

**COOPER NUCLEAR STATION**

**NEAR TERM**

**INTEGRATED ENHANCEMENT**

**PROGRAM**

**FEBRUARY 10, 1994**

A/14

## EXECUTIVE SUMMARY

The purpose of this Integrated Enhancement Program is to provide Senior Management focus on the issues that are important to improving the overall performance of the Nuclear Power Group (NPG) in the near term. For the long term, elements of this program, together with other management improvement initiatives, are being incorporated into the NPG Business Plan.

Embodied within this Program are several inputs from sources such as the Strategic Plan for Performance Improvement, Senior Management identified items, the FPI Common Cause Analysis and the NRC Operational Safety Team Inspection. Individually taken, the items may not indicate a programmatic or organizational weakness; but as a whole there are strong indications that Senior Management has not been effective in directing the operations of Cooper Nuclear Station.

Accordingly, through the successful and timely completion of the program enhancements described within this manual, a marked improvement in the safe operation of Cooper Nuclear Station will be realized.

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# INTRODUCTION

## A. BACKGROUND

Cooper Nuclear Station (CNS) has traditionally been recognized as a good performer within the Nuclear Power Industry. However, recent events at CNS indicate a declining trend in performance. Even though a solid and safe operating record has been maintained, the Nuclear Power Group (NPG) Management, based on a number of recent indicators, recognizes that the performance of the entire organization is in question. Unfortunately, management was remiss in not recognizing earlier the disproportionate number of negative indicators that have been received over the past eighteen months.

NPG Management is keenly aware that major, expeditious changes in how we conduct business must occur if CNS is to remain economically viable while meeting internal and regulatory expectations. This Integrated Enhancement Program will provide management and staff with the short term vehicle to ensure that these changes occur in a timely and consistent manner, and that these changes will result in a strong, safety conscious, competitive nuclear organization. Also under development, in a parallel path, is the NPG Business Plan which will contain the elements necessary to ensure long term performance continues to improve in all areas important to safe operation.

## B. MANAGEMENT CHANGES

Recognizing that the overall performance of CNS was declining, the Vice President - Nuclear made a significant management realignment to provide a strong on-site Senior Management team to focus on the critical issues facing the Nuclear Power Group. These management changes also

included, but are not limited to, relocating the Vice President - Nuclear and the Division Manager of Quality Assurance and his staff to CNS from the corporate office. Additional changes to the NPG organization will also be made where required to further enhance performance.

The new Senior Management team's initial focus is to address significant, recurring issues that have contributed to the declining performance of Cooper Nuclear Station. One of the key issues that will be resolved is the failure to provide prompt and positive resolution to identified problems; and then implementing the appropriate corrective action to prevent recurrence in an aggressive manner.

#### C. DEFICIENCIES

Various NRC inspections, NPG self assessments, and broad consultant reviews have identified concerns with the management and operation of CNS. Although the focus of these inspections and assessments was different, the conclusions reached and recommendations made were generally consistent. There are six areas where the majority of concerns fall. Consequently, the CNS Integrated Enhancement Program has been developed to address these six areas and has been divided into major categories or sections with assigned Senior Managers. The areas in which concerns have been identified include:

- Management

A common finding was that the overall management of the CNS organization was not effective. Contributing factors include poor communications, an inadequate accountability program, the need for improved management training, undefined or poorly communicated management expectations, and an inadequate prioritization system. It was also identified that the Nuclear Power Group did not have a long term business

plan which defines Management's expectations through vision, mission, and goals and objectives for the entire organization.

- Training

The adequacy of training, as well as the administrative discipline (certification and compliance) within specific areas of the CNS Training Program are deficient. This is evident due to the lack of certain training programs and the fact that some individuals have continued to perform their assigned tasks even though they were no longer "certified/qualified".

- Problem Identification and Resolution

The NPG has not consistently demonstrated the ability to identify, aggressively pursue, and permanently resolve their own problems. And when problems were identified by CNS, the implemented corrective action did not consistently prevent reoccurrence. The inability to resolve reoccurring problems has been attributed to a failure to conduct thorough root cause investigations or implementing the necessary, enduring corrective actions. This has resulted in an overall ineffective Corrective Action Program.

- Engineering Modification and Configuration Control

Outside reviews have indicated the need to improve control over plant configuration and the Design Change process. One clear example of this deficiency is the fact that the Maintenance Work Requests, in some instances, have been used in the place of a Design Change.

- Operations

Findings and recommendations noted a general lack of a questioning attitude, formality, and ownership. There is also a lack of standardization in terms of shift turn-over, crew briefings and how operators communicated in the control room.

- Procedural Adequacy and Adherence

The reviews and audits identified a concern that the necessary balance between reliance upon the "skill of the craft" and the need for procedural detail is not well defined. Another important finding is that CNS employees do not consistently demonstrate a questioning attitude when confronted with a procedure which is not clear and workable.

D. CNS INTEGRATED ENHANCEMENT PROGRAM

The CNS Integrated Enhancement Program is a collection of short-term prioritized corrective actions and performance improvements. To develop this program each issue identified in prior audits, assessments or reviews was evaluated. The issues were then prioritized to ensure the critical issues receive the necessary resources and management attention to ensure prompt resolution. It is these critical (Priority "RED") issues that make up the Integrated Enhancement Program.

1. Program Management

As previously discussed, the critical issues were then divided into specific groups and assigned to a Senior Manager for resolution. The Senior Manager has assigned the specific issue to a Task Manager to develop an action plan for completing the specific Program Enhancement that will resolve the critical issue.

The enclosed Program Enhancement Task Sheets contain the essential information used for developing a course of action and provide the means to track the status of each task to completion. The task sheets that follow indicate the title of the task, a task description, the source documents, the program manager (Senior Manager), the task manager, the planned start date, the planned completion date, references as to where the task originated from (i.e. OSTI, SPPI), and the major milestones for completing the task. It should be noted that the planned completion dates and milestone dates are based on the best information available and that conditions or scope may change resulting in improvements or delays to the schedule. Any changes to the schedule must be adequately justified in writing, to the Vice President - Nuclear and this documentation included in the Integrated Enhancement Program document.

Every two weeks the Task Manager will communicate to their respective Senior Manager the progress to date. The Senior Manager will then formally provide the status update to the Vice President - Nuclear. Monthly management reports will be generated reflecting the overall Integrated Enhancement Program status as well as the status of the individual tasks.



## 2. Program Layout

The Integrated Enhancement Program has been divided into several sections which reflect the functional areas of the NPG management. The issues are then assigned to the appropriate Senior Manager.

Section I, Nuclear Power Group, discusses the issues that require specific Vice President - Nuclear attention.

Section II, Management, discusses the management concerns and the specific Integrated Enhancement tasks for resolving the management issues. It should be noted that management related activities will be pursued in each of the following sections as well as Section II.

Section III, Operations, provides a discussion regarding the operations, maintenance and site engineering concerns that must be addressed. The tasks developed for resolving the operational aspects are included as part of Section III.

Section IV, Safety Assessment, addresses the concern with CNS's ability to identify and resolve problems. The Integrated Enhancement tasks for improving the Corrective Action process and conducting independent reviews are included in this section.

Section V, Site Support, primarily focuses on the training issues and providing support resources to the Senior Management team such as the NPG Management Development Program.

Section VI, Nuclear Support, includes communication issues and how to improve the regulatory interface. The tasks for dealing with these issues are included within this section.

Section VII, Corporate Engineering, provides the direction for ensuring the concerns with engineering modification and configuration control are resolved. Consequently the tasks for this effort are included as part of this section. It should be noted, site related engineering is part of the Operations Department, therefore Section III will have certain engineering related tasks.

Section VIII, Quality Assurance, addresses the concerns with procedural adequacy and adherence as well as the inability to conduct proper problem identification and resolution.

E. INDEX OF PROGRAM ENHANCEMENTS

SECTION I - NUCLEAR POWER GROUP

<u>Item Number</u>	<u>Description</u>
GRH-94-01	Establish Periodic Communications Meetings
GRH-94-02	"One Over One"
GRH-94-03	Supervisor Meeting with Subordinates
GRH-94-04	Management Mentors in Key Areas
GRH-94-05	Conduct Study for Appropriate Staffing at CNS
GRH-94-06	Additional Personnel to Meet the Needs of the NPG Organization
GRH-94-07	VP Meetings on Reorganization

SECTION II - MANAGEMENT

<u>Item Number</u>	<u>Description</u>
MGMT-94-01	Strengthen the CNS Safety Culture
MGMT-94-02	Develop an NPG Business Plan
MGMT-94-03	Prioritize Outstanding Work

SECTION III - OPERATIONS

<u>Item Number</u>	<u>Description</u>
RLG-94-01	Develop Program to Review Maintenance Procedures/Activities
RLG-94-02	Review Preventative Maintenance Task Assignments for Adequate Instructions
RLG-94-03	Upgrade the System Engineer Program
RLG-94-04	Complete the Maintenance Department Reorganization
RLG-94-05	Evaluate PIV, ISI, IST and LLRT Programs

SECTION III - OPERATIONS (Continued)

<u>Item Number</u>	<u>Description</u>
RLG-94-06	Engineering Backlog
RLG-94-07	Maintenance Backlog
RLG-94-08	Review the Qualifications and Training of Current CNS System Engineers to Determine Training Required
RLG-94-09	Improve Operations Communications

SECTION IV - SAFETY ASSESSMENT

<u>Item Number</u>	<u>Description</u>
JMM-94-01	Upgrade the Corrective Action Program
JMM-94-02	Improve Operating Experience Review Program
JMM-94-03	Enhance the Human Performance Evaluation Program
JMM-94-04	Review/Revise Operability Determination Process
JMM-94-05	Develop the Independent Review Group
JMM-94-06	Develop an NPG-Wide Priority System
JMM-94-07	Implement the Industry Advisory Group

SECTION V - SITE SUPPORT

<u>Item Number</u>	<u>Description</u>
EMM-94-01	NPG Manager and Supervisor Management Skills Training
EMM-94-02	Develop User-Friendly Tracking System for Training and Certification
EMM-94-03	Develop a Comprehensive System Engineering Training Program for CNS System Engineers
EMM-94-04	Root Cause Training

SECTION V - SITE SUPPORT (Continued)

<u>Item Number</u>	<u>Description</u>
EMM-94-05	CAP Training
EMM-94-06	Implement Recommendation of Fire Protection Assessment
EMM-94-07	Conduct a Compliance Review of CNS Training Programs

SECTION VI - NUCLEAR SUPPORT

<u>Item Number</u>	<u>Description</u>
DAW-94-01	Evaluate Licensing Department Organization
DAW-94-02	Issue NPG Directives in Support of the Strategic Plan for Performance Improvement

SECTION VII - CORPORATE ENGINEERING

<u>Item Number</u>	<u>Description</u>
REW-94-01	Engineering Program Responsibility Assignment
REW-94-02	Nuclear Engineering and Construction Division Self-Assessment
REW-94-03	Evaluate the Configuration Control and Design Change Process within the NPG

SECTION VIII - QUALITY ASSURANCE

<u>Item Number</u>	<u>Description</u>
VLW-94-01	Revise the Self-Assessment Program
VLW-94-02	Enhance CAP Audits/QA Trend Report
VLW-94-03	Establishment of QA Assessment/Evaluation Program
VLW-94-04	Upgrade the Internal Audit and Surveillance Program (Frequency and Scope)

**SECTION I**

**NUCLEAR POWER GROUP**

## SECTION I

### NUCLEAR POWER GROUP

The Nuclear Power Group (NPG) has recognized as a result of Self Assessments, performance overview, and NRC and INPO feedback that improvements in management oversight, communication, resources, culture, accountability, and identified programs and procedures are required. This near term plan is the methodology to focus NPG organization attention and resources on those issues requiring immediate attention.

The NPG Business Plan will communicate management expectations and the long term guidance for improving NPG performance and providing a means to constantly monitor this performance in order to ensure Senior Management expectations continue to be maintained.

The status of program enhancement milestones and schedule achievements will be reviewed with the NPG Senior Managers on a two week frequency and the plan updated monthly to ensure the expected focus and accomplishments are being maintained. The effectiveness of the program enhancements will also be monitored and revisions made to the near term Integrated Enhancement Program as deemed necessary.

# Program Enhancement

Priority: RED  
Item No: GRH-94-01

Title/Description: Establish Periodic Communications Meetings

Date Updated: 2/10/94

External Funding Requirements: None

Internal Resource Requirements: 30 hrs. quarter - Vice President - Nuclear

Program Manager: Guy Horn

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA

Description: The purpose of the periodic communication meetings is to communicate management expectations to NPG employees.

Objective: Performance levels within the NPG do not currently meet the high standards expected by Senior Management. Establish the desired level of quality in the performance of tasks.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Vice President meetings. (GRH-94-01.1)	10/93	10/1/93
2.	Manager meetings with supervision. (GRH-94-01.2)	3/94	
3.	Supervisory meetings with subordinates. (GRH-94-01.3)	3/94	

Update Status: Vice President - Nuclear routine meetings with NPG organizations continue to be held, and are providing valuable input into the NPG health. Manager and Supervisory meetings have also began but are not yet at the level necessary for providing the required feedback and the teamwork within the organization.



## Program Enhancement

Priority: R3D  
Item No: GRH-94-02

Title/Description: "One Over One"

Date Updated: 2/10/94

External Funding Requirements: None

Internal Resource Requirements: 200 hrs. quarter - NPG Managers/Supervisors

Program Manager: Guy Horn

Planned Start Date: 1/24/94

Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: "One over one" meetings will be established on a quarterly basis. A "One over one" meeting involves a manager meeting with his supervisors to discuss issues.

Objective: To communicate management expectations to supervision, enhance communication between workers and management, improve teamwork and morale, and improve quality of worker performance.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish guidelines and implement manager meetings with supervision to discuss ongoing issues, enhancements, progress, management expectations and to receive employee feedback. (GRH-94-02.1)	3/94	
2.	Improved communication and supervisory feedback, increased overview of worker performance and improved quality of worker performance. (GRH-94-02.2)	6/94	

Update Status: Vice President - Nuclear routine meetings with NPG organizations continue to be held, and are providing valuable input into the NPG health. Manager and Supervisory meetings have also began but are not yet at the level necessary for providing the required feedback and the teamwork within the organization.

## Program Enhancement

Priority: RED  
Item No: GRH-94-03

Title/Description: Supervisor Meeting with Subordinates Date Updated: 2/10/94

External Funding Requirements: None  
Internal Resource Requirements: 100 hrs. month by NPG Supervisors/1200 hrs. yr.

Program Manager: Guy Horn  
Planned Start Date: 1/24/94 Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Supervisor meetings with their subordinates will be established on a monthly basis.

Objective: To establish the desired levels of quality in worker performance, enhance communication between management and workers, enhance employee feedback on issues and improve teamwork and morale throughout the NPG, and eliminate barriers to communication.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish guidelines and implement monthly meetings with subordinates to discuss ongoing issues, enhancements, progress, communicate management expectations and receive employee feedback. (GRH-94-03.1)	3/94	
2.	Improve communication and worker feedback, improve quality of worker performance. (GRH-94-03.2)	6/94	

Update Status: Vice President - Nuclear routine meetings with NPG organizations continue to be held, and are providing valuable input into the NPG health. Manager and Supervisory meetings have also begun but are not yet at the level necessary for providing the required feedback and the teamwork within the organization.

## Program Enhancement

**Priority:** RED  
**Item No:** GRH-94-04

**Title/Description:** Management Mentors in Key Areas    **Date Updated:** 2/10/94

**External Funding Requirements:** \$500,000

**Internal Resource Requirements:** Vice President - Nuclear/Senior Managers - 50 hrs.

**Program Manager:** Guy Horn

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 4/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** CCA

**Description:** Evaluate the benefit of using management mentors in specific areas within the NPG to expedite the upgrade of management skills to the desired levels and to support programmatic and culture changes within the organization.

**Objective:** To expedite the desired levels of performance improvement within the NPG in order to achieve internal and regulatory expectations as rapidly as possible.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Evaluations completed and task agreements submitted for Board approval. (GRH-94-04.1)	4/94	

**Update Status:** The assessment of the need for management mentors within the NPG organization has begun. As a result it has been determined that a mentor in the CNS maintenance organization will be necessary. This person is expected to be on-site in March. Further assessments of this need in other areas will continue.

## Program Enhancement

**Priority:** RED  
**Item No:** GRH-94-05

**Title/Description:** Conduct Study for Appropriate Staffing at CNS  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$50,000 (for study)  
**Internal Resource Requirements:** Vice President - Nuclear - 30 hrs.

**Program Manager:** Guy Horn  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 2/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Conduct a study as to what would be the appropriate staffing level for CNS. This study should consider current staffing compared to industry leaders for a similar unit.

**Objective:** To determine if current staffing levels are sufficient to achieve and maintain current industry standards and continuing normal workload within the NPG.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Complete staffing study. (GRH-94-05.1)	1/94	1/94
2.	Develop a staffing upgrade plan for Senior NPPD Management review and approval. (GRH-94-05.2)	2/94	2/94
3.	Receive NPPD Board of Directors approval of the staffing upgrade plan. (GRH-94-05.3)	2/94	

**Update Status:** A staffing study by T. Martin and Associates has been completed. The interim staffing plan has also been developed and submitted to Senior NPPD Management. A meeting with the NPPD Board of Directors is scheduled for February 10, 1994.

## Program Enhancement

**Priority:** RED  
**Item No:** GRH-94-06

**Title/Description:** Additional Personnel to Meet the Needs of the NPG Organization  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$2,000,000 (estimated)  
**Internal Resource Requirements:** Vice President - Nuclear - 30 hrs.

**Program Manager:** Guy Horn  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 2/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Based on the results of the staffing study, develop a plan of action to redistribute or hire additional personnel to meet the needs of the NPG organization.

**Objective:** To achieve and maintain Nuclear industry standards and improve INPO/NRC rating of NPG activities.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop an interim staffing upgrade plan for Senior Management review and approval. (GRH-94-06.1)	2/94	2/94
2.	Receive NPPD Board of Director approval of the interim staffing upgrade plan. (GRH-94-06.2)	2/94	

**Update Status:** Interim staffing plan has been developed and approved by to NPPD Senior Management. Submittal to the NPPD Board of Directors is scheduled for 2/10/94.

## Program Enhancement

Priority: RED  
Item No: GRH-94-07

Title/Description: VP Meetings on Staffing Study                      Date Updated: 2/10/94

External Funding Requirements: None  
Internal Resource Requirements: Vice President - Nuclear/Senior Management - 20 hrs.

Program Manager: Guy Horn  
Planned Start Date: 1/24/94                      Planned Completion Date: 4/94

References (NRC/INPO/NUMARC/NAIT Etc.): 070 SPPI

Description: Communicate results of staffing study to NPG employees and plan of action to redistribute or hire additional personnel.

Objective: To make CNS employees aware of planned staffing upgrades for long term planning and budgeting purposes and to acquire staff support and ownership of the staffing study.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	NPG staff aware of organizational upgrades and assign appropriate NPG departments action to complete any necessary redistribution studies. (GRH-94-07.1)	4/94	

Update Status: A staffing study by T. Martin and Associates has been completed. The interim staffing plan has also been developed and approved by to Senior NPPD Management. A meeting with the NPPD Board of Directors is scheduled for February 10, 1994.

**SECTION II**  
**MANAGEMENT**

## SECTION II

# MANAGEMENT

These management issues are an indication of the present Nuclear Power Group culture. The lack of a questioning attitude, accountability and ownership; poor communication, inappropriate delegation; and poorly communicated management expectations are examples of the type of management concerns identified. In order for management to become more effective in instilling the improved culture throughout the NPG, a long term business plan that includes the organization's visions, goals and objectives is being developed. Previously, many of the plans and programs that had been established focused on the short term corrective actions without considering the long term impact.

The CNS Integrated Enhancement Program tasks, as part of the Management section, will address many of these cultural issues, as well as bring about other improvements within the NPG. For the long term, the NPG Business Plan will be used to maintain the expected improvements.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.



# Program Enhancement

Priority: RED  
Item No: MGMT-94-01

Title/Description: Strengthen the CNS Safety Culture      Date Updated: 2/10/94

External Funding Requirements: NONE  
Internal Resource Requirements: 100 Hours/Senior Manager; 600 Hours Total

Program Manager: All  
Planned Start Date: 1/24/94      Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, OSTI

Description: The purpose of this enhancement is to instill in management/supervision and the workforce the culture and values to make the changes necessary to become a more healthy organization; ever improving the quality of the work we do.

Objective: To improve the management effectiveness of the NPG organization, continue to provide safe and reliable power, to maintain a cost competitive operation, and to meet or exceed industry standards in all aspects of our operation.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Convey to employees their right as well as their responsibility to have a questioning attitude. (MGMT-94-01.1)	6/94	
2.	Create an atmosphere where employees feel comfortable having a questioning attitude. (MGMT-94-01.2)	6/94	

## Program Enhancement

### Major Milestones: (MGMT-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Emphasize the importance of and encourage employees to use the corrective action program. (MGMT-94-01.3)	6/94	
4.	Encourage employee feedback to management on emerging issues, concerns and suggested corrective actions. (MGMT-94-01.4)	6/94	

**Update Status:** A number of specific actions are underway, including divisional and departmental meetings, specific newspaper articles and management walkarounds.

## Program Enhancement

Priority: RED  
Item No: MGMT-94-02

Title/Description: Develop an NPG Business Plan      Date Updated: 2/10/94

External Funding Requirements: \$100,000  
Internal Resource Requirements: 80 Hours/Senior Manager; 480 Hours Total

Program Manager: All  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI, CCA

Description: Develop an NPG Business Plan with a long range goal of improving plant and personnel performance to a level that meets or exceeds industry standards in all areas.

Objective: To direct, guide and provide measured feedback relative to use of personnel, resources and management for the purpose of improving plant performance.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish mission and goals for emerging issues and important programs. (MGMT-94-02.1)	1/94	1/94
2.	Clearly define management expectations on one sheet of paper. These will establish the NPG Vision, Mission and Values. (MGMT-94-02.2)	1/94	1/94

## Program Enhancement

### Major Milestones: (MGMT-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Hold departmental meetings to communicate the vision and values mission, of the business plan. (MGMT-94-02.3)	3/94	
4.	Complete the Strategic Business Plan. (MGMT-94-02.4)	3/94	
5.	Develop Senior Management Business Plans. (MGMT-94-02.5)	3/94	
6.	Issue first monthly performance Monitoring Report. (MGMT-94-02.6)	5/94	
7.	Continue to communicate management expectations and provide positive feedback on successes. (MGMT-94-02.7)	Ongoing	

**Update Status:** The NPG vision, mission and values has been developed and sent to all NPG employees. Meetings by the Vice President with NPG organizations communicating managements expectations and NPG mission and values are ongoing. Required Management/Supervisor meetings with their staff are in the implementation stage. The NPG Business Plan Goals have been developed and the Division Goals and Objectives to support the Business Plan are under development at this time.

# Program Enhancement

Priority: RED  
Item No: MGMT-94-03

Title/Description: Prioritize Outstanding Work      Date Updated: 2/10/94

External Funding Requirements: \$10,000  
Internal Resource Requirements: 5 Department Personnel for 2 Months; Total 1200 Hours  
(Engineering, Maintenance, Tech. Staff)

Program Manager: All  
Planned Start Date: 1/24/94      Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Developed a priority system to prioritize outstanding work to ensure the critical items are being worked first.

Objective: To focus management and personnel resources in the most effective means possible.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop a prioritization procedure. (JMM-94-06)	3/94	
2.	Assemble items to be prioritized. (MGMT-94-03.1)	3/94	

## Program Enhancement

### Major Milestones: (MGMT-93-03 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Establish departmental team to conduct the initial prioritization. (MGMT-94-03.2)	3/94	
4.	Complete the prioritization of existing items. (MGMT-94-03.3)	3/94	

**Update Status:** Within the Engineering organization the significant work items which include NCRs, DRs, as well as external commitments, are being prioritized via the interim Prioritization Program. This interim effort and program will be folded into the official NPG Prioritization Program.

**SECTION III**  
**OPERATIONS**

## **SECTION III**

### **OPERATIONS**

The issues covered in this section focus on operations, procedural adequacy and adherence, engineering program adequacy, and certain management issues. The concerns regarding operations include the communication of management expectations and the lack of standardization with how operating shifts communicate. There is also a lack of a questioning attitude, accountability and a lack of ownership within the operations organization.

The procedural adequacy and adherence concern included three issues. The first issue is that the work force is changing and, therefore, the content of the procedures have to be revised. The second issue involves the proper balance between the "Skill of the Craft" and the necessary amount of detail in each procedure. Finally, the employees who use the procedures do not display a questioning attitude when confronted with a situation that does not appear to be correct.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.



## Program Enhancement

Priority: RED

Item No: RLG-94-01

Title/Description: Develop Program to Review Maintenance Procedures      Date Updated: 2/10/94

External Funding Requirements: \$275,000

Internal Resource Requirements: Support to research, revise and develop Maintenance Procedures during the course of 1994.

Program Manager: Rick Gardner (Mike Unruh)

Planned Start Date: 1/24/94

Planned Completion Date: 12/94

References (NRC/INPO/NUMARC/NAIT Etc.): SPPI 340, OSTI, SMM

Description: The actions that will be addressed under this action include the following:

- Review selected Maintenance Procedures to verify the incorporation of accurate and sufficient information (including vendor information)
- Determine that sufficient technical detail is incorporated into Maintenance Procedures to allow the Craft to perform the activity.
- Establish and communicate a definition of "Skill of the Craft".
- Determine that adequate training is provided to support the performance of the Maintenance Procedures, as written.

Objective: To provide the appropriate level of detail for the craftsmen and to address performance deficiencies.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Determine manpower requirements, prepare and approve position authorizations, conduct interviews and hire temporary employees. (RLG-94-01.1)	2/94	2/94

## Program Enhancement

### Major Milestones: (RLG-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
2.	Provide facilities, equipment and supplies to procedure upgrade team. (RLG-94-01.2)	2/94	
3.	Conduct scope meeting, outline goals, expectations, and schedule. (RLG-94-01.3)	2/94	
4.	Define "Skill of the Craft". (RLG-94-01.4)	3/94	
5.	Revise current, safety related and important to safety maintenance procedures as necessary to ensure skill of the craft is addressed and the necessary technical details are provided. (RLG-94-01.5)	12/94	
6.	Vendor Manual Validation and Verification (V&V) complete. (RLG-94-01.6)	6/94	
7.	Interface with the Training Department to ensure the incorporation of maintenance procedure changes into training. (RLG-94-01.7)	12/94	

**Update Status:** Temporary employees have been hired and are in training with a completion date of 3/94. Facilities and equipment have been identified. Currently working toward completion of this item.

# Program Enhancement

Priority: RED  
Item No: RLG-94-02

Title/Description: Review Preventive Maintenance  
Task Assignments for Adequate Instructions

Date Updated: 2/10/94

External Funding Requirements: \$150,000 (Estimated)  
Internal Resource Requirements: 350 hours

Program Manager: Rick Gardner (Mike Unruh)  
Planned Start Date: 1/24/94

Planned Completion Date: 12/94

References (NRC/INPO/ETC.): OSTI

Description: Review Preventive Maintenance (PM) tasks under the responsibility of the Maintenance Department to systemically document the adequacy of the work instruction, and revise those PMs that do not contain adequate work instructions.

Objective: To provide the appropriate level of detail for the craftsmen and to address performance deficiencies.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish a Task Group to establish/develop criteria (i.e. checklist) for documents which set forth acceptable practices and/or provide information regarding activities that are considered within the Skill of the Craft (Maintenance Work Practices) (RLG-94.02.1)	2/94	
2.	Collect requirements that define what constitutes SORC procedures. (RLG-94.02.2)	2/94	
3.	Based on items 1 and 2, establish/develop criteria to identify the level of detail required for work instruction documents. (RLG-94-02.3)	3/94	

## Program Enhancement

### Major Milestones: (RLG-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
4.	Submit criteria to the appropriate organizations for review and acceptance. (RLG-94-02.4)	3/94	
5.	Procure services as necessary to review the existing PMs using the criteria established in items 3 and 4. (RLG-94-02.5)	3/94	
6.	Perform the review of approximately 5540 PMs (Planning - 1500, I-Shop - 2270, E-Shop - 900, M-Shop - 800, UT-Shop - 55, and W-Shop - 15), and revise PMs, maintenance procedures and Maintenance Work Practices to insure adequate work instructions exist. (RLG-94-02.6)	12/94	

**Update Status:** A chairman has been named for the Task Group to establish/develop a criterial document. Four additional Maintenance Department individuals have been identified to serve in the Task Group. One additional task force member will be added.

The February Board meeting should approve Tasks with various companies to obtain the manpower to perform the PM review.

## Program Enhancement

Priority: RED  
Item No: RLG-94-03

Title/Description: Upgrade the System Engineer Program      Date Updated: 2/10/94

External Funding Requirements: \$25,000

Internal Resource Requirements: The entire Engineering Department will be involved over an approximate two-year period.

Program Manager: Rick Gardner (Jim Lynch)

Planned Start Date: 10/18/93

Planned Completion Date: 12/94

References (NRC/INPO/NUMARC/NAIT Etc.): SMM

Description: Upgrade of the System Engineer Program consists of the following activities:

- A. Implementation of the Engineering Plan for performance improvement, the elements of which are described below under major milestones.
- B. Improvements to System Engineer training, described in Program Enhancement Item RLG-94-08.
- C. Engineering backlog reduction, described in Program Enhancement Item RLG-94-06.

Objective: Improve the effectiveness of the Engineering Department. Improvements will focus on work management system and program reporting, and definition of roles in the Engineering Department.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Perform assessment of Engineering Department effectiveness and organization. (RLG-94-03.1)	1/94	1/22/94
2.	Develop an integrated plan to address various assessments of engineering at CNS. Submit to Region IV. (RLG-94-03.2)	1/94	1/21/94

## Program Enhancement

### Major Milestones: (RLG-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Work management improvements:		
-	Develop criteria for prioritization of engineering NAIT and ACT items.	1/94	2/8/94
-	Prioritize and schedule NAIT and ACT items.	2/94	
-	Develop a set of engineering department performance indicators. Produce appropriate charts and graphs for department and senior management review.	2/94	
-	Produce final set of department performance indicators, publish monthly. Determine performance goals and incentives for achieving goals.	4/94	

(RLG-94-03.3)

4.	Establish system and program report cards:		
-	Produce first draft system report card for one system.	2/94	
-	Produce final system report card.	2/94	
-	Produce first draft program report card for one program.	2/94	
-	Produce final program report card.	3/94	
-	Produce program report cards for all assigned systems monthly.	3/94	
-	Issue approved EDIs for both report cards.	4/94	
-	Produce program report card for all assigned programs monthly.	4/94	

(RLG-94-03.4)

## Program Enhancement

### Major Milestones: (RLG-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
5.	Evaluate Engineering Department functions for efficiency improvements. Examples include the way NPRDS reports are prepared procurement activities. Complete evaluation and plan for implementation. (RLG-94-03.5)	3/94	
6.	Define roles, management expectations, functions, and accountability for system and program engineers, lead engineers, senior engineers, supervisors, and managers. (RLG-94-03.6)	6/94	
7.	Develop succession plan for manager, assistant manager, supervisor and lead positions. Succession plan will include appropriate developmental assignments and training. (RLG-94-03.7)	6/94	
8.	Perform an assessment and develop a plan to identify candidate processes for re-engineering. The plan should identify and prioritize candidate processes and develop a schedule for completion of the re-engineering analyses. Candidate processes include procurement and engineering work request. (RLG-94-03.8)	8/94	
9.	Self assess the CNS Engineering Department upgrades for effectiveness. (RLG-94-03.9)	12/94	

**Update Status:** Item #1 is complete. Item #2 is complete and was transmitted to Region IV on 1/21/94 (CNSS941043). Item #3 a memo (CNSS943517) was issued on 2/8/94 to engineering supervisors to describe the process and criteria to be used to prioritize the workload. Prioritization is expected to be complete by 2/18/94. A set of 10 draft engineering performance indicators has been completed. Draft indicators are currently under review. Item #4 system report cards used at SONGS, Crystal River 3, and Fermi have been gathered as examples.

## Program Enhancement

Priority: RED  
Item No: RLG-94-04

Title/Description: Complete the Maintenance Department Reorganization      Date Updated: 2/10/94

External Funding Requirements: \$50,000 Consultant to identify structure and positions.  
Internal Resource Requirements: 100 hours

Program Manager: Rick Gardner (Mike Unruh)  
Planned Start Date: 1/24/94      Planned Completion Date: 9/94

References (NRC/INPO/NUMARC/NAIT Etc.): SMM

Description: Develop and implement a reorganization of the Maintenance Department.

Objective: To reduce the number of reporting layers in order to improve communications within the department and to create a Maintenance Support group.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop organization structure. (RLG-94-04.1)	1/94	1/94
2.	Obtain approval of structure and manpower increases. (RLG-94-04.2)	2/94	2/94
3.	Acquire approval to combine Lead Person and Crew Leader jobs. (RLG-94-04.3)	2/94	
4.	Determine space requirements and provide same. (RLG-94-04.4)	4/94	
5.	Re-assign personnel to positions as necessary, and finalize the new position descriptions and postings. (RLG-94-04.5)	6/94	
6.	Self assess the reorganized department for effectiveness. (RLG-94-04.6)	9/94	



Update Status: (RLG-94-

## Program Enhancement

- 1) Orga. (med)
- 2) Orga. structure development complete.  
stage: structure approved and manpower increases for initial
- 3) Recla. structure approved.
- 4) Space for position of Lead Person to Crew Leader approved.  
determ. ents for initial stages of restructure have been  
Acquis. Purchase Requisition for same has been submitted.  
purcha. additional facilities on schedule pending approval of

# Program Enhancement

Priority: RED  
Item No: RLG-94-

Title/Description: Eval.

III. IST and LLRT Programs Date Updated: 2/10/94

External Funding Requ.

Internal Resource Requ.

1,300,000 (Estimate)

- Lic.
  - Cont
  - CNS
  - NEL
  - Oper
- Manager/Supervisor - 40 hours/year,  
 Management Manager/Supervisor - 30 hours/year,  
 - 240 hours/cycle,  
 - 1040 hours/year,  
 Maintenance support - 640 hours/cycle

Program Manager: Ric  
Planned Start Date: 9/1/9

ner (Jim Lynch)

Planned Completion Date: 4/95

References (NRC/INPO/N

PC/NAIT Etc.): SPPI 350

Description: Develop and  
concerns for f  
Inservice Insp

ent programs and program changes to resolve SALP MS-1  
Isolation Valve testing, Local Leak Rate Testing, and  
Testing including:

- Develop
  - Identify  
emerg
  - Identify  
class 1,2  
valves.
  - Implement  
SALP MS
- implement a Pressure Isolation Valve test program.  
 y related manual valves required to be operated in  
 nditions and implement PM requirements.  
 Implement ISI requirements for safety related non-code  
 systems containing piping, pressure vessels, pumps, or  
 modification, testing, and program development to resolve  
 LLRT concerns.

Objective: Evaluate and imp.  
compliance and sou

PIV, ISI, IST and LLRT programs to ensure regulatory  
program bases.

## Program Enhancement

### Major Milestones: (RLG-94-05 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Initiate/approve PMs for manual valves used in EOPs. (RLG-94-05.1)	12/93	11/17/93
2.	Develop an Engineering Department Instruction which provides guidance for action to be taken when components are placed on increased test frequency. (RLG-94-05.2)	4/94	
3.	Evaluate safety related non-code class 1, 2, and 3 systems for ISI program inclusion. (RLG-94-05.3)	6/94	
4.	Determine ISI boundaries and inspection scope for SW and REC systems. (RLG-94-05.4)	7/94	
5.	Determine ISI boundaries and inspection scope for safety related non-code class 1, 2, and 3 systems. (RLG-94-05.5)	7/94	
6.	Complete design basis reconstitution for primary containment (Cost not included in funding requirements). (RLG-94-05.6)	6/94	
7.	Submit relief requests for SW and REC inspection program addenda. (RLG-94-05.7)	8/94	
8.	Submit 10CFR50.55a exemption requests for safety related non-code class 1, 2, and 3 systems not to be added to ISI program. (RLG-94-05.8)	8/94	
9.	Submit relief requests for safety related non-code class 1, 2, and 3 systems inspection program addenda. (RLG-94-05.9)	8/94	
10.	Develop procedures for PIV testing. (RLG-94-05.10)	8/94	
11.	Review safety related manual valves for inclusion in IST or augmented testing programs. (RLG-94-05.11)	8/94	

## Program Enhancement

Major

Items: (RLG-94-05 Continued)

	Accomplishment	Plan Date	Actual Date
12.	Approve PMs for stroking of manual valves.	10/94	
13.	Complete design basis reconstitution program (cost not included in requirements).	11/94	
14.	SI program addenda for SW and items.	12/94	
15.	SI program addenda for safety on code class 1, 2, and 3	12/94	
16.	Procedures for PIV testing.	12/94	
17.	Third party review of IST manual valves.	12/94	
18.	Complete Appendix J program document.	12/94	
19.	Installation of test connections on valves for LLRT accident testing (cost not included in requirements).	4/95	
20.	Perform LLRT accident direction testing for manual valve penetrations.	4/95	

### Update Status

Contractor selected for staff augmentation to complete Item # 4.  
Funding expenditure request to go to the February Board of Directors  
for approval.

PIV testing methods selected and verified to be effective during 1993  
outage.

Approximately 50% of the safety related manual valves have been  
initially reviewed. The effort is approximately 25% complete overall.

## Program Enhancement

Priority: RED  
Item No: RLG-94-06

Title/Description: Engineering Backlog

Date Updated: 2/10/94

**External Funding Requirements:** \$1,200,000 (estimate). Estimate is based on 15 contractors for six to nine months to help reduce engineering backlog and to upgrade programs and to upgrade programs.

**Internal Resource Requirements:** Estimate 25% paid overtime per engineer for the next six to nine months.

**Program Manager:** Rick Gardner (Jim Lynch)

**Planned Start Date:** 1/10/94

**Planned Completion Date:** 4/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI, INPO

**Description:** Reduction of the Engineering Department backlog will result in an Engineering Department workload that is prioritized, manageable in size, delivers products on time, and has measurable results and goals and allow CNS engineering time to establish a enhanced system engineer program and establish healthy reports of assigned systems.

**Objective:** Reduce engineering backlog and improve the effectiveness of managing the workload. This will allow System and Program Engineers to more effectively manage their systems and programs.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop criteria for prioritization of engineering NAIT and ACT items. (RLG-94-06.1)	1/94	2/8/94
2.	Prioritize and schedule NAIT and ACT items. (RLG-94-06.2)	2/94	
3.	Prepare point papers for contractor assistance. (RLG-94-06.3)	1/94	1/94

## Program Enhancement

### Major Milestones: (RLG-94-06 Continued)

	Accomplishment	Plan Date	Actual Date
4.	Plan for contractor site arrival training, badging, office space. (RLG-94-06.4)	2/94	
5.	Identify specific work packages for contractors. Assign contractors for specific engineers. (RLG-94-06.5)	2/94	
6.	Develop a set of Engineering Department performance indicators. Produce appropriate charts and graphs for department and senior management review. (RLG-94-06.6)	2/94	
7.	Produce final set of department performance indicators, publish monthly. Determine goals and incentives for achieving goals. (RLG-94-06.7)	4/94	

**Update Status:** Item #1 is complete, memo (CNSS943517) was issued on 2/8/94. Item #2 is in progress with completion expected by 2/18/94. Item #3, Point Papers have been prepared and discussed with the ERC. Board Of Directors discussion planned for 2/11/94. Item 4, trailer space identified, PO for computer purchase written, Computer Applications setting up a computer trunk line to the trailer. Item #6, draft indicators have been produced.

# Program Enhancement

Priority: RED  
Item No: RLG-94-07

Title/Description: Maintenance Backlog

Date Updated: 2/10/94

External Funding Requirements: \$200,000  
Internal Resource Requirements: 6,000 hours

Program Manager: Rick Gardner (Mike Unruh)  
Planned Start Date: 1/24/94

Planned Completion Date: 9/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Provide Maintenance Department review of all commitments (MWRs/NCRs/DRs) in order to ensure control of same. Additionally, provide interim resources to address incoming items until the maintenance support group is functional.

Objective: Reduce maintenance backlog and improve the effective management of the workload.

## Major Milestone:

	Accomplishment	Plan Date	Actual Date
1.	Define Backlog. (RLG-94-07.1)	2/94	
2.	Determine additional resource requirements and obtain. (RLG-94-07.2)	2/94	
3.	Review all commitments to determine depth of problem (this will be a group review). (RLG-94-07.3)	3/94	
4.	Set Priorities from review. (RLG-94-07.4)	3/94	
5.	Identify and plan for resolution of the problem areas. The major points are spare parts, resources and enhanced scheduling. (RLG-94-07.5)	6/94	

## Program Enhancement

### Major Milestones: (RLG-94-07 Continued)

	Accomplishment	Plan Date	Actual Date
6.	Provide permanent resources to maintain a periodic review of all open items. (RLG-94-07.6)	6/94	
7.	Provide a means for continuous monitoring of Maintenance Group/Shop Backlog. (RLG-94-07.7)	9/94	

**Update Status:** Item #1, define backlog, is in progress. Item #2, additional resource requirements have been identified and the resources should be approved at the February board meeting.



# Program Enhancement

Priority: RED  
Item No: RLG-94-08

Title/Description: Review the Qualifications and Training of Current CNS System Engineers to Determine Training Required

Date Updated: 2/10/94

External Funding Requirements: None

Internal Resource Requirements: Approximately 20 system engineers each attending two newly revised system training courses per year; 30 system engineers attending courses required by revised Training Program Descriptions (TPDs) for one year (qualification to revised TPDs must be completed within one year) training resources to develop and deliver the newly revised system training courses.

Program Manager: Rick Gardner (Jim Lynch)

Planned Start Date: 11/3/93

Planned Completion Date: 7/94

References (NRC/INPO/NUMARC/NAEP Etc.): OSTI, SPPI

Description: Upgrade the training provided to system engineers to include system task oriented objectives. Provide appropriate system training for all engineers assigned systems.

Objective: Organize, enhance, and communicate improvements in engineering training. This includes enhanced systems training and improvements to positional requirements for engineers.

## Major Milestones:

Accomplishment	Plan Date	Actual Date
1. Review and revise TPD 502 - Technical Staff, TPD 509 - Station Engineer, TPD 526 - Station Nuclear Engineer, TPD 527 - ISI Engineer (RLG-94-08.1)	12/93	12/30/93
2. Identify system engineers assigned systems who have not completed system training. (RLG-94-08.2)	1/94	1/24/94
3. System engineers complete system training as identified in Item 2 (above) (RLG-94-08.3)	2/94	

## Program Enhancement

### Major Milestones: (RLG-94-08 Continued)

	Accomplishment	Plan Date	Actual Date
4.	Develop a plan and schedule for system lesson plans to be upgraded for system engineers (i.e., begin with SRO level training lesson plans and revise objectives as appropriate for system engineer). (RLG-94-08.4)	2/94	
5.	Complete revision to system engineer lesson plans and begin delivering new system training lessons. (RLG-94-08.5)	7/94	
6.	Develop individualized training plans appropriate for Engineering Department personnel. (RLG-94-08.6)	7/94	

**Update Status:** Item #1 is complete. TPDs have been reviewed and changes were made regarding position and task required lessons, and optional lessons. Item #2 is complete. Engineers assigned systems who have not completed training on their assigned systems have been identified. Item #3 is in progress.

## Program Enhancement

Priority: RED  
Item No: RLG-94-09

Title/Description: Improve Operations Communications

Date Updated: 2/10/94

External Funding Requirements: None

Internal Resource Requirements: 60 hours per year

Program Manager: Rick Gardner (Bob Brungardt)

Planned Start Date: 12/1/93

Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: The actions that will be addressed under this action include the following:

- Evaluate the conduct of crew briefings including frequency and adequacy of information exchange.
- Standardize the shift turnover process such that operational information/plant station information is communicated between shifts in a consistent manner.
- Establish a mechanism to ensure long term issues/problems are communicated to all shift.
- Evaluate operator verbal communications against the CNS Directive on communications.

Objective: Ensure complete, accurate and consistent transfer of information through improved operator communications.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Implement a Control Room Operator Turnover Checklist to support consistent turnovers. (RLG-94-09.1)	3/94	
2.	Obtain approval of Procedure 2.0.2 which incorporates Long Term Concerns into the Shift Supervisor's turnover. (RLG-94-09.2)	4/94	
3.	Observe shift crews and document communications observations. (RLG-94-09.3)	6/94	

## Program Enhancement

KLG-94-09 (Continued)

**Update Status:** Shift crews were previously observed in September - October 1993, and communications observations documented. Milestone #3 will measure the effectiveness of communication improvements previously implemented.

Procedure 2.0.2 has been revised and a draft of the Long Term Concerns is already in use.

**SECTION IV**  
**SAFETY ASSESSMENT**

## SECTION IV

### SAFETY ASSESSMENT

Within this section the issues regarding problem identification, corrective action, procedural adequacy and adherence will be addressed. The procedural adequacy and adherence concern focused on whether the procedures, as they are currently written, provide the necessary guidance and detail. Part of the oversight function at CNS is to determine if appropriate solutions to existing problems is being provided. A new Corrective Action Program is being developed to accomplish this.

Part of the culture change that must happen before CNS can significantly improve performance is that the employees need to develop a more questioning attitude. To support this change in attitude a mechanism to solicit and implement employee concerns will be developed as a task within this section.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

Priority: RED  
Item No: JMM-94-01

Title/Description: Upgrade the Corrective Action Program      Date Updated: 2/10/94

External Funding Requirements: \$400,000  
Internal Resource Requirements: 2500 hours

Program Manager: John Meacham (Chris Moeller)  
Planned Start Date: 9/17/93      Planned Completion Date: 10/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, SPPI, SMM, OSTI

Description: Various internal and regulatory assessments of the existing Corrective Action Program have identified several weaknesses. These weaknesses are being resolved through this action item.

Objective: In support of the culture change to a more questioning attitude, provide a completely new Corrective Action Program, which facilitates:

1. Easy problem identification.
2. Defined problem ownership and accountability.
3. More in-depth root cause analysis.
4. Improved human performance evaluation.
5. Enhanced trending capability.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish Steering Committee (JMM-94-01.1)	9/93	9/24/93
2.	Develop project goals (JMM-94-01.2)	10/93	9/30/93
3.	Approve conceptual design (JMM-94-01.3)	10/93	10/11/93
4.	Conduct plant visits (JMM-94-01.4)	10/93	10/29/93
5.	Conduct manager/supervisor workshops (JMM-94-01.5)	12/93	12/1/93

## Program Enhancement

### Major Milestones: (JMM-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
6.	SORC review of draft procedures	12/93	12/23/93
6a.	Implementation of interim changes.	1/94	1/27/94
7.	Preliminary approval of procedures	2/94	
8.	Provide CAP training	3/94	
9.	Provide root cause training	3/94	
10.	Implement program and supporting procedure changes	3/94	
11.	Convert existing trending records to new database	6/94	
12.	Assess program effectiveness	10/94	

**Update Status:** Comments have been received from the SORC review of the draft procedures (0.5 through 0.5.5). Draft Procedure 0.5.6, Root Cause, is near completion, awaiting input yet to be received from FPI. Trending database currently under development by FPI. Procedure 0.5.7, Trending, yet to be developed, as are changes to supporting procedures. Interim revisions to the existing CAP Program procedures have been implemented. In support of the formal upgrade, these interim changes established the Condition Review Group (CRG), defined "Responsible Manager" and associated responsibilities, formalized the Corrective Action Plan, and eliminated the Nonconformance Overview Committee (NOC). These enhancements will facilitate the efficient transition to the new program.



# Program Enhancement

**Priority:** RED  
**Item No:** JMM-94-02

**Title/Description:** Improve Operating Experience Review Program  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$35,000  
**Internal Resource Requirements:** 700 hours

**Program Manager:** John Meacham (Pat Thurman)  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 6/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** CCA

**Description:** The NPPD CNS OER Program has come under scrutiny by CNS Senior Management and the NRC because of several recent incidents. Consequently, an effort is underway to improve the effectiveness of the program.

**Objective:** Improve the CNS OER Program through:

1. Lessons learned from a critical review of past document dispositions.
2. Assessing the current program and correcting weaknesses.
3. Enhanced training of involved personnel.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Assess current OER program. (JMM-94-02.1)	2/94	
2.	Assess 20% of OER dispositioned in the last two years. (JMM-94-02.2)	3/94	
3.	Assess certain OER dispositioned within the last ten years. (JMM-94-02.3)	3/94	
4.	Based on the results of assessments, revise the CNS OER Program. (JMM-94-02.4)	3/94	
5.	Develop training module and train personnel on revised program. (JMM-94-02.5)	6/94	

## Program Enhancement

JMM-94-02 (Continued)

### Status Update:

A consultant knowledgeable in operating experience program requirements has been brought on board to assist with an assessment of the current C-S OER Program, and work is underway to this end. The February date should be met with no problem. The assessment of documents dispositioned under the current program by the Corrective Action Program Overview Group (CAPOG) is also underway, with a due date for the initial phase of the review of 2/15/94. The data from this review will then be evaluated by Senior Management to determine any changes that may be required to the program. As shown, the due date for this assessment is March 1994. Also, as shown, any necessary program revisions will be pursued after all assessment activities have been completed.

JMM-94-02 (Cont.)

## Program Enhancement

Priority: RED

Item No: JMM-94-03

Title/Description: Enhance the Human Performance Evaluation Program Date Updated: 2/10/94

External Funding Requirements: \$50,000

Internal Resource Requirements: 4500 hours

Program Manager: John Meacham (IRG Manager)

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, SMM

**Description:** The existing Human Performance Evaluation Program is somewhat rudimentary and is used within the existing Corrective Action Program only when consequential human errors arise. Enhancements to this program, embodied in the aforementioned elements of this action item, will be described in a Nuclear Power Group Directive and will be applicable to all personnel in the NPG. The thresholds for human error and the actions necessary to correct their causes will be decided and implemented at the departmental level. The new Corrective Action Program will serve as the vehicle to implement this program.

**Objective:** Reduce human errors through a programmatic approach to human performance evaluation.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish the IRG Manager as the Program Manager. (JMM-94-03.1)	2/94	
2.	Perform assessment of recent human errors by outside experts. (JMM-94-03.2)	2/94	
3.	Provide input to CAP final procedures. (JMM-94-03.3)	3/94	

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## Program Enhancement

JMM-94-03 (Continued)

**Update Status:** Regarding the first major milestone, the draft Position Description for the new IRG Manager position reflects the responsibility of Program Manager for the Human Performance Evaluation Program for CNS. The approval of this Position Description, and included responsibilities, is tied to the approval of staffing additions as a part of Item No. GRH-94-05. The assessment of recent human performance problems is being performed by INPO and arrangements have been made for this assist visit to start on February 14, 1994. Any change required to the new CAP implementing procedures will be made subsequently. The remaining milestones reflect those contained in Item No. JMM-94-01.

## Program Enhancement

Priority: RED  
Item No: JMM-94-04

Title/Description: Review/Revise Operability Determination Process      Date Updated: 2/10/94

External Funding Requirements: \$30,000  
Internal Resource Requirements: 1000 hours

Program Manager: John Meacham/Consultant  
Planned Start Date: 1/24/94

Planned Completion Date: 11/94

References (NRC/INPO/NUMARC/NAIT Etc.): SPPI

**Description:** Over the past two years, several lessons have been learned regarding the use of the operability determination/operability evaluation process. In view of the changes being made to the Corrective Action Program, management has determined that it would be timely to also enhance this process.

**Objective:** Revise the OD/OE procedures to allow for termination when no longer applicable, to assure inputs are properly reviewed and prepared in accordance with other CNS Procedures, to describe needed threshold, and to allow searching on past OEs/ODs. In addition, provide training to involved personnel.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Assess existing procedural weakness. (JMM-94-04.1)	3/94	
2.	Based on assessment, revise procedure. (JMM-94-04.2)	4/94	
3.	Establish process "owners" for OD and OE process. (JMM-94-04.3)	4/94	

## Program Enhancement

### Major Milestones: JMM-94-04 (Continued)

	Accomplishment	Plan Date	Actual Date
4.	Develop training module and train appropriate personnel on revised procedure. (JMM-94-04.4)	5/94	
5.	Evaluate effectiveness of new process. (JMM-94-04.5)	11/94	

**Update Status:** The schedule provided above is intended to follow closely behind the Corrective Action Program Upgrade schedule provided in Item No. JMM-94-01. The assessment identified as Major Milestone No. 1 is currently underway.

## Program Enhancement

Priority: RED  
Item No: JMM-94-05

Title/Description: Develop the Independent Review Group      Date Updated: 2/10/94

External Funding Requirements: \$30,000  
Internal Resource Requirements: 200 hours

Program Manager: John Meacham (Pat Thurman)  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/NUMARC/NAIT Etc.): N/A

Description: The Independent Review Group (IRG) will perform selected reviews of NPG activities, without constraints or limitations of any kind and has unlimited access to existing trending information and other pertinent data. The outcome of these reviews will be reported to Senior NPG Management and will identify the cause, or causes, which keep the desired results from being obtained. Areas with severe shortcomings will undergo increased overview by the IRG until a positive trend is achieved.

Objective: To ensure that the Nuclear Power Group is achieving results which meet management expectation and, if not, to provide feedback to NPG Senior Management.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Internal review of related programs. (JMM-94-05.1)	2/94	2/10/94
2.	Evaluate how other utilities perform IRG functions. (JMM-94-05.2)	2/94	
3.	Develop conceptual "white paper" for IRG program/procedures. (JMM-94-05.3)	2/94	
4.	Develop IRG Charter. (JMM-94-05.4)	2/94	
5.	Develop the IRG Program Plan/Procedures. (JMM-94-05.5)	2/94	
6.	Develop IRG staffing plan and job descriptions. (JMM-94-05.6)	3/94	

## Program Enhancement

### Major Milestones: (JMM-94-05 Continued)

	Accomplishment	Plan Date	Actual Date
7.	Develop IRG procedures and guidance documents. (JMM-94-05.7)	4/94	
8.	Develop assessment schedule for IRG. (JMM-94-05.8)	4/94	
9.	Provide overview report on IRG implementation. (JMM-94-05.9)	5/94	

**Update Status:** The review of CNS related programs has been completed and the evaluation of other utility programs is in progress. The conceptual "White Paper" for the IRG program and procedures is also being developed based on the results of the internal and external reviews completed to date.



## Program Enhancement

Priority: RED  
Item No: JMM-94-06

Title/Description: Develop an NPG-Wide Priority System      Date Update: 2/10/94

External Funding Requirements: \$15,000  
Internal Resource Requirements: 1600 hours

Program Manager: John Meacham/Consultant  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, OSTI (Observation 93-202-05)

Description: At the present time, the various organizational entities in the Nuclear Power Group are using different (or no) methods to prioritize their work. A simple, universal priority scheme is needed to ensure that everyone understands what the highest priority work is.

### Objective:

1. To ensure critical work is completed first.
2. To ensure backlog work is being processed in an efficient manner.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Conduct survey to determine how other plants prioritize work. (JMM-94-06.1)	2/94	
2.	Evaluate work areas needing prioritization. (JMM-94-06.2)	2/94	
3.	Develop formal conceptual description for priority program. (JMM-94-06.3)	2/94	
4.	Develop the priority program/procedure. (JMM-94-06.4)	3/94	
5.	Develop a training module for the priority program/procedure. (JMM-94-06.5)	4/94	
6.	Train affected personnel on new priority program/procedure. (JMM-94-06.6)	5/94	

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## Program Enhancement

JMM-94-06 (Continued)

**Update Status:** The industry survey of other utility prioritization programs is in progress. Discussions as to which CNS activities should be prioritized has occurred at the Senior Manager level. Additional meetings to resolve this issue are planned. The conceptual description for the priority program is being developed.

## Program Enhancement

Priority: RED  
Item No: JMM-94-07

Title/Description: Implement the Industry Advisory Group      Date Updated: 2/10/94

External Funding Requirements: \$50,000  
Internal Resource Requirements: 150 hours

Program Manager: John Meacham/Consultant  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/ETC.): N/A

**Description:** One of the causes of the recent declining performance of the Nuclear Power Group has been a failure to keep abreast of emerging issues and take action accordingly. An Industry Advisory Group (IAG) will be comprised of several nuclear industry executive level personnel and be chaired by the Senior Nuclear Division Manager of Safety Assessment. The Group will meet periodically to discuss emerging issues, compare CNS performance to industry standards, and provide feedback to Senior Management.

**Objective:** Ensure that the Nuclear Power Group remains abreast of emerging industry issues and proactively responds to those affecting Cooper Nuclear Station.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop IAG Charter. (JMM-94-07.1)	2/94	
2.	Develop "Rule of Practice". (JMM-94-07.2)	3/94	
3.	Obtain industry experts for IAG. (JMM-94-07.3)	4/94	
4.	Develop meeting schedule and hold first meeting. (JMM-94-07.4)	5/94	

## Program Enhancement

JMM-94-07 (Continued)

**Update Status:** Developmental work for the Industry Advisory Group (IAG) is in progress. Mr. Jim Partlow is now on retainer and is currently working with J. M. Meacham to develop the IAG charter and "Rules of Practice". The due dates shown above for these activities remain accurate. Mr. Partlow has also identified several potential candidates for use on the Group and Mr. Meacham is presently pursuing bringing them (and/or possibly others) on board. The remaining due dates also appear to be accurate at this time.

**SECTION V**  
**SITE SUPPORT**

## SECTION V

### SITE SUPPORT

The primary purpose of the Site Support Division enhancements is to resolve the training issues identified by previous audits and assessments and to support the training requirements of several other Program Enhancements. The training deficiencies were centered around the certification process, the adequacy of training, and the apparent inability to maintain the training compliance and qualification requirements for NPG employees.

The Site Support enhancement items address seven areas for improvement. These areas were developed as a result of several inputs and are scheduled and prioritized to provide the required management and staff focus to ensure reasonable and timely progress is achieved and the end product fully addresses the issue.

It is recognized that to improve station performance, increased management attention is needed to increase emphasis on leadership, teamwork, communications and accountability among management, supervision and the workforce. This portion of the Integrated Enhancement Program will support the actions required for these needed improvements.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-01

**Title/Description:** NPG Manager and Supervisor Management Skills Training  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$110,000 (Estimate)

**Internal Resource Requirements:** Approximately 100 people, 4 24-hour workshops/year, 2-3 years. Senior management participation. Nuclear Training Manager - 200 hours/year, Corporate Training Manager/Supervisor - 50 hours/year.

**Program Manager:** E.M. Mace (J.W. Dutton)

**Planned Start Date:** 11/22/93

**Planned Completion Date:** 12/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI, SPPI 270 (Enercon Report), SMM, CCA

**Description:** Develop long term Management Training Program for NPG Supervisors and Managers including:

- Assess each NPG Supervisor and Manager to determine what level of training or support they may require
- Develop Training schedule for NPG Supervisors and Managers
- Develop Management/Supervisor Training Program
- Train Management/Supervision in Basic Management Skills
- Establish Positive Feedback and Improvement areas to Managers and Supervisors

**Objective:** To provide a strong, focused management development within the NPG.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish overview, basic approach and treatment. (EMM-94-01.1)	11/93	11/22/93
2.	Establish Advisory Committee. (EMM-94-01.2)	12/93	12/22/93

## Program Enhancement

### Major Milestones: (EMM-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Initial design of Workshop #1 (W1). (EMM-94-01.3)	12/93	12/22/93
4.	Administer Diagnostic Instruments. (EMM-94-01.4)	2/94	2/4/94
5.	Finalize design of W1, Initial design of W2. (EMM-94-01.5)	2/94	02/12/94
6.	Finalize design of W2, Initial design of W3. (EMM-94-01.6)	4/94	
7.	Delivery of W1 completed to all Management teams. (EMM-94-01.7)	5/94	
8.	Finalize design of W3, Initial design of W4. (EMM-94-01.8)	5/94	
9.	Delivery of W2 completed to all Management teams. (EMM-94-01.9)	6/94	
10.	Finalize design of W4, Initial design of W5. (EMM-94-01.10)	7/94	
11.	Delivery of W3 completed to all Management teams. (EMM-94-01.11)	9/94	
12.	Finalize design of W5, Initial design of W6. (EMM-94-01.12)	10/94	
13.	Delivery of W4 completed to all Management teams. (EMM-94-01.13)	12/94	

**Update Status:** On schedule

Plan is established for one year of a 2-3 year program. Plan will be updated for second year in the third quarter.

Diagnostic instruments delivered, and evaluation in-progress. Final design of Workshop #1 will be set on Saturday, February 12, 1994 and schedule for Workshops 1-4 will be determined.



# Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-02

**Title/Description:** Develop User-Friendly Tracking System for Training and Certification  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$350,000 (Estimate)

**Internal Resource Requirements:** Information Systems assistance, Clerical support for testing, Management/Supervision time for design

**Program Manager:** E. M. Mace (J. W. Dutton)

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 10/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Develop user-friendly computerized database for tracking when various certifications or requalifications are required and who the affected personnel are. Ensure NPG managers/supervisors are involved in the development of this program - OSTI.

**Objective:** To develop a user-friendly system to identify certification status of employees prior to work assignment.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish interim Program to ensure maintenance of certification. (EMM-94-02.1)	1/94	1/94
2.	Scoping session with ISD, Training, Steve Woerth, and CS. (EMM-94-02.2)	1/94	1/11/94
3.	Conduct Business Area Analysis at CNS and GO. (EMM-94-02.3)	2/94	2/9/94
4.	Define and refine requirements. (EMM-94-02.4)	3/94	
5.	Determine alternatives, select best approach, develop Functional Specification. (EMM-94-02.5)	3/94	

## Program Enhancement

### Major Milestones: (EMM-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
6.	Request for Bids.	4/94	
7.	Award contract.	6/94	
8.	Install/Test system.	9/94	
9.	Acceptance Testing Complete.	10/94	

### Update Status:

- 1/11/94 Meeting was held at CNS with Information System and Training Department to develop scope of project.
- 2/8&9/94 Meetings were held at CNS with Information Systems to identify the problems with the current TTS system and gain input for the new system requirements.
- 2/8/94 Nuclear Network is being used to explore what other plants are using for software.

## Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-03

**Title/Description:** Develop a Comprehensive System Engineering Training Program for CNS System Engineers  
**Date Updated:** 2/10/94

**External Funding Requirements:**  
**Internal Resource Requirements:** 860 hours

**Program Manager:** E. M. Mace (J. W. Dutton)  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 7/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Develop a comprehensive System Engineering Training Program for CNS System Engineers - OSTI.

**Objective:** To provide well qualified system engineers to support safe station operation.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish Task Group. (EMM-94-03.1)	1/94	1/7/94
2.	Establish Objectives. (EMM-94-03.2)	4/94	
3.	Develop Training Material. (EMM-94-03.3)	5/94	
4.	Develop Evaluation Method. (EMM-94-03.4)	6/94	
5.	Conduct Training. (EMM-94-03.5)	7/94	

## Program Enhancement

EMM-94-03 (Continued)

Update Status: (1) Upgrade Meeting held January 27, 1994

S. Winn to provide first cut on "Systems" objectives to R. Sanchez and T. Black, this includes objectives from "Tech Spec" material.

B. Toline to provide updated Engineering Task List.

M. Bohling to provide overview of current TPDs.

M. Bohling gave trip report of Monticello Trip.

(2) February 3, 1994

EMR met with Sanchez and Black to review efforts on making "Qual Card" for engineering. They will provide feedback at February 17, 1994, Task Group meeting from Engineering Supervisors.

(3) Next meeting at 1300 February 17, 1994.

# Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-04

**Title/Description:** Root Cause Training **Date Updated:** 2/10/94

**External Funding Requirements:** \$19,250  
**Internal Resource Requirements:** 255 hours

**Program Manager:** E. M. Mace (J. W. Dutton)  
**Planned Start Date:** 1/24/94 **Planned Completion Date:** 12/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** 190 SPPI, 200 SPPI

**Description:** Provide Root Cause Training for the NPG. Root Cause evaluation training needs to be made a part of Engineering and Tech Staff training, and reinforced by continuing training.

**Objective:** To develop an engineering staff that is well qualified in Root Cause Analysis.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Revise GOT Training. (EMM-94-04.1)	3/94	
2.	Develop K-T ATS Training Schedule. (EMM-94-04.2)	3/94	
3.	Conduct classes. (EMM-94-04.3)	11/94	
4.	Revise TPDs 0509 - Station Engineer, 0526 - Station Nuclear Engineer, 0527 - ISI Engineer, and 0516 - Design Engineer to include K-T (ATS) Root Cause as Position Required. (EMM-94-04.4)	12/94	

## Program Enhancement

EMM-94-04 (Continued)

**Update Status:** Discussion with Engineering Manager on 2/8/94 indicates that the Kepner Tregoe (ATS) Root Cause classes should be placed as Position specific on Engineering TPDs versus TPD 0502, Tech Staff. This would focus the sessions more towards personnel who perform Root Cause Analysis.

The K-T classes will be offered five (5) times over the next year to accommodate personnel. Once the classes are completed, the TPDs will be revised to reflect the requirement. Providing the classes, then adding the lesson to the TPD as per NTP: 02, Training Program Descriptions.

# Program Enhancement

Priority: Red  
Item No: EMM-94-05

Title/Description: CAP Training

Date Updated: 2/10/94

External Funding Requirements: \$0

Internal Resource Requirements: 100 Professional hours, 20 Clerical hours

Program Manager: E. M. Mace (J. W. Dutton)

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): 180 SPPI

Description: Develop and present training on the new CAP, upon finalization of CAP procedures.

Objective: To provide training to plant personnel on the new CAP program.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop Lesson on CAP. (EMM-94-05.1)	3/94	
2.	Present Lesson on CAP. (EMM-94-05.2)	3/94	

Update Status: Level I training has been developed and submitted to C. Moeller for review/approval. Awaiting information on objectives from C. Moeller to begin development of Level II training.

## Program Enhancement

**Priority:** RED  
**Item No:** EMM-94-06

**Title/Description:** Implement Recommendations of Fire Protection Assessment  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$500,000  
**Internal Resource Requirements:** 600 hours

**Program Manager:** E. M. Mace (H. T. Hitch)  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 12/94

**References (NRC/INPO/ETC.):** CCA, OSTI

**Description:** The Purpose of the F/P Assessment is to determine the overall adequacy of the NPG Fire Protection Program.

**Objective:** To evaluate the adequacy of the existing F/P Program and make the necessary enhancements to improve the overall Fire Protection Program.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Complete the F/P Assessment. (EMM-94-06.1)	2/94	2/10/94
2.	Deliver the results of the F/P Assessment to NRC Region IV. (EMM-94-06.2)	2/94	
3.	Implement the recommendations of the F/P Assessment. (EMM-94-06.3)	12/94	

**Update Status:** The Fire Protection Assessment inspection was completed on January 14, 1994. As of February 8, 1994, the second draft of the report comments are being incorporated. Within the next 2 weeks the final Fire Assessment report will be issued, with an advanced copy being sent to the Senior Resident Inspector. A drop in visit of to Region IV is planned during February to present the Fire Assessment report to the NRC.



# Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-07

**Title/Description:** Conduct a Compliance Review of CNS Training Program  
**Date Updated:** 2/10/94

**External Funding Requirements:** \$100,000  
**Internal Resource Requirements:** 1000 hours of project management and analysis

**Program Manager:** E. M. Mace  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 12/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** This plan serves as the basis for implementation of a concerted self-inspection program which will precisely focus upon all of the regulatory requirements which impact training. This self-inspection will identify all internal and external training requirements and insure that they are being met thus taking a strong proactive approach toward ensuring that key training programs are in full compliance. Any identified deficiencies will be factored into training and thus, there will be assurance that the training is meeting/exceeding requirements in a cost-effective manner.

This Program Plan is intended to cover/describe the planning and resources required to: obtain and research documentation, develop requisite checklists, and determine how the requirements are being satisfied. It also covers the development of action plans to correct any deficiencies.

**Objective:** To ensure that all internal and external training requirements are being met. This will assist in assuring the training programs truly support the safe and efficient operation of the plant. It will minimize regulatory agency findings and resultant corrective actions. Finally, it will provide a mechanism for determining commitments/requirements to ensure they are not erroneously deleted or changed by later revisions to training.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Submit requests for quotations for man-power. (EMM-94-07.1)	1/94	1/27/94
2.	Select vendor and let contract for man-power. (EMM-94-07.2)	3/94	

## Program Enhancement

### Major Milestones: (EMM-94-07 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Gather references for checklist construction for NRC requirements and licensing commitments. (EMM-94-07.3)	3/94	
4.	Research references, validate commitments and build checklists for NRC requirements and licensing commitments. (EMM-94-07.4)	4/94	
5.	Inspect training programs to determine how/if commitments and requirements are being met. (EMM-94-07.5)	6/94	
6.	Resolve discrepancies with management, develop actions necessary for resolution, submit final product. (EMM-94-07.6)	6/94	
7.	Gather references for checklist construction for INPO requirements. (EMM-94-07.7)	7/94	
8.	Build checklists for INPO requirements and past three years operating experience commitments. (EMM-94-07.8)	8/84	
9.	Inspect training programs to determine how/if requirements are being met. (EMM-94-07.9)	10/94	
10.	Resolve discrepancies with management, develop actions necessary for resolution, submit final product. (EMM-94-07.10)	10/94	
11.	Complete modification of programs and lessons as identified in action plan. (EMM-94-07.11)	12/94	

### Update Status:

- 2/2/94 - Request for quotations sent to prospective vendors with replies requested by 2/7/94. Point paper will need to be completed immediately to allow review by the various boards/committees prior to Board of Directors meeting on 3/4/94.
- 2/8/94 - Quotations have been received from approximately 8 vendors. Currently developing a spreadsheet to compare costs and qualifications. A point paper should be developed and forwarded for review by the various committees and boards so it can be ready for the next (March) Board of Directors meeting.

**SECTION VI**  
**NUCLEAR SUPPORT**

## SECTION VI

### NUCLEAR SUPPORT

Nuclear Support is conducting an evaluation of the Licensing Department to improve the Regulatory Support for CNS. Nuclear Support will also develop directives which will provide policy guidance and management expectations to the organization. It is expected that enhanced organization communications, more effective management oversight, and improved performance will result.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

**Priority:** RED  
**Item No:** DAW-94-01

**Title/Description:** Evaluate Licensing Department  
Organization

**Date Updated:** 2/10/94

**External Funding Requirements:** O&M Budget

**Internal Resource Requirements:** 1 Licensing Manager 40 hours

**Program Manager:** G. R. Smith

**Planned Start Date:** 12/2/94

**Planned Completion Date:** 2/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** SMM

**Description:** This effort involves a study to compare the NPG Licensing function with the Licensing functions of several other utilities operating single unit nuclear plants. The staffing, functions performed, work location, personnel qualifications, and other factors will be compared. This study is intended to support management decision-making relative to the Licensing Department.

**Objective:** This effort is being undertaken in order to provide information to support decisions regarding the Licensing Department in order to improve the Licensing support for CNS.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Interview OPPD (DAW-94-01.1)	12/93	12/10/93
2.	Interview Wolf Creek (DAW-94-01.2)	1/94	1/6/94
3.	Interview Crystal River (DAW-94-01.3)	1/94	1/7/94
4.	Interview Northern States (DAW-94-01.4)	1/94	2/4/94
5.	Interview Duane Arnold (DAW-94-01.5)	1/94	2/4/94
6.	Issue report containing findings to Vice President - Nuclear. (DAW-94-01.6)	2/94	

**Update Status:** Interviews with Northern States Power and Iowa Electric Light and Power were completed on 2/4/94. A report containing the results is under preparation and is expected to be completed in February 1994.

# Program Enhancement

**Priority:** RED  
**Item No:** DAW-94-02

**Title/Description:** Issue NPG Directives in Support of the Strategic Plan for Performance Improvement  
**Date Updated:** 2/10/94

**External Funding Requirements:** O&M Budget  
**Internal Resource Requirements:** 96 hours (exclusive of management review and approval time)

**Program Manager:** A. L. Dostal  
**Planned Start Date:** 10/22/93  
**Planned Completion Date:** 5/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** SPPI Activity 030, 40, 220

**Description:** Issue NPG Directive on Teamwork/Communications  
Issue NPG Directive on Manager Field Involvement  
Issue NPG Directive on Goals and Objectives

**Objective:** The development and issuance of these directives are specified as actions contained in the SPPI. The intent of these documents is to provide policy guidance and management expectations to the organization. It is expected that enhanced organizational communications, more effective management oversight, and improved performance will result.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Issue NPG Directive on Teamwork/Communications for comment. (DAW-94-02.1)	12/93	12/23/93
2.	Issue NPG Directive on Manager Field Involvement for comment. (DAW-94-02.2)	1/94	1/28/94
3.	Issue NPG Directive on Goals and Objectives for comment. (DAW-94-02.3)	4/94	
4.	Approve NPG Directive on Teamwork/Communications (DAW-94-02.4)	2/94	1/24/94

## Program Enhancement

### Major Milestones: (DAW-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
5.	Approve NPG Directive on Manager Field Involvement (DAW-94-02.5)	3/94	
6.	Approve NPG Directive on Goals and Objectives (DAW-94-02.6)	5/94	

**Update Status:** The NPG Directive on Teamwork/Communications was approved on 1/24/94. A draft directive on Manager/Worker Interface was issued for senior management comments on 1/28/94. Development of the directive on NPG Goals and Objectives is on hold pending completion of the NPG Business Plan in April, 1994.

**SECTION VII**  
**CORPORATE ENGINEERING**



## **SECTION VII**

### **CORPORATE ENGINEERING**

The primary focus of the Corporate Engineering effort is on the concern regarding engineering programs assigned to the corporate engineering staff. In addition, assessments will be made of the engineering modification and configuration control process. The tasks developed for this section will better define the plant change process and upgrade the Configuration Management Program at CNS.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

**Priority:** RED  
**Item No:** REW-94-01

**Title/Description:** Engineering Program  
Responsibility Assignment **Date Updated:** 2/10/94

**External Funding Requirements:** Engineering Program Review - NED O&M Budget  
\$2,500

Design Criteria Document - W.O. 20752 \$100,000

**Internal Resource Requirements:** Design Basis Project - 3,500 hours  
NED - 100 hours

**Program Manager:** Robert Wilbur (Steve McClure, Mike Boyce)

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 6/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** Self-Identified

- Letter CNSS937311 R. L. Gardner to R. E. Wilbur dated 11/2/93: Program Turnover
- INPO assist visit December 6-10, 1993.
- Letter CNSS940106 G. R. Horn to NPG Senior Managers dated 1/5/94: INPO Assist Visit - CNS Engineering
- Letter R. E. Wilbur to G. R. Horn dated 1/18/94: INPO Assist Visit - CNS Engineering
- Letter G. R. Horn to J. E. Gagliardo dated 1/21/94: Cooper Nuclear Station (CNS) Engineering Plan for Performance Improvement

**Description:** In order to provide more time for the System Engineer to address specific issues related to his assigned plant systems, a review of work assignments and a reassignment of engineering work was required. A portion of the engineering programs were to be transferred to the Corporate Engineering Group. The Design Basis Project will produce the Primary Containment Design Criteria Document to support the program review and upgrade of the Appendix J Program.

**Objective:** To shift some of the assigned system engineer workload to allow the system engineers to focus on their plant system responsibilities.

## Program Enhancement

### Major Milestones: (REW-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Review of site engineering functions. (REW-94-01.1)	5/94	
2.	Reassignment of specific work functions to other groups. (REW-94-01.2)	5/94	
3.	Generate the Design Specification Document for Primary Containment to support the Appendix J Program. (REW-94-01.3)	6/94	

### Update Status:

1. The site engineering function has been reviewed and resulted in the generation of the Cooper Nuclear Station (CNS) Engineering Plan for Performance Improvement.
2. A preliminary plan to address 15 engineering programs at CNS was generated. It was agreed that Temporary Shielding, Core Drill, Meter Banding, Freeze Seals and Relief Valve Setpoint programs would transfer to NED. NED has accepted responsibility for these programs.

Discussions related to the Check Valve Program, Inservice Testing Program, Repairs and Replacement Program, Appendix J Program and the Inservice Inspection Program were waiting for J. Lynch to finalize his plans as to how the site proposes to handle these programs.

Discussions with J. Lynch on 1/17/94 indicated that the five engineering programs in questions would stay at the site. He is still reviewing the assignment of Equipment Specification Changes.

NED will review and upgrade, as appropriate, the procedures controlling the five programs turned over to NED by 5/94.

3. The Design Basis Project has scheduled the development of the Primary Containment Design Criteria Document to commence in January 1994. A consultant has been identified and is available on an as-needed basis. In addition, the consultant the site used to generate the original Appendix J Program has been made available for support of this work. Work is underway by District personnel and scheduled to be completed June 1994.

# Program Enhancement

Priority: RED  
Item No: REW-94-02

Title/Description: Nuclear Engineering and Construction Division Self-Assessment  
Date Updated: 2/10/94

External Funding Requirements: NED O&M Budget, Configuration Management O&M Budget \$100,000

Internal Resource Requirements: OSC Self-Assessment - 500 hours  
Other Self-Assessment Activities - 800 hours

Program Manager: Robert Wilbur (Steve McClure)

Planned Start Date: 1/24/94

Planned Completion Date: 6/94

## References (NRC/INPO/NUMARC/NAIT Etc.):

- NRC Inspection Report 93-01, Inspection of Engineering & Technical Support, Page 19.

Description: The Licensee was encouraged by the NRC to consider conducting a self-assessment of design engineering.

Objective: For the Nuclear Engineering and Construction Division to self-assess its activities and assure that the functions of NED are adequate, appropriate, and consistent with industry standards.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	OSC Self-Assessment (REW-94-02.1)	1/94	
2.	NED Self-Assessment Activities (REW-94-02.2)	6/94	

Update Status: 1. The OSC Self-Assessment team has been established. A contractor to lead the self-assessment and provide technical training and guidance to the team arrived on site January 17, 1994. The assessment was conducted the week of January 17 & 24, 1994. The draft report was received the week of January 31 and was reviewed by the assessment team. Comments will be incorporated and the report issued by February 11, 1994. There were no safety issues identified and a list of improvements was generated and will be pursued by NED.

# Program Enhancement

**Priority:** RED  
**Item No:** REW-94-03

**Title/Description:** Evaluate the Configuration Control and Design Change Process within the NPG

**Date Updated:** 2/10/94

**External Funding Requirements:** To Be Determined

**Internal Resource Requirements:** To Be Determined

**Program Manager:** Robert Wilbur (Kim Walden, Steve McClure)

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 9/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

- Letter R. E. Wilbur to Senior Managers dated February 3, 1994: Engineering Assessment

**Description:** Conduct an evaluation of the configuration control and design change process within the NPG. This will include, the design change process (DC) and the Maintenance Work Request program (MWR), as well as the technical issues/programs associated with them.

**Objective:** To enhance the configuration control process and enhance the design change methodology. The present system is not logically consistent and not all modifications are handled the same. In addition, the DC close out process is not timely. Materials configuration management needs to be upgraded.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Conduct an evaluation of the configuration control process. (REW-94-03.1)	4/94	
2.	Conduct an evaluation of the design change closure process. (REW-94-03.2)	4/94	

## Program Enhancement

### Major Milestones: (REW-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Based on the results of item 1 above, develop the necessary improvement program to develop the enhancements to ensure plant configuration is protected. (REW-94-03.3)	6/94	
4.	Based on the results of item 2 above, develop the necessary improvement program to develop the enhancements to ensure a more responsive design change closure process. (REW-94-03.4)	6/94	
5.	Communicate procedural and management expectations to NPG personnel. (REW-94-03.5)	9/94	

### Update Status:

1. A draft report "Re-Engineering Assessment of the Cooper Nuclear Station Modification Control Program" was generated by General Physics Corp. This report has been submitted to the NPG Management on February 3, 1994, for review and comment. A meeting to review the plan and comments is planned for the week of March 7, 1994.
2. On January 31, 1994, S. McClure was directed to generate a plan to evaluate the closure process for the Design Change Procedure by February 18, 1994.
3. Although not a direct result of the study of Item 1 above, work was directed to start on the generation of a reference document for insulation. The Configuration Management Department will generate a document that will provide a ready cross-reference of the system insulation requirements at CNS as well as reference any walkdown data that will be generated. This document will be referenced in the appropriate Design Change and maintenance procedures to provide craft and engineers a ready reference to insulation requirements. A completion date is not available yet.

**SECTION VIII**  
**QUALITY ASSURANCE**

## SECTION VIII

### QUALITY ASSURANCE

Realizing CNS has not consistently identified or resolved recurring problems, the Quality Assurance Department (QA) is revising their self-assessment and auditing programs. QA is also enhancing the trending program to more effectively support their assessment activities and keep NPG management aware of possible negative trends.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.



## Program Enhancement

Priority: RED  
Item No: VLW-94-01

Title/Description: Revise the Self-Assessment Program      Date Updated: 2/10/94

External Funding Requirements: Account #948-2007 \$2400.00 (FPI Consultant)

Internal Resource Requirements: 3 weeks

Program Manager: Verne Wolstenholm (D. R. Robinson)

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): SMM

Inter-District Memo (CNSS931273), G. R. Horn to V. L. Wolstenholm

**Description:** Revise the Self-Assessment Program such that it provides management insight into the performance of the plant, personnel, and programs.

Provide for maintaining a yearly schedule selected by Senior Management and stipulate team member makeup.

**Objective:** This task was established by the Vice President - Nuclear to address the concern that "self assessment activities were not always acceptable and will require additional management attention to assure that these activities provide management insight into the performance of the plant and the operating staff."

### Major Milestones:

1. Survey recognized industry leaders for informational input to the revised program.
2. Obtain the services of a consultant to provide review, evaluation, and recommendations for the program revision.
3. Provide the draft revision of the program to NPG Senior Management for review and comment.
4. Approval of the revised program.

## Program Enhancement

(VLW-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Complete industry survey (VLW-94-01.1)	1/94	1/21/94
2.	Consultant services (VLW-94-01.2)	2/94	
3.	Issue draft revision (VLW-94-01.3)	2/94	1/31/94
4.	Program approval (VLW-94-01.4)	3/94	

### Update Status:

- Item 1): Completed plant visits to Waterford (1/20-21/94) and Clinton (1/18-19/94). Also obtained information from Yankee Atomic.
- Item 2): Consultant services to review and comment on the revised Self Assessment Program has been acquired.
- Item 3): A DRAFT revision of the Self Assessment Program was issued to the Vice President - Nuclear, NPG Senior Management, and the Consultant for review and comment.

## Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-02

**Title/Description:** Enhance the CAP Audits/QA Trend Report **Date Updated:** 2/10/94

**External Funding Requirements:** N/A

**Internal Resource Requirements:** 2 years for development

**Program Manager:** Verne Wolstenholm/S. L. Bray (CAP)/P. K. Adelung (Trend)

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 8/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** 210 SPPI

**Description:** Revise the semi-annual audit of the Corrective Action Program to ensure that it provides management with a clear insight as to the effectiveness of the Program.

Upgrade the QA Trend Report program to provide a simplified format which provides a thorough analysis of trend information.

**Objective:** This task was established to address concerns raised in various internal and external evaluation and inspection reports regarding the effectiveness of the Corrective Action Effectiveness Audit and the effectiveness of the analysis provided by the Quarterly Trend Report.

### Major Milestones:

1. Provide additional information and parameters needed to support the Trend Program for inclusion in the new CAP.
2. Survey/visit recognized industry leaders for input to the revised CAP Audit and obtain associated CAP Audits from those utilities.
3. Establish a "Functional/Program Area" and "System" Performance Panel display format within the Trend Report.
4. Develop and revise associated NQPs, QAIs, and QA Guidelines for the Trend Report after implementation of the new CAP.

## Program Enhancement

### Major Milestones: (VLW-94-02 Continued)

5. Provide the DRAFT revision of the CAP Audit Plan and checklist to QA management for review.
6. Approve the revised CAP Audit Plan and checklist.
7. Modify the QA Trend Report format by Issuance of the Second Quarter 1994 QA Trend.

	Accomplishment	Plan Date	Actual Date
1.	Provide additional information and parameters for new CAP. (Trend report) (VLW-94-02.1)	2/94	11/93
2.	Survey/visit other utilities CAP audits. (VLW-94-02.2)	3/94	
3.	Establish panel display for Trend Report. (VLW-94-02.3)	4/94	
4.	Develop/revise NQPs, QAIs & QA Guidelines for trend reporting with new CAP. (VLW-94-02.4)	4/94	
5.	Draft CAP QA Audit Plan and checklist. (VLW-94-02.5)	5/94	
6.	Approve CAP QA Audit Plan and checklist. (VLW-94-02.6)	5/94	
7.	Modify Trend Report format. (VLW-94-02.7)	8/94	

**Update Status:**

Item #1: Proposed trend parameters and data base for the new CAP was submitted to the Technical Staff Manager on 11/03/93.

Item #2: Selected and scheduled visits to three 3 utilities, Comanche Peak, Fort Calhoun, and Calloway in February, 1994.

## Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-03

**Title/Description:** Establishment of QA Assessment/Evaluation Program      **Date Updated:** 2/10/94

**External Funding Requirements:** N/A  
**Internal Resource Requirements:** 1 year for development

**Program Manager:** Verne Wolstenholm (D. R. Robinson)  
**Planned Start Date:** 1/24/94      **Planned Completion Date:** 1/95

**References (NRC/INPO/NUMARC/NAIT Etc.):** Self Imposed

**Description:** Establish a Quality Assessment Group which will enhance the Division's ability to provide effective proactive oversight of Nuclear Power Group activities and provide timely and effective feedback to senior NPG management on applicability of emerging industry issues and regulatory concerns, in addition to feedback on NPG activities.

**Objective:** This Task was established as a result of concerns raised in several NRC inspection reports issued in 1993 as well as the QA Division's recognition that some of the Division's resources were not being utilized effectively.

### Major Milestones:

1. Reorganize the Quality Assurance Division to provide the resources necessary to establish the assessment group.
2. Relocate personnel assigned to the assessment group to CNS.
3. Develop a Nuclear Quality Procedure which defines the Assessment Group's functions and responsibilities.
4. Identify training needs for the Assessment Group and submit training work request.
5. Complete training for all members of the Assessment Group.
6. Identify and develop supporting instructions/guidelines needed to support the activities of the Assessment Group.
7. Arrange for an independent assessment of the Assessment Group's effectiveness.

## Program Enhancement

(VLW-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Reorganize QA Division. (VLW-94-03.1)	10/93	10/16/93
2.	Relocate QA Assessment Group to CNS. (VLW-94-03.2)	2/94	12/31/93
3.	Develop Nuclear Quality Procedure. (VLW-94-03.3)	2/94	11/30/93
4.	Identify training needs & submit TWRs. (VLW-94-03.4)	2/94	10/93
5.	Complete Assessment Group training. (VLW-94-03.5)	9/94	
6.	Identify & develop instructions/guidelines. (VLW-94-03.6)	6/94	
7.	Arrange for independent assessment. (VLW-94-03.7)	1/95	

**Update Status:**

- Item 1): A proposed QA Division reorganization plan was submitted to the Vice President - Nuclear and approved.
- Item 2): The Quality Assurance Assessment Group completed relocation from the G.O. to CNS.
- Item 3): Nuclear Quality Procedure 2.3, "Quality Assessments/Evaluations", has been approved and issued.
- Item 4): Training Work Requests have been initiated for the following training: Technical Staff; Root Cause Analysis (from INPO); Human Performance Evaluation (from INPO); and Problem Solving and Decision Making (TWRs 93-1000, 93-1001, and 93-1002).
- Item 5): The Assessment Group training is not complete, however they have sufficient training to be functional.

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## Program Enhancement

VLW-94-03 (Continued)

- Item 6): One guideline is currently under development to describe generally how assessments and evaluations are to be conducted. Another is being initiated to describe how externally generated documents will be screened for their applicability to Assessment Group activities. Additional reviews are being conducted to determine if other guidelines are needed.

## Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-04

**Title/Description:** Upgrade the Internal Audit and Surveillance Program (Frequency & Scope) **Date Updated:** 2/10/94

**External Funding Requirements:** N/A  
**Internal Resource Requirements:** 2 years for development

**Program Manager:** Verne Wolstenholm (G. E. Smith)  
**Planned Start Date:** 1/24/94 **Planned Completion Date:** 12/95

**References (NRC/INPO/NUMARC/NAIT Etc.):** Self Imposed

**Description:** The existing internal audit program requires restructuring in light of QA's recent clarification of QA Program Audit Frequency Requirements as described in the CNS QA Program for Operation Policy Document and CNS Technical Specifications. (Reference G. E. Smith to SRAB Chairman memo and attached 10CFR50.59 Reportability Review, dated September 8, 1993.)

Revision of the QA surveillance Program to coincide with the objectives of the audit program.

**Objective:** The purpose of this project is to upgrade the QA audit and surveillance programs to provide scoping of audits and surveillance which focus on specific technical programs or activities of concern/declining performance.

### Major Milestones:

1. Identify activities that are to be subject to QA audit/surveillance.
2. Generate a Position Paper which describes the District's position on conducting internal audits.
3. Revise QAI-5 to reflect the new audit process.
4. Generate a grouping of activities for audit scoping.
5. Revise QAI-4 to reflect the new surveillance program.
6. Revise the QA Guidelines to describe the new approach to conducting audits.



## Program Enhancement

### Major Milestones: (VLW-94-04 Continued)

7. Develop new QA Audit Plans.
8. Train auditors on the new approach to auditing.
9. Train auditors on the objectives and performance expectations of the new surveillance program.
10. Complete revision/development of surveillance checklist.
11. Complete development of Audit Scoping Plans.

	Accomplishment	Plan Date	Actual Date
1.	Activities subject to QA audits/surveillance. (VLW-94-04.1)	11/93	11/23/93
2.	Generate internal audit Position Paper. (VLW-94-04.2)	12/93	12/22/93
3.	Revise QAI to reflect the new audit process. (VLW-94-04.3)	1/94	1/14/94
4.	Grouping of activities. (VLW-94-04.4)	11/93	11/23/93
5.	Revise QAI to reflect the surveillance process. (VLW-94-04.5)	4/94	
6.	Revise the QA Guidelines for auditing. (VLW-94-04.6)	4/94	
7.	Develop new QAPs. (VLW-94-04.7)	5/94	
8.	Train Auditors (audits). (VLW-94-04.8)	5/94	
9.	Train Auditors (surveillance). (VLW-94-04.9)	6/94	
10.	Complete surveillance checklist. (VLW-94-04.10)	12/95	
11.	Complete audit scoping plans. (VLW-94-04.11)	12/95	

## Program Enhancement

VLW-94-04 (Continued)

- Update Status:**
- Item 1): Activities subject to QA audits/surveillance have been identified and the 1994 audit schedule has been issued.
  - Item 2): Audit Requirements/Frequencies position paper has been developed and distributed.
  - Item 3): QAI-5 has been revised to reflect the new audit process.
  - Item 4): Activities have been grouped for audit scoping.
  - Item 7): A total of five QAPs are being developed. As of 2/8/94 two of the QAPs have been completed and approved. A third is ready for review, one is in writing and the fifth one has not been initiated.

***COOPER NUCLEAR STATION  
PERFORMANCE IMPROVEMENT***

***NUCLEAR REGULATORY COMMISSION***

***MEETING WITH***

***COOPER NUCLEAR STATION MANAGEMENT***

***FEBRUARY 14, 1994***



A115

## **NRC/NPPD MANAGEMENT MEETING**

- **PURPOSE**
- **OVERVIEW OF NPPD ORGANIZATIONAL CHANGES**
- **ASSESSMENTS PERFORMED TO IDENTIFY WEAKNESSES**
- **PURPOSE OF NEAR TERM INTEGRATED ENHANCEMENT PROGRAM**
- **NEAR TERM INTEGRATED ENHANCEMENT PROGRAM DISCUSSION**
- **SUMMARY**



## **OVERVIEW OF REORGANIZATION CHANGES**

- **PURPOSE OF REORGANIZATION**
  - **IMPROVE NUCLEAR POWER GROUP PERFORMANCE**
  - **FOCUS MORE ON SITE ACTIVITIES**
  - **RESOLVE WEAKNESSES IN THE OVERSIGHT AND SELF-ASSESSMENT FUNCTIONS**

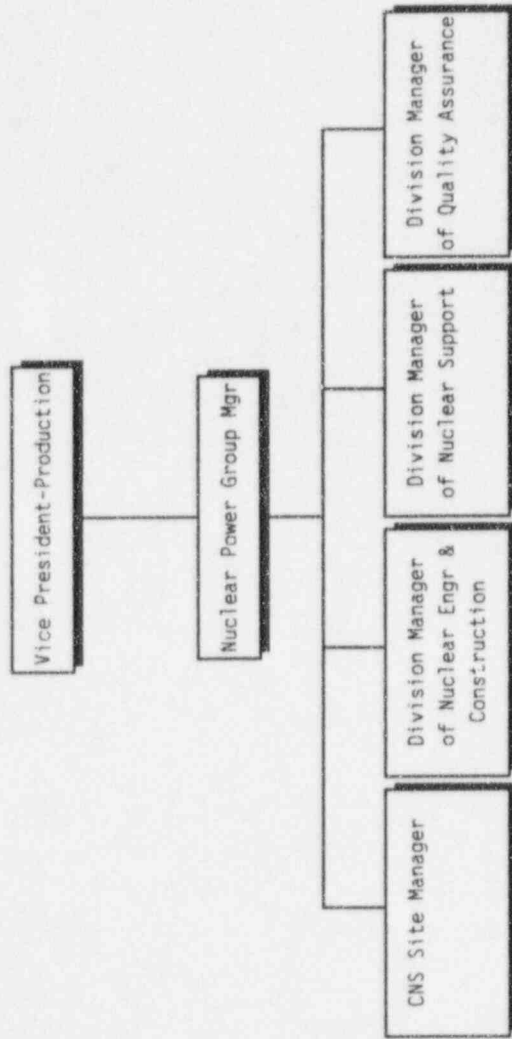


## **ORGANIZATIONAL ENHANCEMENTS**

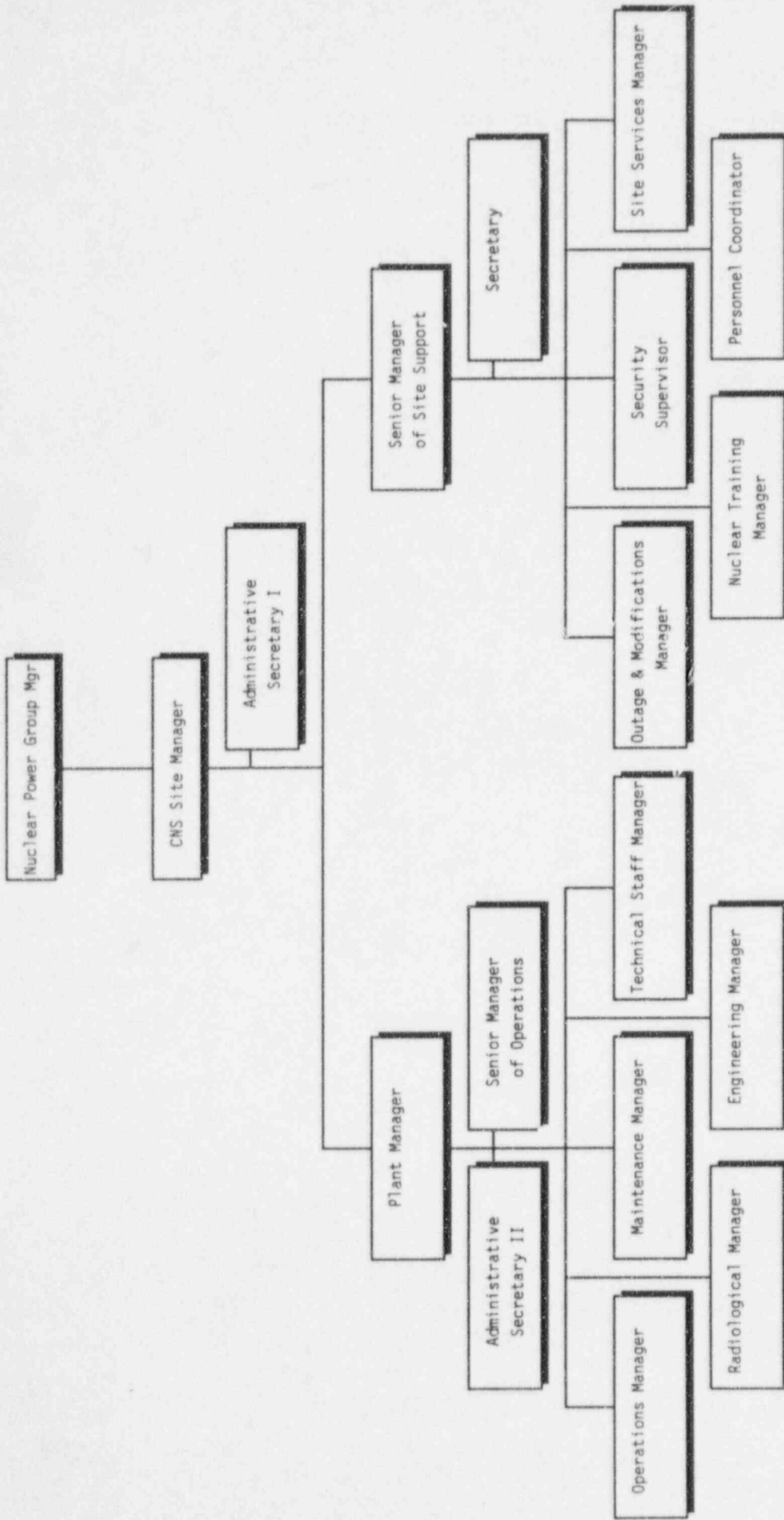
- ***RELOCATED VICE PRESIDENT - NUCLEAR TO CNS***
- ***RELOCATED QUALITY ASSURANCE DIVISION MANAGER TO CNS***
- ***ASSIGNED SENIOR MANAGER RESPONSIBILITY FOR DEVELOPING CNS SAFETY OVERSITE***
- ***SENIOR MANAGERS REPORT TO VICE PRESIDENT - NUCLEAR***
- ***INPO LOANED EXECUTIVE AS PLANT ENGINEERING MANAGER***



PREVIOUS NPG ORGANIZATION

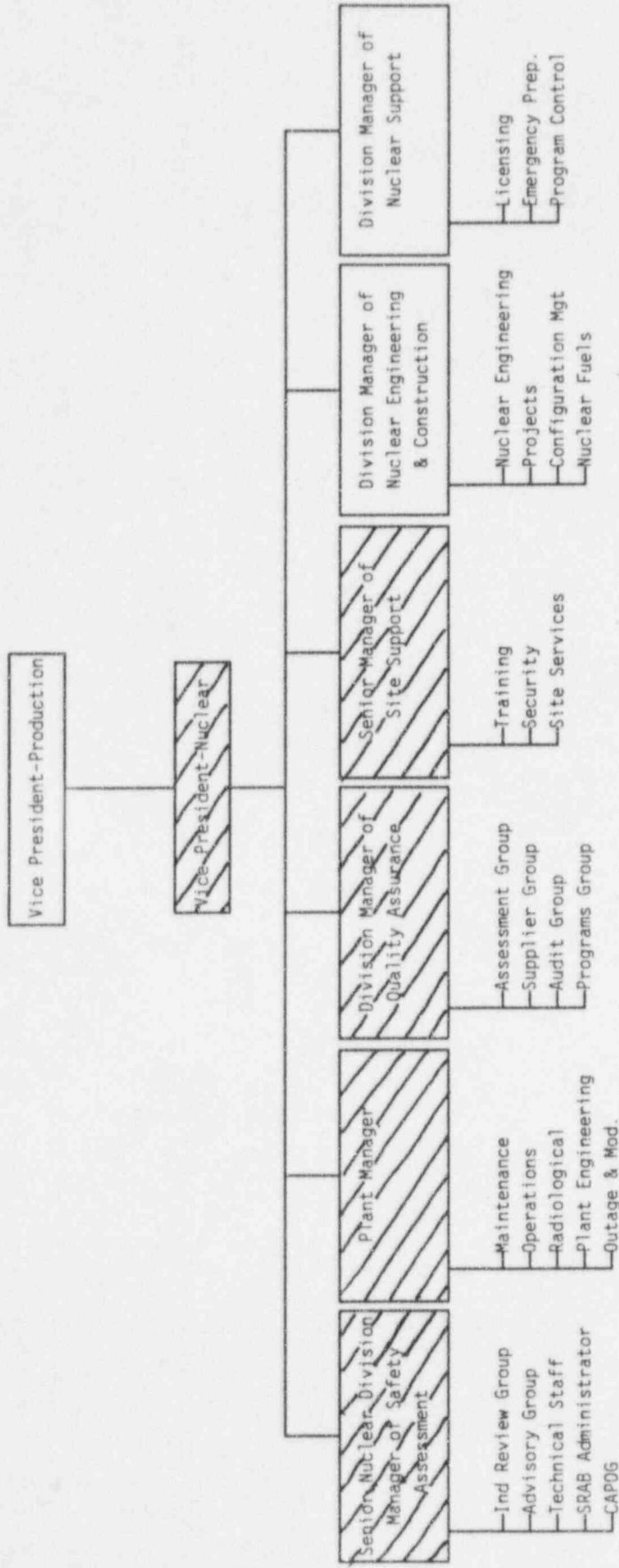


PREVIOUS CNS ORGANIZATION

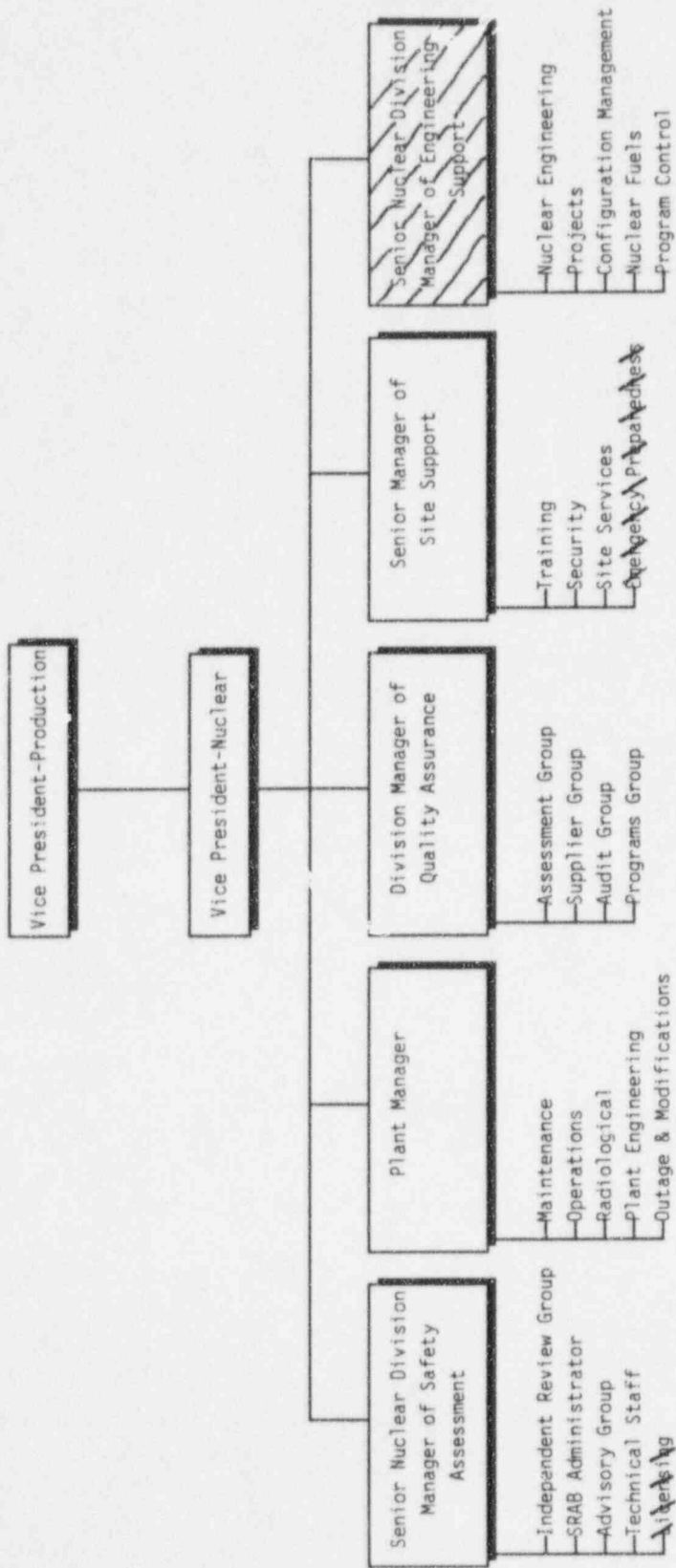




NEW NPG ORGANIZATION



FUTURE NPG ORGANIZATION



## ASSESSMENTS PERFORMED TO IDENTIFY WEAKNESSES

- **CNS PERFORMANCE ASSESSMENT PROJECT** 12/92 completed
- **CNS CORRECTIVE ACTION PROGRAM SELF ASSESSMENT** 5/93 completed
- **ENFORCEMENT ISSUES INVESTIGATION TEAM** 7/93 completed
- **COMMON CAUSE ANALYSIS STUDY** FPI 11/93 completed
- **CNS ENGINEERING PERFORMANCE ASSESSMENT** INPO
- **OUTAGE PERFORMANCE ASSESSMENT**

regulatory interf  
management expectations  
human performance  
prioritize CAP issues

Now - human error assessment (INPO)

6/94 - 9/94 Main Assessment (INPO)

Future: design change



CAP effectiveness  
comm

org  
trng/Fb  
accountability/culture

## *IDENTIFIED AREAS OF WEAKNESS*

- *MANAGEMENT*
  - *COMMUNICATED EXPECTATIONS*
  - *PERSONNEL ACCOUNTABILITY*
  - *VERTICAL COMMUNICATION*
- *QUESTIONING ATTITUDE*
- *TRAINING*
- *IDENTIFICATION OF PROBLEMS AND IMPLEMENTATION OF CORRECTIVE ACTION*
- *PROCEDURAL DETAILEDNESS*



## **PURPOSE OF NEAR TERM INTEGRATED ENHANCEMENT PROGRAM**

- ***PROVIDE MECHANISM TO PRIORITIZE NPPD ASSESSMENT FINDINGS AND NRC CONCERNS***
- ***PROVIDE FOCUS ON PRIORITY ISSUES***
- ***PROVIDE MECHANISM TO MEASURE PERFORMANCE IMPROVEMENT AND EFFECTIVENESS***
- ***EMPLOYEE AWARENESS AND FEEDBACK***
- ***INPUT FOR BUSINESS PLAN (LONG TERM PLAN)***



**NEAR TERM INTEGRATED ENHANCEMENT PROGRAM**  
**DISCUSSION**

- ***NUCLEAR POWER GROUP - G. HORN***
- ***OPERATIONS - R. GARDNER/J. LYNCH***
- ***SAFETY ASSESSMENT - J. MEACHAM***
- ***SITE SUPPORT - E. MACE***
- ***QUALITY ASSURANCE - V. WOLSTENHOLM***



## ***PROGRAM ENHANCEMENT NUCLEAR POWER GROUP***

- 94-01 ESTABLISH PERIODIC COMMUNICATIONS  
MEETINGS***
- 94-04 CONSIDER USE OF MANAGEMENT MENTORS***
- 94-05 CONDUCT STUDY FOR APPROPRIATE  
STAFFING AT CNS***



## **PROGRAM ENHANCEMENT NUCLEAR POWER GROUP**

**94-01    *Establish Periodic Communications Meetings***

### **OBJECTIVES:**

- *Enhance Communications Within the NPG*
- *Communicate Management Expectations*

### **MAJOR MILESTONES:**

- *Vice President meetings.*
- *Manager meetings with supervision.*
- *Supervisory meetings with subordinates.*

### **RESULTS:**

- *Vice President - Nuclear meetings with NPG personnel ongoing.*
- *Employee feedback increasing.*
- *More frequent manager and supervisor meetings.*





## **PROGRAM ENHANCEMENT NUCLEAR POWER GROUP**

**94-04    *Consider Use of Management Mentors***

### **OBJECTIVE:**

- ***Expedite the Desired Level of Performance Improvement within the NPG in Order to Achieve Internal and Regulatory Expectation as Rapidly as Possible***

### **MAJOR MILESTONE:**

- ***Complete support evaluation and obtain Board approval.***

### **RESULT:**

- ***Management mentors are being used for:***
  - ***Safety Review and Audit Board (SRAB)***
  - ***Industry Advisory Group***
  - ***Maintenance***
  - ***Engineering***
  - ***Other***



## **PROGRAM ENHANCEMENT NUCLEAR POWER GROUP**

**94-05     *Conduct Study for Appropriate Staffing at CNS***

### **OBJECTIVE:**

- ***Determine if Current Staffing Levels are Sufficient to Achieve and Maintain Management's Performance Standards***

### **MAJOR MILESTONES:**

- ***Perform staffing study.***
- ***Develop an interim staffing upgrade plan for senior NPPD management review and approval.***
- ***Obtain NPPD Board endorsement.***

### **RESULTS:**

- ***Completed staffing study.***
- ***Interim staffing plan complete.***
- ***Staffing plan endorsed by NPPD Board.***



# ***PROGRAM ENHANCEMENT MANAGEMENT***

***94-01 STRENGTHEN THE CNS SAFETY CULTURE***

***94-02 DEVELOP AN NPG BUSINESS PLAN***

***94-03 PRIORITIZE OUTSTANDING WORK***



## **PROGRAM ENHANCEMENT MANAGEMENT**

**94-01     *Strengthen the CNS Safety Culture***

### **OBJECTIVE:**

- *"Do It Right the First Time; Every Time."*

### **MAJOR MILESTONES:**

- *Consultative decision making.*
- *Promote an atmosphere where employees feel comfortable having a questioning attitude.*
- *Emphasize importance of the Corrective Action Program.*
- *Encourage employee communication feedback.*

### **RESULTS:**

- *Increased number of DRs, NCRs, LERs, and QA Findings.*
- *Improved employee attitude.*
- *Continued emphasis required.*



## **PROGRAM ENHANCEMENT MANAGEMENT**

**94-02    *Develop an NPG Business Plan***

### **OBJECTIVE:**

- *Provide a Long Term Strategic Plan for the Purpose of Improving Nuclear Power Group Performance*

### **MAJOR MILESTONES:**

- *Establish NPG vision, mission, values, and goals.*
- *Hold departmental meetings to communicate the vision and values.*
- *Establish objectives and performance indicators.*
- *Finalize senior management business plans.*
- *Issue first monthly performance review report.*

### **RESULTS:**

- *Vision, mission, values, and goals developed.*
- *Vision, mission, and values have been communicated to each employee.*
- *Specific instances of application have been observed.*
- *Methodology will result in increase of ownership.*
- *A dedicated facilitator has been assigned.*



## **SUMMARY**

- **ORGANIZATIONAL ASSESSMENTS CONTINUE**
- **SENIOR MANAGEMENT EXPECTATIONS ARE BEING COMMUNICATED**
- **BUSINESS PLAN DEVELOPMENT CONTINUES**
- **NEAR TERM INTEGRATED ENHANCEMENT PROGRAM ISSUES ARE BEING ADDRESSED**
- **SHORT-TERM SUPPORT IDENTIFIED AND COST APPROVED**
- **ORGANIZATIONAL STAFFING ADDITIONS APPROVED**
- **CNS CULTURE SHOWING IMPROVEMENT**
- **REGULATORY INTERFACE IMPROVEMENTS MUST CONTINUE**



# ***PROGRAM ENHANCEMENT***

## ***OPERATIONS***

***94-01 REVIEW OF MAINTENANCE PROCEDURES***

***94-02 REVIEW PREVENTIVE MAINTENANCE  
ASSIGNMENTS***

***94-04 MAINTENANCE DEPARTMENT  
REORGANIZATION***

***94-07 MAINTENANCE BACKLOG***



# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-01 DEVELOP PROGRAM TO REVIEW MAINTENANCE PROCEDURES**

#### **OBJECTIVES:**

- *Provide the Appropriate Level of Detail for Performers*
- *Address Performance Deficiencies*

#### **MAJOR MILESTONES:**

- *Hire Temporary Replacements for Craftsmen to Promote Procedure Development and Provide Required Resources*
- *Formalize "Skill of the Craft" Definition*
- *Revise Appropriate Procedures*





# ***PROGRAM ENHANCEMENT OPERATIONS***

## ***MAJOR MILESTONES (CON'T.):***

- ***Complete Vendor Manual Validation and Verification***
- ***Incorporate Procedure Changes into Training Materials***

## ***RESULTS:***

- ***Temporary Employees Presently in Training***
- ***Facilities and Equipment Procurement in Progress***
- ***Procedural Changes in Process***



# ***PROGRAM ENHANCEMENT***

## ***OPERATIONS***

***94-02 Review Preventive Maintenance (PM) Task Assignments For Adequate Instructions***

### **OBJECTIVES:**

- ***Provide the Appropriate Level of Detail for Performers***
- ***To Address Performance Deficiencies***

### **MAJOR MILESTONES:**

- ***Research Requirements for Procedures, Maintenance Practices and PMs***
- ***Establish Standard***
- ***Provide Resources***



# ***PROGRAM ENHANCEMENT OPERATIONS***

## ***MAJOR MILESTONES (CON'T):***

- ***Review PMs Against Standard and Revise Accordingly***

## ***RESULTS:***

- ***Task Group Selected to Establish Standard***
- ***Contract Engineers Approved at February Board Meeting***
- ***Facilities and Equipment Procurement in Progress***



# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-04 COMPLETE THE MAINTENANCE DEPARTMENT REORGANIZATION**

#### **OBJECTIVES:**

- *Reduce the Number of Reporting Layers*
- *Improve Departmental Communications*
- *Create a Maintenance Support Group*

#### **MAJOR MILESTONES:**

- *Develop Organizational Structure Using Industry Expert*
- *Obtain Required Approval for Staffing Additions*
- *Incorporate Lead Person and Crew Leader Job Functions*
- *Relocate Personnel as Appropriate*
- *Perform Self Assessment to Determine Effectiveness*



# ***PROGRAM ENHANCEMENT OPERATIONS***

## **RESULTS:**

- ***Organization Structure Development Complete***
- ***Structure Approved and Positions Authorized***
- ***Incorporation of Job Functions Approved***



# ***PROGRAM ENHANCEMENT***

## ***OPERATIONS***

### ***94-07 MAINTENANCE BACKLOG***

#### **OBJECTIVE:**

- ***Reduce Maintenance Backlog and Improve the Effectiveness of Management of the Workload.***

#### **MAJOR MILESTONES:**

- ***Establish Scope of Backlog***
- ***Establish Priorities***
- ***Identify and Resolve Problem Areas***
- ***Formalize Continuous Backlog Monitoring***



# ***PROGRAM ENHANCEMENT OPERATIONS***

## ***RESULTS:***

- ***Resources Dedicated***
- ***Backlog Scoping in Progress***
- ***Criteria for Priorities Established***



# ***PROGRAM ENHANCEMENT***

## ***OPERATIONS***

***94-03 UPGRADE THE SYSTEM ENGINEER PROGRAM***

***94-06 ENGINEERING BACKLOG REDUCTION***

***94-08 ENHANCE QUALIFICATION AND TRAINING OF  
SYSTEM ENGINEERS***





# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-03 UPGRADE THE SYSTEM ENGINEER PROGRAM**

#### **OBJECTIVES**

- *Improve the Effectiveness of the Engineering Department*
- *Improvements Will Focus on Work Management, System Reliability Program Effectiveness, and Definition of Roles in the Engineering Department*

#### **MAJOR MILESTONES:**

- *Perform Assessment of Engineering Department Effectiveness and Organization*
- *Develop Integrated Plan to Address Various Assessments and Audits of CNS Engineering*
- *Implement Work Management Improvements*
- *Establish System and Program Report Cards*
- *Define Roles, Management Expectations, and Accountabilities*



# ***PROGRAM ENHANCEMENT***

## ***OPERATIONS***

### ***94-03 UPGRADE THE SYSTEM ENGINEER PROGRAM (CONT'D)***

#### ***RESULTS:***

- ***Engineering Department Assessment Complete***
- ***Integrated Plan is Complete***
- ***Work Management Items Discussed in 94-06***



# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-06 ENGINEERING BACKLOG REDUCTION**

#### **OBJECTIVE**

- *Reduce Engineering Backlog and Improve the Effectiveness of Management of the Workload. This Will Allow System and Program Engineers to More Effectively Manage Their Systems and Programs.*

#### **MAJOR MILESTONES:**

- *Develop Method to Prioritize Work*
- *Prioritize Work*
- *Obtain Temporary Contract Help*
- *Increase Department Staffing*
- *Develop Engineering Department Indicators*



# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-06 ENGINEERING BACKLOG REDUCTION (CONT'D)**

#### **RESULTS:**

- *Prioritization Method Developed*
- *Prioritization Expected to Be Complete By February 28, 1994*
- *Contractors Begin Arriving February 14, 1994*
- *Permanent Staffing Authorized*
- *Draft Performance Indicators Developed*



# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-08    ENHANCE QUALIFICATION AND TRAINING OF SYSTEM ENGINEERS**

#### **OBJECTIVES**

- *Organize, Enhance, and Communicate Improvements in Engineering Training. This Includes Systems Training and Improvements to Positional Requirements for Engineers.*

#### **MAJOR MILESTONES:**

- *Identify and Complete System Training for System Engineers*
- *Upgrade System Training Lesson Plans*
- *Organize and Structure Training and Qualification to Broaden System Engineer Background*
- *Complete Individualized Training Plan for Appropriate Engineers*



# **PROGRAM ENHANCEMENT**

## **OPERATIONS**

### **94-08 ENHANCE QUALIFICATION AND TRAINING OF SYSTEM ENGINEERS (CONT'D)**

#### **RESULTS:**

- *Training Needs Identified, Engineers are Taking Needed Systems Training*
- *Engineering Training Task Force Established*
- *Lesson Plan Upgrades Have Begun*



# ***PROGRAM ENHANCEMENT SAFETY ASSESSMENT***

***94-01 UPGRADE THE CAP***

***94-03 ENHANCE THE HUMAN PERFORMANCE  
EVALUATION PROGRAM***

***94-05 DEVELOP THE INDEPENDENT REVIEW GROUP***

***94-07 IMPLEMENT THE INDUSTRY ADVISORY  
GROUP***



## **PROGRAM ENHANCEMENT SAFETY ASSESSMENT**

### ***94-01 Upgrade the Corrective Action Program***

#### **OBJECTIVE:**

- ***Support the "Questioning Attitude" Culture Change***
- ***Identify and Aggressively Resolve Our Own Problems***

#### **MAJOR MILESTONES:**

- ***Develop Goals***
- ***Develop Conceptual Design***
- ***Conduct Workshops***
- ***Implement Critical Interim Changes***
- ***Approve Procedures (Preliminary)***
- ***Provide Training***
- ***Implement Program Through Final Procedure Approval***
- ***Assess Program Effectiveness***

#### **RESULTS:**

- ***Milestones Through Interim Changes Have Been Implemented***
- ***Station Staff Now Much More Sensitive to CAP Expectations***





## CAP INTERIM CHANGE VS. RECOMMENDATION(S) ADDRESSED

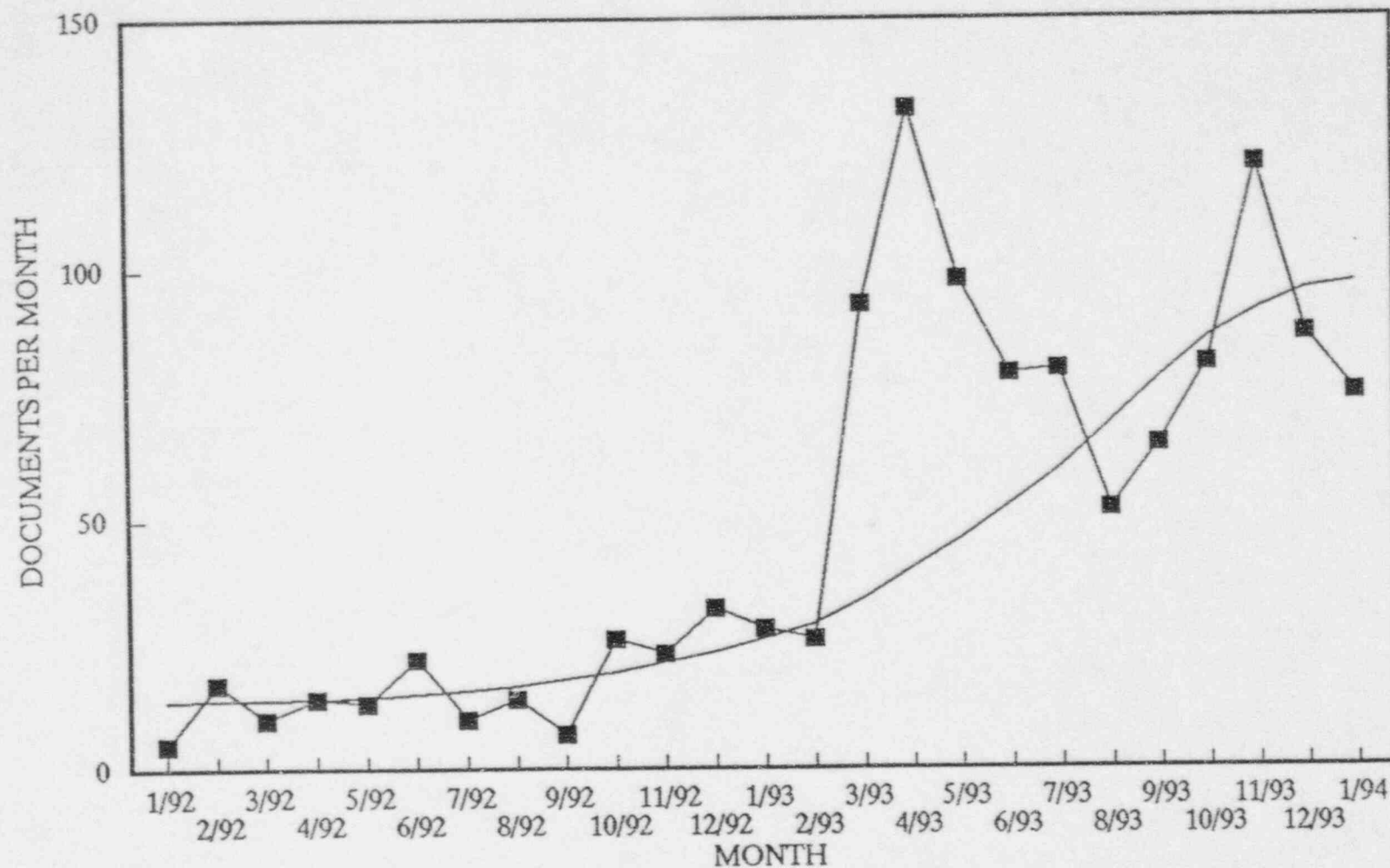
<i>Change</i>	<i>Recommendation</i>	
<i>Condition Review Group</i>	<i>EIIT-6</i>	<i>Increase management attention and involvement in the CAP.</i>
	<i>SALP ETS-2</i>	<i>The licensee should also give management oversight.</i>
<i>Responsible Manager</i>	<i>EIIT-5</i>	<i>Re-establish empowerment, ownership, and accountability.</i>
	<i>SALP ETS-1</i>	<i>The licensee needs to resolve plant problems by correcting the root cause, with the objective of closing the issue with finality rather than by using a quick-fix approach to mitigate the immediate symptoms. The licensee should put more thoroughness, formality, and attention to careful documentation into the process.</i>
	<i>SALP ETS-2</i>	<i>The licensee should also give...system engineering functions more emphasis, with more responsibility and authority for reviewing all aspects of a problem.</i>
<i>Eliminate Tech Staff and NOC overview</i>	<i>CAPSAG R-8</i>	<i>Valid root causes, once identified, should not be altered.</i>  <i>Overview group responsibility should not dilute root cause originators' responsibilities.</i>
	<i>CAPSAG R-10</i>	<i>Evaluate the value added by overview groups relative to NCRs/DRs. In addition, overview groups should refrain from setting standards without management concurrence and resultant revisions to the standard and/or procedure.</i>
<i>Corrective Action Plan</i>	<i>EIIT-4</i>	<i>Emphasize and implement team building.</i>
	<i>CAPSAG R-8</i>	<i>Corrective actions are negotiable and should include a value impact.</i>  <i>Overview groups should not resolve interdepartmental complications, but forward such issues to line management for resolution.</i>
	<i>CAPSAG R-16</i>	<i>The effective use of resources includes:...utilization of QA in greater assessment role to monitor CAP effectiveness.</i>
<i>Eliminate in-line QA NCR review</i>	<i>CAPSAG R-16</i>	<i>The effective use of resources includes:...utilization of QA in greater assessment role to monitor CAP effectiveness.</i>
<i>Radiological deficiency reporting</i>	<i>SALP R-1</i>	<i>The licensee needs to implement measures to assure that the facility staff is more aggressive in the pursuit of issues which are to be documented in the radiological safety incident report process established by site procedures.</i>



**CORRECTIVE ACTION PROGRAM STATISTICS**  
**DOCUMENTS GENERATED PER YEAR**

	<u>1992</u>	<u>1993</u>
NCRs	139	273
DRs	53	662
QA FINDINGS	69	90
QA OBSERVATIONS	<u>35</u>	<u>36</u>
TOTALs	296	1025

# CORRECTIVE ACTION PROGRAM TREND

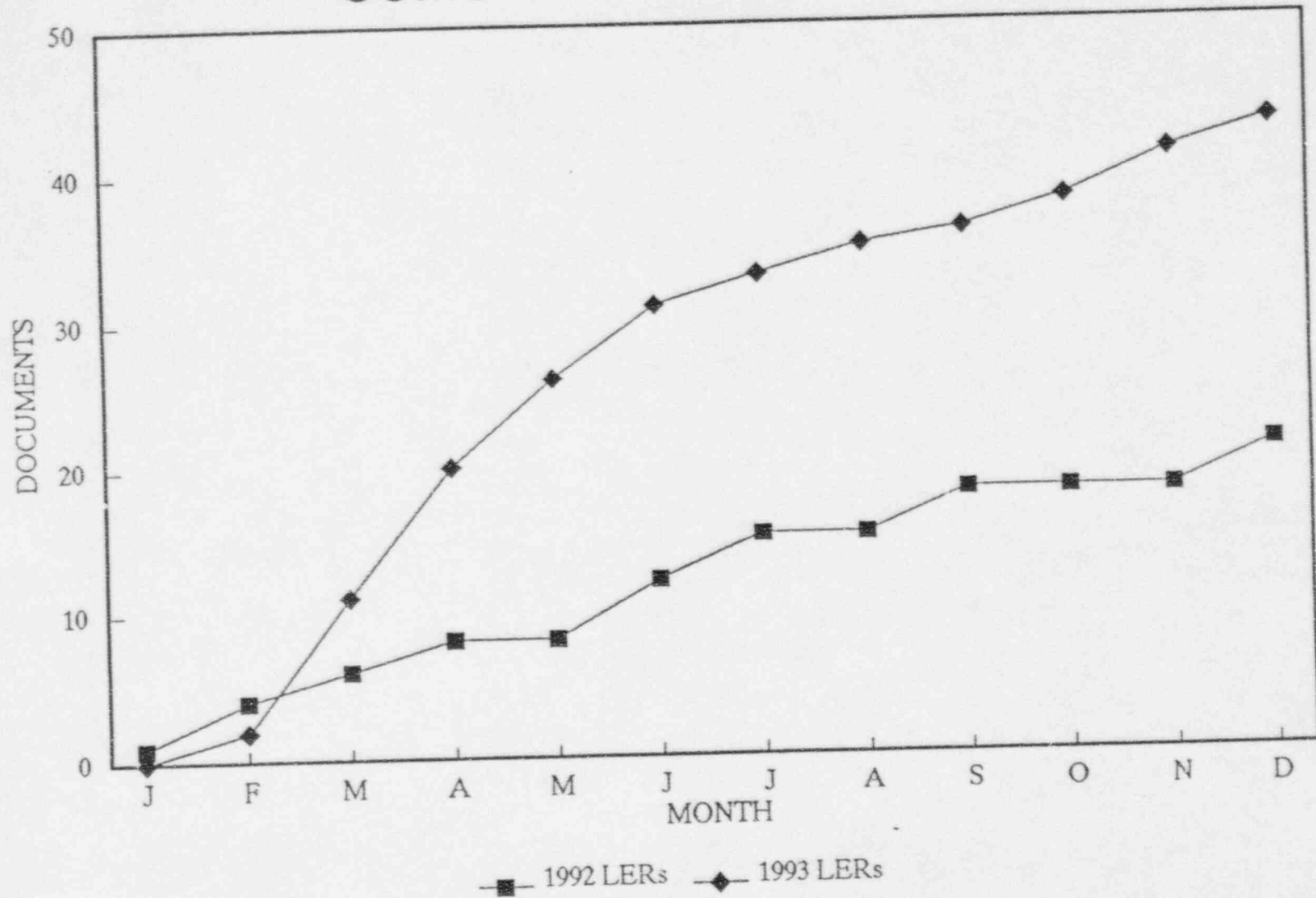


■ NCRs & DRs

— DATA FIT CURVE\*

\*EXCLUDES OUTAGE DATA MARCH - JULY

# CUMULATIVE LERs WRITTEN



INCLUDES SUPPLEMENTS

## **PROGRAM ENHANCEMENT SAFETY ASSESSMENT**

**94-03 Enhance the Human Performance Evaluation Program**

### **OBJECTIVE:**

- ***Reduce Human Error Through a Programmatic Approach to Human Performance Evaluation***

### **MAJOR MILESTONES:**

- ***Establish Program Manager***
- ***Assess Recent Human Errors***
- ***Provide Input to CAP Procedures***

### **RESULTS:**

- ***IRG Manager Position is Program Manager***
- ***Developmental Discussions With Consultant Still Ongoing***
- ***INPO Assist Visit Scheduled for February 14, 1994***



## **PROGRAM ENHANCEMENT SAFETY ASSESSMENT**

**94-05 Develop the Independent Review Group**

### **OBJECTIVE:**

- ***Ensure That Results are Being Achieved Which Meet Senior Management Expectations***

### **MAJOR MILESTONES:**

- ***Develop Conceptual Design***
- ***Develop Administrative Controls***
- ***Authorize/Fill Staff Positions***
- ***Implement IRG.***

### **RESULTS:**

- ***CAPOG Continues to Fulfill Similar Responsibilities***
- ***Staffing Has Been Authorized***
- ***Visits Conducted to Other Plants***



## **PROGRAM ENHANCEMENT SAFETY ASSESSMENT**

***94-07 Implement the Industry Advisory Group***

### **OBJECTIVE:**

- ***Remain Abreast of Emerging Industry Issues and Take Action, Accordingly***

### **MAJOR MILESTONES:**

- ***Develop Charter and Rules of Practice***
- ***Retain Industry Experts***
- ***Implement the Group***

### **RESULT:**

- ***Developmental Work in Progress***



***PROGRAM ENHANCEMENT***

***QUALITY ASSURANCE***

***94-03 ESTABLISHMENT OF A QA ASSESSMENT/  
EVALUATION PROGRAM***

***94-04 UPGRADE THE INTERNAL AUDIT AND SURVEILLANCE  
PROGRAM***





## **PROGRAM ENHANCEMENT**

### **QUALITY ASSURANCE**

**94-03 ESTABLISHMENT OF A QA  
ASSESSMENT/EVALUATION PROGRAM**

#### **OBJECTIVE**

**BE PROACTIVE IN PROVIDING EFFECTIVE FEEDBACK ON THE  
APPLICABILITY OF EMERGING INDUSTRY AND REGULATORY  
ISSUES.**

#### **MAJOR MILESTONES**

- **REORGANIZATION OF QA DIVISION**
- **DEVELOP THE PROGRAM DOCUMENT**
- **IMPLEMENT THE PROGRAM**
- **INDEPENDENT EVALUATION OF THE PROGRAM AND ITS  
EFFECTIVENESS**



**PROGRAM ENHANCEMENT**  
**QUALITY ASSURANCE**

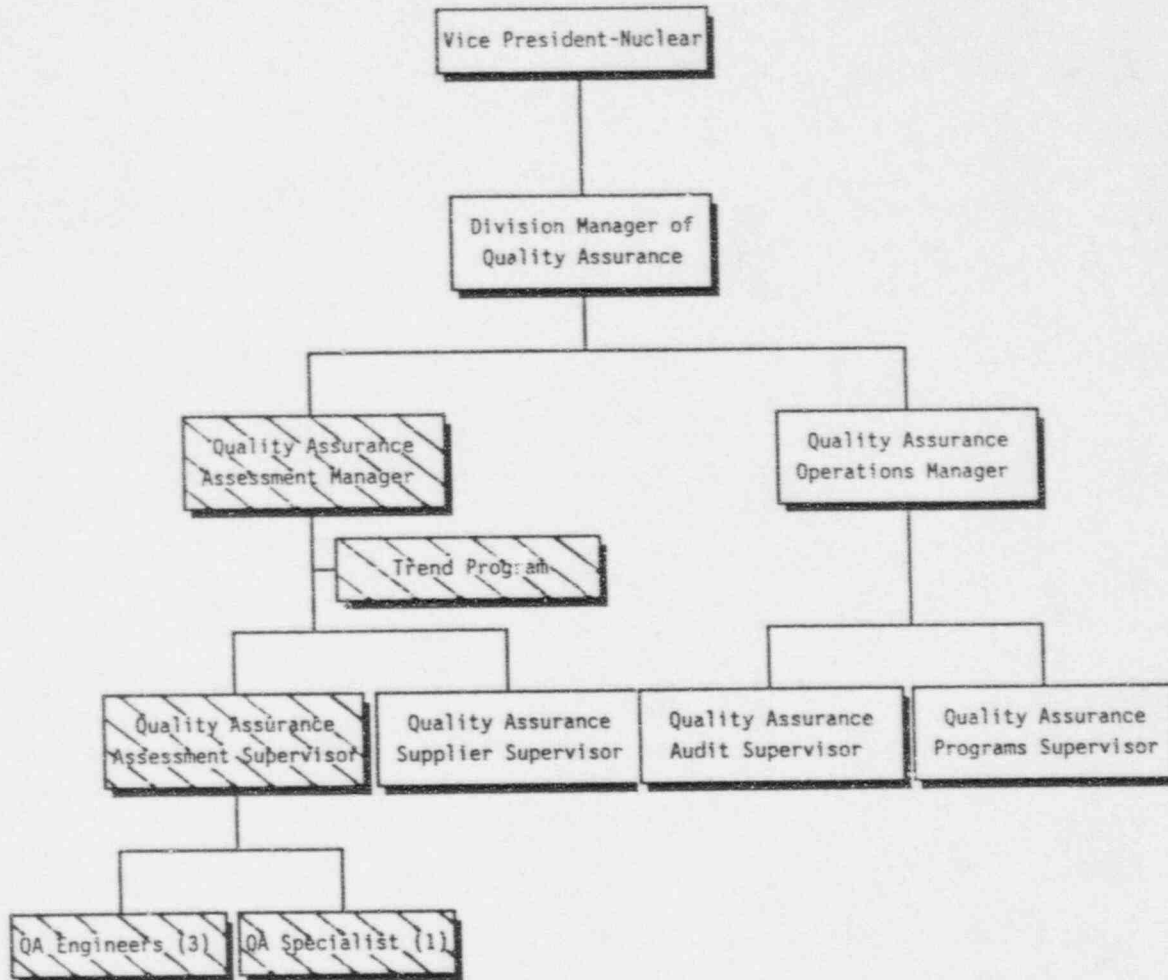
**94-03 (CONTINUED)**

**RESULTS**

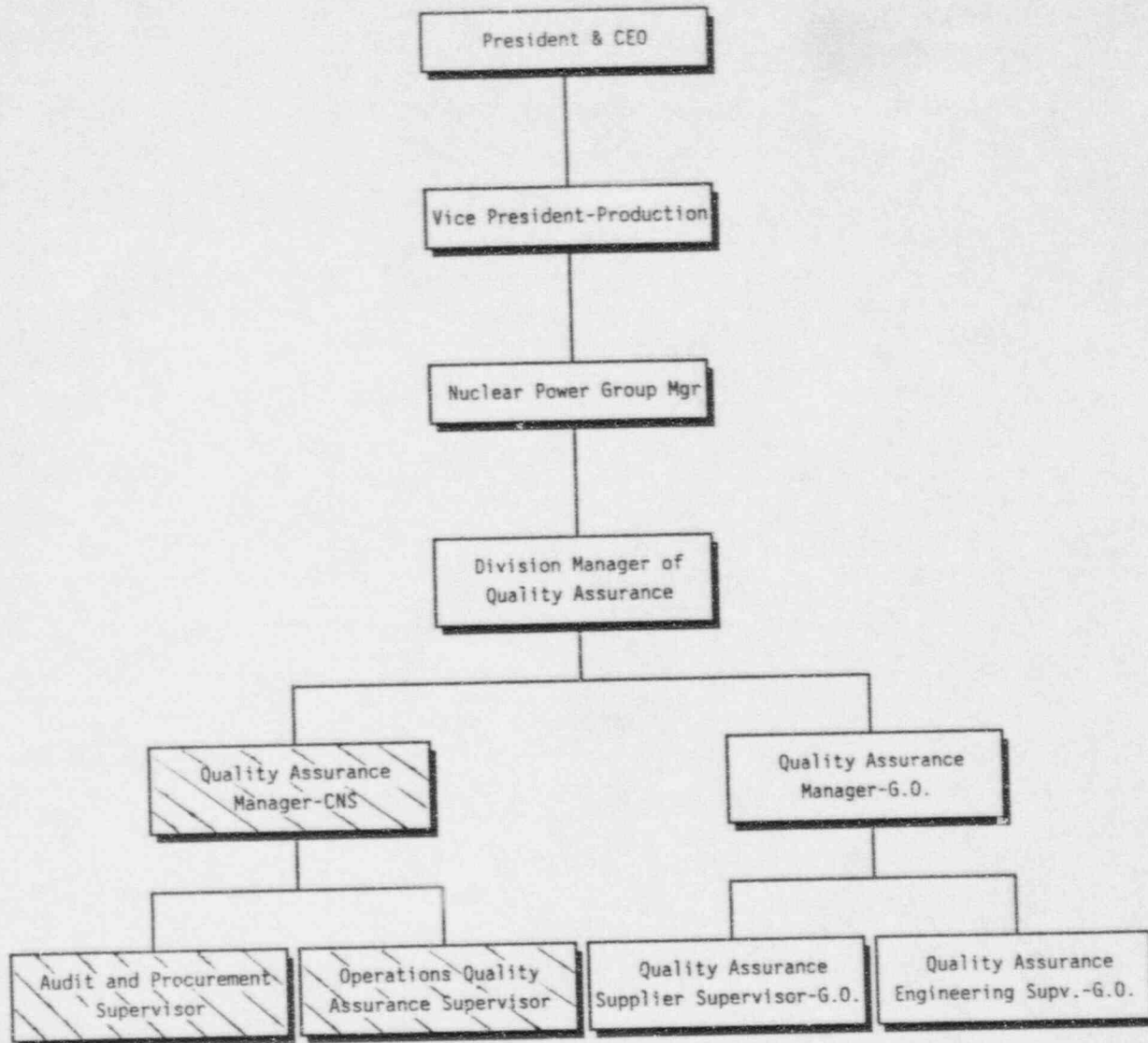
- **REORGANIZATION COMPLETED (10-16-93)**
- **NUCLEAR QUALITY PROCEDURE APPROVED AND BECAME EFFECTIVE (11-30-93)**
- **PROGRAM IMPLEMENTED (11-30-93)**



NEW EXISTING QA ORGANIZATION



PREVIOUS QA ORGANIZATION



## **PROGRAM ENHANCEMENT**

### **QUALITY ASSURANCE**

**94-04    UPGRADE THE INTERNAL AUDIT AND SURVEILLANCE PROGRAM**

#### **OBJECTIVE**

**PROVIDE AN INTERNAL AUDIT AND SURVEILLANCE PROGRAM WHICH WILL FOCUS ON PROGRAMS OR ACTIVITIES OF CONCERN/DECLINING PERFORMANCE**

#### **MAJOR MILESTONES**

- **IDENTIFY AUDIT FREQUENCY REQUIREMENTS**
- **GROUPING OF ACTIVITIES FOR AUDIT SCOPING**
- **DEVELOP QA AUDIT PLANS (QAP)**
- **DEVELOP QA AUDIT SCOPING PLANS (ASP)**
- **IMPLEMENTATION**



**PROGRAM ENHANCEMENT**  
**QUALITY ASSURANCE**

**94-04 (CONTINUED)**

**RESULTS**

- **IDENTIFICATION OF AUDIT FREQUENCY REQUIREMENTS COMPLETED**
- **GROUPING OF ACTIVITIES FOR AUDIT SCOPING COMPLETED**
- **REQUIRED QAP AND ASP COMPLETED PRIOR TO AUDIT PERFORMANCE**
- **PERFORMED THREE AUDITS TO DATE**
  - **HIGHER QUALITY FINDINGS**
  - **POSITIVE FEEDBACK**



## ***PROGRAM ENHANCEMENT***

### ***SITE SUPPORT***

- 94-01 NPG MANAGER AND SUPERVISOR MANAGEMENT SKILLS TRAINING***
- 94-02 DEVELOP USER-FRIENDLY TRACKING SYSTEM FOR TRAINING AND CERTIFICATION***
- 94-07 CONDUCT A COMPLIANCE REVIEW OF CNS TRAINING PROGRAMS***



## **PROGRAM ENHANCEMENT**

### **SITE SUPPORT**

#### **94-01 NPG MANAGER AND SUPERVISOR MANAGEMENT SKILLS TRAINING**

##### **OBJECTIVE**

**TO PROVIDE A STRONG, FOCUSED MANAGEMENT  
DEVELOPMENT WITHIN THE NPG**

##### **MAJOR MILESTONES**

- **ASSESS EACH NPG SUPERVISOR AND MANAGER TO  
DETERMINE WHAT LEVEL OF TRAINING OR SUPPORT THEY  
MAY REQUIRE**
- **DEVELOP TRAINING SCHEDULE FOR NPG SUPERVISORS  
AND MANAGERS**
- **DEVELOP MANAGEMENT/SUPERVISOR TRAINING  
PROGRAM**
- **TRAIN MANAGEMENT/SUPERVISION IN BASIC  
MANAGEMENT SKILLS**

##### **RESULTS**

- **ASSESSMENTS COMPLETED**
- **TRAINING SCHEDULE DEVELOPED FOR 1994**
- **FIRST WORKSHOP DESIGNED**





## **PROGRAM ENHANCEMENT**

### **SITE SUPPORT**

**94-02 DEVELOP USER-FRIENDLY TRACKING SYSTEM FOR TRAINING AND CERTIFICATION**

#### **OBJECTIVE**

- **DEVELOP A USER-FRIENDLY SYSTEM TO IDENTIFY CERTIFICATION STATUS OF EMPLOYEES PRIOR TO WORK ASSIGNMENT.**
- **PROMOT ACCOUNTABILITY FOR CERTIFICATION MAINTENANCE**

#### **MAJOR MILESTONES**

- **SCOPING SESSION WITH ISD, TRAINING, CS, AND USERS**
- **CONDUCT BUSINESS AREA ANALYSIS AT CNS AND GO**
- **DETERMINE ALTERNATIVES, SELECT BEST APPROACH, DEVELOP FUNCTIONAL SPECIFICATION**
- **AWARD CONTRACT**
- **INSTALL/TEST SYSTEM**

#### **RESULTS**

- **SCOPING SESSION COMPLETED**
- **BUSINESS AREA ANALYSIS COMPLETED**
- **FUNCTIONAL SPECIFICATION DEVELOPMENT STARTED**



## **PROGRAM ENHANCEMENT**

### **SITE SUPPORT**

**94-07 CONDUCT A COMPLIANCE REVIEW OF CNS TRAINING PROGRAM**

#### **OBJECTIVE**

**TO ENSURE THAT ALL INTERNAL AND EXTERNAL TRAINING REQUIREMENTS ARE BEING MET**

#### **MAJOR MILESTONES**

- **SUBMIT REQUESTS FOR QUOTATIONS**
- **SELECT VENDOR AND LET CONTRACT**
- **RESEARCH REFERENCES, VALIDATE COMMITMENTS AND BUILD CHECKLISTS**
- **INSPECT TRAINING PROGRAMS**
- **RESOLVE DISCREPANCIES**
- **COMPLETE MODIFICATION OF PROGRAMS AND LESSONS**

#### **RESULTS**

- **VENDOR SELECTED**
- **WORK START IN APPROXIMATELY THREE WEEKS**



***NEBRASKA PUBLIC POWER DISTRICT***  
***NUCLEAR REGULATORY COMMISSION - REGION IV***

***ENFORCEMENT CONFERENCE***

***NRC INSPECTION REPORT 50-298/93-202 (JANUARY 3, 1994)***

***APRIL 4, 1994***



A/17

## AGENDA

**INTRODUCTION/OVERVIEW**

**G.R. HORN**

**PERFORMANCE IMPROVEMENT RESULTS**

**G.R. HORN**

**DISCUSSION OF ISSUES**

- **INADEQUATE PROCEDURES/  
PROCEDURE ADHERENCE**
- **TECHNICAL SPECIFICATION  
COMPLIANCE (LEVEL INSTR.)**
- **TRAINING**
- **FIRE DOORS**
- **CONFIGURATION CONTROL**
- **DESIGN MODIFICATIONS**

**R.L. GARDNER**

**R.L. GARDNER**

**E.M. MACE**

**E.M. MACE**

**J.E. LYNCH**

**J.E. LYNCH**

**CLOSING REMARKS**

**G.R. HORN**



**INTRODUCTION/OVERVIEW**

**G.R. HORN**



## **INTRODUCTION/OVERVIEW**

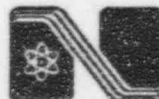
**PRESENTATION ADDRESSES SEVEN CATEGORIES OF DEFICIENCIES IDENTIFIED IN THE JANUARY 3, 1994, NRC INSPECTION REPORT WHICH ARE BEING CONSIDERED BY THE NRC FOR ESCALATED ENFORCEMENT.**

- **ALL DEFICIENCIES ARE BEING ADDRESSED BY ISSUE-SPECIFIC CORRECTIVE ACTIONS.**
- **BROAD CONCERNS EXPRESSED BY THE NRC IN THE OSTI INSPECTION REPORT COVER LETTER WILL BE DISCUSSED IN DETAIL IN TODAY'S MANAGEMENT MEETING.**
  - **PROGRAMMATIC EFFORTS ONGOING.**
  - **POSITIVE RESULTS.**
- **ISSUE-SPECIFIC AND PROGRAMMATIC CORRECTIVE ACTIONS HAVE BEEN PRIORITIZED TO ENSURE THAT MORE SIGNIFICANT SAFETY AND REGULATORY CONCERNS ARE PROMPTLY ADDRESSED.**



## INTRODUCTION/OVERVIEW (CONT'D)

- *ALTHOUGH NPPD DISAGREES WITH ONE APPARENT VIOLATION, NRC RAISED A VALID ISSUE -- ACTIONS HAVE BEEN TAKEN TO ADDRESS NRC CONCERNS.*
- *MOST APPARENT VIOLATIONS OCCURRED BEFORE OR DURING ONGOING CULTURE/PERFORMANCE IMPROVEMENT EFFORTS.*
- *LIKELIHOOD OF REPEAT OCCURRENCES HAS BEEN MINIMIZED DUE TO INCREASED MANAGEMENT OVERVIEW AND PERFORMANCE IMPROVEMENT PROGRESS.*



MATRIX OF ISSUES VS. SPECIFIC VS. PROGRAMMATIC CORRECTIVE ACTIONS

<u>ENF. ISSUE</u>	<u>DESCRIPTION</u>	<u>EVENT DATE</u>	<u>DISCOVERY DATE</u>	<u>SPECIFIC CORR. ACTION</u>	<u>PROGRAMMATIC CORR. ACTION</u>
I.1	HOUSEKEEPING	INDEF.	11/93	DR 94-220	*
I.2	BATTERY CHARGER, FUEL OIL TRANSFER PUMP PM	11/93	11/93	DR 94-267	RLG-94-02
I.3	CONTROL BLDG. VENT. FAN MOTOR GREASE MIXING	9/29/93	11/93	DR 94-179	*
<i>I.4</i>	<i>CONTROL BLDG. DAMPERS PM</i>	<i>8/90</i>	<i>11/93</i>	<i>DR 93-542</i>	<i>REW-94-03</i>
I.5	MANIPULATION OF SLC VALVES	11/93	11/93	DR 93-492	MGMT-94-01
I.6	DEFERRED TEMP. MODS	5,6/93	11/93	DR 93-553	*
II.1	ADDIT. WORK ON CLOSED MWR	1/92	11/93	DR 94-265	*
II.2	HPCI OIL PRESS. SET. TOLER.	9/93	11/93	DR 94-252	MGMT-94-01
II.3	ADDL. WORK ON MWR - LEFT OPEN	11/93	11/93	DR 94-245, 93-493	*
II.4	PUMP FREQUENCY TESTING	8/93	8/93	MISC.	*
<i>II.5</i>	<i>OPERATOR AIDS</i>	<i>INDEF.</i>	<i>11/93</i>	<i>MISC.</i>	*
II.6	TRAINING ATTEND. RECORDS	1/93	11/93	NCR 93-237	*
III	SUPPRESS/TORUS LS	1/92	11/93	DR 93-549 NCR 94-052	MGMT-94-01
<i>IV.1</i>	<i>STA CERTIFICATION</i>	<i>10/93</i>	<i>10/93</i>	<i>NCR 93-229</i>	<i>EMM-94-02, 07</i>
<i>IV.2</i>	<i>FIRE BRIG. CERTIFICATION</i>	<i>3/91</i>	<i>11/93</i>	<i>NCR 93-243, 228, DR 93-556, 557</i>	<i>EMM-94-02, 07</i>
V.1	REPL. ORIFICE	7/93	11/93	DR 93-294	REW-94-03
V.2	RHR DRAIN LINE	3/93	11/93	DR 94-246	MGMT-94-01
V.3	RHR SPOOL PIECE TORQUE	3/93	11/93	DR 93-551	MGMT-94-01 RLG-94-01
VI	FIRE DOORS	11/93	11/93	NCRs 93-226, 227, 239, 247, 249	RLG-94-01
<i>VII</i>	<i>DESIGN CONTR. PIPING/INSUL.</i>	<i>11/93</i>	<i>11/93</i>	<i>DR 93-522, NCR 93-230</i>	<i>MGMT-94-01</i>

- "\*" indicates that the item is more appropriately addressed by issue-specific corrective actions.
- Italics indicate that the violation was licensee-identified.



**DISCUSSION OF APPARENT VIOLATIONS**

**INADEQUATE PROCEDURES**

**R.L. GARDNER**



## **INADEQUATE/FAILURE TO FOLLOW PROCEDURES OVERVIEW**

93-202-01/92-202-02

### **CAUSE SUMMARY**

- *INATTENTION TO DETAIL.*
- *IMPROPER BALANCE BETWEEN SKILL OF THE CRAFT AND PROCEDURE DETAIL.*
- *ACCEPTANCE OF LESS THAN ADEQUATE PROCEDURES TO DO WORK.*

### **FOCUS OF CORRECTIVE ACTIONS**

- *ENSURE THAT PERSONNEL ARE PROPERLY TRAINED/SKILLED.*
- *MANAGEMENT EFFORTS TO IMPROVE SAFETY CULTURE/IMPROVE QUESTIONING ATTITUDES [MGMT-94-01].*
- *DEVELOPMENT AND UTILIZATION OF FEEDBACK MECHANISMS -- DESCRIBING PROCEDURAL CONCERNS, BOTH ADEQUACY AND ADHERENCE.*
- *PROCEDURE CHANGES.*



## **INADEQUATE/FAILURE TO FOLLOW PROCEDURES OVERVIEW**

**93-202-01/92-202-02**

### **RESULTS ACHIEVED**

- **WORKER FEEDBACK ON PROCEDURE INADEQUACIES HAS IMPROVED.**
- **INCREASED NUMBER OF DRs AND NCRs.**
- **IMPROVED ATTENTION TO DETAIL.**



**APPARENT VIOLATION 93-202-01 (EXAMPLE 1)**

***NPPD FAILED TO INCORPORATE COMMITMENTS FOR HOUSEKEEPING REQUIREMENTS INTO PROCEDURES.***

***NPPD AGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V AND THE QAP.***

**CAUSE:**

***INATTENTION TO DETAIL REGARDING CONFIRMATION THAT THE COMMITMENT HAD BEEN INCORPORATED INTO APPROPRIATE PROCEDURES.***

**SIGNIFICANCE:**

- ***MINIMAL SAFETY SIGNIFICANCE.***
- ***SOME REGULATORY SIGNIFICANCE.***



**APPARENT VIOLATION 93-202-01 (EXAMPLE 1) (CONT'D)**

**CORRECTIVE ACTIONS:**

- ***AFFECTED AREAS CLEANED UP IMMEDIATELY.***
- ***ACTIONS HAVE BEEN TAKEN TO ENSURE THAT APPROPRIATE SAMPLING PROCEDURES INCORPORATE CLEANLINESS REQUIREMENTS.***
- ***DR 94-220 PREPARED TO ASSESS EXTENT OF CONDITION AND ENSURE DEVELOPMENT OF APPROPRIATE BROAD CORRECTIVE ACTIONS.***
- ***BASED ON CUMULATIVE IMPACT OF RECENT EVENTS, NPPD WILL PERFORM A REEVALUATION OF SYSTEM CLEANLINESS COMMITMENTS.***



**APPARENT VIOLATION 93-202-01 (EXAMPLE 2)**

**PREVENTIVE MAINTENANCE TASKS DEALING WITH CLEANING THE 24-V BATTERY CHARGERS AND WITH PERFORMING A VISUAL INSPECTION OF THE DIESEL FUEL OIL TRANSFER PUMP DID NOT HAVE SUFFICIENT DETAIL.**

**NPPD AGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.**

**CAUSE:**

**BALANCE BETWEEN SKILL OF THE CRAFT AND PROCEDURAL DETAIL WAS INADEQUATE.**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **MINIMAL REGULATORY SIGNIFICANCE.**



**APPARENT VIOLATION 93-202-01 (EXAMPLE 2) (CONT'D)**

**CORRECTIVE ACTIONS:**

- **DR 94-267 INITIATED.**
- **THE PM WILL BE REVISED PRIOR TO NEXT USE.**
- **PROGRAM ENHANCEMENTS [RLG-94-02] ARE BEING IMPLEMENTED FOR PM TASKS UNDER THE RESPONSIBILITY OF THE MAINTENANCE DEPARTMENT TO ASSESS AND DOCUMENT THE ADEQUACY OF PM WORK INSTRUCTIONS AND TO REVISE THOSE PMs THAT ARE INADEQUATE.**
  - **BALANCE BETWEEN SKILL OF THE CRAFT AND PROCEDURAL DETAIL WILL BE ADDRESSED.**
  - **PRIORITY WILL BE ESTABLISHED TO ENSURE THAT PMs ARE REVISED PRIOR TO USE.**



**APPARENT VIOLATION 93-202-01 (EXAMPLE 3)**

**PM TASK 07272 (DEVELOPED FOR THE CONTROL BUILDING VENTILATION FAN MOTORS) DID NOT HAVE PROVISIONS THAT WOULD PREVENT MIXING INCOMPATIBLE GREASES.**

**NPPD AGREES THAT IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.**

**CAUSE:**

- **PROCESS SHOULD HAVE ENSURED THAT AN ADEQUATE REVIEW OF LUBRICATION CRITERIA OCCURS FOR DESIGN/MAINTENANCE DOCUMENTS.**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**





**APPARENT VIOLATION 93-202-01 (EXAMPLE 3) (CONT'D)**

**CORRECTIVE ACTIONS:**

- **REVISED MAINTENANCE PROCEDURE 7.0.2, "WORK ITEM TRACKING-PREVENTIVE MAINTENANCE" TO ENSURE APPROPRIATE REVIEW OF PM ADDITIONS AND/OR CHANGES THAT INVOLVE LUBRICANTS.**
  - **ENSURE APPROPRIATE COMMUNICATIONS BETWEEN DESIGN CHANGE PROCESS AND LUBRICANT CONTROL PROCESS.**
- **DR 94-179 INITIATED.**
- **DETAILED ASSESSMENT OF ALL PMs PERFORMED TO PROVIDE FURTHER ASSURANCE THAT SAFETY RELATED EQUIPMENT DID NOT HAVE INCOMPATIBLE GREASES.**
- **PM 07272 WILL BE REVISED BEFORE NEXT USE.**



## **APPARENT VIOLATION 93-202-01 (EXAMPLE 4)**

**THE WEEKLY PM CYCLE OF SIX CONTROL BUILDING ACTUATORS HAD NOT BEEN PERFORMED SINCE THEY WERE INSTALLED IN 1990. THE PM ITEM HAD BEEN IDENTIFIED IN THE DESIGN CHANGE PACKAGE UNDER WHICH THE ACTUATORS WERE INSTALLED, BUT THE PM TASK WAS NOT PREPARED AND INCORPORATED INTO THE MAINTENANCE PROGRAM.**

**NPPD AGREES THAT THIS SELF-IDENTIFIED FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.**

### **CAUSE:**

**FAILURE TO ENSURE THAT THE PM WAS INCORPORATED IN APPROPRIATE PROCEDURES IN A TIMELY MANNER.**

### **SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**



## **APPARENT VIOLATION 93-202-01 (EXAMPLE 4) (CONT'D)**

### **CORRECTIVE ACTIONS:**

- ***DR 93-542 INITIATED.***
- ***DISCUSSION WITH VENDOR TO DETERMINE APPROPRIATE FREQUENCY.***
- ***INCORPORATED QUARTERLY PM REQUIREMENTS INTO PROCEDURE 6.3.17.11.***
- ***DAMPERS SUCCESSFULLY CYCLED UNDER INTERIM MEASURES (QUARTERLY).***
- ***A REVIEW OF OPEN DCs WHICH COULD HAVE SIMILAR DEFICIENCIES HAS BEEN COMPLETED.***
- ***A REVIEW OPEN ESCs WHICH COULD HAVE SIMILAR DEFICIENCIES IS ONGOING.***
- ***PROCEDURE 3.4.11 "STATUS REPORTS" HAS BEEN REVISED TO REQUIRE TIMELY SUBMITTAL REVIEW AND "IMPLEMENTATION" OF PMs.***
- ***CAUSES ALREADY BEING ADDRESSED IN ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [REW-94-03].***



**APPARENT VIOLATION 93-202-01 (EXAMPLE 5)**

**DURING THE PERFORMANCE OF A SURVEILLANCE TEST FOR STANDBY LIQUID CONTROL PUMP OPERABILITY, AN OPERATOR MANIPULATED TWO VALVES THAT WERE REQUIRED TO PERFORM THE TEST, BUT WERE NOT INCLUDED IN PROCEDURAL GUIDANCE.**

**NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V.**

**CAUSE:**

- **POTENTIALLY CONFLICTING GUIDANCE WITHIN PROCEDURE 2.0.1.**

**SIGNIFICANCE:**

- **NO SAFETY SIGNIFICANCE.**
- **MINIMAL REGULATORY SIGNIFICANCE.**



**APPARENT VIOLATION 93-202-01 (EXAMPLE 5) (CONT'D)**

**CORRECTIVE ACTIONS:**

- **DR 93-492 INITIATED.**
- **TPCN 93-321 WAS INITIATED TO PROVIDE INTERIM GUIDANCE.**
  - ° **PROCEDURE 2.0.1 BEING REVISED TO CLARIFY GUIDANCE TO OPERATORS.**
- **MANAGEMENT EXPECTATIONS CONCERNING PROCEDURE ADHERENCE STRESSED IN OPERATIONS MANAGER LETTER TO ALL OPERATIONS DEPARTMENT PERSONNEL.**
- **PROCEDURE 6.3.8.2, "SLC PUMP OPERABILITY" REVISED TO LIST ADDITIONAL POSSIBLE VALVE MANIPULATIONS.**
- **CAUSE ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [MGMT-94-01].**



## **APPARENT VIOLATION 93-202-01 (EXAMPLE 6)**

**PROCEDURE 2.0.7 FAILED TO PROVIDE MEASURES TO ENSURE THAT THE NECESSARY REVIEWS ASSOCIATED WITH TEMPORARY MODIFICATIONS (WHICH WERE DEFERRED BECAUSE THE AFFECTED SYSTEM WAS OUT OF SERVICE) WERE PERFORMED IN THE EVENT THE SYSTEM WAS PLACED BACK IN SERVICE WITH THE TEMPORARY MODIFICATION STILL INSTALLED. AS A RESULT OF THIS DEFICIENCY, AT LEAST TWO IN-SERVICE TEMPORARY MODIFICATIONS (PTMs FOR PLANT SECURITY) HAD NOT BEEN PROPERLY REVIEWED.**

**NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V.**

### **CAUSE:**

- **FAILURE TO RECOGNIZE NECESSARY CHECKS AND BALANCES WHEN DEVIATING FROM NORMAL PTM PROCESS.**



**APPARENT VIOLATION 93-202-01 (EXAMPLE 6) (CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **APPROPRIATE REVIEWS OF PTMs 93-31 AND 93-53 WERE PERFORMED.**
- **DR 93-553 ISSUED.**
- **TEMPORARY PROCEDURE CHANGE 93-355 IMPLEMENTED AS AN INTERIM MEASURE -- DELETED SCREENING QUESTION.**
- **PROCEDURE 2.0.7 REVISED AND APPROVED ON 3/2/94. THE PROCEDURE REQUIRES REVIEWS, INCLUDING SORC APPROVAL, PRIOR TO INSTALLATION OF ANY PTM.**



**DISCUSSION OF APPARENT VIOLATIONS**

**PROCEDURE ADHERENCE**

**R.L. GARDNER**





## **APPARENT VIOLATION 93-202-02 (EXAMPLE 1)**

### **DESCRIPTION:**

**A MAINTENANCE WORK REQUEST WAS IMPROPERLY USED TO PERFORM ADDITIONAL WORK ON LEVEL INDICATOR PC-LI-13. THE ADDITIONAL WORK INCLUDED POST-MAINTENANCE TESTING AND CORRECTING AN INCORRECT LEVEL READING AFTER THE WORK IDENTIFIED ON THE MWR HAD BEEN COMPLETED. THE ADDITIONAL WORK WAS NOT SPECIFIED IN THE APPROVED MWR.**

**NPPD BELIEVES THAT A VIOLATION OCCURRED ON A DIFFERENT BASIS -- SINCE THE PROCEDURE ON MWRs WAS INADEQUATE A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V OCCURRED.**

### **CAUSES:**

- **UNCLEAR GUIDANCE FOR WHAT SHOULD BE CONSIDERED WITHIN THE "SCOPE OF WORK" FOR AN MWR.**
- **PROCEDURAL REQUIREMENTS FOR TROUBLESHOOTING INADEQUATE.**



**APPARENT VIOLATION 93-202-02 (EXAMPLE 1) (CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DR 94-265 INITIATED.**
- **TPCN ISSUED TO CLARIFY INSTRUCTIONS TO MORE CLEARLY QUANTIFY "SCOPE OF WORK" AND "TROUBLESHOOTING."**



## **APPARENT VIOLATION 93-202-02 (EXAMPLE 2)**

**MWR 93-3590 WAS WRITTEN TO ADJUST THE OIL PRESSURE ON THE HIGH PRESSURE COOLANT INJECTION TURBINE LUBE OIL SYSTEM TO A SPECIFIC PRESSURE (12 psig), BUT IT DID NOT SPECIFY THE ACCEPTABLE TOLERANCE FOR THE PRESSURE SETTING (10-12 psig) PER SURVEILLANCE PROCEDURE 6.3.3.1.1, "HPCI IST AND QUARTERLY TEST MODE SURVEILLANCE OPERATION," REV. 2. THE CRAFTS PERSON ADJUSTED THE PRESSURE TO 11 psig AND DID NOT PROVIDE AN EXPLANATION FOR THE DISCREPANCY.**

**NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS".**

### **CAUSE:**

- **NOT RECOGNIZING THE NEED TO DOCUMENT AND EXPLAIN DEVIATIONS TO WORK INSTRUCTIONS.**



**APPARENT VIOLATION 93-202-02 (EXAMPLE 2) (CONT'D)**

**SIGNIFICANCE:**

- **NO SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DR 94-252 INITIATED.**
- **ASSESSED ADEQUACY OF AS-LEFT CONDITION.**
- **RE-EMPHASIS TO PERSONNEL ON THE NECESSITY OF STRICT COMPLIANCE TO PROCEDURES.**
- **NPPD MANAGEMENT HAS INITIATED LONG TERM CORRECTIVE ACTIONS TO IMPROVE ATTENTION TO DETAIL AND BETTER ENSURE APPROPRIATE QUESTIONING ATTITUDES [MGMT-94-01].**



### **APPARENT VIOLATION 93-202-02 (EXAMPLE 3)**

**CONTRARY TO APPROVED MAINTENANCE PROCEDURES, MWRs WERE FOUND TO HAVE BEEN LEFT OPEN FOR EXTENDED PERIODS TO PERMIT MULTIPLE WORK ACTIVITIES TO BE PERFORMED ON THE COMPONENT USING THE OPEN MWR. USE OF A RWCU PUMP MWR FOR INTENDED REPAIRS AND A SUBSEQUENTLY DISCOVERED OIL LEAK AND USE OF AN MWR FOR SGT INDICATOR TROUBLE SHOOTING AND SUBSEQUENT WORK (AFTER THE MWR HAD BEEN CLOSED) WERE CITED AS EXAMPLES OF THIS APPARENT VIOLATION.**

**NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V.**

#### **CAUSE:**

- **UNCLEAR GUIDANCE FOR WHAT SHOULD BE CONSIDERED WITHIN THE "SCOPE OF WORK" FOR AN MWR.**
- **PROCEDURAL REQUIREMENTS FOR TROUBLESHOOTING INADEQUATE.**



## APPARENT VIOLATION 93-202-02 (EXAMPLE 3) (CONT'D)

### SIGNIFICANCE:

- *MINIMAL SAFETY SIGNIFICANCE.*
- *SOME REGULATORY SIGNIFICANCE.*

### CORRECTIVE ACTIONS:

- *A REVIEW OF THE MWRs WAS PERFORMED TO ENSURE THAT WORK WAS PERFORMED APPROPRIATELY.*
- *MWR 93-3927 WAS ISSUED TO ALLOW ADDITIONAL WORK (SGT).*
- *DRs 93-493 AND 94-245 WERE ISSUED.*
- *TPCN ISSUED TO CLARIFY INSTRUCTIONS TO MORE CLEARLY QUANTIFY "SCOPE OF WORK" AND "TROUBLESHOOTING."*



## **APPARENT VIOLATION 93-202-02 (EXAMPLE 4)**

### **DESCRIPTION:**

**ENGINEERING PROCEDURE 3.9 REQUIRES THAT PUMPS FAILING INSERVICE TESTING BE REPAIRED, REPLACED, OR HAVE AN ENGINEERING ANALYSIS PERFORMED DEMONSTRATING THAT THE CONDITION DID NOT IMPAIR PUMP OPERABILITY AND THAT THE PUMP WOULD PERFORM ITS INTENDED FUNCTION. THE SLC PUMPS AND 11 ADDITIONAL COMPONENTS WERE FOUND TO HAVE BEEN ON INCREASED FREQUENCY TESTING WITHOUT THE REQUIRED REPAIR, REPLACEMENT, OR ENGINEERING ANALYSIS HAVING BEEN PERFORMED. THE SLC PUMPS HAD BEEN ON INCREASED TESTING FREQUENCY SINCE DECEMBER 1990 WITHOUT HAVING BEEN REPAIRED, REPLACED, OR ANALYZED.**

**NPPD DISAGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V AND ENGINEERING PROCEDURE 3.9.**

- **HOWEVER, NPPD AGREES THAT A PROBLEM EXISTED WITH COMMUNICATING THESE INSTANCES TO MANAGEMENT AND AS A RESULT, AT THE TIME OF THE OSTI INSPECTION, AGGRESSIVE ACTIONS TO RESOLVE COMPONENT PROBLEMS HAD NOT BEEN TAKEN.**



## APPARENT VIOLATION 93-202-02 (EXAMPLE 4)

### BASIS:

- *PROCEDURE 3.9 AND ASME SECTION XI, IWP-3230(a) CODE REQUIREMENTS ADDRESS "ALERT" AND "ACTION" CATEGORIES.*
- *THE PUMPS WERE APPROPRIATELY CATEGORIZED IN THE "ALERT" CATEGORY.*
- *ALL "ALERT" REQUIREMENTS -- MAINTAINING INCREASED TESTING FREQUENCY UNTIL THE CAUSE OF THE DEVIATION IS DETERMINED AND THE CONDITION CORRECTED -- WERE SATISFIED.*
- *CORRECTIVE ACTION MAY INCLUDE REPAIR, REPLACEMENT, OR ENGINEERING ANALYSIS.*
- *UPON COMPLETION OF CORRECTIVE ACTION, NORMAL TESTING FREQUENCY MAY BE RESUMED.*





**APPARENT VIOLATION 93-202-02 (EXAMPLE 4) (CONT'D)**

**BASIS (CONT'D):**

- **"ACTION" CATEGORY REQUIRES THE FOLLOWING:**
  - **DECLARE THE PUMP INOPERABLE AND DO NOT RETURN THE PUMP TO SERVICE UNTIL THE CAUSE OF THE DEVIATION HAS BEEN DETERMINED AND THE CONDITION CORRECTED.**
  - **CORRECTIVE ACTION MAY INCLUDE REPAIR, REPLACEMENT OR ENGINEERING ANALYSIS.**
- **THE CITED COMPONENTS WERE NEVER IN THE "ACTION" CATEGORY -- THEREFORE, ITS REQUIREMENTS WERE NEVER APPLICABLE.**



**APPARENT VIOLATION 93-202-02 (EXAMPLE 4) (CONT'D)**

**ACTIONS TAKEN:**

- ***NPPD MANAGEMENT IS NOT SATISFIED WITH THE PROMPTNESS THAT COMPONENTS WERE RETURNED TO THE NORMAL TESTING FREQUENCY.***
  - ***QA AUDIT 93-18-A WAS ISSUED PRIOR TO THE OSTI. IN RESPONSE, A PLAN WAS BEING DEVELOPED FOR EACH COMPONENT ON THE INCREASED TESTING FREQUENCY LIST.***
  - ***ACTIONS HAVE BEEN TAKEN TO ENSURE THAT THE SYSTEM ENGINEER IS BETTER INFORMED OF MANAGEMENT EXPECTATIONS FOR EXPEDITIOUSLY RESTORING COMPONENTS TO THE NORMAL TESTING FREQUENCY.***
- ***NOW, A CR IS WRITTEN WHENEVER A COMPONENT ENTERS THE "ALERT" RANGE TO ENSURE THAT MANAGEMENT MAINTAINS AWARENESS OF THE SITUATION.***
- ***PROCEDURE 3.9 HAS BEEN REVISED TO MORE CLEARLY REFLECT THE INTENT OF THE APPLICABLE CODE REQUIREMENTS FOR INCREASED TESTING FREQUENCY.***



## **APPARENT VIOLATION 93-202-02 (EXAMPLE 5)**

***NPPD FAILED TO CONTROL OPERATOR AIDS, INCLUDING "GREEN BAND" MARKINGS CONSISTENT WITH PROCEDURE 2.0.9.***

***NPPD DISAGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V FOR FAILURE TO FOLLOW OPERATIONS PROCEDURE 2.0.9.***

- ***HOWEVER, NPPD CONCLUDES THAT A VIOLATION OF CRITERION V OCCURRED FOR A DIFFERENT REASON -- APPROPRIATE PROCEDURES WERE NOT IN PLACE TO CONTROL HUMAN FACTORS ENHANCEMENTS SUCH AS THE ORANGE DOTS AND "GREEN BANDS."***

### **CAUSES:**

- ***ORANGE DOTS DO NOT MEET THE THRESHOLD OR INTENT OF AN "OPERATOR AID" AS IDENTIFIED IN PROCEDURE 2.0.9 AND INPO GOOD PRACTICE OP-207.***
- ***NPPD DID NOT CONSIDER THE ORANGE DOTS OR GREEN BANDING TO BE AN OPERATOR AID.***
- ***ONLY SOME OF THE GREEN BANDING WAS CONTROLLED BY PROCEDURE 3.26.1, "METER BANDING CHANGE CONTROL."***



**APPARENT VIOLATION 93-202-02 (EXAMPLE 5) (CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **ORANGE DOTS REMOVED.**
- **PLANT WALKDOWN CONDUCTED TO IDENTIFY/REMOVE ANY OTHER DOTS AND TO REMOVE OR PREPARE WORK ITEMS TO REMOVE INAPPROPRIATE FIELD METER BANDING.**
- **PROCEDURE 3.26.1 WILL BE MODIFIED TO INCLUDE BANDING CONTROL ON INSTRUMENTS IN THE FIELD.**
- **CNS PROCEDURE BEING DEVELOPED TO ADDRESS LABELING IN THE FIELD.**



**APPARENT VIOLATION 93-202-02 (EXAMPLE 5) (CONT'D)**

**CORRECTIVE ACTIONS (CONT'D):**

- **METER BANDING IN THE FIELD WILL BE LIMITED TO METERING THAT IS NOT AVAILABLE IN THE CONTROL ROOM AND IS USED FOR SCRAM FREQUENCY REDUCTION OR TO MEET OTHER REGULATORY AGENCY (E.G., EPA, ETC) REQUIREMENTS.**
- **CHANGE REQUESTS HAVE BEEN WRITTEN FOR ALL METER BANDING IN THE FIELD THAT WILL NOT BE REMOVED.**
  - **HUMAN FACTORS STANDARDS WILL BE APPLIED.**
- **FIELD METER BANDING NOT REQUIRED AS A RESULT OF THE PROCEDURE REVISION WILL BE REMOVED.**



## **APPARENT VIOLATION 93-202-02 (EXAMPLE 6)**

**CONTRARY TO PROCEDURE NTI-02, THE START AND COMPLETION DATES IN VARIOUS ATTENDANCE RECORDS CONCERNING THE FOURTH QUARTER 1992 AND FIRST QUARTER 1993 FIRE BRIGADE TRAINING WERE CHANGED BY OVERWRITING THE ORIGINAL DATES ON THE FORM.**

**NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 CFR PART 50, APPENDIX B, CRITERION V AND TRAINING PROCEDURE NTI-02.**

### **CAUSE:**

- **FAILURE BY AN INDIVIDUAL TO IMPLEMENT QA REQUIREMENTS FOR MODIFYING OFFICIAL RECORDS.**

### **SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**



**APPARENT VIOLATION 93-202-02 (EXAMPLE 6) (CONT'D)**

**CORRECTIVE ACTIONS:**

- **TRAINING DATA CORRECTED IN COMPUTER DATABANK.**
- **INVESTIGATION CONDUCTED TO DETERMINE EXTENT AND INTENT OF EVENT.**
- **INVOLVED INSTRUCTOR WAS DISCIPLINED.**
- **TRAINING MANAGER HELD DEPARTMENT MEETING OUTLINING THE CIRCUMSTANCES OF THE EVENT, EMPHASIZING THE IMPORTANCE OF ACCURATE RECORDS.**
- **NCR 93-237.**



**DISCUSSION OF APPARENT VIOLATIONS**

**TECHNICAL SPECIFICATIONS - WATER LEVEL INSTRUMENTATION**

**R.L. GARDNER**





**APPARENT VIOLATION 93-202-03**

**ON JANUARY 30, 1992, BOTH SUPPRESSION CHAMBER/TORUS WATER LEVEL INSTRUMENTS (PC-LI-12 AND PC-LI-13) WERE RENDERED INOPERABLE DURING THE PERFORMANCE OF A MAINTENANCE WORK REQUEST, AND AN ORDERLY SHUT DOWN WAS NOT COMMENCED AFTER 6 HOURS AND THE REACTOR WAS NOT PLACED IN HOT SHUTDOWN WITHIN THE FOLLOWING 6 HOURS. THE INSTRUMENTS WERE NOT DECLARED OPERABLE UNTIL THE FOLLOWING DAY.**

**NPPD AGREES THAT THIS FINDING REPRESENTS A VIOLATION OF TECHNICAL SPECIFICATION TABLE 3.2.F.**



**APPARENT VIOLATION 93-202-03 (CONT'D)**

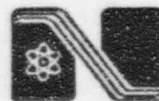
**CAUSES:**

**INATTENTION TO DETAIL IN FOLLOWING PROCEDURE REQUIREMENTS.**

- **AS STATED IN PROCEDURE 2.0.2, "OPERATIONS LOGS AND REPORTS," TECHNICAL SPECIFICATION INOPERABILITY MUST BE LOGGED IN THE SHIFT SUPERVISORS' LOG AND SHOULD BE LOGGED IN THE CONTROL ROOM LOG.**
- **FAILURE TO RECOGNIZE THAT PMT HAD NOT BEEN PERFORMED AND THAT THE METER WAS STILL "INOPERABLE" WHEN THE SECOND METER WAS REMOVED.**

**SIGNIFICANCE:**

- **SOME SAFETY SIGNIFICANCE.**
- **REGULATORY SIGNIFICANCE.**



## **APPARENT VIOLATION 93-202-03 (CONT'D)**

### **CORRECTIVE ACTIONS:**

- **DR 93-549 INITIATED -- SUBSEQUENTLY UPGRADED TO NCR-94-052.**
- **REVIEW OF PAST TABLE 3.2.F-RELATED MWRs PERFORMED.**
  - **HELD I&C DEPARTMENT TAILGATE SESSIONS TO DISCUSS WORKING ON INSTRUMENTATION LISTED IN TECH. SPECS.**
  - **COMPLETED TRAINING FOR OPERATOR RE TECH. SPEC. SECTIONS 3.1 AND 3.2 INSTRUMENTS.**
- **PROCEDURAL GUIDELINES HAVE BEEN DEVELOPED TO PREVENT THE INCLUSION OF MULTIPLE TECHNICAL SPECIFICATION COMPONENTS INTO A SINGLE MWR.**
- **CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [MGMT-94-01].**



**DISCUSSION OF APPARENT VIOLATIONS**

**TRAINING - STAs AND SECURITY OFFICERS**

**E.M. MACE**



## **TRAINING OVERVIEW**

**93-202-04**

### **CAUSE SUMMARY**

- **LACK OF MANAGEMENT, SUPERVISORY, AND INDIVIDUAL ACCOUNTABILITY.**
- **LACK OF A QUESTIONING ATTITUDE.**

### **FOCUS OF CORRECTIVE ACTIONS**

- **MANAGEMENT INVOLVEMENT AND COMMUNICATIONS OF EXPECTATIONS.**
- **REDESIGNED TRACKING SYSTEM.**
- **COMPLIANCE MATRIX DEVELOPMENT.**

### **RESULTS ACHIEVED**

- **INCREASED AWARENESS.**
- **NUMBER OF CERTIFICATION DELINQUENCIES SUBSTANTIALLY REDUCED.**
- **TRACKING SYSTEM AND COMPLIANCE MATRIX PROCEEDING ON SCHEDULE.**



**APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2)**

**STAs**

**NPPD IDENTIFIED THAT BETWEEN OCTOBER 14 AND 21, 1993, WITH THE PLANT IN THE RUN MODE, FIVE SHIFT TECHNICAL ADVISORS STOOD WATCH EVEN THOUGH THEIR TRAINING HAD EXPIRED.**

**FIRE BRIGADE**

**NPPD IDENTIFIED THAT DURING 1993, SECURITY OFFICERS WHO WERE MEMBERS OF THE FIRE BRIGADE WERE NOT UNDERGOING QUARTERLY FIRE BRIGADE TRAINING. IN ADDITION, TRAINING SESSIONS HAD NOT BEEN HELD QUARTERLY FOR ALL MEMBERS OF THE FIRE BRIGADE.**

**NPPD AGREES THAT THE FINDINGS ARE EXAMPLES OF VIOLATIONS OF 10 C.F.R. PART 50, APPENDIX B, CRITERION XVI (RE STAs AND FIRE BRIGADE) AND TECHNICAL SPECIFICATION 6.1.4.B (RE FIRE BRIGADE).**



## APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2) (CONT'D)

### CAUSES:

#### STA

- *INADEQUATE COMMITMENT TO TRAINING PROGRAM IMPLEMENTATION BY MANAGEMENT AND INDIVIDUALS.*

#### FIRE BRIGADE

- *NPPD IMPROPERLY CONCLUDED THAT THE REQUIREMENT FOR QUARTERLY TRAINING DID NOT APPLY TO FIRE BRIGADE MEMBERS WHO DID NOT COME FROM THE OPERATIONS ORGANIZATION.*
- *PERCEIVED PRIORITY OF OPERATOR LICENSING TRAINING OVER FIRE BRIGADE TRAINING.*
- *INAPPROPRIATE SUPERVISORY GUIDANCE.*



**APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2) (CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DRs 93-556, 557 INITIATED.**
- **NON-CONFORMANCE REPORTS 93-228, 229 AND 243 INITIATED.**
- **TRAINING DELINQUENCIES RESOLVED.**
- **VICE-PRESIDENT NUCLEAR ISSUED MEMORANDUM THAT REAFFIRMED MANAGEMENT COMMITMENT TO TRAINING.**





**APPARENT VIOLATION 93-202-04 (EXAMPLES 1 & 2) (CONT'D)**

**CORRECTIVE ACTIONS (CONT'D):**

- **REVISED TRAINING PROGRAM DESCRIPTION FOR STA AND FIRE BRIGADE.**
- **REDESIGNING TRAINING TRACKING SYSTEM.**
- **DEVELOPING A TRAINING COMPLIANCE MATRIX.**
- **CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [EMM-94-02, EMM-94-07].**



**DISCUSSION OF APPARENT VIOLATIONS**

**FIRE DOORS**

**E.M. MACE**



## **FIRE DOORS OVERVIEW**

93-202-06

### **CAUSE SUMMARY**

- ***INADEQUATE MANAGEMENT OVERSIGHT OF FIRE DOOR INSPECTION PROGRAM***

### **FOCUS OF CORRECTIVE ACTIONS**

- ***INTERIM ACTIONS***
  - ***TAILGATE***
  - ***PROCEDURE UPGRADES***
  - ***FPE OVERSIGHT***
- ***TRAINING PROGRAM UPGRADES***
- ***MAINTENANCE PROCEDURE UPGRADE***
- ***FIRE PROTECTION PROGRAM SELF-ASSESSMENT***
- ***ORGANIZATION AND ACCOUNTABILITY IMPROVEMENTS***



## *FIRE DOORS OVERVIEW*

### *RESULTS ACHIEVED*

- *INTERIM ACTIONS MAINTAINING FIRE DOOR OPERABILITY*
- *CRAFT FEEDBACK FROM PROCEDURE INADEQUACIES*



## APPARENT VIOLATION 93-202-06

**IT WAS DETERMINED THAT SEVERAL FIRE DOORS WERE INOPERABLE DUE TO GAP WIDTHS AND OTHER HARDWARE DEFICIENCIES.**

**NPPD AGREES THAT HAVING FIRE DOORS INOPERABLE IS A VIOLATION OF TECHNICAL SPECIFICATION 3.19.A.**

### CAUSES:

- **INADEQUATE MANAGEMENT OVERSIGHT OF FIRE DOOR INSPECTION PROGRAM.**
  - **TRAINING OF INSPECTION PERSONNEL NOT FORMALIZED.**
  - **ERRONEOUS ASSUMPTION THAT PERSONNEL INSPECTING FIRE DOORS HAD NECESSARY SKILLS.**
  - **BASED ON ACTUAL SKILL LEVEL OF PERSONNEL, PROCEDURE 6.4.5.2.12 WAS INADEQUATE.**

### SIGNIFICANCE:

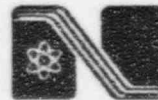
- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**



## **APPARENT VIOLATION 93-202-06 (CONT'D)**

### **CORRECTIVE ACTIONS:**

- **POSTED FIRE WATCHES (COMPENSATORY MEASURES PER TECHNICAL SPECIFICATIONS).**
- **INITIATED MWRs 93-3914, 93-4068, 93-4069, AND 93-4129 TO REPAIR DOORS.**
  - **DETAIL PROVIDED ON HOW TO PERFORM INSPECTIONS -- WALK-THROUGHS WITH FIRE PROTECTION PERSONNEL.**
- **NCRs 93-226, 227, 239, 247, AND 249 ISSUED.**
- **FIRE DOORS REINSPECTED WITH FIRE PROTECTION PERSONNEL PRESENT AND REPAIRED AS NEEDED AND PROMPTLY RETURNED TO FULL OPERABLE STATUS.**
- **FIRE PROTECTION ENGINEERING EVALUATIONS PERFORMED ON EFFECTS OF DISCREPANCIES ON FIRE PROTECTION CAPABILITIES.**
- **PROCEDURE REVISED AS APPROPRIATE.**



## APPARENT VIOLATION 93-202-06 (CONT'D)

### CORRECTIVE ACTIONS (CONT'D):

- **INITIATED ACTIVE PARTICIPATION BY FIRE PROTECTION SUPERVISION IN FIRE DOOR INSPECTIONS UNTIL PROCEDURES ARE REVISED AND EFFECTIVENESS OF TRAINING CONFIRMED.**
- **A CORRECTIVE ACTION REVIEW BOARD (CARB 93-03) WAS FORMED TO EVALUATE THIS EVENT AND TO MAKE RECOMMENDATIONS TO MANAGEMENT FOR RECURRENCE PREVENTION.**
  - **PROGRAMMATIC CONTROLS ON FIRE DOORS HAVE BEEN REVISED TO ENSURE THAT OPERABILITY REQUIREMENTS CAN BE PROPERLY ASSESSED AND APPROPRIATE FIRE DOOR CONTROL PROCEDURES WILL BE REVISED.**
  - **A PM PROGRAM FOR HIGH TRAFFIC FIRE DOORS IS IN PROGRESS.**
  - **A FIRE DOOR INSPECTION TRAINING PROGRAM IS UNDER DEVELOPMENT.**
- **DETERMINE THAT SUFFICIENT TECHNICAL DETAIL HAS BEEN INCORPORATED INTO MAINTENANCE PROCEDURES TO ALLOW CRAFT TO PERFORM THE ACTIVITY [RLG-94-01].**



**DISCUSSION OF APPARENT VIOLATIONS**

**CONFIGURATION CONTROL**

**J.E. LYNCH**





# **CONFIGURATION CONTROL AND DESIGN MODIFICATION OVERVIEW**

93-202-05 & 93-202-07

## **CAUSE SUMMARY**

- **EXISTING PROCEDURES NOT USED**
- **CULTURAL**
  - **AWARENESS OF REQUIREMENTS**
  - **WORKING AROUND PROBLEMS**
  - **MANAGEMENT MONITORING AND EXPECTATIONS**

## **FOCUS OF CORRECTIVE ACTIONS**

- **REW-94-03**
  - **EVALUATE THE CONFIGURATION CONTROL AND DESIGN CHANGE PROCESS.**
- **CULTURAL**
  - **WORK ON IT EVERY DAY**



**CONFIGURATION CONTROL AND DESIGN MODIFICATION OVERVIEW**  
93-202-05 & 93-202-07

**RESULTS ACHIEVED**

- OVERVIEW
- THIRD-PARTY ASSESSMENT OF DESIGN CHANGE PROCESS COMPLETE
- TAILGATE SESSIONS
- WALKDOWNS
- PROCEDURE IMPROVEMENTS



## **APPARENT VIOLATION 93-202-05 (EXAMPLE 1)**

**MWR 93-2691 WAS USED TO FABRICATE A REPLACEMENT RESTRICTING ORIFICE PLATE FOR HPCI-RO-137C. NPPD FABRICATED A DUPLICATE BASED ON AN ORIFICE TO AN ADJACENT FLANGE RATHER THAN DETERMINING THE DESIGN REQUIREMENTS FOR THE MISSING ORIFICE PLATE.**

**NPPD AGREES THAT THIS FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION II.**

### **CAUSES:**

- **ALTHOUGH DESIGN REQUIREMENTS WERE ADDRESSED, EXISTING PROCEDURES WERE NOT UTILIZED.**
- **INFLEXIBILITY BUILT INTO COMPONENT FABRICATION PROCEDURE.**
- **CULTURE WAS NOT CONSISTENT WITH MANAGEMENT EXPECTATIONS.**



**APPARENT VIOLATION 93-202-05 (EXAMPLE 1 CONT'D)**

**SIGNIFICANCE:**

- **NO SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DR 93-552 INITIATED.**
- **TAILGATE SESSIONS HAVE BEEN HELD WITH ALL ENGINEERING PERSONNEL ON PROCEDURAL ADHERENCE AND WORKING AROUND PROBLEMS.**
- **ENGINEERING PROCEDURE 3.21, "FABRICATION OF REPLACEMENT PARTS" WILL BE REVIEWED TO FACILITATE THE APPLICATION OF THE PROCEDURE.**
- **CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [REW-94-03].**



**APPARENT VIOLATION 93-202-05 (EXAMPLE 2)**

**MWR 93-0855 WAS USED TO MODIFY A DRAIN LINE FROM A RESIDUAL HEAT REMOVAL PIPE IN ACCORDANCE WITH TWO MEMORANDA FROM THE NUCLEAR ENGINEERING DEPARTMENT RATHER THAN UNDER AN APPROVED DESIGN PACKAGE.**

**NPPD AGREES THAT THIS IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION II.**

**CAUSE:**

- **FAILURE TO IMPLEMENT PROCEDURE FOR PLANT MODIFICATIONS.**



**APPARENT VIOLATION 93-202-05 (EXAMPLE 2 CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DR 94-246 INITIATED.**
  - **A PROCEDURAL PROCESS WILL BE DEVELOPED FOR A GRADED APPROACH TO DESIGN CHANGE EVALUATIONS.**
- **CONFIGURATION CONTROL BEING ADDRESSED BY SITE-SPECIFIC INDUSTRY EVENTS TRAINING.**
- **CAUSES ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [MGMT-94-01].**



### **APPARENT VIOLATION 93-202-05 (EXAMPLE 3)**

**MWR 93-0801 WAS USED TO REPLACE THE RHR PUMP SUCTION SPOOL PIECES. THE SPOOL PIECE WAS TORQUED TO THE MAXIMUM VALUE ALLOWED IN MAINTENANCE WORK PRACTICE 5.1.2. WHEN THE PIPE WAS FILLED WITH WATER FOR INSERVICE LEAK TESTING, ONE OR MORE OF THE JOINTS LEAKED. THE CRAFTSMEN SUBSEQUENTLY TIGHTENED THE BOLTS TO PREVENT LEAKAGE. NO ENGINEERING INVOLVEMENT WAS OBTAINED TO ENSURE THAT THE BOLTS HAD NOT BEEN OVERSTRESSED.**

**NPPD BELIEVES THAT THE FINDING IS AN EXAMPLE OF A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION V (INADEQUATE PROCEDURE) INSTEAD OF CRITERION II (QUALITY ASSURANCE PROGRAM).**

#### **CAUSES:**

- **FAILURE TO STRICTLY FOLLOW PROCEDURE REQUIREMENTS.**
- **THE PROCEDURE WAS TOO LIMITING -- USE OF THE TERM "MAXIMUM" IN THE MAINTENANCE INSTRUCTION WAS INCORRECT -- CONSISTENT WITH INDUSTRY GUIDANCE, THE "MINIMUM" TORQUE VALUE SHOULD HAVE BEEN PROVIDED.**
- **CULTURE.**



**APPARENT VIOLATION 93-202-05 (EXAMPLE 3 CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DR 93-551 INITIATED.**
- **CONDUCTED VISUAL INSPECTION TO IDENTIFY IF FLANGE DEFORMATIONS HAVE OCCURRED.**
- **ASSESSED MAXIMUM TORQUE FOR BOLTS.**
- **CHECKED SAMPLING OF BOLT BREAK-AWAY TORQUE.**





**APPARENT VIOLATION 93-202-05 (EXAMPLE 3 CONT'D)**

**CORRECTIVE ACTIONS (CONT'D):**

- **AS AN ENHANCEMENT TO FLANGE/BOLT TORQUING PRACTICES, NPPD WILL PROVIDE MINIMUM AND MAXIMUM BOLT TORQUE CRITERIA FOR TORQUING IN MAINTENANCE WORK PRACTICES.**
- **CAUSE ADDRESSED BY ONGOING PROGRAMMATIC CORRECTIVE ACTIONS [RLG-94-01, MGMT-94-01].**



**DISCUSSION OF APPARENT VIOLATIONS**

**DESIGN MODIFICATIONS**

**J.E. LYNCH**



## **APPARENT VIOLATION 93-202-07**

**CHANGES TO THE DESIGN AND CONFIGURATION OF PIPING AND EQUIPMENT INSULATION WERE ROUTINELY MADE WITHOUT THE USE OF THE DESIGN CHANGE PROCESS. AS A RESULT, REVIEWS WERE NOT PERFORMED IN A MANNER COMMENSURATE WITH THOSE APPLIED TO THE ORIGINAL INSULATION DESIGN.**

**NPPD AGREES THAT THIS FINDING, WHICH WAS IDENTIFIED BY NPPD, REPRESENTS A VIOLATION OF 10 C.F.R. PART 50, APPENDIX B, CRITERION III.**

### **CAUSES:**

- **INADEQUATE TRAINING.**
- **UNCLEAR GUIDANCE ON MAINTENANCE OF THE PLANT CONFIGURATION.**
- **MANAGEMENT OVERSIGHT LESS THAN ADEQUATE.**



**APPARENT VIOLATION 93-202-07 (CONT'D)**

**SIGNIFICANCE:**

- **MINIMAL SAFETY SIGNIFICANCE.**
- **SOME REGULATORY SIGNIFICANCE.**

**CORRECTIVE ACTIONS:**

- **DR 93-522 INITIATED.**
- **TAILGATE SESSIONS HAVE BEEN CONDUCTED TO INFORM CNS ENGINEERS OF THIS ISSUE AND RESULTING ACTION PLANS.**
- **INTERIM INSULATION CONTROLS DEVELOPED AND DISCUSSED WITH CRAFT AND ENGINEERING -- ENSURES THAT ALL WORK IS CAPTURED UNDER THE MWR PROCESS (ENSURES ENGINEERING INVOLVEMENT).**
- **PERFORMED WALKDOWN OF A SAMPLE OF ACCESSIBLE IMPORTANT TO SAFETY SYSTEMS.**



**APPARENT VIOLATION 93-202-07 (CONT'D)**

**CORRECTIVE ACTIONS (CONT'D):**

- **PERFORMED WALKDOWN OF REMAINING ACCESSIBLE IMPORTANT TO SAFETY SYSTEMS.**
- **PLANNED INSPECTIONS OF INACCESSIBLE IMPORTANT TO SAFETY SYSTEMS.**
- **INCORPORATED LESSONS LEARNED INTO GOT TRAINING AND INDUSTRY EVENTS TRAINING.**
- **CONTINUED MANAGEMENT EMPHASIS ON IMPROVED PERSONNEL PERFORMANCE INCLUDING A HEIGHTENED QUESTIONING ATTITUDE [MGMT-94-01].**



**CLOSING REMARKS**

**G.R. HORN**



## CLOSING REMARKS

- **MAJORITY OF VIOLATIONS OCCURRED BEFORE NPPD HAD DEVELOPED AND IMPLEMENTED CULTURE/PERFORMANCE IMPROVEMENTS.**
  - **NO LONGER REPRESENTATIVE OF THE WAY BUSINESS IS DONE AT CNS.**
- **HOWEVER, NPPD STILL HAS NOT ACHIEVED A LEVEL OF PERFORMANCE THAT MEETS NPPD EXPECTATIONS.**
- **MANAGEMENT IS PROMPTLY ADDRESSING PROGRAMMATIC AND ISSUE-SPECIFIC CONCERNS.**
- **NPPD MUST AND WILL CONTINUE IMPLEMENTATION OF PERFORMANCE IMPROVEMENT EFFORTS**
  - **WILL NOT BE SATISFIED WITH SUBSTANDARD PERFORMANCE -- WE MUST FOLLOW THROUGH COMPLETELY.**



### **CLOSING REMARKS (CONT'D)**

- ***NPPD REQUESTS ENFORCEMENT DISCRETION WHEN APPROPRIATE.***
- ***SEVERAL VIOLATIONS:***
  - ***WERE IDENTIFIED AS PART OF NPPD CORRECTIVE ACTION EFFORTS.***
  - ***HAVE MINIMAL SAFETY AND REGULATORY SIGNIFICANCE (NPPD RECOGNIZES THE ADDITIONAL IMPACT FROM CUMULATIVE EFFECTS OF THE VIOLATIONS).***
  - ***HAVE THE SAME OR SIMILAR ROOT CAUSE AS VIOLATIONS FOR WHICH ESCALATED ENFORCEMENT ACTION HAS ALREADY BEEN TAKEN.***
- ***THE VIOLATIONS DISCUSSED TODAY WERE OR WILL BE CORRECTED WITHIN A REASONABLE TIME FOLLOWING IDENTIFICATION.***
- ***ADDITIONAL EXAMPLES OF VIOLATIONS ADDRESSED IN PREVIOUS ESCALATED ENFORCEMENT ACTIONS DO NOT SUBSTANTIALLY CHANGE THE SAFETY SIGNIFICANCE OR THE CHARACTER FOR THE REGULATORY CONCERN ARISING OUT OF THE INITIAL VIOLATION.***
  - ***UNCLEAR REGULATORY BENEFIT FROM ADDITIONAL ESCALATED ENFORCEMENT.***





## **CLOSING REMARKS (CONT'D)**

- ***NPPD REQUESTS THE OPPORTUNITY TO FOCUS ON AND ADJUST PERFORMANCE IMPROVEMENT EFFORTS -- THE NRC'S MESSAGE CONTINUES TO BE RECEIVED, UNDERSTOOD, AND ACTED UPON.***
  
- ***TODAY'S MANAGEMENT MEETING ON PERFORMANCE IMPROVEMENT STATUS WILL PROVIDE GOOD AND BAD NEWS.***
  - ***GOOD NEWS IS INTERPRETED BY NPPD AS A SIGN THAT WE ARE ON THE RIGHT TRACK, NOT AS A BASIS FOR RELAXING EFFORTS.***
  
  - ***BAD NEWS IS CONSIDERED A SIGN THAT ONGOING EFFORTS MUST BE MODIFIED -- ADDITIONAL NEW PROGRAMS ARE NOT THE ANSWER!***



***COOPER NUCLEAR STATION***  
***NEAR TERM INTEGRATED ENHANCEMENT PROGRAM***

***COOPER NUCLEAR STATION MANAGEMENT***

***MEETING WITH***

***NUCLEAR REGULATORY COMMISSION***

***APRIL 4, 1994***



A/18

## *NPPD/NRC MANAGEMENT MEETING*

- *INTRODUCTION*
- *NPPD INTERNAL ASSESSMENT ACTIVITIES*
- *PURPOSE OF NEAR TERM INTEGRATED ENHANCEMENT PROGRAM*
- *DEVELOPMENT/MAINTENANCE OF INTEGRATED ENHANCEMENT PROGRAM*
- *STATUS OF INTEGRATED ENHANCEMENT PROGRAM ITEMS*
- *RESULTS*
- *PROBLEMS*



## **NPPD INTERNAL ASSESSMENT ACTIVITIES**

- ***INTEGRATED ENHANCEMENT PROGRAM INPUTS***
  - ***CNS PERFORMANCE ASSESSMENT PROJECT***
  - ***CNS CORRECTIVE ACTION PROGRAM SELF ASSESSMENT***
  - ***ENFORCEMENT ISSUES INVESTIGATION TEAM***
  - ***COMMON CAUSE ANALYSIS STUDY***
  - ***CNS ENGINEERING PERFORMANCE ASSESSMENT***



## **NPPD INTERNAL ASSESSMENT ACTIVITIES**

- **OTHER ASSESSMENTS PERFORMED**
  - **OUTAGE PERFORMANCE ASSESSMENT**
  - **HUMAN PERFORMANCE ASSESSMENT**
  - **FIRE PROTECTION ASSESSMENT**
  - **MOV ASSESSMENT**
  - **DESIGN CHANGE ASSESSMENT**
  
- **PLANNED ASSESSMENTS FOR 1994**
  - **DESIGN ENGINEERING**
  - **MAINTENANCE**
  - **VARIOUS EXISTING PROGRAMS**



# **NPPD INTERNAL ASSESSMENT ACTIVITIES**

## **IDENTIFIED AREAS OF WEAKNESS**

- **MANAGEMENT**
  - **ESTABLISH/COMMUNICATE EXPECTATIONS**
  - **MONITOR PERFORMANCE**
  - **FEEDBACK/ACCOUNTABILITY**
- **QUESTIONING ATTITUDE**
- **IDENTIFICATION OF PROBLEMS AND IMPLEMENTATION OF CORRECTIVE ACTION**
- **PROCEDURE AND PROGRAM ADEQUACY/ADHERENCE**



## **PURPOSE OF NEAR TERM INTEGRATED ENHANCEMENT PROGRAM**

- *PRIORITIZE NPPD ASSESSMENT FINDINGS AND NRC CONCERNS*
- *PLAN AND SCHEDULE THE ACCOMPLISHMENT OF PRIORITY ISSUES*
- *MONITOR AND MEASURE PERFORMANCE IMPROVEMENT AND EFFECTIVENESS*
- *ENHANCE EMPLOYEE AWARENESS AND GOAL SETTING*
- *PROVIDE INPUT FOR BUSINESS PLAN (LONG TERM PLAN)*



## **DEVELOPMENT/MAINTENANCE OF INTEGRATED ENHANCEMENT PROGRAM**

- **DEVELOPED BY IDENTIFYING AND PRIORITIZING KNOWN ISSUES**
  - **NPPD INTERNAL ASSESSMENT RESULTS**
  - **NRC CONCERNS**
- **INDEPENDENT OUTSIDE REVIEW TO VERIFY ADEQUACY**
- **MAINTAINED THROUGH**
  - **MONTHLY HARD COPY UPDATES**
  - **SEMI-MONTHLY STAFF REVIEW UPDATES**
  - **MONTHLY MANAGEMENT REPORTS**





## *INTEGRATED ENHANCEMENT PROGRAM STATUS*

- *QUALITY ASSURANCE*
- *SITE SUPPORT*
- *SAFETY ASSESSMENT*
- *OPERATIONS*
- *MANAGEMENT*
- *NUCLEAR POWER GROUP*



## RESULTS

- *INTEGRATED ENHANCEMENT PROGRAM SCHEDULE*
- *MANAGEMENT*
  - *MENTORS BEING USED*
  - *EMPHASIS ON EMPLOYEE AND NRC COMMUNICATIONS*
  - *QA SURVEY INDICATES PROGRESS*
  - *MANAGEMENT DEVELOPMENT WORKSHOPS*
  - *PRIORITIZATION OF ENGINEERING BACKLOG*
  - *STAFFING ADDITIONS*



## RESULTS

- **QUESTIONING ATTITUDE/IDENTIFICATION OF PROBLEMS AND IMPLEMENTATION OF CORRECTIVE ACTION**
  - **RHR-27A LEAKAGE DISCOVERED DURING SURVEILLANCE**
    - **CONSERVATIVE DECISION PROCESS**
    - **APPROACH TO OUTAGE SAFETY - PROTECTED SYSTEMS**
    - **USED AS AN EXAMPLE FOR FUTURE PLANT PROBLEMS**
  - **INCREASED USE OF PROBLEM RESOLUTION TEAMS TO FOCUS EFFORTS ON SIGNIFICANT PROBLEMS**
    - **1993 - 5**
    - **1994 - 5**



## RESULTS

- ***PROCEDURE AND PROGRAM ADEQUACY/ADHERENCE***
  - ***COMMUNICATED MANAGEMENT EXPECTATIONS REGARDING INADEQUATE PROCEDURES AND WORK AROUNDS***
  - ***INITIATED MAINTENANCE PROCEDURE UPGRADE, WHICH INCLUDES DEFINING SKILL-OF-THE-CRAFT***
  - ***IMPLEMENTED PLAN FOR PROGRAM ASSESSMENT***
  - ***RECOGNIZED NEED FOR PROGRAM MANAGERS***



## **PROBLEM AREAS**

- ***CULTURE IN THE MAINTENANCE DEPARTMENT***
- ***MANAGEMENT BY WALKING AROUND***
- ***EMPLOYEE OWNERSHIP OF REQUIRED IMPROVEMENTS***
- ***PERFORMANCE MONITORING CAPABILITIES***
  - ***TRENDS AND FEEDBACK IN INTERIM***
- ***RIGOR AND CONSISTENCY IN HANDLING REACTIVE ISSUES***
- ***OVERLY COMPLICATED KEY WORK PROCESSES***



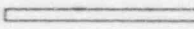
## Cooper Nuclear Station Near Term Integrated Enhancement Program


ID	Name	Qtr 1, 1994			Qtr 2, 1994			Qtr 3, 1994			Qtr 4, 1994			Qtr 1, 1995		
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
1	GRH 94-01, Establish Periodic Communications Meetings	█														
2	GRH 94-02, "One Over One"		█		█											
3	GRH 94-03, Supervisor Meeting with Subordinates		█		█											
4	GRH 94-04, Management Mentors in Key Areas		█		█											
5	GRH 94-05, Conduct Study for Appropriate Staffing at CNS	█														
6	GRH 94-06, Additional Personnel to Meet Needs of NPG	█														
7	GRH 94-07, VP Meetings on Staffing Study		█		█											
8	MGMT 94-01, Strengthen CNS Safety Culture		█		█											
9	MGMT 94-02, Develop an NPG Business Plan	█			█											
10	MGMT 94-03, Prioritize Outstanding Work			█	█											
11	RLG 94-01, Develop Program to Review Maintenance Procedures	█			█			█			█					
12	RLG 94-02, Review PM Task Assignments for Adequate Instructions	█			█			█			█					
13	RLG 94-03, Upgrade System Engineer Program	█			█			█			█					
14	RLG 94-04, Complete Maintenance Department Reorganization	█			█			█			█					
15	RLG 94-05, Evaluate PIV, ISI, IST and LLRT Programs	█			█			█			█					
16	RLG 94-06, Engineering Backlog	█			█											
17	RLG 94-07, Maintenance Backlog	█			█			█			█					
18	RLG 94-08, Review Qual. & Training of CNS Sys. Eng.; Determine Training Required	█			█			█			█					
19	RLG 94-09, Improve Operations Communications	█			█			█			█					
20	JMM 94-01, Upgrade Corrective Action Program	█			█			█			█					
21	JMM 94-02, Improve Operating Experience Review Program	█			█			█			█					
22	JMM 94-03, Enhance Human Performance Evaluation Program	█			█			█			█					
23	JMM 94-04, Review/Revise Operability Determination Process	█			█			█			█					

Date: 3/31/94


Critical 

Noncritical 

Progress 

Milestone 

Summary 

Rolled Up 

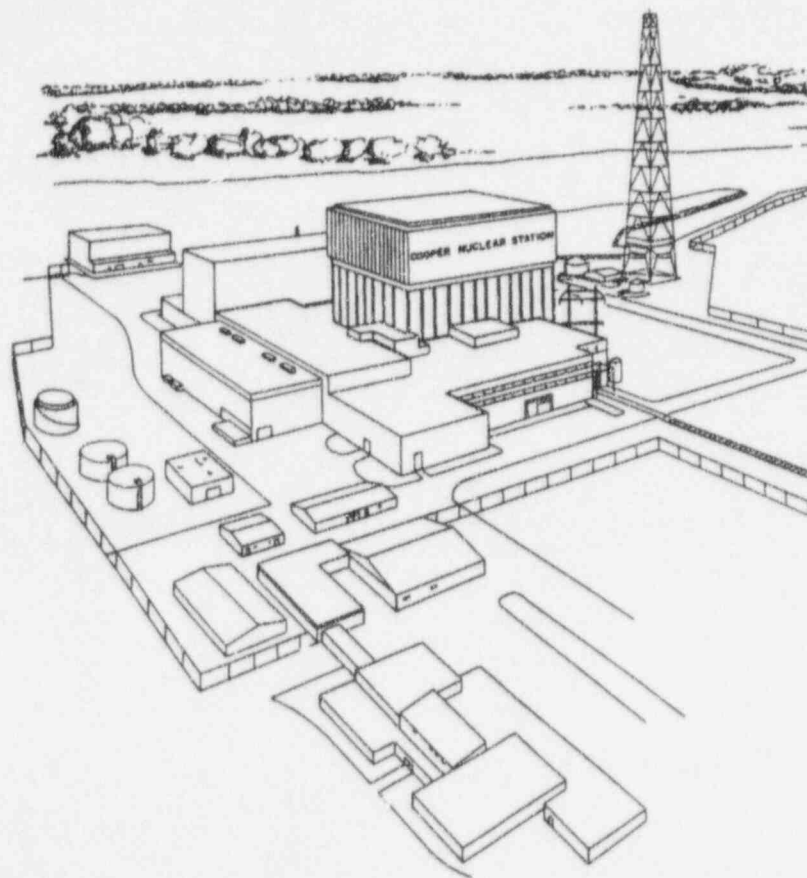
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		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
24	JMM 94-05, Develop Independent Review Group	Progress			Progress											
25	JMM 94-06, Develop NPG-Wide Priority System	Progress			Progress											
26	JMM 94-07, Implement Industry Advisory Group	Progress			Progress											
27	EMM 94-01, NPG Manager & Supervisor Management Skills Training	Progress			Progress			Progress			Progress					
28	EMM 94-02, Develop User-Friendly Tracking System for Training & Certification	Progress			Progress			Progress			Progress					
29	EMM 94-03, Develop Comprehensive System Engineer Training Program for CNS	Progress			Progress			Progress								
30	EMM 94-04, Root Cause Training	Progress			Progress			Progress			Progress					
31	EMM 94-05, CAP Training	Progress			Progress											
32	EMM 94-06, Implement Recommendations of Fire Protection Assessment	Progress			Progress			Progress			Progress					
33	EMM 94-07, Conduct Compliance Review of CNS Training Program	Progress			Progress			Progress			Progress					
34	DAW 94-01, Evaluate Licensing Department Organization	Progress														
35	DAW 94-02, Issue NPG Directives Supporting SPPI	Progress			Progress											
36	REW 94-01, Engineering Program Responsibility Assignment	Progress			Progress			Progress								
37	REW 94-02, Nuclear Engineering & Construction Division Self-Assessment	Progress			Progress			Progress								
38	REW 94-03, Evaluate NPG Configuration Control & Design Change Process	Progress			Progress			Progress			Progress					
39	VLW 94-01, Revise Self-Assessment Program	Progress			Progress											
40	VLW 94-02, Enhance CAP Audits/QA Trend Report	Progress			Progress			Progress								
41	VLW 94-03, Establish QA Assessment/Evaluation Program	Progress			Progress			Progress			Progress			Progress		
42	VLW 94-04, Upgrade Internal Audit & Surveillance Program	Progress			Progress			Progress			Progress			Progress		

Date: 3/31/94

Critical  Progress  Summary   
 Noncritical  Milestone  Rolled Up 

# Nebraska Public Power District Cooper Nuclear Station Nuclear Power Group



## Performance Improvement Plan

A/19



NEBRASKA PUBLIC POWER DISTRICT  
COOPER NUCLEAR STATION

May 4, 1995

Agenda

1. Introduction
2. Plant Status/Recent History
3. Phase 2 Status
4. Assessment of Operating Performance
5. Management Performance
6. Challenges

PERFORMANCE IMPROVEMENT PLAN  
PHASE 2

Focus on Operations

- Expectations for Conduct of Operations
- Shift Crew Performance
- Surveillance Program Upgrade

Configuration Management

- Engineering Effectiveness

Resource Allocation

- Prioritization of Workload
- Integrated Planning/Scheduling
- Budgeting

Continuous Improvement

- Corrective Action
- Assessments
- Management Involvement in Training

Management Practices and System

- Business/Strategic Planning

## OPERATIONS

- Current Assessment
  - Increased ownership
  - Enhanced watchstanding formality
  - Shift turnovers
  - Control of plant evolutions
  - Focus on safe operations
  
- Areas for Continued Focus
  - Consistent implementation of management expectations
  - Surveillance procedure validation

## MAINTENANCE

- Current Assessment
  - Schedule adherence
  - Peer QC program
  - Equipment performance
  - Backlog reduction
  - First line supervisor involvement
  
- Areas for Continued Focus
  - Quality of work documents
  - Efficiency
  - Procedure Improvements
  - Evaluation and incorporation of feedback

## ENGINEERING

- Current Assessment
  - Reorganization
  - Responsiveness
  - Backlog dispositions
    - Engineering Work Requests
    - Nuclear Action Item Tracking Items
    - Condition Reports
  
- Areas for Continued Focus
  - Outage design changes
  - Backlog reduction
  - Process improvements
  - Completion of reorganization
  - Clearly defined roles

## SUPPORT

- Current Assessment
  - Security
  - Emergency Planning
  - Chemistry
  - Radiation Protection
  - Training
  - Licensing
  - Assessment
  
- Areas for Continued Focus
  - Health physics work practices
  - Management involvement in training
  - Simulator critiquing
  - Timely/accurate communication with NRC
  - Internalize continuous improvement

## MANAGEMENT

- Leadership and Direction
  - Communication
  - Depth
  - Corporate Support
- Focus
  - Safe Operations
  - Corrective Action
  - Planning/Scheduling

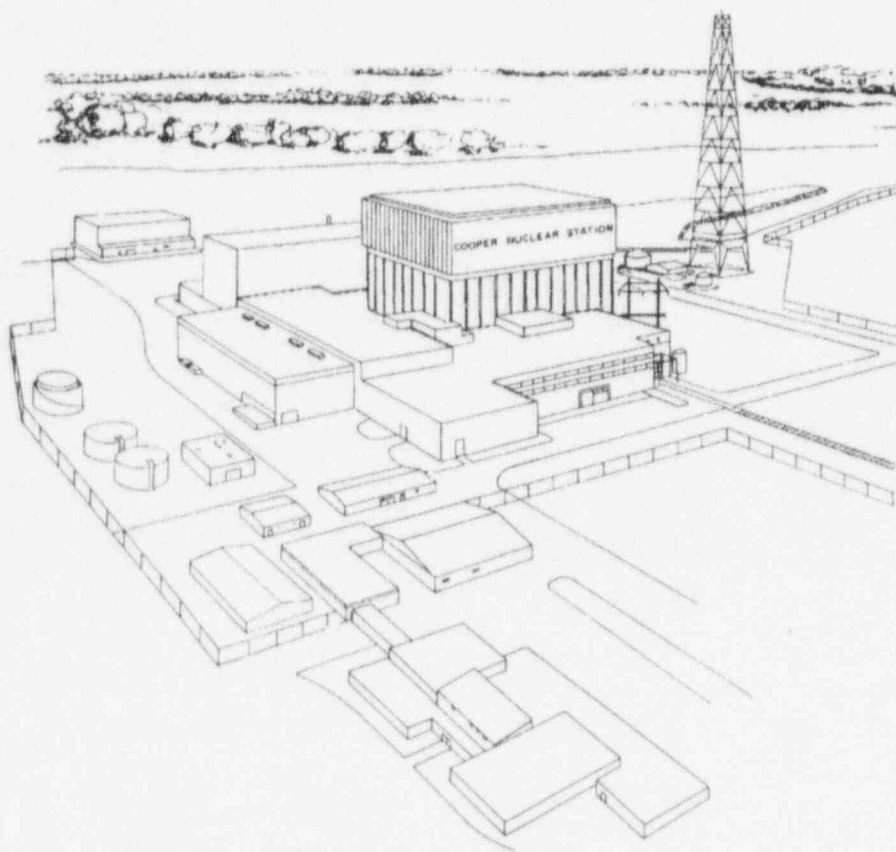
## CHALLENGES

- Refueling Outage
- Engineering Reorganization
- Event-Free Operation
- Solidify Management Team



# NEBRASKA PUBLIC POWER DISTRICT

## COOPER NUCLEAR STATION



**PUBLIC MEETING - MAY 4, 1995**

A/20

NEBRASKA PUBLIC POWER DISTRICT  
COOPER NUCLEAR STATION  
MAY 4, 1995

Agenda

1. Introduction
2. 10 CFR 50.9
3. Design Basis Reconstitution
4. Technical Specification Improvements

# 10 CFR 50.9

## Inspection Report 93-06

January 1993, strainers found in REC & RCIC

February 1993, IR 93-06 found that information supplied to the NRC in response to NOV 92-19 was:

- Inaccurate regarding the removal of RCIC strainers;
- Incomplete in that the potential for strainers in the REC system (identified in 1986) was not discussed in the Reply;
- Incomplete in that the 1986 identification that strainers existed in the RHR system appeared to invalidate the evaluation of IEN 85-96 and was not discussed in the Reply;
- Incomplete in that the identification, in 1992, of spacer rings in the REC system was not discussed.

## **10 CFR 50.9**

### **IR 93-06 Corrective Actions**

Training on management's expectations for accuracy and completeness of information

NPG manager policy memorandum on job performance

50.9 training included in Management and Tech Staff continuing training programs

Overview committees at GO and CNS to review NRC submittals for technical accuracy and completeness

Accountability and clearly defined guidelines for performing reviews of safety issues directed by NPG Manager

The guidelines to be established through visits to other plants

## **10 CFR 50.9**

### **Subsequent Issues**

**NRC questioned accuracy/completeness of  
LER 94-002**

**Management concerns about:**

- Adequacy and depth of CAP investigations
- Inadequate formality of preparation and review
- Lack of rigor and accountability
- Timeliness of preparation

**CNS embarked upon fundamental change in  
the Performance Improvement Program**

- Action Plan Project 2.1 - Corrective Action
- Action Plan Project 9.5 - Licensing Submittals

# **10 CFR 50.9**

## **Current Practice**

### Event Investigation

- CARBs for reportable events and violations
- Management involvement in investigations
- Root Causes must address generic implications

# 10 CFR 50.9

## Current Practice

### Document development

- Supporting documentation for statements of fact required
- Single individual responsible for assembly of information
- Line by line verification required
- Strict accountability
- Focused management review
- Commitments clearly identified in each submittal
- Commitment tracking database

**10 CFR 50.9**  
Continuing Improvements

Review of submittals since 1/1/95 to assess performance

Phase 3 Performance Improvement Program for CAP

Commitment Management procedure under development



**PRESENTATION TO  
NUCLEAR REGULATORY COMMISSION (NRC) REGION IV**

*MAY 4, 1995*

**NEBRASKA PUBLIC POWER DISTRICT  
PROPOSAL FOR HANDLING SIGNIFICANT  
DESIGN BASIS RECONSTITUTION DISCREPANCIES**

*MICHAEL T. BOYCE*

*ENGINEERING SUPPORT MANAGER*



**Nebraska Public Power District**

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## **DESIGN BASIS RECONSTITUTION PROGRAM EXPERIENCE WITH DISCREPANCIES**

CONTRACTOR: *TEHERA*

- DISCREPANCIES WILL BE IDENTIFIED
- SCREENING/PRIORITIZATION
- THOSE WITH CLEAR SAFETY SIGNIFICANCE
- THOSE WHERE SAFETY SIGNIFICANCE IS NOT CLEAR OR WHERE CONSEQUENCES ARE UNCERTAIN



## OBJECTIVE

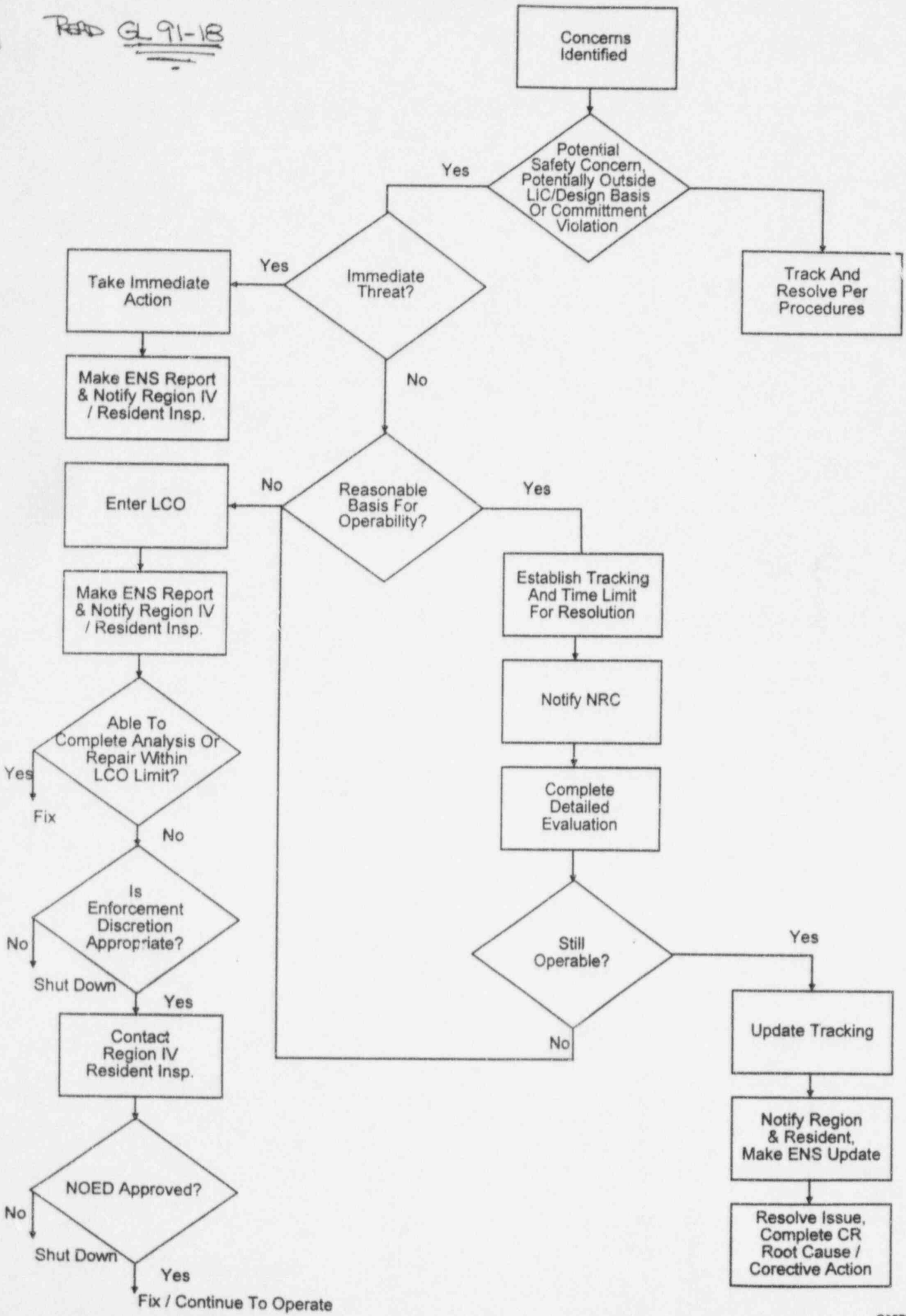
DEFINE A PROCESS FOR HANDLING DESIGN BASIS DISCREPANCIES THAT WILL:

- ENSURE LICENSE COMPLIANCE
- ENSURE COMPLIANCE WITH REPORTING REGULATIONS
- PRIORITIZE DISCREPANCIES BY RISK/SAFETY SIGNIFICANCE
- ENSURE APPROPRIATE CORRECTIVE ACTIONS IN A TIME FRAME COMMENSURATE WITH SAFETY SIGNIFICANCE
- ENSURE APPROPRIATE COMMUNICATIONS WITH OPERATIONS
- ENSURE TIMELY AND APPROPRIATE COMMUNICATIONS WITH NRC
- FOCUS DISTRICT AND NRC RESOURCES
- PREVENT NEEDLESS TRANSIENTS

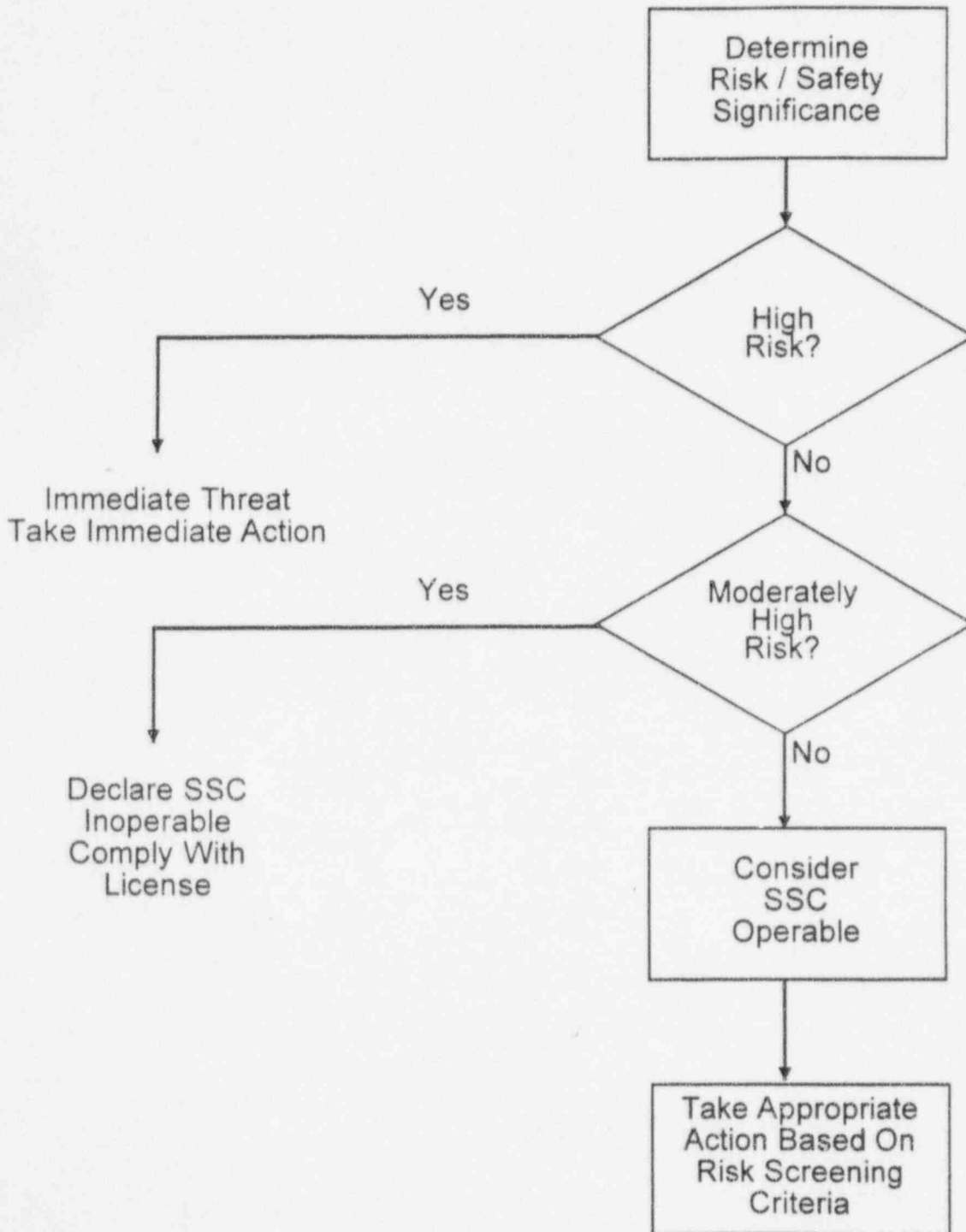




READ GL 91-1B



# Proposed Process For Evaluating Safety Significance For Design Basis Reconstitution Discrepancies



## DISCREPANCY SCREENING CRITERIA

RISK CATEGORY	CONTRIBUTION TO CORE DAMAGE/YR (CCD)	CONTRIBUTION TO CONTAINMENT BYPASS/YR (GIVEN CORE DAMAGE) (CBD)	EQUIPMENT STATUS
HIGH	$CCD > E-4$ Or $\geq 50\%$ Of Total	$CBC > E-5$ Or $\geq 20\%$ Of Total	IMMEDIATE THREAT
MODERATELY HIGH	$E-4 > CCD > E-5$ Or $\geq 20\%$ Of Total	$E-5 > CBC > E-6$ Or 5-20% Of Total	INOPERABLE
MODERATE	$E-5 > CCD > E-6$	$E-6 > CBC > E-7$	OPERABLE
LOW	$E-6 > CCD > E-7$	$E-7 > CBC > E-8$	OPERABLE
INSIGNIFICANT	$CCD < E-7$	$CBC < E-8$	OPERABLE

G35722.DS4

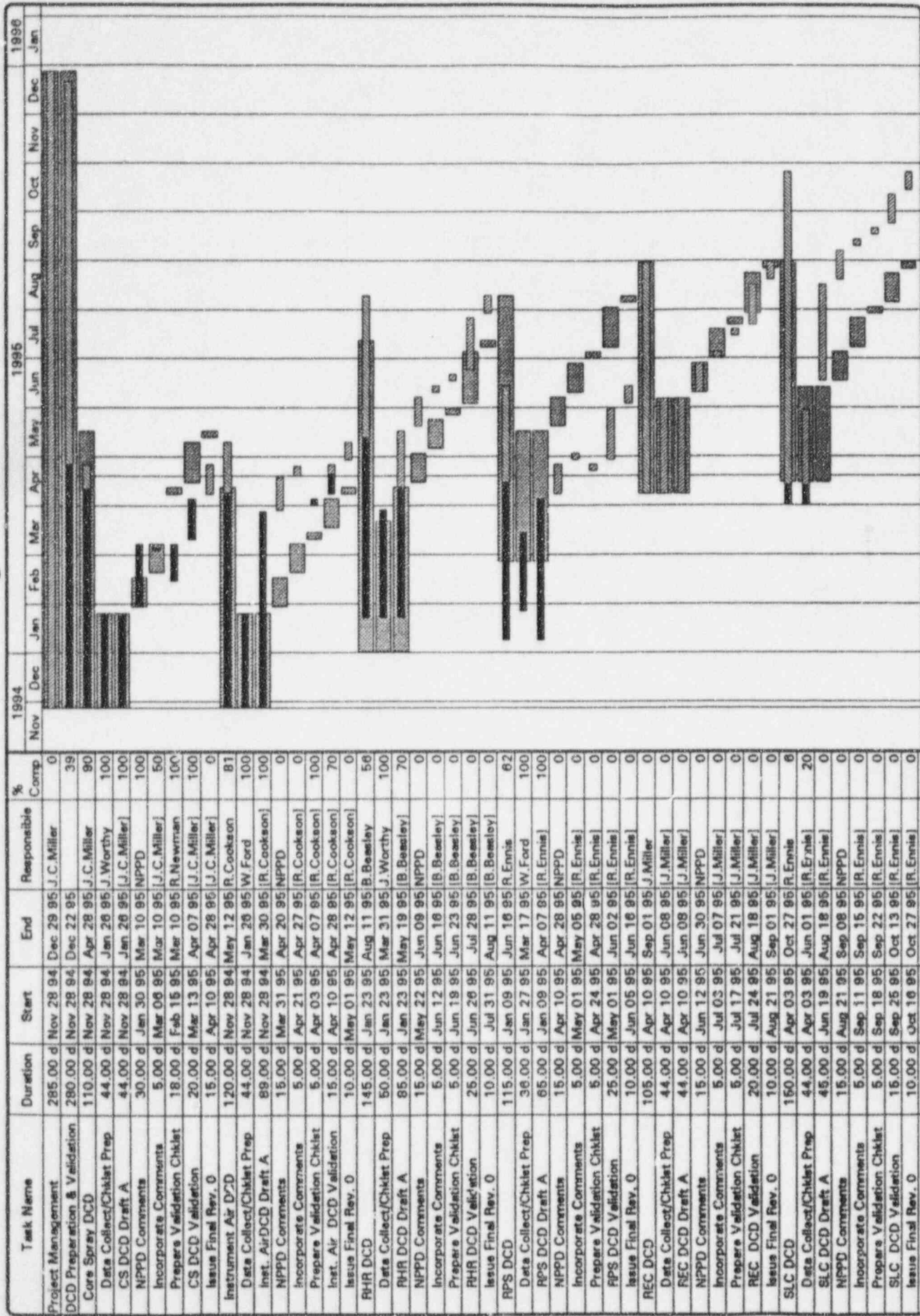


## REQUIRED ACTION BASED ON SCREENING CRITERIA

<b>RISK CATEGORY</b>	<b>REPORTABILITY / NOTIFICATION</b>	<b>REQUIRED ACTION</b>
<b>HIGH</b>	<ul style="list-style-type: none"> <li>- 10 CFR 50.72 &amp; 73</li> <li>- Notify Region IV Within 12 Hours</li> </ul>	Take Immediate Action To Eliminate Threat
<b>MODERATELY HIGH</b>	<ul style="list-style-type: none"> <li>- 10 CFR 50.72 &amp; 73 (as appropriate)</li> <li>- Notify Region IV Within 24 Hours</li> </ul>	Implement Tech Spec LCO Action Statements
<b>MODERATE</b>	<ul style="list-style-type: none"> <li>- Notify Region IV Within 7 Days</li> </ul>	Provide Corrective Action Plan To Region IV Within 30 Days
<b>LOW</b>	<ul style="list-style-type: none"> <li>- Notify Region IV Within 30 Days</li> </ul>	Incorporate Corrective Action Into Performance Improvement Plan / Business Plan / Provide Corrective Action Plan To Region IV Within 90 Days
<b>INSIGNIFICANT</b>	<ul style="list-style-type: none"> <li>- Review With Senior Resident Inspector Within 30 Days</li> </ul>	Document In Design Criteria Document



# NPPD DCD Schedule (Original w/Status)



Nebraska Public Power District



## NPPD DCD Schedule (Original w/Status)

Task Name	Duration	Start	End	Responsible	% Comp	1994		1995												1996			
						Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan			
RCIC DCD	120.00 d	Jun 19 95	Dec 01 95	B. Beasley	0																		
Data Collect/Chklist Prep	44.00 d	Jun 19 95	Aug 17 95	[B. Beasley]	0																		
RCIC DCD Draft A	45.00 d	Jul 10 95	Sep 08 95	[B. Beasley]	0																		
NPPD Comments	15.00 d	Sep 11 95	Sep 29 95	NPPD	0																		
Incorporate Comments	5.00 d	Oct 02 95	Oct 06 95	[B. Beasley]	0																		
Prepare Validation Chklist	5.00 d	Oct 09 95	Oct 13 95	[B. Beasley]	0																		
RCIC DCD Validation	25.00 d	Oct 16 95	Nov 17 95	[B. Beasley]	0																		
Issue Final Rev. 0	10.00 d	Nov 20 95	Dec 01 95	[B. Beasley]	0																		
CRD Hydraulic DCD	140.00 d	Jun 12 95	Dec 22 95	J. Miller	0																		
Data Collect/Chklist Prep	44.00 d	Jun 12 95	Aug 10 95	[J. Miller]	0																		
CRD Hyd DCD Draft A	84.00 d	Jun 12 95	Oct 05 95	[J. Miller]	0																		
NPPD Comments	15.00 d	Oct 09 95	Oct 27 95	NPPD	0																		
Incorporate Comments	5.00 d	Oct 30 95	Nov 03 95	[J. Miller]	0																		
Prepare Validation Chklist	5.00 d	Nov 06 95	Nov 10 95	[J. Miller]	0																		
CRD Hyd DCD Validation	20.00 d	Nov 13 95	Dec 08 95	[J. Miller]	0																		
Issue Final Rev. 0	10.00 d	Dec 11 95	Dec 22 95	[J. Miller]	0																		
DCD Validation	135.00 d	Feb 08 95	Aug 11 95		32																		
AC JCD Validation	55.00 d	Feb 13 95	Apr 28 95	D. Sexton	90																		
Prepare Validation Chklist	25.00 d	Feb 13 95	Mar 17 95	R. Newman	100																		
AC DCD Validation	20.00 d	Mar 27 95	Apr 21 95	[D. Sexton]	100																		
Issue Final Report	5.00 d	Apr 24 95	Apr 28 95	[D. Sexton]	0																		
HPCI DCD Validation	75.00 d	Feb 08 95	May 19 95	J. Miller	62																		
Prepare Validation Chklist	30.00 d	Feb 08 95	Mar 17 95	R. Newman	100																		
HPCI DCD Validation	25.00 d	Apr 10 95	May 12 95	[J. Miller]	30																		
Issue Final Report	5.00 d	May 15 95	May 19 95	[J. Miller]	0																		
DC DCD Validation	30.00 d	Jun 12 95	Jul 21 95	C. Markert	0																		
Prepare Validation Chklist	5.00 d	Jun 12 95	Jun 16 95	[C. Markert]	0																		
DC DCD Validation	20.00 d	Jun 19 95	Jul 14 95	[C. Markert]	0																		
Issue Final Report	5.00 d	Jul 17 95	Jul 21 95	[C. Markert]	0																		
NPR DCD Validation	33.00 d	May 24 95	Jul 07 95	B. Beasley	0																		
Prepare Validation Chklist	5.00 d	May 24 95	May 30 95	[B. Beasley]	0																		
NPR DCD Validation	20.00 d	Jun 05 95	Jun 30 95	[B. Beasley]	0																		
Issue Final Report	5.00 d	Jul 03 95	Jul 07 95	[B. Beasley]	0																		
Diesel Gen DCD Validation	30.00 d	Jul 03 95	Aug 11 95	D. Sexton	0																		
Prepare Validation Chklist	5.00 d	Jul 03 95	Jul 07 95	[D. Sexton]	0																		
DG DCD Validation	20.00 d	Jul 10 95	Aug 04 95	[D. Sexton]	0																		
Issue Final Report	5.00 d	Aug 07 95	Aug 11 95	[D. Sexton]	0																		
Pri Cont DCD Validation	30.00 d	Jun 12 95	Jul 21 95	T. Snyder	0																		
Prepare Validation Chklist	5.00 d	Jun 12 95	Jun 16 95	[T. Snyder]	0																		
Pri Cont DCD Validation	20.00 d	Jun 19 95	Jul 14 95	[T. Snyder]	0																		
Issue Final Report	5.00 d	Jul 17 95	Jul 21 95	[T. Snyder]	0																		
SGT DCD Validation	30.00 d	Apr 24 95	Jun 02 95	C. Markert	8																		
Prepare Validation Chklist	5.00 d	Apr 24 95	Apr 28 95	[C. Markert]	50																		
SGT DCD Validation	20.00 d	May 01 95	May 26 95	[C. Markert]	0																		
Issue Final Report	5.00 d	May 29 95	Jun 02 95	[C. Markert]	0																		



## STATUS OF OPEN ITEMS AND DISCREPANCIES DESIGN BASIS RECONSTITUTION PROGRAM

Total Discovered to Date: 988

Total Open as of 5/2/95: 571

<u>CATEGORY</u>	<u>TOTAL DISCOVERED</u>	<u>NUMBER REMAINING OPEN</u>
I CLEAR TS OP ISSUES	9	0
II POT SAFETY SIG. NO DIRECT TS APPLIES	121	0
III } NOT QUOTED IN IPE MODEL	221	70
IV } -O-RISK	189	117
V }	<u>448</u>	<u>384</u>
TOTAL:	988	571

DOCUMENTATION & VALIDATION : BY END OF 1995



# TECHNICAL SPECIFICATION IMPROVEMENT

## WHERE WE ARE

- Current License, 20 Years Of Inspections
- Reviewed Surveillance Program; System/Components Not Declared Inoperable
- Management Concern With Consistent Application Of Out-Of-Service Time
- Caused CNS To Develop AOTs
- Evaluating Tech Specs Change To Minimize Special Administrative Control

## OBJECTIVES OF PHASE 3 PLAN FOR TECH SPEC IMPROVEMENT

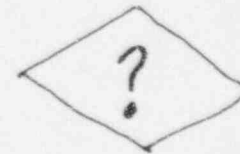
- Increase Understanding And Application Of The Tech Specs; Reduce Need For Interpretations
- Improve Ease Of Tech Spec Use
- Reduce/Eliminate Requirements Having No Safety/Operational Benefit
- Enhance Operational Control Of System Configuration

### PHASE 3 ACTION PLAN

- Perform Line Item Comparison To Standard Tech Specs
- Complete A Review Of NRC Recommended Line Item Improvements
- Collect Industry Experience With Tech Spec Improvements
- Develop A Schedule For Line Item Improvements "Short Term"

### CNS TEAM TO DETERMINE

- Conversion To Standard Tech Specs Or
- Conversion To Improve Our Custom Tech Specs
- Develop Schedule To Implement The Final Conversion Plan



LATE AUGUST, SEPTEMBER

GAGLIARDO

**COOPER NUCLEAR STATION**

**NEAR TERM**

**INTEGRATED ENHANCEMENT**

**PROGRAM**

**MARCH 31, 1994**

9404150139

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## EXECUTIVE SUMMARY

The purpose of this Integrated Enhancement Program is to provide Senior Management focus on the issues that are important to improving the overall performance of the Nuclear Power Group (NPG) in the near term. For the long term, elements of this program, together with other management improvement initiatives, are being incorporated into the NPG Business Plan.

Embodied within this Program are several inputs from sources such as the Strategic Plan for Performance Improvement, Senior Management identified items, the FPI Common Cause Analysis and the NRC Operational Safety Team Inspection. Individually taken, the items may not indicate a programmatic or organizational weakness; but as a whole there are strong indications that Senior Management has not been effective in directing the operations of Cooper Nuclear Station.

Accordingly, through the successful and timely completion of the program enhancements described within this manual, a marked improvement in the safe operation of Cooper Nuclear Station will be realized.

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# INTRODUCTION

## A. BACKGROUND

Cooper Nuclear Station (CNS) has traditionally been recognized as a good performer within the Nuclear Power Industry. However, recent events at CNS indicate a declining trend in performance. Even though a solid and safe operating record has been maintained, the Nuclear Power Group (NPG) Management, based on a number of recent indicators, recognizes that the performance of the entire organization is in question. Unfortunately, management was remiss in not recognizing earlier the disproportionate number of negative indicators that have been received over the past eighteen months.

NPG Management is keenly aware that major, expeditious changes in how we conduct business must occur if CNS is to remain economically viable while meeting internal and regulatory expectations. This Integrated Enhancement Program will provide management and staff with the short term vehicle to ensure that these changes occur in a timely and consistent manner, and that these changes will result in a strong, safety conscious, competitive nuclear organization. Also under development, in a parallel path, is the NPG Business Plan which will contain the elements necessary to ensure long term performance continues to improve in all areas important to safe operation.

## B. MANAGEMENT CHANGES

Recognizing that the overall performance of CNS was declining, the Vice President - Nuclear made a significant management realignment to provide a strong on-site Senior Management team to focus on the critical issues facing the Nuclear Power Group. These management changes also

included, but are not limited to, relocating the Vice President - Nuclear and the Division Manager of Quality Assurance and his staff to CNS from the corporate office. Additional changes to the NPG organization will also be made where required to further enhance performance.

The new Senior Management team's initial focus is to address significant, recurring issues that have contributed to the declining performance of Cooper Nuclear Station. One of the key issues that will be resolved is the failure to provide prompt and positive resolution to identified problems; and then implementing the appropriate corrective action to prevent recurrence in an aggressive manner.

#### C. DEFICIENCIES

Various NRC inspections, NPG self assessments, and broad consultant reviews have identified concerns with the management and operation of CNS. Although the focus of these inspections and assessments was different, the conclusions reached and recommendations made were generally consistent. There are six areas where the majority of concerns fall. Consequently, the CNS Integrated Enhancement Program has been developed to address these six areas and has been divided into major categories or sections with assigned Senior Managers. The areas in which concerns have been identified include:

- Management

A common finding was that the overall management of the CNS organization was not effective. Contributing factors include poor communications, an inadequate accountability program, the need for improved management training, undefined or poorly communicated management expectations, and an inadequate prioritization system. It was also identified that the Nuclear Power Group did not have a long term business

plan which defines Management's expectations through vision, mission, and goals and objectives for the entire organization.

- Training

The adequacy of training, as well as the administrative discipline (certification and compliance) within specific areas of the CNS Training Program are deficient. This is evident due to the lack of certain training programs and the fact that some individuals have continued to perform their assigned tasks even though they were no longer "certified/qualified".

- Problem Identification and Resolution

The NPG has not consistently demonstrated the ability to identify, aggressively pursue, and permanently resolve their own problems. And when problems were identified by CNS, the implemented corrective action did not consistently prevent reoccurrence. The inability to resolve reoccurring problems has been attributed to a failure to conduct thorough root cause investigations or implementing the necessary, enduring corrective actions. This has resulted in an overall ineffective Corrective Action Program.

- Engineering Modification and Configuration Control

Outside reviews have indicated the need to improve control over plant configuration and the Design Change process. One clear example of this deficiency is the fact that the Maintenance Work Requests, in some instances, have been used in the place of a Design Change.

- Operations

Findings and recommendations noted a general lack of a questioning attitude, formality, and ownership. There is also a lack of standardization in terms of shift turn-over, crew briefings and how operators communicated in the control room.

- Procedural Adequacy and Adherence

The reviews and audits identified a concern that the necessary balance between reliance upon the "skill of the craft" and the need for procedural detail is not well defined. Another important finding is that CNS employees do not consistently demonstrate a questioning attitude when confronted with a procedure which is not clear and workable.

D. CNS INTEGRATED ENHANCEMENT PROGRAM

The CNS Integrated Enhancement Program is a collection of short-term prioritized corrective actions and performance improvements. To develop this program each issue identified in prior audits, assessments or reviews was evaluated. The issues were then prioritized to ensure the critical issues receive the necessary resources and management attention to ensure prompt resolution. It is these critical (Priority "RED") issues that make up the Integrated Enhancement Program.

1. Program Management

As previously discussed, the critical issues were then divided into specific groups and assigned to a Senior Manager for resolution. The Senior Manager has assigned the specific issue to a Task Manager to develop an action plan for completing the specific Program Enhancement that will resolve the critical issue.

The enclosed Program Enhancement Task Sheets contain the essential information used for developing a course of action and provide the means to track the status of each task to completion. The task sheets that follow indicate the title of the task, a task description, the source documents, the program manager (Senior Manager), the task manager, the planned start date, the planned completion date, references as to where the task originated from (i.e. OSTI, SPPI), and the major milestones for completing the task. It should be noted that the planned completion dates and milestone dates are based on the best information available and that conditions or scope may change resulting in improvements or delays to the schedule. Any changes to the schedule must be adequately justified in writing, to the Vice President - Nuclear and this documentation included in the Integrated Enhancement Program document.

Every two weeks the Task Manager will communicate to their respective Senior Manager the progress to date. The Senior Manager will then formally provide the status update to the Vice President - Nuclear. Monthly management reports will be generated reflecting the overall Integrated Enhancement Program status as well as the status of the individual tasks.

2. Program Layout

The Integrated Enhancement Program has been divided into several sections which reflect the functional areas of the NPG management. The issues are then assigned to the appropriate Senior Manager.

Section I, Nuclear Power Group, discusses the issues that require specific Vice President - Nuclear attention.

Section II, Management, discusses the management concerns and the specific Integrated Enhancement tasks for resolving the management issues. It should be noted that management related activities will be pursued in each of the following sections as well as Section II.

Section III, Operations, provides a discussion regarding the operations, maintenance and site engineering concerns that must be addressed. The tasks developed for resolving the operational aspects are included as part of Section III.

Section IV, Safety Assessment, addresses the concern with CNS's ability to identify and resolve problems. The Integrated Enhancement tasks for improving the Corrective Action process and conducting independent reviews are included in this section.

Section V, Site Support, primarily focuses on the training issues and providing support resources to the Senior Management team such as the NPG Management Development Program.

Section VI, Nuclear Support, includes communication issues and how to improve the regulatory interface. The tasks for dealing with these issues are included within this section.

Section VII, Corporate Engineering, provides the direction for ensuring the concerns with engineering modification and configuration control are resolved. Consequently the tasks for this effort are included as part of this section. It should be noted, site related engineering is part of the Operations Department, therefore Section III will have certain engineering related tasks.

Section VIII, Quality Assurance, addresses the concerns with procedural adequacy and adherence as well as the inability to conduct proper problem identification and resolution.

E. INDEX OF PROGRAM ENHANCEMENTS

SECTION I - NUCLEAR POWER GROUP

<u>Item Number</u>	<u>Description</u>
GRH-94-01	Establish Periodic Communications Meetings
GRH-94-02	"One Over One"
GRH-94-03	Supervisor Meeting with Subordinates
GRH-94-04	Management Mentors in Key Areas
GRH-94-05	Conduct Study for Appropriate Staffing at CNS
GRH-94-06	Additional Personnel to Meet the Needs of the NPG Organization
GRH-94-07	VP Meetings on Reorganization

SECTION II - MANAGEMENT

<u>Item Number</u>	<u>Description</u>
MGMT-94-01	Strengthen the CNS Safety Culture
MGMT-94-02	Develop an NPG Business Plan
MGMT-94-03	Prioritize Outstanding Work

SECTION III - OPERATIONS

<u>Item Number</u>	<u>Description</u>
RLG-94-01	Develop Program to Review Maintenance Procedures/Activities
RLG-94-02	Review Preventative Maintenance Task Assignments for Adequate Instructions
RLG-94-03	Upgrade the System Engineer Program
RLG-94-04	Complete the Maintenance Department Reorganization
RLG-94-05	Evaluate PIV, ISI, IST and LLRT Programs



SECTION III - OPERATIONS (Continued)

<u>Item Number</u>	<u>Description</u>
RLG-94-06	Engineering Backlog
RLG-94-07	Maintenance Backlog
RLG-94-08	Review the Qualifications and Training of Current CNS System Engineers to Determine Training Required
RLG-94-09	Improve Operations Communications

SECTION IV - SAFETY ASSESSMENT

<u>Item Number</u>	<u>Description</u>
JMM-94-01	Upgrade the Corrective Action Program
JMM-94-02	Improve Operating Experience Review Program
JMM-94-03	Enhance the Human Performance Evaluation Program
JMM-94-04	Review/Revise Operability Determination Process
JMM-94-05	Develop the Independent Review Group
JMM-94-06	Develop an NPG-Wide Priority System
JMM-94-07	Implement the Industry Advisory Group

SECTION V - SITE SUPPORT

<u>Item Number</u>	<u>Description</u>
EMM-94-01	NPG Manager and Supervisor Management Skills Training
EMM-94-02	Develop User-Friendly Tracking System for Training and Certification
EMM-94-03	Develop a Comprehensive System Engineering Training Program for CNS System Engineers
EMM-94-04	Root Cause Training

**SECTION V - SITE SUPPORT (Continued)**

<u>Item Number</u>	<u>Description</u>
EMM-94-05	CAP Training
EMM-94-06	Implement Recommendation of Fire Protection Assessment
EMM-94-07	Conduct a Compliance Review of CNS Training Programs

**SECTION VI - NUCLEAR SUPPORT**

<u>Item Number</u>	<u>Description</u>
DAW-94-01	Evaluate Licensing Department Organization
DAW-94-02	Issue NPG Directives in Support of the Strategic Plan for Performance Improvement

**SECTION VII - CORPORATE ENGINEERING**

<u>Item Number</u>	<u>Description</u>
REW-94-01	Engineering Program Responsibility Assignment
REW-94-02	Nuclear Engineering and Construction Division Self-Assessment
REW-94-03	Evaluate the Configuration Control and Design Change Process within the NPG

**SECTION VIII - QUALITY ASSURANCE**

<u>Item Number</u>	<u>Description</u>
VLW-94-01	Revise the Self-Assessment Program
VLW-94-02	Enhance CAP Audits/QA Trend Report
VLW-94-03	Establishment of QA Assessment\Evaluation Program
VLW-94-04	Upgrade the Internal Audit and Surveillance Program (Frequency and Scope)

**SECTION I**  
**NUCLEAR POWER GROUP**

# SECTION I

## NUCLEAR POWER GROUP

The Nuclear Power Group (NPG) has recognized as a result of Self Assessments, performance overview, and NRC and INPO feedback that improvements in management oversight, communication, resources, culture, accountability, and identified programs and procedures are required. This near term plan is the methodology to focus NPG organization attention and resources on those issues requiring immediate attention.

The NPG Business Plan will communicate management expectations and the long term guidance for improving NPG performance and providing a means to constantly monitor this performance in order to ensure Senior Management expectations continue to be maintained.

The status of program enhancement milestones and schedule achievements will be reviewed with the NPG Senior Managers on a two week frequency and the plan updated monthly to ensure the expected focus and accomplishments are being maintained. The effectiveness of the program enhancements will also be monitored and revisions made to the near term Integrated Enhancement Program as deemed necessary.

## Program Enhancement

Priority: RED  
Item No: GRH-94-01

Title/Description: Establish Periodic Communications Meetings

Date Updated: 3/31/94

External Funding Requirements: None

Internal Resource Requirements: 30 hrs. quarter - Vice President - Nuclear

Program Manager: Guy Horn

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA

Description: The purpose of the periodic communication meetings is to communicate management expectations to NPG employees.

Objective: Performance levels within the NPG do not currently meet the high standards expected by Senior Management. Establish the desired level of quality in the performance of tasks.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Vice President meetings. (GRH-94-01.1)	10/93	10/1/93
2.	Manager meetings with supervision. (GRH-94-01.2)	3/94	3/31/94
3.	Supervisory meetings with subordinates. (GRH-94-01.3)	3/94	3/31/94

Update Status: Vice President - Nuclear routine meetings with NPG organizations continue to be held, and are providing valuable input into the NPG health. Manager and Supervisory meetings and supervisory meetings with subordinates have begun in all areas. The CNS Senior Managers have been challenged to develop a listing of priority issues ie; top ten list, in each major area that support the NTIEP as a means of focusing CNS activities. The following is a listing of meetings with Departmental Personnel conducted to date.

# Program Enhancement

GRH-94-01 (Continued)

**Update Status:**

MEETINGS WITH DEPARTMENTAL PERSONNEL

To Discuss the Organization

August 24, 1993 - Maintenance  
August 26, 1993 - Engineering/Technical Staff  
September 2, 1993 - Operations/I&C/Operations Support  
September 7, 1993 - Security/Training  
September 8, 1993 - Radiological  
September 16, 1993 - NED/QA/Nuclear Support  
September 23, 1993 - QA/Construction Management

To Discuss Management Expectations and Solicit Feedback:

October 7 and 11, 1993 - CNS (specific) Employee Committee Meetings  
October 14, 1993 - Electric Shop  
October 18, 1993 - Maintenance  
October 19, 1993 - Engineering  
October 29, 1993 - Mechanical Maintenance  
December 10, 1993 - Electric Shop  
January 11, 1994 - I&C and Operations  
January 13, 1994 - Engineering  
January 17, 1994 - CNS (specific) Employee Committee Meeting  
January 29, 1994 - License Dinner  
February 17, 1994 - Shift Supervisor Breakfast  
February 17, 1994 - Electric Shop  
February 22, 1994 - Mechanical Maintenance  
February 25, 1994 - Radiological/Outage & Modifications  
February 28, 1994 - Site Support/NOD Managers and Supervisors  
March 1, 1994 - Training/Site Services/QA/Construction Management  
March 16, 1994 - Introduction to Management Development

## Program Enhancement

Priority: RED  
Item No: GRH-94-02

Title/Description: "One Over One"

Date Updated: 3/31/94

External Funding Requirements: None

Internal Resource Requirements: 200 hrs. quarter - NPG Managers/Supervisors

Program Manager: Guy Horn

Planned Start Date: 1/24/94

Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: "One over one" meetings will be established on a quarterly basis. A "One over one" meeting involves a manager meeting with his supervisors to discuss issues.

Objective: To communicate management expectations to supervision, enhance communication between workers and management, improve teamwork and morale, and improve quality of worker performance.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish guidelines and implement manager meetings with supervision to discuss ongoing issues, enhancements, progress, management expectations and to receive employee feedback. (GRH-94-02.1)	3/94	3/31/94
2.	Improved communication and supervisory feedback, increased overview of worker performance and improved quality of worker performance. (GRH-94-02.2)	6/94	

Update Status: Vice President - Nuclear routine meetings with NPG organizations continue to be held, and are providing valuable input into the NPG health. Manager and Supervisory meetings and supervisory meetings with subordinates have begun in all areas. The CNS Senior Managers have been challenged to develop a listing of priority issues ie; top ten list, in each major area that support the NTIEP as a means of focusing CNS activities.

## Program Enhancement

GRH-94-02 (Continued)

**Update Status:** Guidelines for the managers meeting with supervisors and for the supervisory meetings with staff have been provided to the Senior Managers and includes expectations for effectiveness overview.



## Program Enhancement

Priority: RED  
Item No: GRH-94-03

Title/Description: Supervisor Meeting with Subordinates Date Updated: 3/31/94

External Funding Requirements: None  
Internal Resource Requirements: 100 hrs. month by NPG Supervisors/1200 hrs. yr.

Program Manager: Guy Horn  
Planned Start Date: 1/24/94 Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Supervisor meetings with their subordinates will be established on a monthly basis.

Objective: To establish the desired levels of quality in worker performance, enhance communication between management and workers, enhance employee feedback on issues and improve teamwork and morale throughout the NPG, and eliminate barriers to communication.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish guidelines and implement monthly meetings with subordinates to discuss ongoing issues, enhancements, progress, communicate management expectations and receive employee feedback. (GRH-94-03.1)	3/94	3/31/94
2.	Improve communication and worker feedback, improve quality of worker performance. (GRH-94-03.2)	6/94	

Update Status: Vice President - Nuclear routine meetings with NPG organizations continue to be held, and are providing valuable input into the NPG health. Manager and Supervisory meetings and supervisory meetings with subordinates have begun in all areas. The CNS Senior Managers have been challenged to develop a listing of priority issues ie; top ten list, in each major area that support the NTIEP as a means of focusing CNS activities.

# Program Enhancement

GRH-94-03 (Continued)

**Update Status:** Guidelines for the managers meeting with supervisors and for the supervisory meetings with staff have been provided to the Senior Managers and includes expectations for effectiveness overview.

# Program Enhancement

Priority: RED  
Item No: GRH-94-04

Title/Description: Management Mentors in Key Areas    Date Updated: 3/31/94

External Funding Requirements: \$500,000

Internal Resource Requirements: Vice President - Nuclear/Senior Managers - 50 hrs.

Program Manager: Guy Horn

Planned Start Date: 1/24/94

Planned Completion Date: 4/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA

Description: Evaluate the benefit of using management mentors in specific areas within the NPG to expedite the upgrade of management skills to the desired levels and to support programmatic and culture changes within the organization.

Objective: To expedite the desired levels of performance improvement within the NPG in order to achieve internal and regulatory expectations as rapidly as possible.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Evaluations completed and task agreements submitted for Board approval. (GRH-94-04.1)	4/94	

## Program Enhancement

GRH-94-04 (Continued)

**Update Status:** The assessment of the need for management mentors within the NPG organization continues. A Senior Management consultant has recently been obtained to aid in the overall assessment of the effectiveness of the NTEIP and to provide overview and guidance to the CNS Senior Managers. This consultant began onsite work March 14, 1994. The following is a listing of the mentors currently supporting the CNS organization.

- Safety Assessment - two consultants  
J. Partlow  
E. Erickson
- Senior Managers - one consultant  
D. Beckman
- Maintenance - one consultant  
B. York

The Maintenance mentor has been tasked with performing a overall evaluation of the Maintenance Department effectiveness and to provide recommendations to Management/Supervision to correct identified weaknesses. Past performance history will be used in this evaluation.

The Safety and Assessment mentors are currently supporting the Senior Manager in the establishment of procedures, guidelines and charters to ensure effective oversight of Nuclear Power Group activities. They are also supporting implementation of the enhanced Corrective Action Program.

# Program Enhancement

**Priority:** RED  
**Item No:** GRH-94-05

**Title/Description:** Conduct Study for Appropriate Staffing at CNS  
**Date Updated:** 3/31/94

**External Funding Requirements:** \$50,000 (for study)  
**Internal Resource Requirements:** Vice President - Nuclear - 30 hrs.

**Program Manager:** Guy Horn  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 2/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Conduct a study as to what would be the appropriate staffing level for CNS. This study should consider current staffing compared to industry leaders for a similar unit.

**Objective:** To determine if current staffing levels are sufficient to achieve and maintain current industry standards and continuing normal workload within the NPG.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Complete staffing study. (GRH-94-05.1)	1/94	1/94
2.	Develop a staffing upgrade plan for Senior NPPD Management review and approval. (GRH-94-05.2)	2/94	2/94
3.	Receive NPPD Board of Directors approval of the staffing upgrade plan. (GRH-94-05.3)	2/94	2/94

**Update Status:** A staffing study by T. Martin and Associates has been completed. The interim staffing plan has also been developed and submitted to Senior NPPD Management. The NPPD Board of Directors provided their full support of the interim staffing plan at the February Board Meeting.

## Program Enhancement

**Priority:** RED  
**Item No:** GRH-94-06

**Title/Description:** Additional Personnel to Meet the Needs of the NPG Organization  
**Date Updated:** 3/31/94

**External Funding Requirements:** \$2,000,000 (estimated)  
**Internal Resource Requirements:** Vice President - Nuclear - 30 hrs.

**Program Manager:** Guy Horn  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 2/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Based on the results of the staffing study, develop a plan of action to redistribute or hire additional personnel to meet the needs of the NPG organization.

**Objective:** To achieve and maintain Nuclear industry standards and improve INPO/NRC rating of NPG activities.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop an interim staffing upgrade plan for Senior Management review and approval. (GRH-94-06.1)	2/94	2/94
2.	Receive NPPD Board of Director approval of the interim staffing upgrade plan. (GRH-94-06.2)	2/94	2/94

**Update Status:** Interim staffing plan has been developed and approved by to NPPD Senior Management. This plan was submitted to the NPPD Board of Directors at the February Board Meeting and received their full support.

## Program Enhancement

Priority: RED  
Item No: GRH-94-07

Title/Description: VP Meetings on Staffing Study

Date Updated: 3/31/94

External Funding Requirements: None

Internal Resource Requirements: Vice President - Nuclear/Senior Management - 20 hrs.

Program Manager: Guy Horn

Planned Start Date: 1/24/94

Planned Completion Date: 4/94

References (NRC/INPO/NUMARC/NAIT Etc.): 070 SPPI

Description: Communicate results of staffing study to NPG employees and plan of action to redistribute or hire additional personnel.

Objective: To make CNS employees aware of planned staffing upgrades for long term planning and budgeting purposes and to acquire staff support and ownership of the staffing study.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	NPG staff aware of organizational upgrades and assign appropriate NPG departments action to complete any necessary redistribution studies. (GRH-94-07.1)	4/94	

## Program Enhancement

GRH-94-07 (Continued)

**Update Status:** A staffing study by T. Martin and Associates has been completed. The interim staffing plan has also been developed and approved by to Senior NPPD Management. This plan was submitted to the NPPD Board of Directors at the February meeting and it received their full support. The results of the staffing study is being discussed at the periodic Communication Meetings by the Vice President - Nuclear. Assignment of action to perform a redistribution study in the areas of security and training has been made to the Senior Management of Site Support and contains a completions date of 6/1/94.



**SECTION II**  
**MANAGEMENT**

## SECTION II

# MANAGEMENT

These management issues are an indication of the present Nuclear Power Group culture. The lack of a questioning attitude, accountability and ownership; poor communication, inappropriate delegation; and poorly communicated management expectations are examples of the type of management concerns identified. In order for management to become more effective in instilling the improved culture throughout the NPG, a long term business plan that includes the organization's visions, goals and objectives is being developed. Previously, many of the plans and programs that had been established focused on the short term corrective actions without considering the long term impact.

The CNS Integrated Enhancement Program tasks, as part of the Management section, will address many of these cultural issues, as well as bring about other improvements within the NPG. For the long term, the NPG Business Plan will be used to maintain the expected improvements.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

Priority: RED  
Item No: MGMT-94-01

Title/Description: Strengthen the CNS Safety Culture      Date Updated: 3/31/94

External Funding Requirements: NONE  
Internal Resource Requirements: 100 Hours/Senior Manager; 600 Hours Total

Program Manager: All  
Planned Start Date: 1/24/94      Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, OSTI

Description: The purpose of this enhancement is to instill in management/supervision and the workforce the culture and values to make the changes necessary to become a more healthy organization; ever improving the quality of the work we do.

Objective: To improve the management effectiveness of the NPG organization, continue to provide safe and reliable power, to maintain a cost competitive operation, and to meet or exceed industry standards in all aspects of our operation.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Convey to employees their right as well as their responsibility to have a questioning attitude. (MGMT-94-01.1)	6/94	
2.	Create an atmosphere where employees feel comfortable having a questioning attitude. (MGMT-94-01.2)	6/94	

## Program Enhancement

### Major Milestones: (MGMT-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Emphasize the importance of and encourage employees to use the corrective action program. (MGMT-94-01.3)	6/94	
4.	Encourage employee feedback to management on emerging issues, concerns and suggested corrective actions. (MGMT-94-01.4)	6/94	
5.	Conduct an effectiveness review of the Corrective Action Program.	10/94	

**Update Status:** A number of specific actions are underway, including divisional and departmental meetings, specific newsletter articles and management walkarounds.

A Level I CAP Training course has been developed and will be delivered to the majority of the NPG by the end of March. This Level I course will provide employees with an understanding of the CAP. This training will encourage the use of the CAP and also stress its importance and effectiveness.

To provide additional feedback to Senior Management (beyond meetings and walkarounds) the QA Assessment Department has developed and implemented a monthly employee, one on one, interview questionnaire. The results will be used to measure success and failure at the departmental level and adjust accordingly.

## Program Enhancement

**Priority:** RED  
**Item No:** MGMT-94-02

**Title/Description:** Develop an NPG Business Plan      **Date Updated:** 3/31/94

**External Funding Requirements:** \$100,000

**Internal Resource Requirements:** 80 Hours/Senior Manager; 480 Hours Total

**Program Manager:** All

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 5/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI, CCA

**Description:** Develop an NPG Business Plan with a long range goal of improving plant and personnel performance to a level that meets or exceeds industry standards in all areas.

**Objective:** To direct, guide and provide measured feedback relative to use of personnel, resources and management for the purpose of improving plant performance.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish mission and goals for emerging issues and important programs. (MGMT-94-02.1)	1/94	1/94
2.	Clearly define management expectations on one sheet of paper. These will establish the NPG Vision, Mission and Values. (MGMT-94-02.2)	1/94	1/94

## Program Enhancement

### Major Milestones: (MGMT-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Hold departmental meetings to communicate the vision, mission and value statements of the business plan. (MGMT-94-02.3)	3/94	3/31/94
4.	Complete the Strategic Business Plan. (MGMT-94-02.4)	4/94	
5.	Issue first monthly performance Monitoring Report. (MGMT-94-02.5)	5/94	
6.	Continue to communicate management expectations and provide positive feedback on successes. (MGMT-94-02.6)	Ongoing	

- Update Status:**
- Milestones number 1 and 2 have been completed. The NPG vision, mission, and value statements were developed and forwarded to all NPG employees.
  - Milestone number 3 is currently being implemented.
  - Milestone number 4 and 5 are in progress. Workshops have been conducted with Senior Management to develop and finalize the Business Plan supportive missions and goals. The objectives, performance indicators, and performance measures are currently being developed.
  - Milestone number 6 is an ongoing activity.

## Program Enhancement

Priority: RED  
Item No: MGMT-94-03

Title/Description: Prioritize Outstanding Work      Date Updated: 3/31/94

External Funding Requirements: \$10,000  
Internal Resource Requirements: 5 Department Personnel for 2 Months; Total 1200 Hours  
(Engineering, Maintenance, Tech. Staff)

Program Manager: All  
Planned Start Date: 1/24/94      Planned Completion Date: 4/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Developed a priority system to prioritize outstanding work to ensure the critical items are being worked first.

Objective: To focus management and personnel resources in the most effective means possible.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop a prioritization procedure. (JMM-94-06)	4/94	
2.	Assemble items to be prioritized. (MGMT-94-03.1)	3/94	3/7/94

## Program Enhancement

### Major Milestones: (MGMT-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Establish departmental team to conduct the initial prioritization. (MGMT-94-03.2)	3/94	3/7/94
4.	Complete the prioritization of existing items. (MGMT-94-03.3)	4/94	

**Update Status:** Within the Engineering organization the significant work items which include NCRs, DRs, as well as external commitments, are being prioritized via the interim Prioritization Program. The prioritization of the MWRs, TWRs, and PCNs is being validated/established. (See Action Item JMM-94-04)

It was found that our existing priority schemes (for EWR, MWR, TWR, and PCN) are being revalidated to ensure their adequacy and correctness of application.

Items #2 and #3 were completed for the Engineering Department on 2/9/94; The prioritization of outstanding engineering work (Item #4) was completed on 3/10/94. Items #2 and #3 were completed for the Maintenance Department the week of 3/7/94; The prioritization of outstanding maintenance work (Item #4) is in progress with an expected completion of 4/30/94. (Forced shutdown maintenance activities in the month of March precluded completion of this activity on schedule.)



**SECTION III**  
**OPERATIONS**

## SECTION III

### OPERATIONS

The issues covered in this section focus on operations, procedural adequacy and adherence, engineering program adequacy, and certain management issues. The concerns regarding operations include the communication of management expectations and the lack of standardization with how operating shifts communicate. There is also a lack of a questioning attitude, accountability and a lack of ownership within the operations organization.

The procedural adequacy and adherence concern included three issues. The first issue is that the work force is changing and, therefore, the content of the procedures have to be revised. The second issue involves the proper balance between the "Skill of the Craft" and the necessary amount of detail in each procedure. Finally, the employees who use the procedures do not display a questioning attitude when confronted with a situation that does not appear to be correct.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

Priority: RED  
Item No: RLG-94-01

Title/Description: Develop Program to Review Maintenance Procedures Date Updated: 3/31/94

External Funding Requirements: \$275,000

Internal Resource Requirements: Support to research, revise and develop Maintenance Procedures during the course of 1994.

Program Manager: Rick Gardner (Mike Unruh)

Planned Start Date: 1/24/94

Planned Completion Date: 12/94

References (NRC/INPO/NUMARC/NAIT Etc.): SPPI 340, OSTI, SMM

Description: The actions that will be addressed under this action include the following:

- Review selected Maintenance Procedures to verify the incorporation of accurate and sufficient information (including vendor information).
- Determine that sufficient technical detail is incorporated into Maintenance Procedures to allow the Craft to perform the activity.
- Establish and communicate a definition of "Skill of the Craft".
- Determine that adequate training is provided to support the performance of the Maintenance Procedures, as written.

Objective: To provide the appropriate level of detail for the craftsmen and to address performance deficiencies.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Determine manpower requirements, prepare and approve position authorizations, conduct interviews and hire temporary employees. (RLG-94-01.1)	2/94	2/94

## Program Enhancement

### Major Milestones: (RLG-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
2.	Provide facilities, equipment and supplies to procedure upgrade team. (RLG-94-01.2)	2/94	2/28/94
3.	Conduct scope meeting, outline goals, expectations, and schedule. (RLG-94-01.3)	2/94	2/28/94
4.	Define "Skill of the Craft". (RLG-94-01.4)	4/94	
5.	Revise current, safety related and important to safety maintenance procedures as necessary to ensure skill of the craft is addressed and the necessary technical details are provided. (RLG-94-01.5)	12/94	
6.	Vendor Manual Validation and Verification (V&V) complete. (RLG-94-01.6)	6/94	
7.	Interface with the Training Department to ensure the incorporation of maintenance procedure changes into training. (RLG-94-01.7)	12/94	

- Update Status:**
- 1) Temporary employees have been hired and are in training with a completion date of 3/94.
  - 2) Facilities and equipment have been identified. Currently sufficient facilities and equipment have been provided to support the procedures upgrade effort. Procurement of remaining equipment is still in progress.
  - 3) Initial "Scope Meeting" was conducted on 2/28/94. Additional meetings will be conducted on a bi-weekly basis as necessary to support this project. This meeting was not held as scheduled due to the plant scram on March 2, 1994, the shutdown for RHR-27A, and work on the HPCI stop valve. Next meeting to be held April 8, 1994.
  - 4) Defining "Skill of the Craft" effort in progress. The project was delay due to the plant scram on March 2, 1994, the shutdown for RHR-27A, and work on the HPCI stop valve.

## Program Enhancement

RLG-94-01 (Continued)

- Update Status:       6)   This item is currently being pursued either completely or partially by programs engineering. A meeting is being scheduled to integrate these efforts. The meeting will take place no later than April 15, 1994.

# Program Enhancement

Priority: RED  
Item No: RLG-94-02

Title/Description: Review Preventive Maintenance Task Assignments for Adequate Instructions  
Date Updated: 3/31/94

External Funding Requirements: \$150,000 (Estimated)  
Internal Resource Requirements: 350 hours

Program Manager: Rick Gardner (Mike Unruh)  
Planned Start Date: 1/24/94  
Planned Completion Date: 12/94

References (NRC/INPO/ETC.): OSTI

Description: Review Preventive Maintenance (PM) tasks under the responsibility of the Maintenance Department to systemically document the adequacy of the work instruction, and revise those PMs that do not contain adequate work instructions.

Objective: To provide the appropriate level of detail for the craftsmen and to address performance deficiencies.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish a Task Group to establish/develop criteria (i.e. checklist) for documents which set forth acceptable practices and/or provide information regarding activities that are considered within the Skill of the Craft (Maintenance Work Practices) (RLG-94-02.1)	2/94	2/28/94
2.	Collect requirements that define what constitutes SORC procedures. (RLG-94-02.2)	2/94	2/28/94
3.	Based on items 1 and 2, establish/develop criteria to identify the level of detail required for work instruction documents. (RLG-94-02.3)	3/94	3/31/94

## Program Enhancement

### Major Milestones: (RLG-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
4.	Submit criteria to the appropriate organizations for review and acceptance. (RLG-94-02.4)	3/94	3/31/94
5.	Procure services as necessary to review the existing PMs using the criteria established in items 3 and 4. (RLG-94-02.5)	3/94	3/7/94
6.	Perform the review of approximately 5540 PMs (Planning - 1500, I-Shop - 2270, E-Shop - 900, M-Shop - 800, UT-Shop - 55, and W-Shop - 15), and revise PMs, maintenance procedures and Maintenance Work Practices to insure adequate work instructions exist. (RLG-94-02.6)	12/94	

**Update Status:** A chairman has been named for the Task Group to establish/develop a criterial document. Four additional Maintenance Department individuals have been identified to serve in the Task Group. One additional task force member will be added.

The February Board meeting should approve Tasks with various companies to obtain the manpower to perform the PM review.

#### Major Milestone 1

Establish a Task Group to establish/develop criteria (i.e. checklist) for documents which set forth acceptable practices and/or provide information regarding activities that are considered within the "Skill of the Craft".

#### Status 3/7/94

A Task Group has been formed and met to discuss the objective of milestone 3. Reference 1 provides more details regarding the Task Group, and it identifies the personnel in the Task Group. The Task Group has developed a draft definition for "Skill of the Craft".

# Program Enhancement

Update Status: (RLG-94-02 Continued)

## Major Milestone 2

Collect requirements that define what constitutes SORC procedures.

Status 3/7/94

This milestone is completed. Reference 3 provides the discussion of what constitutes SORC procedures.

## Major Milestone 3

Based on items 1 and 2, establish/develop criteria to identify the level of detail required for work instruction documents.

Status 3/7/94

The Task Group identified in milestone 1 has met to discuss the objective of the milestone.

Status 3/24/94

A document that provides guidance on procedural detail is currently being written. The initial draft may be ready for review by the first of April.

Status 3/31/94

The initial draft has been developed and issued for comments. This milestone is completed.

## Major Milestone 4

Submit criteria to the appropriate organizations for review and acceptance.

Status 3/7/94

No Action

Status 3/31/94

A draft document that provides guidance on procedural detail has been submitted for review and acceptance. this milestone is completed.



## Program Enhancement

Update Status: (RLG-94-02 Continued)

### Major Milestone 5

Procure services as necessary to review the existing PMs using the criteria established in items 3 and 4.

Status 3/7/94

Three people from General Physics Corporation has been procured under General Services Agreement No. 86A-C1, Task 42, to perform the review. This milestone is completed.

### Major Milestone 6

Perform the PM review, and revise PMs, procedures and MWP's to insure adequate work instructions exist.

Status 3/7/94

Reference 2 discusses and includes a checklist for the items being addressed in the PM review. The checklist has been revised to review the "P" Shop PMs that were originally excluded from the PM review. A copy of the revised checklist is attached. The three people from General Physics will be starting the PM review this week.

Status 3/24/94

An initial review of all PMs should be completed before the first of April. This review will identify the PMs that need revision and which PMs that are currently adequate based on the review criteria.

# Program Enhancement

Priority: RED  
Item No: RLG-94-03

Title/Description: Upgrade the System Engineer Program      Date Updated: 3/31/94

External Funding Requirements: \$25,000

Internal Resource Requirements: The entire Engineering Department will be involved over an approximate two-year period.

Program Manager: Rick Gardner (Jim Lynch)

Planned Start Date: 10/18/93

Planned Completion Date: 12/94

References (NRC/INPO/NUMARC/NAIT Etc.): SMM

Description: Upgrade of the System Engineer Program consists of the following activities:

- A. Implementation of the Engineering Plan for performance improvement, the elements of which are described below under major milestones.
- B. Improvements to System Engineer training, described in Program Enhancement Item RLG-94-08.
- C. Engineering backlog reduction, described in Program Enhancement Item RLG-94-06.

Objective: Improve the effectiveness of the Engineering Department. Improvements will focus on work management system and program reporting, and definition of roles in the Engineering Department.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Perform assessment of Engineering Department effectiveness and organization. (RLG-94-03.1)	1/94	1/22/94
2.	Develop an integrated plan to address various assessments of engineering at CNS. Submit to Region IV. (RLG-94-03.2)	1/94	1/21/94

## Program Enhancement

### Major Milestones: (RLG-94-03 Continued)

Accomplishment	Plan Date	Actual Date
3. Work management improvements:		
- Develop criteria for prioritization of engineering NAIT and ACT items. (RLG-94-03.3)	1/94	2/9/94
- Prioritize and schedule NAIT and ACT items. (RLG-94-03.4)	2/94	3/10/94
- Develop a set of engineering department performance indicators. Produce appropriate charts and graphs for department and senior management review. (RLG-94-03.5)	2/94	
- Produce final set of department performance indicators, publish monthly. Determine performance goals and incentives for achieving goals. (RLG-94-03.6)	4/94	
4. Establish system and program report cards:		
- Produce first draft system report card for one system. (RLG-94-03.7)	2/94	3/4/94
- Produce final system report card. (RLG-94-03.8)	2/94	3/31/94
- Produce first draft program report card for one program. (RLG-94-03.9)	2/94	3/4/94
- Produce final program report card. (RLG-94-03.10)	3/94	3/31/94
- Produce report cards for all assigned systems monthly. (RLG-94-03.11)	3/94	
- Issue approved EDIs for both report cards. (RLG-94-03.12)	4/94	
- Produce program report card for all assigned programs monthly. (RLG-94-03.13)	4/94	

RLG-94-03 (Cont.)

## Program Enhancement

### Major Milestones: (RLG-94-03 Continued)

Accomplishment	Plan Date	Actual Date
5. Evaluate Engineering Department functions for efficiency improvements. Examples include the way NPRDS reports are prepared procurement activities. Complete evaluation and plan for implementation. (RLG-94-03.14)	3/94	
6. Define roles, management expectations, functions, and accountability for system and program engineers, lead engineers, senior engineers, supervisors, and managers. (RLG-94-03.15)	6/94	
7. Develop succession plan for manager, assistant manager, supervisor and lead positions. Succession plan will include appropriate developmental assignments and training. (RLG-94-03.16)	6/94	
8. Perform an assessment and develop a plan to identify candidate processes for re-engineering. The plan should identify and prioritize candidate processes and develop a schedule for completion of the re-engineering analyses. Candidate processes include procurement and engineering work request. (RLG-94-03.17)	8/94	
9. Self assess the CNS Engineering Department upgrades for effectiveness. (RLG-94-03.18)	12/94	

**Update Status:** 2/10/94

Item #1 is complete. Item #2 is complete and was transmitted to Region IV on 1/21/94 (CNSS941043). Item #3 a memo (CNSS943517) was issued on 2/8/94 to engineering supervisors to describe the process and criteria to be used to prioritize the workload. Prioritization is expected to be complete by 2/18/94. A set of 10 draft engineering performance indicators has been completed. Draft indicators are currently under review. Item #4 system report cards used at SONGS, Crystal River 3, and Fermi have been gathered as examples.

## Program Enhancement

Update Status: (RLG-94-03 Continued)

- 3/10/94      Item #5, a draft set has been produced and is being reviewed by management. Item #8 will be completed during 3/94. Item #14, procurement, change process, design and NPRDS reporting are currently being evaluated. No results to report to date.
- 3/31/94      Item #5, Draft performance indicators have been produced 3/10/94. On schedule for final set by 4/94. Items #8 and #10 has been completed. Item #11, System Report Cards will be produced in April. Item #14, changes are currently being made to the way purchase requisitions and NPRDS reports are handled within Engineering. Comprehensive evaluation will be performed in April.

## Program Enhancement

Priority: RED  
Item No: RLG-94-04

Title/Description: Complete the Maintenance Department Reorganization      Date Updated: 3/31/94

External Funding Requirements: \$50,000 Consultant to identify structure and positions.  
Internal Resource Requirements: 100 hours

Program Manager: Rick Gardner (Mike Unruh)  
Planned Start Date: 1/24/94      Planned Completion Date: 9/94

References (NRC/INPO/NUMARC/NAIT Etc.): SMM

Description: Develop and implement a reorganization of the Maintenance Department.

Objective: To reduce the number of reporting layers in order to improve communications within the department and to create a Maintenance Support group.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop organization structure. (RLG-94-04.1)	1/94	1/94
2.	Obtain approval of structure and manpower increases. (RLG-94-04.2)	2/94	2/94
3.	Acquire approval to combine Lead Person and Crew Leader jobs. (RLG-94-04.3)	2/94	2/15/94
4.	Determine space requirements and provide same. (RLG-94-04.4)	4/94	
5.	Re-assign personnel to positions as necessary, and finalize the new position descriptions and postings. (RLG-94-04.5)	6/94	
6.	Self assess the reorganized department for effectiveness. (RLG-94-04.6)	9/94	

RLG-94-04

*Maintenance department charges drawing room assistance*

## Program Enhancement

### Update Status: (RLG-94-04 Continued)

- 1) Organization structure development complete.
- 2) Organization structure approved and manpower increases for initial stages of restructure approved.
- 3) Reclassification of Lead Person positions to Crew Leader is complete. Reclassifications took affect 3/1/94.
- 4) Space requirements for initial stages of restructure have been determined and a Purchase Requisition for same has been submitted. Received approval of PR for trailer on 3/12/94 P.O. 379174 issued for trailer on 3/23/94.
- 5) Met with Human Resources personnel on 3/7 and 3/8 to begin development of new position descriptions to support reorganization. Writing of new position descriptions is in progress.

## Program Enhancement

**Priority:** RED  
**Item No:** RLG-94-05

**Title/Description:** Evaluate PIV, ISI, IST and LLRT Programs      **Date Updated:** 3/31/94

**External Funding Requirements:** \$800,000 (Estimate)

### Internal Resource Requirements:

Licensing Manager/Supervisor - 40 hours/year,  
Configuration Management Manager/Supervisor - 30 hours/year,  
CNS Engineers - 240 hours/cycle,  
NED Engineer - 1040 hours/year,  
Operations/Maintenance support - 640 hours/cycle

**Program Manager:** Rick Gardner (Jim Lynch)

**Planned Start Date:** 9/1/93

**Planned Completion Date:** 4/95

**References (NRC/INPO/NUMARC/NAIT Etc.):** SPPI 350

**Description:** Develop and implement programs and program changes to resolve SALP MS-1 concerns for Pressure Isolation Valve testing, Local Leak Rate Testing, and Inservice Inspection/Testing including:

- Develop and implement a Pressure Isolation Valve test program.
- Identify safety related manual valves required to be operated in emergency conditions and implement PM requirements.
- Identify and implement ISI requirements for safety related, non-code class 1,2, or 3 systems containing piping, pressure vessels, pumps, or valves.
- Implement modification, testing, and program development to resolve SALP MS-1 LLRT concerns.

**Objective:** Evaluate and improve PIV, ISI, IST and LLRT programs to ensure regulatory compliance and sound program bases.



## Program Enhancement

### Major Milestones: (RLG-94-05 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Initiate/approve PMs for manual valves used in EOPs. (RLG-94-05.1)	12/93	11/17/93
2.	Develop an Engineering Department Instruction which provides guidance for action to be taken when components are placed on increased test frequency. (RLG-94-05.2)	4/94	
3.	Evaluate safety related non-code class 1, 2, and 3 systems for ISI program inclusion. (RLG-94-05.3)	6/94	
4.	Determine ISI boundaries and inspection scope for SW and REC systems. (RLG-94-05.4)	7/94	
5.	Determine ISI boundaries and inspection scope for safety related non-code class 1, 2, and 3 systems. (RLG-94-05.5)	7/94	
6.	Complete design basis reconstitution for primary containment (Cost not included in funding requirements). (RLG-94-05.6)	6/94	
7.	Submit relief requests for SW and REC inspection program addenda. (RLG-94-05.7)	8/94	
8.	Submit 10CFR50.55a exemption requests for safety related non-code class 1, 2, and 3 systems not to be added to ISI program. (RLG-94-05.8)	8/94	
9.	Submit relief requests for safety related non-code class 1, 2, and 3 systems inspection program addenda. (RLG-94-05.9)	8/94	
10.	Develop procedures for PIV testing. (RLG-94-05.10)	8/94	
11.	Review safety related manual valves for inclusion in IST or augmented testing programs. (RLG-94-05.11)	8/94	

## Program Enhancement

### Major Milestones: (RLG-94-05 Continued)

	Accomplishment	Plan Date	Actual Date
12.	Initiate/approve PMs for stroking identified manual valves. (RLG-94-05.12)	10/94	
13.	Complete design basis reconstitution walkdown (cost not included in funding requirements). (RLG-94-05.13)	11/94	
14.	Submit ISI program addenda for SW and REC systems. (RLG-94-05.14)	12/94	
15.	Submit ISI program addenda for safety related non-code class 1, 2, and 3 systems. (RLG-94-05.15)	12/94	
16.	Approve procedures for PIV testing. (RLG-94-05.16)	12/94	
17.	Conduct a third party review of IST program manual valves. (RLG-94-05.17)	12/94	
18.	Develop an Appendix J program document. (RLG-94-05.18)	12/94	
19.	Complete installation of test connections and isolation valves for LLRT accident direction testing (cost not included in funding requirements). (RLG-94-05.19)	4/95	
20.	Perform LLRT accident direction testing for modified penetrations. (RLG-94-05.20)	4/95	

**Update Status:** Contractor selected for staff augmentation to complete Item # 4. Funding expenditure request to go to the February Board of Directors for approval.

PIV testing methods selected and verified to be effective during 1993 outage.

Approximately 50% of the safety related manual valves have been initially reviewed. The effort is approximately 25% complete overall.

## Program Enhancement

Priority: RED  
Item No: RLG-94-06

Title/Description: Engineering Backlog

Date Updated: 3/31/94

**External Funding Requirements:** \$1,200,000 (estimate). Estimate is based on 15 contractors for six to nine months to help reduce engineering backlog and to upgrade programs.

**Internal Resource Requirements:** Estimate 25% paid overtime per engineer for the next six to nine months.

**Program Manager:** Rick Gardner (Jim Lynch)

**Planned Start Date:** 1/10/94

**Planned Completion Date:** 4/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI, INPO

**Description:** Reduction of the Engineering Department backlog will result in an Engineering Department workload that is prioritized, manageable in size, delivers products on time, and has measurable results and goals and allow CNS engineering time to establish an enhanced system engineer program and establish healthy reports of assigned systems.

**Objective:** Reduce engineering backlog and improve the effectiveness of managing the workload. This will allow System and Program Engineers to more effectively manage their systems and programs.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop criteria for prioritization of engineering NAIT and ACT items. (RLG-94-06.1)	1/94	2/8/94
2.	Prioritize and schedule NAIT and ACT items. (RLG-94-06.2)	2/94	2/28/94
3.	Prepare point papers for contractor assistance. (RLG-94-06.3)	1/94	1/94

## Program Enhancement

### Major Milestones: (RLG-94-06 Continued)

	Accomplishment	Plan Date	Actual Date
4.	Plan for contractor site arrival training, badging, office space. (RLG-94-06.4)	2/94	2/28/94
5.	Identify specific work packages for contractors. Assign contractors for specific engineers. (RLG-94-06.5)	2/94	2/28/94
6.	Develop a set of Engineering Department performance indicators. Produce appropriate charts and graphs for department and senior management review. (RLG-94-06.6)	2/94	3/10/94
7.	Produce final set of department performance indicators, publish monthly. Determine goals and incentives for achieving goals. (RLG-94-06.7)	4/94	

**Update Status:**      2/10/94      Item #1 is complete, memo (CNSS943517) was issued on 2/8/94. Item #2 is in progress with completion expected by 2/18/94. Item #3, Point Papers have been prepared and discussed with the ERC. Board Of Directors discussion planned for 2/11/94. Item 4, trailer space identified, PO for computer purchase written, Computer Applications setting up a computer trunk line to the trailer. Item #6, draft indicators have been produced.

                                 3/10/94      Item #2 and #4 are complete. Item #5, contractors began arriving on 2/14. All contractors are on-site and have been assigned to specific supervisors. Item #6, a draft set has been produced and are being reviewed by management.

# Program Enhancement

Priority: RED  
Item No: RLG-94-07

Title/Description: Maintenance Backlog

Date Updated: 3/31/94

External Funding Requirements: \$200,000  
Internal Resource Requirements: 6,000 hours

Program Manager: Rick Gardner (Mike Unruh)  
Planned Start Date: 1/24/94

Planned Completion Date: 9/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Provide Maintenance Department review of all commitments (MWRs/NCRs/DRs) in order to ensure control of same. Additionally, provide interim resources to address incoming items until the maintenance support group is functional.

Objective: Reduce maintenance backlog and improve the effective management of the workload.

## Major Milestone:

	Accomplishment	Plan Date	Actual Date
1.	Define Backlog. (RLG-94-07.1)	2/94	2/23/94
2.	Determine additional resource requirements and obtain. (RLG-94-07.2)	2/94	2/28/94
3.	Review all commitments to determine depth of problem (this will be a group review). (RLG-94-07.3)	4/94	
4.	Set Priorities from review. (RLG-94-07.4)	4/94	
5.	Identify and plan for resolution of the problem areas. The major points are spare parts, resources and enhanced scheduling. (RLG-94-07.5)	6/94	

## Program Enhancement

### Major Milestones: (RLG-94-07 Continued)

	Accomplishment	Plan Date	Actual Date
6.	Provide permanent resources to maintain a periodic review of all open items. (RLG-94-07.6)	6/94	
7.	Provide a means for continuous monitoring of Maintenance Group/Shop Backlog. (RLG-94-07.7)	9/94	

<b>Update Status:</b>	2/10/94	Item #1, define backlog, is in progress. Item #2, additional resource requirements have been identified and the resources should be approved at the February board meeting.
	3/10/94	Item #1, definition for backlog has been established and is being included in M.P. 7.0.4 <u>Conduct of Maintenance</u> . Additionally a method for prioritizing backlog items has been established. Procedure revision is ready to be submitted for SORC routing.  Item #6, resources to maintain periodic review of all open items has been provided on a temporary basis through use of a consultant engineer.
	<u>3/31/94</u>	The prioritization of outstanding maintenance work is in progress with an expected completion of 4/30/94. (Forced shutdown maintenance activities in the month of March precluded completion of this activity on schedule.)

# Program Enhancement

**Priority:** RED  
**Item No:** RLG-94-08

**Title/Description:** Review the Qualifications and Training of Current CNS System Engineers to Determine Training Required

**Date Updated:** 3/31/94

**External Funding Requirements:** None

**Internal Resource Requirements:** Approximately 20 system engineers each attending two newly revised system training courses per year; 30 system engineers attending courses required by revised Training Program Descriptions (TPDs) for one year (qualification to revised TPDs must be completed within one year) training resources to develop and deliver the newly revised system training courses.

**Program Manager:** Rick Gardner (Jim Lynch)

**Planned Start Date:** 11/3/93

**Planned Completion Date:** 7/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI, SPPI

**Description:** Upgrade the training provided to system engineers to include system task oriented objectives. Provide appropriate system training for all engineers assigned systems.

**Objective:** Organize, enhance, and communicate improvements in engineering training. This includes enhanced systems training and improvements to positional requirements for engineers.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Review and revise TPD 502 - Technical Staff, TPD 509 - Station Engineer, TPD 526 - Station Nuclear Engineer, TPD 527 - ISI Engineer (RLG-94-08.1)	12/93	12/30/93
2.	Identify system engineers assigned systems who have not completed system training. (RLG-94-08.2)	1/94	.94
3.	System engineers complete system training as identified in Item 2 (above). (RLG-94-08.3)	2/94	2/28/94

## Program Enhancement

### Major Milestones: (RLG-94-08 Continued)

	Accomplishment	Plan Date	Actual Date
4.	Develop a plan and schedule for system lesson plans to be upgraded for system engineers (i.e., begin with SRO level training lesson plans and revise objectives as appropriate for system engineer). (RLG-94-08.4)	2/94	
5.	Complete revision to system engineer lesson plans and begin delivering new system training lessons. (RLG-94-08.5)	7/94	
6.	Develop individualized training plans appropriate for Engineering Department personnel. (RLG-94-08.6)	7/94	
7.	System Engineer Certification (RLG-94-08.7)	7/94	

<b>Update Status:</b>	2/10/94	Item #1 is complete. TPDs have been reviewed and changes were made regarding position and task required lessons, and optional lessons. Item #2 is complete. Engineers assigned systems who have not completed training on their assigned systems have been identified. Item #3 is in progress.
	3/10/94	Item #3, all System Engineers have completed the appropriate systems training. Item #4, discussions with training have begun and three meeting have been held. Schedules have not been produced but are scheduled to be completed during 3/94.
	3/31/94	Item #4, lesson objectives for System Engineer Training have been completed 3/9/94. Schedule for lesson plan upgrades to be developed in April.



# Program Enhancement

Priority: RED  
Item No: RLG-94-09

Title/Description: Improve Operations Communications

Date Updated: 3/31/94

External Funding Requirements: None

Internal Resource Requirements: 60 hours per year

Program Manager: Rick Gardner (Bob Brungardt)

Planned Start Date: 12/1/93

Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: The actions that will be addressed under this action include the following:

- Evaluate the conduct of crew briefings including frequency and adequacy of information exchange.
- Standardize the shift turnover process such that operational information/plant station information is communicated between shifts in a consistent manner.
- Establish a mechanism to ensure long term issues/problems are communicated to all shift.
- Evaluate operator verbal communications against the CNS Directive on communications.

Objective: Ensure complete, accurate and consistent transfer of information through improved operator communications.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Implement a Control Room Operator Turnover Checklist to support consistent turnovers. (RLG-94-09.1)	3/94	3/10/94
2.	Obtain approval of Procedure 2.0.2 which incorporates Long Term Concerns into the Shift Supervisor's turnover. (RLG-94-09.2)	4/94	
3.	Observe shift crews and document communications observations. (RLG-94-09.3)	6/94	

## Program Enhancement

### RLG-94-09 (Continued)

**Update Status:** 2/10/94 Shift crews were previously observed in September - October 1993, and communications observations documented. Milestone #3 will measure the effectiveness of communication improvements previously implemented.

Procedure 2.0.2 has been revised and a draft of the Long Term Concerns is already in use.

3/10/94 (RLG-94-09.1)

A Control Room Operator Turnover Checksheet is in use by the CRS, RO, and BOP.

(RLG-94-09.2)

Procedure 2.0.2 is in technical review routing.

**SECTION IV**  
**SAFETY ASSESSMENT**

## SECTION IV

### SAFETY ASSESSMENT

Within this section the issues regarding problem identification, corrective action, procedural adequacy and adherence will be addressed. The procedural adequacy and adherence concern focused on whether the procedures, as they are currently written, provide the necessary guidance and detail. Part of the oversight function at CNS is to determine if appropriate solutions to existing problems is being provided. A new Corrective Action Program is being developed to accomplish this.

Part of the culture change that must happen before CNS can significantly improve performance is that the employees need to develop a more questioning attitude. To support this change in attitude a mechanism to solicit and implement employee concerns will be developed as a task within this section.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

**Priority:** RED  
**Item No:** JMM-94-01

**Title/Description:** Upgrade the Corrective Action Program      **Date Updated:** 3/31/94

**External Funding Requirements:** \$400,000  
**Internal Resource Requirements:** 2500 hours

**Program Manager:** John Meacham (Chris Moeller)  
**Planned Start Date:** 9/17/93      **Planned Completion Date:** 10/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** CCA, SPPI, SMM, OSTI

**Description:** Various internal and regulatory assessments of the existing Corrective Action Program have identified several weaknesses. These weaknesses are being resolved through this action item.

**Objective:** In support of the culture change to a more questioning attitude, provide a completely new Corrective Action Program, which facilitates:

1. Easy problem identification.
2. Defined problem ownership and accountability.
3. More in-depth root cause analysis.
4. Improved human performance evaluation.
5. Enhanced trending capability.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish Steering Committee. (JMM-94-01.1)	9/93	9/24/93
2.	Develop project goals. (JMM-94-01.2)	10/93	9/30/93
3.	Approve conceptual design. (JMM-94-01.3)	10/93	10/11/93
4.	Conduct plant visits. (JMM-94-01.4)	10/93	10/29/93
5.	Conduct manager/supervisor workshops. (JMM-94-01.5)	12/93	12/1/93

## Program Enhancement

### Major Milestones: (JMM-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
6.	SORC review of draft procedures. (JMM-94-01.6)	12/93	12/23/93
6a.	Implementation of interim changes. (JMM-94-01.6a)	1/94	1/27/94
7.	Preliminary approval of CAP implementation procedures. (JMM-94-01.7)	2/94	2/28/94
8.	Provide CAP training. (JMM-94-01.8)	3/94	3/31/94
9.	Preliminary approval of Root Cause Guideline. (JMM-94-01.9)	3/94	3/31/94
10.	Provide root cause training. (JMM-94-01.10)	3/94	3/31/94
11.	Implement program and supporting procedure changes. (JMM-94-01.11)	3/94	3/31/94
12.	Convert existing trending records to new database. (JMM-94-01.12)	6/94	
13.	Assess program effectiveness. (JMM-94-01.13)	10/94	

### Update Status:

All CAP procedures have been completed and SORC approval received. The Root Cause Guideline has been completed, reviewed and approved for general use. Root Cause Training began on March 28, 1994 for the first group of trainees. Additional groups will be trained over the next two months. Program implementation has been affected and full implementation achieved.

# Program Enhancement

Priority: RED  
Item No: JMM-94-02

Title/Description: Improve Operating Experience Review Program

Date Updated: 3/31/94

External Funding Requirements: \$35,000  
Internal Resource Requirements: 700 hours

Program Manager: John Meacham (Pat Thurman)

Planned Start Date: 1/24/94

Planned Completion Date: 6/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA

Description: The NPPD CNS OER Program has come under scrutiny by CNS Senior Management and the NRC because of several recent incidents. Consequently, an effort is underway to improve the effectiveness of the program.

Objective: Improve the CNS OER Program through:

1. Lessons learned from a critical review of past document dispositions.
2. Assessing the current program and correcting weaknesses.
3. Enhanced training of involved personnel.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Assess current OER program. (JMM-94-02.1)	2/94	2/25/94
2.	Assess 20% of OER dispositioned in the last two years. (JMM-94-02.2)	3/94	3/31/94
3.	Assess certain OER dispositioned within the last ten years. (JMM-94-02.3)	3/94	3/31/94
4.	Based on the results of assessments, revise the CNS OER Program. (JMM-94-02.4)	4/94	
5.	Develop training module and train personnel on revised program. (JMM-94-02.5)	6/94	

## Program Enhancement

JMM-94-02 (Continued)

**Status Update:**

Assessment of the existing CNS OER program has been completed. The review of past OER dispositions, as well as the evaluation by an independent consultant has shown a need to revise the current program. Efforts have begun to revise the program procedures in areas where weakness has been identified. The previous plan date for JMM-94-02.4 of 3/31/94 was in error. It was always anticipated that the OER Program would be reviewed after the assessments were complete.



## Program Enhancement

Priority: RED

Item No: JMM-94-03

Title/Description: Enhance the Human Performance Evaluation Program Date Updated: 3/31/94

External Funding Requirements: \$50,000

Internal Resource Requirements: 4500 hours

Program Manager: John Meacham (IRG Manager)

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, SMM

**Description:** The existing Human Performance Evaluation Program is somewhat rudimentary and is used within the existing Corrective Action Program only when consequential human errors arise. Enhancements to this program, embodied in the aforementioned elements of this action item, will be described in a Nuclear Power Group Directive and will be applicable to all personnel in the NPG. The thresholds for human error and the actions necessary to correct their causes will be decided and implemented at the departmental level. The new Corrective Action Program will serve as the vehicle to implement this program. An Independent Review Group (IRG) will be formed to assess human performance through investigate assessments by Senior Management. The development activities associated with this program will be performed as item No. JMM-94-05, develop the Independent Review Group.

**Objective:** Reduce human errors through a programmatic approach to human performance evaluation.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish the IRG Manager as the Program Manager. (JMM-94-03.1)	2/94	2/24/94
2.	Perform assessment of recent human errors by outside experts. (JMM-94-03.2)	2/94	3/18/94
3.	Provide input to CAP final procedures. (JMM-94-03.3)	3/94	3/18/94

## Program Enhancement

JMM-94-03 (Continued)

**Update Status:** The INPO assessment report on human performance problems was received during the first week in March. Recommendations from this report were reviewed. CAP procedures were reviewed to insure that the issues identified by INPO has been addressed by the CAP program. The evaluation determined that the new CAP program encompassed the INPO concern. This completes the activities associated with this program.

## Program Enhancement

Priority: RED  
Item No: JMM-94-04

Title/Description: Review/Revise Operability Determination Process      Date Updated: 3/31/94

External Funding Requirements: \$30,000  
Internal Resource Requirements: 1000 hours

Program Manager: John Meacham/(R.L. Sanchez/E.A. Erickson)  
Planned Start Date: 1/24/94      Planned Completion Date: 11/94

References (NRC/INPO/NUMARC/NAIT Etc.): SPFI

**Description:** Over the past two years, several lessons have been learned regarding the use of the operability determination/operability evaluation process. In view of the changes being made to the Corrective Action Program, management has determined that it would be timely to also enhance this process.

**Objective:** Revise the OD/OE procedures to allow for termination when no longer applicable, to assure inputs are properly reviewed and prepared in accordance with other CNS Procedures, to describe needed threshold, and to allow searching on past OEs/ODs. In addition, provide training to involved personnel.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Assess existing procedural weakness. (JMM-94-04.1)	3/94	3/31/94
2.	Based on assessment, revise procedure. (JMM-94-04.2)	4/94	
3.	Establish process "owners" for OD and OE process. (JMM-94-04.3)	4/94	

## Program Enhancement

### Major Milestones: JMM-94-04 (Continued)

	Accomplishment	Plan Date	Actual Date
4.	Develop training module and train appropriate personnel on revised procedure. (JMM-94-04.4)	5/94	
5.	Evaluate effectiveness of new process. (JMM-94-04.5)	11/94	

**Update Status:** The assessment of existing OD/OE procedures is completed. Procedures are currently undergoing revision with a planned completion in April.

## Program Enhancement

Priority: RED  
Item No: JMM-94-05

Title/Description: Develop the Independent Review Group      Date Updated: 3/31/94

External Funding Requirements: \$30,000  
Internal Resource Requirements: 200 hours

Program Manager: John Meacham (Pat Thurman)  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/NUMARC/NAIT Etc.): N/A

**Description:** The Independent Review Group (IRG) will perform selected reviews of NPG activities, without constraints or limitations of any kind and has unlimited access to existing trending information and other pertinent data. The outcome of these reviews will be reported to Senior NPG Management and will identify the cause, or causes, which keep the desired results from being obtained. Areas with severe shortcomings will undergo increased overview by the IRG until a positive trend is achieved.

**Objective:** To ensure that the Nuclear Power Group is achieving results which meet management expectation and, if not, to provide feedback to NPG Senior Management.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Internal review of related programs. (JMM-94-05.1)	2/94	2/10/94
2.	Evaluate how other utilities perform IRG functions. (JMM-94-05.2)	2/94	2/24/94
3.	Develop IRG Charter. (JMM-94-05.3)	2/94	2/28/94
4.	Develop IRG staffing plan and job descriptions. (JMM-94-05.4)	3/94	3/31/94
5.	Develop IRG procedures and guidance documents. (JMM-94-05.5)	4/94	

## Program Enhancement

### Major Milestones: (JMM-94-05 Continued)

	Accomplishment	Plan Date	Actual Date
6.	Develop assessment schedule for IRG. (JMM-94-05.6)	4/94	
7.	Provide overview report on IRG implementation. (JMM-94-05.7)	5/94	

**Update Status:** The IRG Charter has been developed in the form of an NPG Directive which is now undergoing review. Job Descriptions have been defined, the jobs posted, and staffing for the group is underway.

# Program Enhancement

Priority: RED  
Item No: JMM-94-06

Title/Description: Develop an NPG-Wide Priority System      Date Update: 3/31/94

External Funding Requirements: \$15,000  
Internal Resource Requirements: 1600 hours

Program Manager: John Meacham/E. Erickson  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/NUMARC/NAIT Etc.): CCA, OSTI (Observation 93-202-05)

Description: At the present time, the various organizational entities in the Nuclear Power Group are using different methods to prioritize their work. Simple, priority schemes are needed to ensure that everyone understands what the highest priority work is.

## Objective:

1. To ensure critical work is completed first.
2. To ensure backlog work is being processed in an efficient manner.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Conduct survey to determine how other plants prioritize work. (JMM-94-06.1)	2/94	2/24/94
2.	Evaluate work areas needing prioritization. (JMM-94-06.2)	2/94	2/24/94
3.	Develop formal conceptual description for priority program. (JMM-94-06.3)	2/94	2/24/94
4.	Revalidate existing priority schedules for EWR, MWR, TWR, PCN. (JMM-94-06.4)	4/94	
5.	Implement any upgrades stemming from revalidation effort. (JMM-94-06.5)	5/94	

## Program Enhancement

JMM-94-06 (Continued)

**Update Status:** The industry survey of other utility prioritization programs has been completed. Work areas at CNS which require prioritization are being evaluated.

It was found that our existing priority schemes (for EWR, MWR, TWR, and PCN) are being revalidated to ensure their adequacy and correctness of application. The due dates for JMM-94-06.4 and JMM-94-06.5 have been moved one month forward to allow this revalidation effort to occur.



# Program Enhancement

Priority: RED  
Item No: JMM-94-07

Title/Description: Implement the Industry Advisory Group      Date Updated: 3/31/94

External Funding Requirements: \$50,000  
Internal Resource Requirements: 150 hours

Program Manager: John Meacham/J. Partlow  
Planned Start Date: 1/24/94      Planned Completion Date: 5/94

References (NRC/INPO/NUMARC/NAIT ETC.): N/A

**Description:** One of the causes of the recent declining performance of the Nuclear Power Group has been a failure to keep abreast of emerging issues and take action accordingly. An Industry Advisory Group (IAG) will be comprised of several nuclear industry executive level personnel and be chaired by the Senior Nuclear Division Manager of Safety Assessment. The Group will meet periodically to discuss emerging issues, compare CNS performance to industry standards, and provide feedback to Senior Management.

**Objective:** Ensure that the Nuclear Power Group remains abreast of emerging industry issues and proactively responds to those affecting Cooper Nuclear Station.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop IAG Charter. (JMM-94-07.1)	2/94	2/28/94
2.	Develop "Rules of Practice". (JMM-94-07.2)	3/94	3/31/94
3.	Obtain industry experts for IAG. (JMM-94-07.3)	4/94	
4.	Develop meeting schedule and hold first meeting. (JMM-94-07.4)	5/94	

## Program Enhancement

JMM-94-07 (Continued)

**Update Status:** The IAG "Rules of Practice" have been developed and are undergoing review. Resumes have been obtained for potential candidates to serve on the IAG. Activity remains on schedule.

**SECTION V**  
**SITE SUPPORT**

## SECTION V

### SITE SUPPORT

The primary purpose of the Site Support Division enhancements is to resolve the training issues identified by previous audits and assessments and to support the training requirements of several other Program Enhancements. The training deficiencies were centered around the certification process, the adequacy of training, and the apparent inability to maintain the training compliance and qualification requirements for NPG employees.

The Site Support enhancement items address seven areas for improvement. These areas were developed as a result of several inputs and are scheduled and prioritized to provide the required management and staff focus to ensure reasonable and timely progress is achieved and the end product fully addresses the issue.

It is recognized that to improve station performance, increased management attention is needed to increase emphasis on leadership, teamwork, communications and accountability among management, supervision and the workforce. This portion of the Integrated Enhancement Program will support the actions required for these needed improvements.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

# Program Enhancement

Priority: Red  
Item No: EMM-94-01

Title/Description: NPG Manager and Supervisor Management Skills Training      Date Updated: 3/31/94

External Funding Requirements: \$110,000 (Estimate)  
Internal Resource Requirements: Approximately 100 people, 4 24-hour workshops/year, 2-3 years. Senior management participation. Nuclear Training Manager - 200 hours/year, Corporate Training Manager/Supervisor - 50 hours/year.

Program Manager: E.M. Mace (J.W. Dutton)  
Planned Start Date: 11/22/93      Planned Completion Date: 12/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI, SPPI 270 (Enercon Report), SMM, CCA

Description: Develop long term Management Training Program for NPG Supervisors and Managers including:

- Assess each NPG Supervisor and Manager to determine what level of training or support they may require
- Develop Training schedule for NPG Supervisors and Managers
- Develop Management/Supervisor Training Program
- Train Management/Supervision in Basic Management Skills
- Establish Positive Feedback and Improvement areas to Managers and Supervisors

Objective: To provide a strong, focused management development within the NPG.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish overview, basic approach and treatment. (EMM-94-01.1)	11/93	11/22/93
2.	Establish Advisory Committee. (EMM-94-01.2)	12/93	12/22/93

*Assessed 72 personnel*

EMM-94-01

*Top 4090 of what was  
that last time it*

## Program Enhancement

### Major Milestones: (EMM-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Initial design of Workshop #1 (W1). (EMM-94-01.3)	12/93	12/22/93
4.	Administer Diagnostic Instruments. (EMM-94-01.4)	2/94	2/4/94
5.	Finalize design of W1, Initial design of W2. (EMM-94-01.5)	2/94	02/12/94
6.	Finalize design of W2, Initial design of W3. (EMM-94-01.6)	4/94	
7.	Delivery of W1 completed to all Management teams. (EMM-94-01.7)	5/94	
8.	Finalize design of W3, Initial design of W4. (EMM-94-01.8)	5/94	
9.	Delivery of W2 completed to all Management teams. (EMM-94-01.9)	6/94	
10.	Finalize design of W4, Initial design of W5. (EMM-94-01.10)	7/94	
11.	Delivery of W3 completed to all Management teams. (EMM-94-01.11)	9/94	
12.	Finalize design of W5, Initial design of W6. (EMM-94-01.12)	10/94	
13.	Delivery of W4 completed to all Management teams. (EMM-94-01.13)	12/94	

**Update Status:** On schedule

Plan is established for one year of a 2-3 year program. Plan will be updated for second year in the third quarter.

Diagnostic instruments delivered, and evaluation in-progress. Final design of Workshop #1 will be set on Saturday, February 12, 1994 and schedule for Workshops 1-4 will be determined.

## Program Enhancement

**Update Status:** Workshop #1 is scheduled, design finalized and in development. Agreement with Lied Conference in progress. GSA with BCAL and JP & Associates completed. Teams identified.

Team #1 has completed workshop #1, with good acceptance. Delivery of workshop #1 to teams 2-6 is in-progress.

*no negative input*

## Program Enhancement

Priority: Red  
Item No: EMM-94-02

Title/Description: Develop User-Friendly Tracking System for Training and Certification  
Date Updated: 3/31/94

External Funding Requirements: \$350,000 (Estimate)

Internal Resource Requirements: Information Systems assistance, Clerical support for testing, Management/Supervision time for design

Program Manager: E. M. Mace (J. W. Dutton)

Planned Start Date: 1/24/94

Planned Completion Date: 10/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

Description: Develop user-friendly computerized database for tracking when various certifications or requalifications are required and who the affected personnel are. Ensure NPG managers/supervisors are involved in the development of this program - OSTI.

Objective: To develop a user-friendly system to identify certification status of employees prior to work assignment.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish interim Program to ensure maintenance of certification. (EMM-94-02.1)	1/94	1/94
2.	Scoping session with ISD, Training, Steve Woerth, and CS. (EMM-94-02.2)	1/94	1/11/94
3.	Conduct Business Area Analysis at CNS and GO. (EMM-94-02.3)	2/94	2/9/94
4.	Define and refine requirements. (EMM-94-02.4)	3/94	3/9/94
5.	Determine alternatives, select best approach, develop Functional Specification. (EMM-94-02.5)	3/94	3/15/94



## Program Enhancement

### Major Milestones: (EMM-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
6.	Request for Bids. (EMM-94-02.6)	4/94	
7.	Award contract. (EMM-94-02.7)	6/94	
8.	Install/Test system. (EMM-94-02.8)	9/94	
9.	Acceptance Testing Complete. (EMM-94-02.9)	10/94	

### Update Status:

- 1/11/94 Meeting was held at CNS with Information System and Training Department to develop scope of project.
- 2/8&9/94 Meetings were held at CNS with Information Systems to identify the problems with the current TTS system and gain input for the new system requirements.
- 2/8/94 Nuclear Network is being used to explore what other plants are using for software.
- 3/3/94 Meeting scheduled for 3/9/94 at the G.O. with Information Systems to define and refine requirements.
- 3/9/94 Meeting was held on 3/9/94 with IS to define and refine requirements.
- 3/28/94 ISSC (NPPD VP committee) approved expenditure for upgrade (\$350,000 Work Order). Will be submitted for Board approval 4/7/94.

## Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-03

**Title/Description:** Develop a Comprehensive System  
Engineering Training Program for CNS  
System Engineers  
**Date Updated:** 3/31/94

**External Funding Requirements:**  
**Internal Resource Requirements:** 860 hours

**Program Manager:** E. M. Mace (J. W. Dutton)  
**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 7/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** Develop a comprehensive System Engineering Training Program for CNS  
System Engineers - OSTI.

**Objective:** To provide well qualified system engineers to support safe station operation.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Establish Task Group. (EMM-94-03.1)	1/94	1/7/94
2.	Establish Objectives. (EMM-94-03.2)	4/94	
3.	Develop Training Material. (EMM-94-03.3)	5/94	
4.	Develop Evaluation Method. (EMM-94-03.4)	6/94	
5.	Conduct Training. (EMM-94-03.5)	7/94	

## Program Enhancement

EMM-94-03 (Continued)

- Update Status:
- (1) Upgrade Meeting held January 27, 1994
    - S. Winn to provide first cut on "Systems" objectives to R. Sanchez and T. Black, this includes objectives from "Tech Spec" material.
    - B. Toline to provide updated Engineering Task List.
    - M. Bohling to provide overview of current TPDs.
    - M. Bohling gave trip report of Monticello Trip.
  - (2) February 3, 1994

EMR met with Sanchez and Black to review efforts on making "Qual Card" for engineering. They will provide feedback at February 17, 1994, Task Group meeting from Engineering Supervisors.
  - (3) March 3, 1994 Meeting:
    - A) S. Winn has completed review of all COR002 Systems objectives. Forward to Sanchez and Black.
    - B) R. Sanchez presented a cross matrix of integrated systems for engineers. Will select five systems for review and "buy in" by engineer supervision.
    - C) M. Bohling developed a flow chart of current TPDs. This should aid in an overall understanding of the training program.
    - D) "Expert Level" Qual Card developed by B. Toline. Presently under review for comments by T.B., R.S., J.B., W.M.
    - E) Review of the "under development" Manager/Supervisor Systems training course may be suited for 2 week course by new engineers.
    - F) Next task group meeting March 17, 1994.

EMM-94-03 (Cont.)

## Program Enhancement

EMM-94-03 (Continued)

Update Status: 3/31/93

- 1) Due to unplanned outage, task group meetings scheduled for 3-17 and 3-23 were cancelled at Engineering's request.
- 2) A TWR was written by EMR for Program Development to produce a Task to Training matrix. This will justify the current approved Engineering Task list and identify areas needing training development.
- 3) B. Toline will produce a "Generic" workbook for Engineering review; to be included with "System Specific" qual cards.
- 4) Task group meeting for 4-7-94 will pick up where 3-17-94 agenda left off.

## Program Enhancement

Priority: Red  
Item No: EMM-94-04

Title/Description: Root Cause Training

Date Updated: 3/31/94

External Funding Requirements: \$19,250  
Internal Resource Requirements: 255 hours

Program Manager: E. M. Mace (J. W. Dutton)  
Planned Start Date: 1/24/94

Planned Completion Date: 12/94

References (NRC/INFO/NUMARC/NAIT Etc.): 190 SPPI, 200 SPPI

Description: Provide Root Cause Training for the NPG. Root Cause evaluation training needs to be made a part of Engineering and Tech Staff training, and reinforced by continuing training.

Objective: To develop an engineering staff that is well qualified in Root Cause Analysis.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Revise GOT Training. (EMM-94-04.1)	3/94	3/31/94
2.	Develop K-T ATS Training Schedule. (EMM-94-04.2)	3/94	3/29/94
3.	Conduct classes. (EMM-94-04.3)	11/94	
4.	Revise TPDs 0509 - Station Engineer, 0526 - Station Nuclear Engineer, 0527 - ISI Engineer, and 0516 - Design Engineer to include K-T (ATS) Root Cause as Position Required. (EMM-94-04.4)	12/94	

## Program Enhancement

EMM-94-04 (Continued)

**Update Status:** Discussion with Engineering Manager on 2/8/94 indicates that the Kepner Tregoe (ATS) Root Cause classes should be placed as Position specific on Engineering TPDs versus TPD 0502, Tech Staff. This would focus the sessions more towards personnel who perform Root Cause Analysis.

The K-T classes will be offered five (5) times over the next year to accommodate personnel. Once the classes are completed, the TPDs will be revised to reflect the requirement. Providing the classes, then adding the lesson to the TPD as per NTP: 02, Training Program Descriptions.

The three ATS Instructors completed upgrade by Kepner Tregoe on March 23 and 24, 1994. The first three ATS classes have been scheduled for April 11, 12, 13, May 17, 18, 19, and June 27, 28, 29, 1994.

The CAP material will be a "Stand Alone" lesson in GOT. A lesson plan is being developed and TPD's will be revised as directed by Plant Management. The existing "Level One" CAP lesson will be presented to all initial training personnel until the new lesson is developed, all personnel who have completed the "Level One" CAP training will be "Alternately Completed" to the GOT lesson. The "Stand Alone" lesson is 50% complete and will be approved and incorporated on a TPD by 4/1/94.

## Program Enhancement

Priority: Red  
Item No: EMM-94-05

Title/Description: CAP Training

Date Updated: 3/31/94

External Funding Requirements: \$0

Internal Resource Requirements: 100 Professional hours, 20 Clerical hours

Program Manager: E. M. Mace (J. W. Dutton)

Planned Start Date: 1/24/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): 180 SPPI

Description: Develop and present training on the new CAP, upon finalization of CAP procedures.

Objective: To provide training to plant personnel on the new CAP program.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Develop Lesson on CAP. (EMM-94-05.1)	3/94	3/23/94
2.	Present Lesson on CAP. (EMM-94-05.2)	3/94	3/31/94

Update Status: Level I training has been developed and submitted to C. Moeller for review/approval. Awaiting information on objectives from C. Moeller to begin development of Level II training.

Received objectives for Level II Training. Development of Level II lesson in progress, completion is dependent upon approval of Corrective Action Program.

## Program Enhancement

EMM-94-05 (Continued)

**Update Status:** Lesson Plans for Level I and II submitted for review/approval. During the week of 3/28/94, 20 classes for Level I and 10 for Level II training have been scheduled on site. In addition, seven classes for Level I and Level II have been scheduled in Columbus. It is the intent to train majority of NPG personnel by 3/31/94.



## Program Enhancement

Priority: RED  
Item No: EMM-94-06

Title/Description: Implement Recommendations of Fire Protection Assessment  
Date Updated: 3/31/94

External Funding Requirements: \$500,000  
Internal Resource Requirements: 600 hours

Program Manager: E. M. Mace (H. T. Hitch)  
Planned Start Date: 1/24/94  
Planned Completion Date: 12/94

References (NRC/INPO/ETC.): CCA, OSTI

Description: The Purpose of the F/P Assessment is to determine the overall adequacy of the NPG Fire Protection Program.

Objective: To evaluate the adequacy of the existing F/P Program and make the necessary enhancements to improve the overall Fire Protection Program.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Complete the F/P Assessment. (EMM-94-06.1)	2/94	2/10/94
2.	Deliver the results of the F/P Assessment to NRC Region IV. (EMM-94-06.2)	2/94	3/2/94
3.	Implement the recommendations of the F/P Assessment. (EMM-94-06.3)	12/94	

Update Status: The Fire Protection Assessment inspection was completed on January 14, 1994. As of February 8, 1994, the second draft of the report comments are being incorporated. Within the next 2 weeks the final Fire Assessment report will be issued, with an advanced copy being sent to the Senior Resident Inspector. A drop in visit of to Region IV is planned during February to present the Fire Assessment report to the NRC.

Item #2 NRC rescheduled meeting from February 28, 1994 to March 2, 1994.

## Program Enhancement

EMM-94-06 (Continued)

**Update Status:** The Fire Protection Assessment results have been entered into Action Tracking with Senior Management responsibility assigned. The contract project engineer assigned to the Senior Manager Site Support was badged the week of 3/21/94. Expect to have a draft responsibility matrix and project schedule by 3/31/94. Meeting scheduled with responsible site managers the week of 4/4/94.

## Program Enhancement

**Priority:** Red  
**Item No:** EMM-94-07

**Title/Description:** Conduct a Compliance Review of CNS Training Program  
**Date Updated:** 3/31/94

**External Funding Requirements:** \$100,000

**Internal Resource Requirements:** 1000 hours of project management and analysis

**Program Manager:** E. M. Mace (Dutton)

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 12/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** OSTI

**Description:** This plan serves as the basis for implementation of a concerted self-inspection program which will precisely focus upon all of the regulatory requirements which impact training. This self-inspection will identify all internal and external training requirements and insure that they are being met thus taking a strong proactive approach toward ensuring that key training programs are in full compliance. Any identified deficiencies will be factored into training and thus, there will be assurance that the training is meeting/exceeding requirements in a cost-effective manner.

This Program Plan is intended to cover/describe the planning and resources required to: obtain and research documentation, develop requisite checklists, and determine how the requirements are being satisfied. It also covers the development of action plans to correct any deficiencies.

**Objective:** To ensure that all internal and external training requirements are being met. This will assist in assuring the training programs truly support the safe and efficient operation of the plant. It will minimize regulatory agency findings and resultant corrective actions. Finally, it will provide a mechanism for determining commitments/requirements to ensure they are not erroneously deleted or changed by later revisions to training.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Submit requests for quotations for man-power. (EMM-94-07.1)	1/94	1/27/94
2.	Select vendor and let contract for man-power. (EMM-94-07.2)	3/94	3/3/94

## Program Enhancement

### Major Milestones: (EMM-94-07 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Gather references for checklist construction for NRC requirements and licensing commitments. (EMM-94-07.3)	3/94	3/30/94
4.	Research references, validate commitments and build checklists for NRC requirements and licensing commitments. (EMM-94-07.4)	4/94	
5.	Inspect training programs to determine how/if commitments and requirements are being met. (EMM-94-07.5)	6/94	
6.	Resolve discrepancies with management, develop actions necessary for resolution, submit final product. (EMM-94-07.6)	6/94	
7.	Gather references for checklist construction for INPO requirements. (EMM-94-07.7)	7/94	
8.	Build checklists for INPO requirements and past three years operating experience commitments. (EMM-94-07.8)	8/84	
9.	Inspect training programs to determine how/if requirements are being met. (EMM-94-07.9)	10/94	
10.	Resolve discrepancies with management, develop actions necessary for resolution, submit final product. (EMM-94-07.10)	10/94	
11.	Complete modification of programs and lessons as identified in action plan. (EMM-94-07.11)	12/94	

## Program Enhancement

### Update Status: (EMM-94-07 Continued)

- 2/2/94 - Request for quotations sent to prospective vendors with replies requested by 2/7/94. Point paper will need to be completed immediately to allow review by the various boards/committees prior to Board of Directors meeting on 3/4/94.
- 2/8/94 - Quotations have been received from approximately 8 vendors. Currently developing a spreadsheet to compare costs and qualifications. A point paper should be developed and forwarded for review by the various committees and boards so it can be ready for the next (March) Board of Directors meeting.
- 3/3/94 - A point paper was developed and has gone through both the ERB and ERC. It was to be presented to the Board today or tomorrow. (3/3 or 3/4)
- 3/23/94 - Board approval was obtained on 3/3/94. Both contractors are on-site and have completed required training. The gathering of references and checklist construction has been completed. A trail run of requirements for 10CFR20 will be made to ensure that the process developed for this review is satisfactory. This is being done to ensure the process is satisfactory before proceeding too far into the project.

**SECTION VI**  
**NUCLEAR SUPPORT**

## SECTION VI

### NUCLEAR SUPPORT

Nuclear Support is conducting an evaluation of the Licensing Department to improve the Regulatory Support for CNS. Nuclear Support will also develop directives which will provide policy guidance and management expectations to the organization. It is expected that enhanced organization communications, more effective management oversight, and improved performance will result.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

## Program Enhancement

Priority: RED  
Item No: DAW-94-01

Title/Description: Evaluate Licensing Department  
Organization

Date Updated: 3/31/94

External Funding Requirements: O&M Budget

Internal Resource Requirements: 1 Licensing Manager 40 hours;  
Division Manager of Nuclear Support 20 hours

Program Manager: G. R. Smith

Planned Start Date: 12/2/94

Planned Completion Date: 3/94

References (NRC/INPO/NUMARC/NAIT Etc.): SMM

Description: This effort involves a study to compare the NPG Licensing function with the Licensing functions of several other utilities operating single unit nuclear plants. The staffing, functions performed, work location, personnel qualifications, and other factors will be compared. This study is intended to support management decision-making relative to the Licensing Department.

Objective: This effort is being undertaken in order to provide information to support decisions regarding the Licensing Department in order to improve the Licensing support for CNS.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Interview OPPD (DAW-94-01.1)	12/93	12/10/93
2.	Interview Wolf Creek (DAW-94-01.2)	1/94	1/6/94
3.	Interview Crystal River (DAW-94-01.3)	1/94	1/7/94
4.	Interview Northern States (DAW-94-01.4)	1/94	2/4/94
5.	Interview Duane Arnold (DAW-94-01.5)	1/94	2/4/94
6.	Issue report containing findings to Vice President - Nuclear. (DAW-94-01.6)	2/94	2/9/94
7.	Prepare Licensing Department Reorganization Plan for Vice President - Nuclear approval. (DAW-94-01.7)	3/94	3/4/94



# Program Enhancement

**Priority:** RED  
**Item No:** DAW-94-02

**Title/Description:** Issue NPG Directives in Support of the Strategic Plan for Performance Improvement  
**Date Updated:** 3/31/94

**External Funding Requirements:** O&M Budget  
**Internal Resource Requirements:** 96 hours (exclusive of management review and approval time)

**Program Manager:** A. L. Dostal  
**Planned Start Date:** 10/22/93  
**Planned Completion Date:** 5/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** SPPI Activity 030, 40, 220

**Description:** Issue NPG Directive on Teamwork/Communications  
Issue NPG Directive on Manager Field Involvement  
Issue NPG Directive on Business Plan Preparation

**Objective:** The development and issuance of these directives are specified as actions contained in the SPPI. The intent of these documents is to provide policy guidance and management expectations to the organization. It is expected that enhanced organizational communications, more effective management oversight, and improved performance will result.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Issue NPG Directive on Teamwork/Communications for comment. (DAW-94-02.1)	12/93	12/23/93
2.	Issue NPG Directive on Manager Field Involvement for comment. (DAW-94-02.2)	1/94	1/28/94
3.	Issue NPG Directive on Business Plan Preparation for comment. (DAW-94-02.3)	4/94	
4.	Approve NPG Directive on Teamwork/Communications (DAW-94-02.4)	2/94	1/24/94

## Program Enhancement

### Major Milestones: (DAW-94-02 Continued)

	Accomplishment	Plan Date	Actual Date
5.	Approve NPG Directive on Manager Field Involvement (DAW-94-02.5)	3/94	
6.	Approve NPG Directive on Business Plan Preparation (DAW-94-02.6)	5/94	

**Update Status:** The NPG Directive on Teamwork/Communications was approved on 1/24/94. A draft directive on Manager/Worker Interface was issued for senior management comments on 1/28/94. All comments have been received as of February 28, 1994. The directive is on schedule for approval routing. The title of the NPG Directive on Goals and Objectives has been changed to "Business Plan Preparation" to reflect the planning process being pursued. Development of the directive on NPG Business Plan Preparations is on hold pending completion of the NPG Business Plan in April, 1994.

**SECTION VII**  
**CORPORATE ENGINEERING**

## SECTION VII

### CORPORATE ENGINEERING

The primary focus of the Corporate Engineering effort is on the concern regarding engineering programs assigned to the corporate engineering staff. In addition, assessments will be made of the engineering modification and configuration control process. The tasks developed for this section will better define the plant change process and upgrade the Configuration Management Program at CNS.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.



## Program Enhancement

(REW-94-01 Continued)

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Review of site engineering functions. (REW-94-01.1)	5/94	1/18/94
2.	Reassignment of specific work functions to other groups. (REW-94-01.2) (S. McClure)	5/94	
3.	Generate the Design Specification Document for Primary Containment to support the Appendix J Program. (REW-94-01.3) (K. Walden)	6/94	

- Update Status:
1. The site engineering function has been reviewed and resulted in the generation of the Cooper Nuclear Station (CNS) Engineering Plan for Performance Improvement.
  2. A preliminary plan to address 15 engineering programs at CNS was generated. It was agreed that Temporary Shielding, Core Drill, Meter Banding, Freeze Seals and Relief Valve Setpoint programs would transfer to NED. NED has accepted responsibility for these programs.

Discussions related to the Check Valve Program, Inservice Testing Program, Repairs and Replacement Program, Appendix J Program and the Inservice Inspection Program were waiting for J. Lynch to finalize his plans as to how the site proposes to handle these programs. Discussions with J. Lynch on 1/17/94 indicated that the five engineering programs in questions would stay at the site.

NED will review and upgrade, as appropriate, the procedures controlling the five programs turned over to NED by 5/94.

- a) Freeze Seal Procedure - M. Siedlik
- b) Core Drill Procedure - M. Siedlik
- c) Temporary Shielding Procedure - M. Siedlik
- d) Meter Banding Procedure - A. Boesch
- e) Relief Valve Setpoint Program - M. Hillstrom

## Program Enhancement

(REW-94-01 Continued)

- Update Status:** 3. The Design Basis Project has scheduled the development of the Primary Containment Design Criteria Document to commence in January 1994. A consultant has been identified and is available on an as-needed basis. In addition, the consultant the site used to generate the original Appendix J Program has been made available for support of this work.

A draft Design Criteria Document is in progress. A walkdown of all Primary Containment penetrations that are accessible from the outside is scheduled. The draft walkdown STP is generated and out for management review. The walkdown is scheduled from mid-May to mid-June. An internal walkdown of the Primary Containment is presently scheduled for the fall maintenance outage. RFPs for walkdown support personnel have been sent out. Award of this task will be proposed for the April Board Meeting.

## Program Enhancement

**Priority:** RED  
**Item No:** REW-94-02

**Title/Description:** Nuclear Engineering and Construction Division Self-Assessment  
**Date Updated:** 3/31/94

**External Funding Requirements:** NED O&M Budget, Configuration Management O&M Budget \$100,000

**Internal Resource Requirements:** OSC Self-Assessment - 500 hours  
MOV Self-Assessment - 1000 man-hours  
Design Change Closeout Self-Assessment - 1000 hours  
NED Self-Assessment - Unknown

**Program Manager:** Robert Wilbur (Steve McClure, Ken Almquist)

**Planned Start Date:** 1/24/94  
**Planned Completion Date:** 12/94

### References (NRC/INPO/NUMARC/NAIT Etc.):

- NRC Inspection Report 93-01, Inspection of Engineering & Technical Support, Page 19.

**Description:** The Licensee was encouraged by the NRC to consider conducting a self-assessment of design engineering.

**Objective:** For the Nuclear Engineering and Construction Division to self-assess its activities and assure that the functions of NED are adequate, appropriate, and consistent with industry standards.

### Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	OSC Self-Assessment (REW-94-02.1)	1/94	1/27/94
2.	NED Self-Assessment Activities (REW-94-02.2) (S. McClure)	12/94	

**Update Status:** 1. The OSC Self-Assessment team has been established. A contractor to lead the self-assessment and provide technical training and guidance to the team arrived on site January 17, 1994. The assessment was conducted the week of January 17 & 24, 1994. The draft report was received the week of January 31 and was reviewed by the assessment team. Comments were incorporated and the report issued by February 11, 1994. There were no safety issues identified and a list of improvements was generated. NED has generated an action plan to address the findings.

REW-94-02



## Program Enhancement

(REW-94-02 Continued)

- Update Status: 2.
- a) The MOV Program Project is conducting a self-assessment of the project. The assessment started on March 10 and is scheduled to complete on March 22. A draft report is scheduled to be issued for review by April 1. (K. Almquist)
  - b) NED organized a self-assessment of the design change closeout process. A team was organized to collect required information. It was then decided to have QA use this task as their first assignment for their new Assessment Group. The NED data was turned over to QA which started the evaluation on March 22. A report on the evaluation is expected in draft form from QA by April 15. (S. McClure)
  - c) A complete self-assessment of NED has been scheduled for the fourth quarter of 1994. (S. McClure)

# Program Enhancement

Priority: RED  
Item No: REW-94-03

Title/Description: Evaluate the Configuration  
Control and Design Change  
Process within the NPG

Date Updated: 3/31/94

External Funding Requirements: To Be Determined  
Internal Resource Requirements: To Be Determined

Program Manager: Robert Wilbur (Kim Walden, Steve McClure)

Planned Start Date: 1/24/94

Planned Completion Date: 9/94

References (NRC/INPO/NUMARC/NAIT Etc.): OSTI

- Letter R. E. Wilbur to Senior Managers dated February 3, 1994: Engineering Assessment

**Description:** Conduct an evaluation of the configuration control and design change process within the NPG. This will include, the design change process, as well as the technical issues/programs associated with the Design Change Procedure and the Maintenance Work Request Procedure.

**Objective:** To enhance the configuration control process and enhance the design change methodology. The present system is not logically consistent and not all modifications are handled the same. In addition, the DC close out process is not timely. Materials configuration management needs to be upgraded.

## Major Milestones:

	Accomplishment	Plan Date	Actual Date
1.	Conduct an evaluation of the configuration control process. (REW-94-03.1) (K. Walden)	4/94	
2.	Conduct an evaluation of the design change closure process. (REW-94-03.2) (S. McClure)	4/94	

## Program Enhancement

### Major Milestones: (REW-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
3.	Based on the results of item 1 above, develop the necessary improvement program to develop the enhancements to ensure plant configuration is protected. (REW-94-03.3) (K. Walden)	6/94	
4.	Based on the results of item 2 above, develop the necessary improvement program to develop the enhancements to ensure a more responsive design change closure process. (REW-94-03.4) (S. McClure)	6/94	
5.	Communicate procedural and management expectations to NPG personnel. (REW-94-03.5)	9/94	

### Update Status:

1. A draft report "Re-Engineering Assessment of the Cooper Nuclear Station Modification Control Program" was generated by General Physics Corp. This report has been submitted to the NPG Management on February 3, 1994, for review and comment. A meeting to review the plan and comments was held on March 11, 1994. Further development of a proposed action plan is in progress.

Although not a direct result of the study of Item 1 above, work was directed to start on the generation of a reference document for insulation. The Configuration Management Department has generated a draft document that will provide a ready cross-reference of the system insulation requirements at CNS as well as reference any walkdown data that will be generated. This document will be referenced in the appropriate Design Change and maintenance procedures to provide craft and engineers a ready reference to insulation requirements. A completion date is not available yet.

2. On January 31, 1994, S. McClure was directed to generate a plan to evaluate the closure process for the Design Change Procedure by February 18, 1994.

NED organized a self-assessment of the design change closeout process. A team was organized to collect required information. It was then decided to have QA use this task as their first assignment for their new Assessment Group. The NED data was turned over to QA which started the evaluation on March 22. A report on the evaluation is expected in draft form from QA by April 15.

**SECTION VIII**  
**QUALITY ASSURANCE**

## SECTION VIII

# QUALITY ASSURANCE

Realizing CNS has not consistently identified or resolved recurring problems, the Quality Assurance Department (QA) is revising their self-assessment and auditing programs. QA is also enhancing the trending program to more effectively support their assessment activities and keep NPG management aware of possible negative trends.

To address these issues, the following Integrated Enhancement Program tasks have been developed and are being implemented. The tasks included in this section are Program Enhancements which provide a description of the task, the responsible manager, and the expected completion date.

# Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-01

**Title/Description:** Revise the Self-Assessment Program      **Date Updated:** 3/31/94

**External Funding Requirements:** Account #948-2007 \$2400.00 (FPI Consultant)  
**Internal Resource Requirements:** 3 weeks

**Program Manager:** Verne Wolstenholm (D. R. Robinson)  
**Planned Start Date:** 1/24/94      **Planned Completion Date:** 3/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** SMM

Inter-District Memo (CNSS931273), G. R. Horn to V. L. Wolstenholm

**Description:** Revise the Self-Assessment Program such that it provides management insight into the performance of the plant, personnel, and programs.

Provide for maintaining a yearly schedule selected by Senior Management and stipulate team member makeup.

**Objective:** This task was established by the Vice President - Nuclear to address the concern that "self assessment activities were not always acceptable and will require additional management attention to assure that these activities provide management insight into the performance of the plant and the operating staff."

## Major Milestones:

1. Survey recognized industry leaders for informational input to the revised program.
2. Obtain the services of a consultant to provide review, evaluation, and recommendations for the program revision.
3. Provide the draft revision of the program to NPG Senior Management for review and comment.
4. Approval of the revised program.

## Program Enhancement

(VLW-94-01 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Complete industry survey (VLW-94-01.1)	1/94	1/21/94
2.	Consultant services (VLW-94-01.2)	2/94	2/17/94
3.	Issue draft revision (VLW-94-01.3)	2/94	1/31/94
4.	Program approval (VLW-94-01.4)	3/94	2/26/94

### Update Status:

- Item 1): Completed plant visits to Waterford (1/20-21/94) and Clinton (1/18-19/94). Also obtained information from Yankee Atomic.
- Item 2): Consultant services to review and comment on the revised Self Assessment Program has been acquired. Consultant review completed 2/17/94, comments were reviewed with consultant and applicable comments were incorporated.
- Item 3): A DRAFT revision of the Self Assessment Program was issued to the Vice President - Nuclear, NPG Senior Management, and the Consultant for review and comment.
- Item 4): Comments from Senior Management were reviewed, discussed, and incorporated where appropriate. Revision 2 of the NPG Self-Assessment Program was approved by the Vice-President - Nuclear on 2/26/94.

This item is closed.

## Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-02

**Title/Description:** Enhance the CAP Audits/QA Trend Report **Date Updated:** 3/31/94

**External Funding Requirements:** N/A

**Internal Resource Requirements:** 2 years for development

**Program Manager:** Verne Wolstenholm/S. L. Bray (CAP)/P. K. Adelung (Trend)

**Planned Start Date:** 1/24/94

**Planned Completion Date:** 8/94

**References (NRC/INPO/NUMARC/NAIT Etc.):** 210 SPPI

**Description:** Revise the semi-annual audit of the Corrective Action Program to ensure that it provides management with a clear insight as to the effectiveness of the Program.

Upgrade the QA Trend Report program to provide a simplified format which provides a thorough analysis of trend information.

**Objective:** This task was established to address concerns raised in various internal and external evaluation and inspection reports regarding the effectiveness of the Corrective Action Effectiveness Audit and the effectiveness of the analysis provided by the Quarterly Trend Report.

### Major Milestones:

1. Provide additional information and parameters needed to support the Trend Program for inclusion in the new CAP.
2. Survey/visit recognized industry leaders for input to the revised CAP Audit and obtain associated CAP Audits from those utilities.
3. Establish a "Functional/Program Area" and "System" Performance Panel display format within the Trend Report.
4. Develop and revise associated NQPs, QAIs, and QA Guidelines for the Trend Report after implementation of the new CAP.



## Program Enhancement

### Major Milestones: (VLW-94-02 Continued)

5. Provide the DRAFT revision of the CAP Audit Plan and checklist to QA management for review.
6. Approve the revised CAP Audit Plan and checklist.
7. Modify the QA Trend Report format by Issuance of the Second Quarter 1994 QA Trend.

	Accomplishment	Plan Date	Actual Date
1.	Provide additional information and parameters for new CAP. (Trend report) (VLW-94-02.1)	2/94	11/93
2.	Survey/visit other utilities CAP audits. (VLW-94-02.2)	3/94	<u>3/31/94</u>
3.	Establish panel display for Trend Report. (VLW-94-02.3)	4/94	
4.	Develop/revise NQPs, QAIs & QA Guidelines for trend reporting with new CAP. (VLW-94-02.4)	4/94	
5.	Draft CAP QA Audit Plan and checklist. (VLW-94-02.5)	5/94	
6.	Approve CAP QA Audit Plan and checklist. (VLW-94-02.6)	5/94	
7.	Modify Trend Report format. (VLW-94-02.7)	8/94	

**Update Status:**      Item #1:      Proposed trend parameters and data base for the new CAP was submitted to the Technical Staff Manager on 11/03/93.

Item #2:      Selected and scheduled visits to three 3 utilities, Comanche Peak, Fort Calhoun, and Calloway in March, 1994. Completed 3/18/94.

## Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-03

**Title/Description:** Establishment of QA Assessment/Evaluation Program      **Date Updated:** 3/31/94

**External Funding Requirements:** N/A  
**Internal Resource Requirements:** 1 year for development

**Program Manager:** Verne Wolstenholm (D. R. Robinson)  
**Planned Start Date:** 1/24/94      **Planned Completion Date:** 1/95

**References (NRC/INPO/NUMARC/NAIT Etc.):** Self Imposed

**Description:** Establish a Quality Assessment Group which will enhance the Division's ability to provide effective proactive oversight of Nuclear Power Group activities and provide timely and effective feedback to senior NPG management on applicability of emerging industry issues and regulatory concerns, in addition to feedback on NPG activities.

**Objective:** This Task was established as a result of concerns raised in several NRC inspection reports issued in 1993 as well as the QA Division's recognition that some of the Division's resources were not being utilized effectively.

### Major Milestones:

1. Reorganize the Quality Assurance Division to provide the resources necessary to establish the assessment group.
2. Relocate personnel assigned to the assessment group to CNS.
3. Develop a Nuclear Quality Procedure which defines the Assessment Group's functions and responsibilities.
4. Identify training needs for the Assessment Group and submit training work request.
5. Complete training for all members of the Assessment Group.
6. Identify and develop supporting instructions/guidelines needed to support the activities of the Assessment Group.
7. Arrange for an independent assessment of the Assessment Group's effectiveness.

## Program Enhancement

(VLW-94-03 Continued)

	Accomplishment	Plan Date	Actual Date
1.	Reorganize QA Division. (VLW-94-03.1)	10/93	10/16/93
2.	Relocate QA Assessment Group to CNS. (VLW-94-03.2)	2/94	12/31/93
3.	Develop Nuclear Quality Procedure. (VLW-94-03.3)	2/94	11/30/93
4.	Identify training needs & submit TWRs. (VLW-94-03.4)	2/94	10/93
5.	Complete Assessment Group training. (VLW-94-03.5)	9/94	
6.	Identify & develop instructions/guidelines. (VLW-94-03.6)	6/94	
7.	Arrange for independent assessment. (VLW-94-03.7)	1/95	

*Training to be given*

- Update Status:**
- Item 1): A proposed QA Division reorganization plan was submitted to the Vice President - Nuclear and approved.
  - Item 2): The Quality Assurance Assessment Group completed relocation from the G.O. to CNS.
  - Item 3): Nuclear Quality Procedure 2.3, "Quality Assessments/Evaluations", has been approved and issued.
  - Item 4): Training Work Requests have been initiated for the following training: Technical Staff; Root Cause Analysis (from INPO); Human Performance Evaluation (from INPO); and Problem Solving and Decision Making (TWRs 93-1000, 93-1001, and 93-1002).
  - Item 5): The Assessment Group training is not complete, however they have sufficient training to be functional.

## Program Enhancement

VLW-94-03 (Continued)

- Item 6): One guideline is currently under development to describe generally how assessments and evaluations are to be conducted (Completed 2/94). Another is being initiated to describe how externally generated documents will be screened for their applicability to Assessment Group activities. Additional reviews are being conducted to determine if other guidelines are needed.

## Program Enhancement

**Priority:** RED  
**Item No:** VLW-94-04

**Title/Description:** Upgrade the Internal Audit and Surveillance Program (Frequency & Scope) **Date Updated:** 3/31/94

**External Funding Requirements:** N/A  
**Internal Resource Requirements:** 2 years for development

**Program Manager:** Verne Wolstenholm (G. E. Smith)  
**Planned Start Date:** 1/24/94 **Planned Completion Date:** 12/95

**References (NRC/INPO/NUMARC/NAIT Etc.):** Self Imposed

**Description:** The existing internal audit program requires restructuring in light of QA's recent clarification of QA Program Audit Frequency Requirements as described in the CNS QA Program for Operation Policy Document and CNS Technical Specifications. (Reference G. E. Smith to SRAB Chairman memo and attached 10CFR50.59 Reportability Review, dated September 8, 1993.)

Revision of the QA surveillance Program to coincide with the objectives of the audit program.

**Objective:** The purpose of this project is to upgrade the QA audit and surveillance programs to provide scoping of audits and surveillance which focus on specific technical programs or activities of concern/declining performance.

### Major Milestones:

1. Identify activities that are to be subject to QA audit/surveillance.
2. Generate a Position Paper which describes the District's position on conducting internal audits.
3. Revise QAI-5 to reflect the new audit process.
4. Generate a grouping of activities for audit scoping.
5. Revise QAI-4 to reflect the new surveillance program.  
**NOTE: QAI-4 is being converted to NQP.**
6. Revise the QA Guidelines to describe the new approach to conducting audits.

## Program Enhancement

### Major Milestones: (VLW-94-04 Continued)

7. Develop new QA Audit Plans.
8. Train auditors on the new approach to auditing.
9. Train auditors on the objectives and performance expectations of the new surveillance program.
10. Complete revision/development of surveillance checklist.
11. Complete development of Audit Scoping Plans.

	Accomplishment	Plan Date	Actual Date
1.	Activities subject to QA audits/surveillance. (VLW-94-04.1)	11/93	11/23/93
2.	Generate internal audit Position Paper. (VLW-94-04.2)	12/93	12/22/93
3.	Revise QAI to reflect the new audit process. (VLW-94-04.3)	1/94	1/14/94
4.	Grouping of activities. (VLW-94-04.4)	11/93	11/23/93
5.	Revise QAI to reflect the surveillance process. (VLW-94-04.5) <u>NOTE: This QAI is being converted to NQP.</u>	4/94	11/23/93
6.	Revise the QA Guidelines for auditing. (VLW-94-04.6)	4/94	
7.	Develop new QAPs. (VLW-94-04.7)	5/94	
8.	Train Auditors (audits). (VLW-94-04.8)	5/94	
9.	Train Auditors (surveillance). (VLW-94-04.9)	6/94	
10.	Complete surveillance checklist. (VLW-94-04.10)	12/95	
11.	Complete audit scoping plans. (VLW-94-04.11)	12/95	

5 audits to date

## Program Enhancement

VLW-94-04 (Continued)

- Update Status:**
- Item 1): Activities subject to QA audits/surveillance have been identified and the 1994 audit schedule has been issued.
  - Item 2): Audit Requirements/Frequencies position paper has been developed and distributed.
  - Item 3): QAI-5 has been revised to reflect the new audit process.
  - Item 4): Activities have been grouped for audit scoping.
  - Item 5): QAI-4 is being converted to NQP.
  - Item 7): A total of five QAPs are being developed. As of 2/8/94 two of the QAPs have been completed and approved. A third is ready for review, one is in writing and the fifth one has not been initiated.

*Findings (Observations) have  
essentially (0)*