilization for GPU Nuclear Corporation conducted by Basic Energy Technology Associates, Inc. (BETA) was issued in a report dated February 28, 1983.

The focus of the review was on resources devoted to Three Mile Island Unit 1 and Oyster Creek. A total of eighty-five (85) findings resulted in one hundred fifty-six (156) separate recommendations.

This report represents the GPUNC Response. The 156 recommendations (paraphrased) have been assigned to one of five (5) broad categories:

- I. Organization - understanding and working within the functional GPUN structure.
- II. Manning - appropriate staffing levels.
- III. Operating/Management Efficiency/Productivity
- IV. Personnel-Related Matters - personnel practices.
- V. Training

Within each of the above categories, responses have been placed into one of five classifications (STATUS CODE):

- A. Agree - Complete: agree with recommendation, action is complete.
- B. Agree - Action Underway/Goal: agree with recommendation, action is underway and/or action is a 1983 goal.
- C. Agree - Action to be Scheduled: agree with recommendation, action to be taken in the future.
- D. Under - Evaluation: either recommendation or appropriate action is under evaluation.
- E. Disagree: disagree with recommendation.

This report is sorted by BETA finding and recommendation and includes only OPEN items.

The GPUNC Response Report (sorted by BETA finding) will be updated semi-annually until completion. This revision contains the first half 1984 updated status. Since the last update, 3 additional open items have been completed (as noted by asterisk in the comment column) for a total complete or disagree of 127 with twenty due for review or completion in 1984 and the remainder in 1985.

TABLE OF CONTENTS

BETA FINDINGS & RECOMMENDATIONS

	<u>PAGE</u>
TMI-1 Plant and Division	1-2
O.C. Plant and Division	3-5
Nuclear Assurance Division	6
Technical Functions Division	7-8
Administration Division	9-10
Human Resources Division	11
Radiological & Environmental Controls Division	--
Maintenance & Construction Division	--
Communications Division	--
General	12-14

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding III-C:</u>	Maintenance at TMI-1 can improve its support of the plant.				
III-C (b)	<p>Rec: Assign system responsibility in Plant Engineering for maintenance tasks.</p> <p>Resp: Our goal remains to assign responsibility for each plant system to a specific engineer; i.e., establish a program of "system experts". Due to higher priority work in preparation for restart, the formal implementation of this program has not yet been completed although, in practicality, it is in use. Formal establishment of the program is targeted for completion in 4th Q 1984.</p>	I.	TMI-1	B	4th Q 1984
III-C (c)	<p>Rec: Delay assignment of corrective maintenance function to M&C until after Unit 1 restart.</p> <p>Resp: Formal assignment of CM function to M&C will not take place until after January 1, 1985.</p>	I.	O/P	C	1st Q 1985
<u>Finding III-G-1:</u>	The warehouse inventory records have enough nomenclature inaccuracies to degrade efficiency.				
III-G-1	<p>Rec: Program to improve nomenclature of inventory records.</p> <p>Resp: Physical inventory complete. Warehouse discrepancy reports being used effectively and service has improved significantly. Items procured via AMMS since 12/82 have significantly improved noun nomenclature. The remaining items, however, continue to reflect inaccurate descriptions and an effort has been initiated by Materials Management to provide additional manpower resources to undertake the task of nomenclature improvements for items which have receipt/issue activity. This is a long term project and will require substantial effort to fully implement. As the surplus material is eliminated in the TMI warehouse, the total magnitude and significance of the problem will be reduced. Technical Functions and Materials Management are jointly proposing establishment of a unit to assign consistent and accepted nomenclature. These efforts must be conducted in parallel with reduction of surplus inventory items which is part of ongoing Warehouse Reassessment Program. Will be restated again at the end of 1984.</p>	III.	Admin./ TMI-1/ M&C	B	Review for status 4th Q 1984 M&C Division will support Materials Management in this effort to improve nomenclature of inventory records.

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding III-G-2:</u> The amount of stock at TMI is excessive.					
III-G-2	Rec: Purge TMI stock of unnecessary material. Resp: Program underway. Admin Division Goal for 1984. Materials Management has issued listing of inventory material which have had no issue activity during the past three years. TMI-1 Plant Engineering, however, does not have sufficient personnel resources available to perform an assessment of surplus/obsolete material. Meanwhile, MMD has reestablished contact with B&W to act as agent for sale of surplus/obsolete TMI-2 unique inventory items and is working with GPUSC and JCP&L to seek NBBPU approval for sale of these items with a target approval date of 4Q/84.	III.	Admin.	B	Review for status 4th Q 1984
<u>Finding III-I:</u> A review of the number of people assigned to administration work at TMI-1 appears excessive.					
III-I	Rec: Look to reduce on-site clerical/admin. support. Resp: Operations Analysis is systematically studying all clerical/administrative support positions on a division-by-division basis. A review of TMI-1 non-exempt, non-bargaining secretarial positions was completed in 1983. A review of Nuclear Assurance clerical support positions at TMI is in progress and studies are planned for TMI based Rad Con and TMI Information Center administrative support positions later this year.	II.	TMI-1/ Admin.	B	1st Q 1985 Complete for TMI-1 Division

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding IV-D-2:</u>	The sanctity of coffee breaks at Oyster Creek is a sizeable contributor to poor productivity.				
IV-D-2 (b)	Rec: Eliminate p.m. break or allow management to determine timing. Resp: Management has ability to set whether break is allowed and if so, the timing. Management rights identified to all managers and supervisors after Company/Union negotiations by JCP&L in training programs and GPUNC directives. There are not authorized afternoon coffee breaks.	IV.	H. R./ O. C.	B	4th Q 1984 Due to outage time requirement, supervisory training programs have been deferred. Supervisor training is an ongoing requirement and refresher training should be conducted later in 1984.
<u>Finding IV-D-4:</u>	Only a fraction of the preventive maintenance routines planned for accomplishment are completed.				
IV-D-4 (c)	Rec: Consider reducing Preventive Maintenance Manager's staff when program stabilizes. Resp: Will address in '85 budget based on first half '84 experience. Plant Materiel established in 10/82. Their charter is to identify preventive maintenance requirements. M&C, with the acquisition of the maintenance work force, is responsible for accomplishment of identified preventive maintenance. During the 1983 negotiations, the rotating shift concept for the maintenance group was established. Phase I of the implementation program for the rotating shift commences on 5/1/84. Rotating shift concept will provide for maintenance personnel to be available 7 days per week, 24 hours per day, permitting full-time coverage enhancing the availability and timeliness of keeping preventive maintenance procedures and requirements. In addition, the PM program has been reviewed by a GORB subcommittee during the 2nd quarter.	II.	O. C.	D	Review for status 3rd Q 1984
<u>Finding IV-D-5:</u>	Mobile maintenance is a costly way to perform plant maintenance.				
IV-D-5 (a&b)	Rec: Consider negotiating agreements with better utilization of Mobile Maintenance. Consider making Mobile Maintenance employees who perform most of their work at Oyster Creek part of M&C Division. Resp: M&C Division is taking steps to reduce the number of Mobile Maintenance personnel located at the site. In progress through attrition. Target completion for the reduction of Mobile Maintenance personnel located at Oyster Creek is still 4th Q 1984. This may slip as the outage has extended into the 3rd Q 1984.	IV.	M&C	B	4th Q 1984

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding IV-G:</u>	There are too many instances where rad. controls are not as good as they should be. The work force has not accepted enough of the responsibility for high quality rad work performance. Excessive generation of radioactive waste is part of these problems.				
IV-G (b)	Rec: Improve Rad Con management and work force management working relationships. Resp: Preparation for and initial work during outage have resulted in substantial improvements in working relationships. A Radiation Awareness Committee has been formed and has held routine meetings since 5/20/83. See responses to IV-G(a) and (c). Programs are in place to improve the working relationships; however, additional effort is needed. Rad Awareness Committee is functional but is not achieving success yet. Management at the site level involved with hands-on personnel are required to foster and generate compliance. Will be restated for progress 4th Q 1984.	I.	R&EC O.C./M&C	B	Review for status 4th Q 1984
IV-G (f)	Rec: Look to decrease number of rad. techs. as work force practices good rad. work performance. Resp: Will be addressed in setting '84 & '85 authorized levels of manpower. Will reduce number of Company rad. techs as work practices improve.	II.	R&EC	B	3rd Q 1984 Complete for 1984 levels.
<u>Finding IV-H:</u>	Senior management people at Oyster Creek are spending too much time on PORC matters.				
IV-H	Rec: Review Tech. Specs to determine if present wording requires PORC to review documents beyond a scope considered appropriate. No rewrites by PORC of poorly written procedures. Resp: Tech Spec Change Request has been submitted to and issued by NRC which will meet this recommendation. Equivalent issue under new review procedure was addressed during implementation of new administrative procedures. Completed February 1984.	III.	O. C.	A*	Complete
<u>Finding IV-I:</u>	The number of people assigned to administrative work at Oyster Creek appears excessive.				
IV-I	Rec: Reduce on-site clerical and administrative positions. (All divisions.) Office of the President set arbitrary number. Resp: Operations Analysis is currently studying 25 clerical positions in Oyster Creek Division. O/A studies are planned for Oyster Creek based Nuclear Assurance and Rad Con administrative support staff in early 1985.	II.	O/P & Admin.	B	2nd Q 1985

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding IV-J-2:</u>	The stores and warehouse function at Oyster Creek can improve its support of the plant.				
IV-J-2 (b)	<p>Rec: Carefully plan disposal of on-hand direct turnover material not required for plant support.</p> <p>Resp: Material outage support to the site has been enhanced by both the assignment of a new Warehouse Manager and overall system improvements introduced by the Warehouse Reassessment Program initiated in 9/83. The number of items in the inventory has increased by over 3,000 line items over the past year. Plant Engineering does not have sufficient personnel resources, however, to evaluate and verify the 8,700+ DTO items for continued retention. Plant engineering resources will be made available to support this requirement which involves about two man years of effort are planned to begin 1st Q 1985.</p>	III.	Admin./ O. C.	8	Review for status 2Q 1985

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding V-B-3:</u>	There are inefficiencies in the TMI training effort due to a lack of meaningful scheduling. The Training Department has difficulty in obtaining data to schedule its training.				
V-B-3	Rec: Develop realistic training schedules on an annual basis. Resp: The 1984 schedule for all supervisory and management development has been generated. New initial training programs in operator and other technical areas have been scheduled. Schedules are reviewed and updated, as appropriate, on a quarterly basis. This finding should be closed.	V.	N. A.	A*	Complete
<u>Finding V-B-4:</u>	There is an overly "understanding" attitude which prevails in the TMI Training Department, especially with respect to operator training.				
V-B-4 (c)	Rec: Make students more responsible for their own performance in training. Resp: Each training site has generated documents of student responsibilities when in training. Documents are being discussed for agreement with user departments at GPUN. A consolidated student responsibility document is being reviewed for final approval. Finding should be closed by September 1984 with formal issuance of document.	V.	N. A./ All Div.	B	3rd Q 1984 ° M&C is making diligent effort to enforce better participation and discipline of its employees during company training programs. ° OC is working with plant training to achieve more professional student conduct in classrooms and to better control of classroom hours and breaks.

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Technical Functions Findings & Recommendations</u>					
<u>Finding VI-A:</u>	The overall effectiveness of Technical Functions in supporting TMI-1 and Oyster Creek is lacking.				
VI-A (b)	<p>Rec: Review methods to improve the management of the large engineering group within TF.</p> <p>Resp: Activities identified in the prior response are continuing, including updating of procedures reflecting experience at Oyster Creek, the evaluation of audit findings and continuing training of staff. At the request of the Division Director, three study groups were formed within GPUN to provide recommendations on modification control, site access and budget/estimating systems to the Office of the President. Implementation of these recommendations will generally assist in efforts to improve productivity. Activities developed in the first and second quarter will be carried on through the third and fourth quarter. The implementation of three additional study groups on GPUN practices suggested by the Technical Functions Division Director should be implemented in the third quarter by the Office of the President. Will be reviewed for progress in 4th Q 1984.</p>	III.	T. F.	B	Review for status 4th Q 1984
VI-A (c)	<p>Rec: Evaluate and procure outside assistance to train TF Management in supervising a large engineering group.</p> <p>Resp: A program has been implemented in cooperation with the Training Department and A. Miller Associates to provide a structured interaction within the Division senior management. Interviews have been conducted by A. Miller Associates with senior management and are planned for various other levels within the Division. Initial discussions have been held on the results of the management interviews and preliminary action plans developed. The program will be finally structured after interviews with other Division personnel. Completion of the management activities will require cooperation with the M&C and two Plant Divisions since much of the perceived difficulties are interdivisional. Will be reviewed for progress in 4th Q 1984.</p>	III.	T. F.	B	Review for status 4th Q 1984

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding VI-F-3:</u>	Project engineers do not receive adequate information concerning the progress, cost and trends in progress and cost for the budget activities for which they were the originating source of authority for the modification or the major O&M project.				
VI-F-3	<p>Rec: Devise reports that will permit having a running knowledge of cost and performance.</p> <p>Resp: The Business Systems Planning (BSP) study, and two other committess (Budgeting, Estimating, and Cost Control Committee; and Plant Modification Study Team) have reviewed all systems, practices, etc., and will make recommendations to provide information which correlates work progress to utilization of resources. The next issue of this status report will set forth those specific plans.</p>	III.	Admin./ O/P	B	Review for status 4th Q 1984

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding VII-D:</u>	The cost reductions possible with more sophisticated contracting methods are not being achieved.				
VII-D (a)	Rec: Continue training requisitioners of materials and services and develop a means to measure success of training.	V.	Admin.	B	3rd Q 1984 (M&C, R&EC) 4th Q 1984 (NA, OC, TMI-1)
	Resp: Requisitioner Training Course being revised to tailor to specific GPUN Div. needs presented in a "seminar" type 2 hour approach; will better insure avail. of key requisition activity managers and permit discussion of practical problems, causes and solutions vs. highly theoretical nature of initial training course. M&C and Rad Con Seminar scheduled for 3rd Q 1984; N.A., O.C. and TMI-1 scheduled for 4th Q 1984. Increased use of firm fixed price and award fee type contracts has taken place over the past year and one half. The use of fixed price contracts, however, is limited to contractor efforts which are clearly defined in scope and where the cost can be estimated by GPU Nuclear with some degree of certainty. Added improvements depend upon 1) early identification of technical requirements so that competition (technical and/or price) can be used to the maximum; 2) improved and firm design specifications so that incentives can be structured to precise program milestones; and 3) enhanced in-house estimating capability which will provide realistic incentives to be structured for cost reimbursement type contracts. The interface between Technical Functions and Materials Management has significantly improved, and earlier coordination of future requirements has taken place.				

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding VII-E-4:</u>	The TMI-2 entrance to the protected area uses a temporary building and manual search to control entry of personnel. This facility and its operation are inefficient in the use of guard manpower.				
VII-E-4	Rec: Upgrade TMI-2 Processing Center including installation of metal monitors and explosive monitors. Offset is reduction in guards at TMI-2.	II.	Admin.	B	3rd Q 1984
	Resp: Key carded turnstiles will be installed at the Unit 2 Processing Center not later than September 15, 1984. The delay thus far in accomplishing this project has been occasioned by the extremely high workload associated with the reactor head removal. The turnstile project has now been reprioritized to assure its completion by the 3rd Quarter of 1984. This will result in a reduction of four man years for the Unit 2 Site Protection Officer force. The construction of a permanent Unit 2 Processing Center to include electronic search equipment was rejected for the 1984 budget due to the impending overall status change for TMI-2 that will occur when the core is removed from the reactor.				
<u>Finding VII-E-5:</u>	The protected area perimeter alarm system at TMI has an excessive number of alarms.				
VII-E-5	Rec: Upgrade perimeter alarm system to produce a system with a minimum number of false alarms.	III.	Admin.	B	4th Q 1984 (TMI) 3rd Q 1985 (OC)
	Resp: Project is underway at TMI and O.C., coordinated by Technical Functions. This is a long term project with estimated completion 4Q '84 (TMI) and 3rd Q 1985 (OC). Improvement is now a NRC commitment for Oyster Creek.				
<u>Finding VII-F:</u>	GPUN has no employee who is a medical doctor at headquarters or TMI-1 or Oyster Creek to oversee medical aspects of the GPUN rad. health program. Part time contract physicians and a contractor are used for these functions.				
VII-F	Rec: Employ a physician at TMI and assign medical radiological health responsibilities for TMI-1, TMI-2, and Oyster Creek.	II.	R&EC	B	4th Q 1984
	Resp: Board of Directors has agreed. Physician was recruited and hired 5/14/84. Position vacated 6/13/84. Replacement actively sought.				

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding VIII-3:</u>	Productivity at the nuclear plant sites is adversely affected by current bargaining unit employees.				
VIII-3	<p>Rec: Conduct review of bargaining agreements to determine impact on work efficiency.</p> <p>Resp: Completed for Oyster Creek 4Q'83. Major emphasis has been on enforcing management rights in current agreement. Remains open for TMI and will be addressed prior to the May 1985 negotiations.</p>	IV.	H. R.	B	Complete (OC) 1st Q 1985 (TMI)

7/20/84

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Finding XII-A:</u>	Insufficient or poor supervision is contributing to poor productivity.				
XII-A (a)	<p>Rec: Properly train supervisory personnel.</p> <p>Resp: Responses to other recommendations address this problem directly. Revised Supervisory Development Program now complete and being delivered at TMI and Oyster Creek. Initial efforts at Parsippany have begun. This item remains open with 80% completion of the Supervisory Development Program expected during the 3rd Q 1985.</p>	V.	N. A. Gen./OP	B	3rd Q 1985
XII-A (c)	<p>Rec: Managers should develop their supervisors by observing them and instructing them.</p> <p>Resp: This issue is being addressed in conjunction with the response to Recommendation XII-A-f. Has been addressed with all Managers on many occasions. New Supervisory Development Program includes management overview and involvement in the development of their subordinate supervisors. This training will be ongoing and will also be an integral part of the GPUN Management Development process. This item remains open with 80% completion of the Supervisory Development Program expected during the 3rd Q 1985.</p>	V.	N. A./ Gen.	B	3rd Q 1985
XII-A (j)	<p>Rec: Trending of data to ascertain problem areas.</p> <p>Resp: The Activity Indicator Display program has been implemented to trend for potential problem areas. A major effort by the Operations Analysis staff is underway to enhance the indices currently reported and to encourage the use of trending within the divisions. Some divisions have already instituted trending programs for key operating parameters. TMI-1, for example, trends budget, job tickets, chemistry analysis, and radiological parameters. Rad Con trends man rems, and radiological incident reports. M&C has a trending program to identify problem areas in its operation.</p>	III.	Admin./ Gen./OP	B	Review for status 4th Q 1984

7/20/84

BETA
FINDING/
RECOMMEND.

	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
XII-A (1)	<p>Rec: Color-code hard hats at the site to distinguish workers, foremen, officers, contractors.</p> <p>Resp: Color coding of hard hats has been revised at Oyster Creek. TMI-1 and O.C. Division Directors will review this item and coordinate on desirable further revisions. At TMI-1, exempt and non-exempt wear different color hard hats. No current plans to change system to include all categories of people listed. M&C supports; consideration must be given to contractor identification requirements.</p>	IV.	TMI-1/ Gen./O.C.	D	Review for status 4th Q 1984
Finding XII-B: There is too much paper being generated and distributed throughout the GPUN organization.					
XII-B (a)	<p>Rec: Each division director should help ensure distribution is necessary.</p> <p>Resp: A specific effort has been initiated at the officer level to identify and use case studies to exemplify inappropriate distribution of documents. Corporate Goal 8 also addresses this issue. Operations Analysis has completed paperwork reduction studies in four divisions helping them achieve an average of 23.6 percent paperflow reduction. Operations Analysis plans similar studies in the remaining divisions. At least one year is needed to measure the effectiveness of these efforts. In addition, Administrative Division has established a Forms Management Control group to help manage corporate paper generation and distribution. Will be reviewed for status at the end of 1984.</p>	III.	Admin. Gen./OP	B	Review for status 4th Q 1984
XII-B (b)	<p>Rec: Tighten signature authority; monitor for compliance.</p> <p>Resp: Operations Analysis has been tasked to conduct a review of the approval and signature requirements on all documents supportive of GPUNC approval requirements. The next issue of this status report will comment on the progress of that review.</p>	III.	Admin. Gen./OP	B	<p>Review for status 4th Q 1984</p> <ul style="list-style-type: none"> o Complete for TMI-1 o Communication with other divisions is parallel or downward. o Addressed in M&C procedures and monitored in an ongoing review process.

7/20/84

<u>BETA FINDING/ RECOMMEND.</u>	<u>PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE</u>	<u>CAT.</u>	<u>DIVISION</u>	<u>STATUS CODE</u>	<u>COMMENTS</u>
XII-B (e)	<p>Rec: Limit required concurrences on documents/procedures.</p> <p>Resp: Concurrence distribution is being considered as part of the corporate paperwork reduction effort. Formal procedure systems have been streamlined to implement limits on required concurrences. Administration Division has drafted new procedures for obtaining and documenting formal concurrences. Office of the President action on this issue will continue.</p>	III.	Admin.	B	Review for status 4th Q 1984 minimize signatures on documents.
<u>Finding XII-D:</u>	There appears to be a reluctance within the GPUN system to take action either to improve the performance of poor performers or to terminate their employment.				
XII-D (a)	<p>Rec: Review for practical usefulness, GPUNC procedure addressing poor performers.</p> <p>Resp: Progressive discipline procedure developed and in use. H. R. has worked with each Division and reviewed all Performance Appraisals of 2.0 or below. Plans for improvement have been developed and follow-up procedures are in effect.</p>	IV.	H. R./ General	A*	Complete
<u>Finding XII-E:</u>	Since the creation of GPUN, too many small groups (cells or staffs) have been formed to carry out functions which should be handled within the normal functioning groups.				
XII-E	<p>Rec: Each director review manpower staffing to reduce unnecessary small staff build-ups.</p> <p>Resp: Staffing of all Divisions is reviewed as part of budget process. Staff reduction goals of 1-2 percent were established in 1984. Further reductions are planned for 1985. Operations Analysis conducts 4 - 5 staffing studies annually. In addition, Operations Analysis plans to specifically study cell groups throughout GPUN in 1985.</p>	II.	O/P & Admin.	B	2nd Q 1985