Nebraska Public Power District

Nuclear Power Group

Phase 2/3 Performance Improvement Plan

with

Phase 2 Action Plans

Release 1.0

December 9, 1994

A/44

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1 Introduction and Purpose

1.1 Introduction and Overview

This document is the Phase 2/3 Performance Improvement Plan (Phase 2/3 Plan) of the Nuclear Power Group (NPG). It is a strategy-based plan for achieving significant long-term improvements in NPG's plant and organizational performance. The plan provides clear linkages from NPG challenges and performance issues to corrective strategies and implementing programs. It covers NPG activities, both those directly involving the staff at Cooper Nuclear Station (CNS) and activities in support of our operations provided from the General Office. The plan serves the following purposes:

- It encompasses the important activities that NPG needs to perform in the near future. If it is not in the Phase 2/3 Plan, and not an essential part of baseload work, then by definition it is not important to our success.

- It establishes the strategic direction for NPG and focuses all activities on supporting plant operations.

- It is a primary source of management direction. The Phase 2/3 Plan will be a guide for achieving significant improvements in our regulatory, operating and cost performance.

- The Phase 2/3 Plan directly addresses the causes of performance problems; its strategies and programs will result in lasting improvements in plant and organizational performance.

- Phase 2 focuses on a manageable set of high-priority issues to be accomplished within two to three months. This expedited attention will reinforce our momentum for performance improvement.

The plan establishes an overall framework for improving NPG performance, starting with our vision and top level goals, then translating them to strategies with associated implementing programs. Each program is defined in a comprehensive action plan, including objectives, schedule and performance measures. Each strategy and program has an identified management sponsor. Resources are linked to each program and are tied to baseline budgets through redirecting existing resources or requests for incremental funding.

Programs are classified as either "Phase 2" or "Phase 3." Phase 2 programs address the high-priority issues where performance improvement is most important, and visible results are expected within a few months. Phase 3 programs are longer-term in nature, with results expected in a horizon extending to approximately 24 months. All Phase 2/3 Plan programs (and other NPG activities) will evolve into a continuous improvement mode as the actions described are implemented and take effect.

This release of the Phase 2/3 Plan specifies all eight Phase 2 and seventeen Phase 3 implementing programs. In addition detailed action plans and schedules are included for the Phase 2 programs. Phase 3 Action Plans will be developed after plant restart and incorporated in a subsequent release of the Phase 2/3 Plan.

Consistent with this plan's focus on long term improvement, a set of top level goals are specified to be attained within three years, consistent with NPG's overall strategic objectives. Annual goals and performance measures will be developed to guide incremental improvement. The specific goals and measures for 1995 will be developed and added to the plan after plant restart.

The NPG 1994-1997 Business Plan developed in early 1994 and the CNS Integrated Enhancement Program plan are superseded by this Phase 2/3 Plan.

1.2   Expected Results

This plan is the road map for attaining and maintaining top quartile performance over the next three years. Interim goals will be established to measure progress and guide management action on an annual basis.

Specific performance measures, identified in the action plans, will be used to determine progress and the effectiveness of improvement activities. Periodic management reports will be developed and distributed to plant personnel to compare performance to goals and performance indicators. These reports also will be reviewed in periodic NPG management review meetings.

Phase 2/3 Plan development and implementation will serve to further reinforce a disciplined management planning process begun with the Phase 1 Plan and Restart Readiness Program.

1.3   Planning Assumptions

Several key assumptions guided plan development. These are:

- Performance improvement activities must address problems and issues identified in recent assessments as well as strategic initiatives needed to progress toward the top level goals.

- Industry performance standards will continue to rise while NPG resolves its current performance issues. After acceptable plant performance is reestablished, continuous improvement will be required to establish and maintain NPG's competitive position relative to other nuclear plants and non-nuclear energy suppliers.

- NPG's performance must fit within NPPD's overall business envelope for being a competitive power supplier. Top quartile nuclear industry performance should be consistent with this boundary condition.

- All NPG activities must be directed toward supporting safe plant operations.

2 Vision and Top Level Goals

2.1 Vision

NPG's vision describes what the organization is striving to be and how it communicates those qualities to others. The vision implies change, containing both the direction and objectives for needed changes. The NPG management team developed the NPG vision statement and is committed to acting in accordance with its principles.

Our vision statement on the next page describes the key attributes of the NPG organization that will be apparent within three years. This vision, by highlighting areas where new or significantly enhanced capabilities or behavior is required, provides the focus for near- and longer-term performance objectives. Progress toward this vision is already occurring by virtue of the initiatives under the Phase 1 Plan and continued progress should be observed as we implement the Phase 2/3 action plans. By the end of 1997, or sooner, we want to achieve the vision attributes.

The vision incorporates attributes that are characteristic of the best performing nuclear plants and our strategic objectives. As a consequence, NPG's vision and top level goals are linked and consistent. The strategies, objectives and action plan activities are also consistent with the vision and, in some cases, are directly intended to develop one or more specific vision attributes.

NPG Vision

Focus on Safe Operations

Safe operations is the central focus of the Nuclear Power Group.

Operations sets the agenda for all other organizations.

NPG finds its own problems. Self assessment and a questioning attitude are used to recognize improvement opportunities as well as problems. Significant problems are addressed promptly.

Recurring deficiencies or equipment failures are not accepted.

Personnel errors are avoided by individual discipline and effective administrative barriers.

Conservative decision-making is practiced at all times.

Management Practices

Performance standards are established and communicated to employees.

Rewards are aligned with and based on results.

Accountability is used to focus efforts on results.

All employees accept ownership and personal responsibility for work safety, quality, and efficiency.

Decisions have a rational basis and are consistent with goals.

Responsive to External Environment

NPG's operation of CNS delivers a competitive product to its customers.

Customers know their input is valued and they are viewed as partners.

Regulators, the public, and our partners have confidence in our ability to operate safely. There are no surprises. NPG integrates industry experience in continuing assessments of its performance.

Vigilance toward emerging industry issues will be maintained.

Resource Management

A consistent priority system is used to allocate financial and human resources to high value activities that support top level goals.

Work activities are planned and completed within budget and on schedule.

Long term asset value is realized by balancing expenditures, operating reliability and risk.

Outage duration is consistently less than 50 days.

Organizational Effectiveness

Communications up, down and across the organization are timely, clear and complete. Each member of NPG has a consistent understanding of expectations and the current situation.

Fully developed management development programs preserve "bench strength" and allow NPG to manage both routine and emergent issues without shortchanging either.

Roles and responsibilities are clearly defined and designed to facilitate teamwork. Behavior consistent with teamwork is routine and a constant expectation.

2.2 Top Level Goals

NPG performance must support the District's goals. To focus NPG's efforts, we must within the next three years achieve and maintain upper quartile performance compared to other U.S. nuclear plants in the areas of safety, generation and cost. The top level quantifiable measures in these areas are NRC SALP ratings, capacity factor and plant production costs. These performance measures provide consistent industry-wide indicators of CNS performance.

Achieving these goals should put NPG into its desired relative competitive position. Cost and operations goals are directly linked to NPG's business purpose: to produce power at a competitive cost so that NPPD can attract and retain customers. Safety and regulatory performance satisfies a mandatory requirement for our business. Achieving this goal allows us to pursue our business goals.

The performance measures associated with our top level goals are a minimum set; the challenge is that they must be achieved concurrently. A number of U.S. nuclear plants have achieved top quartile performance in all three performance areas. Their experience shows that it is possible to achieve a successful balance among the many interrelated factors that affect performance. At these plants, the various performance factors reinforce each other: a safe plant runs efficiently and reliably; high output and reliability improves cost performance on a $/MWH basis; and improved regulatory performance means fewer resources are spent reacting to regulatory issues.

In the short-term, obvious tensions exist among the performance factors. We recognize that continued financial investment will be necessary before paybacks are visible in terms of higher capacity factor or improved SALP ratings. This plan targets resources on high leverage opportunities and problem areas that stand between NPG and top quartile performance.

The Phase 2/3 Plan focuses on areas that are key to CNS becoming a top quartile plant. We know that performance standards and expectations will continue to rise in each area. However, accepting less than top quartile performance is not an option; only top performing nuclear plants will be economically competitive in the future.

NPG's goals are challenging but realistic. Until recently (through 1992), CNS was a top quartile performer in cost and capacity factor. Following are the NPG 19.. '''7 performance goals in each category:

Performance Category	1995	1996	1997
Safety/Regulatory (average SALP rating)	*	*	≤1.25
Operating (% Capacity Factor)	*	*	≥85%
O&M plus Fuel Cost ($/MWH)	*	*	≤$18/MWH

' Values for 1995 goals will be developed after plant restart. Values for 1996 goals will be developed by the end of 1995.

2.3 Other Performance Measures

The top level goals show how NPG is performing relative to other nuclear plants. Other performance measures are needed to show (1) how NPG is contributing to the District's needs and expectations and (2) major components of the top level goals. To this end, NPG has established the following more specific performance indicators for 1995-1997. These indicators are derived from and supportive of the top level goals. Values for the indicators for 1995 will be developed after plant restart. Values for subsequent years will be developed prior to the beginning of each year.

Performance Indicator	1995	1996	1997
Safety/Regulatory Performance (SALP rating)	To be developed	To be developed	To be developed
NRC violations			
Total			
Level III or higher			
Regulatory commitments compliance			
Unplanned scrams			
Collective radiation exposure (man-rem)			
INPO rating			
Industrial safety accident rate			
Human performance (indicator to be developed)			
Quality of communication with external parties			
(indicator to be developed)			
Operating Performance (Capacity factor)			
Refueling outage duration			
Forced outage rate			
Thermal performance			
MWR performance (indicator to be developed)			
EWR performance (indicator to be developed)			
Cost Performance (O&M plus fuel cost per MWH)			
O&M expense and budget compliance			
Capital expense and budget compliance			
Fuel cost per MWH			
NPG staffing level			
Condition reporting process time (by priority)			
Problem recurrence rate			
Project budget and schedule performance			

3   NPG Strategies and Programs

3.1   Strategy Overview

The Phase 2/3 Plan is a strategy-driven plan for achieving the vision and top level goals. Strategies delineate *how* NPG will achieve the changes associated with meeting the goals and vision. Strategies provide the overall direction and unifying themes for the programs and specific activities.

Two different paths were pursued for strategy development: vision-based and problem/issue based. This process (illustrated in **Figure 3-1**) drives a convergence to the key performance gaps - and the strategies needed to address each gap. It ensures that the strategic significance of a wide variety of problems, issues and vision attributes are integrated into the performance improvement process.

ISSUES

COLLECTIVE
SIGNIFICANCE

ROOT
CAUSES

STRATEGIES   PROGRAMS   ACTION
PLANS

GOALS/
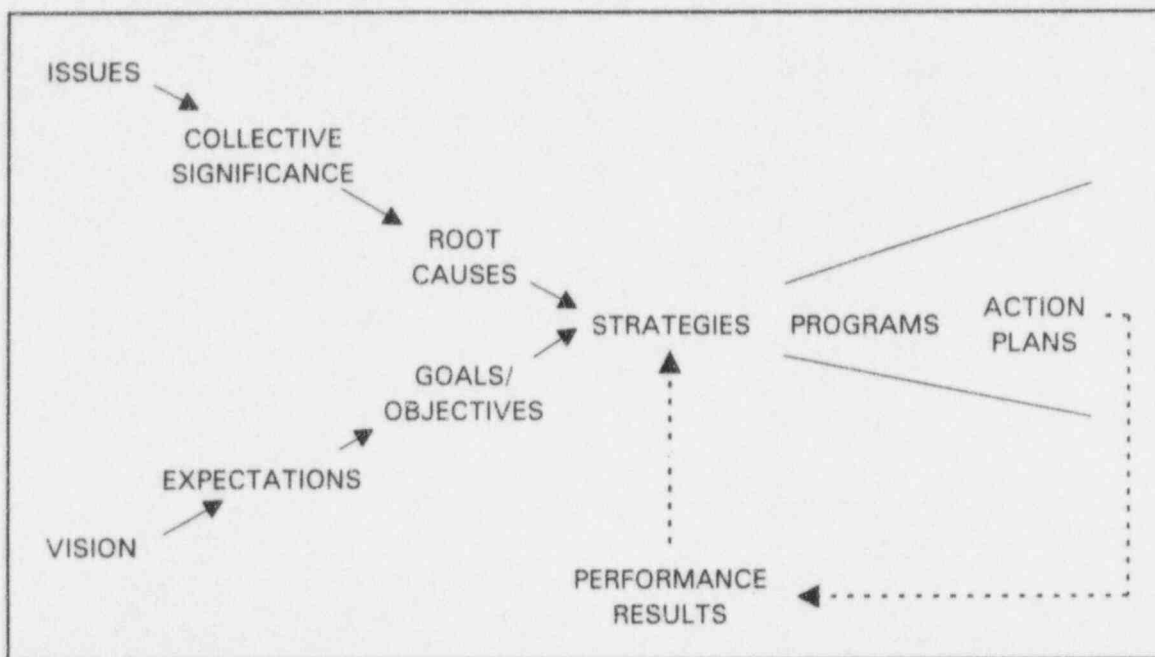OBJECTIVES

EXPECTATIONS

VISION

PERFORMANCE
RESULTS

Figure 3-1 Strategy Development Process

Seven strategies for improving performance were identified to address key performance gaps. The areas addressed by these strategies, identified in **Figure 3-2**, are comprehensive in terms of improvement focus for the next 18-24 months. Additional strategies may be developed in certain areas to

encompass baseline activities that are basically sound, but which should be part of continuous improvement efforts.

> * Focus on Operations
> * Configuration Management
> * Resource Allocation and Work Management
> * Continuous Improvement
> * Management Practices and Systems
> * Skills and Qualifications
> * External Relations

Figure 3-2 Top Level NPG Strategies

3.2 Supporting Strategic Programs

Within the seven strategies, specific activities required for performance improvement are delineated as strategic programs. Each strategy can (and does) have several associated programs. Each program has its own objectives, performance indicators and action plan, including a detailed schedule, activities and performance milestones. Activities are resource loaded and will be funded by redirecting existing resources or requesting incremental funding. The programs will result in pervasive, systematic changes in NPG's business approach and processes; the programs are not punch lists of action items or one-shot problem fixes.

Programs are identified as either "Phase 2" or "Phase 3," depending on their relative priority. Phase 2 programs will have the highest priority in the post-startup period. NPG's intent is to apply maximum effort in these areas and realize significant improvements in 2-3 months after startup. Action Plans for Phase 2 programs are included in Section 7 of this plan. Phase 3 Action Plans will be developed after plant restart. Implementation of all performance improvement activities will continue to be integrated into an overall schedule and managed to meet top level milestones.

"Program trees" are used to illustrate the development of strategic programs for each strategy area. These trees provide a convenient road map to the overall Phase 2/3 program structure provided in Section 7. **Figure 7-1** presents the seven top level strategies and their associated programs. **Figures 7-2** through **7-8** provide expanded trees for each strategy; each tree

shows the Phase 2 and 3 strategy sponsor, programs and program objectives. For Phase 2 plans the implementing activities are also displayed.

4   Development Process

4.1   Management Involvement

The NPG management team developed the Phase 2/3 Plan. To the maximum
extent possible, the Phase 2/3 Plan process attempted to develop
management consensus on all aspects of the plan, from the current situation
analysis to the development of strategies and programs.

The NPG management team participated in a set of workshops to assess the
current situation and initiate the planning process. The vision and top level
goals were formulated based on (1) an analysis of the attributes of top
performing nuclear plants and how these attributes would apply to NPG's
situation, (2) performance history and trends at CNS, (3) the experience of
new managers with other nuclear programs and (4) the constraints and
requirements established by customers, regulators and other external factors.
The group also analyzed the issues and causes from various CNS
performance assessments to identify common threads and causes.

Using both the vision and the situation analysis, the management group
identified a series of performance gaps, or areas where improvement was
needed to meet standards and/or the vision attributes. The set of seven long-
term strategies were defined to address these performance gaps. Smaller
teams then developed the outlines of the strategic programs necessary to
implement each strategy.

individual managers were assigned as sponsors for each of the seven
strategy areas and as program leaders for each of the implementing
programs. Sponsors and program leaders were responsible for configuring
multi-disciplinary teams (drawn from throughout NPPD) to develop detailed
action plans and resource estimates for each program. Regular meetings
with senior site management are used to review the plans, ensure their focus
is consistent with management direction and confirm the program managers'
commitment to their plans. This rigorous, collaborative process provides a
high level of confidence that the Phase 2/3 Plan establishes a correct and
effective course of action for NPG.

4.2   Process Inputs

As noted above, the Phase 2/3 planning process considered both current
performance problems and the NPG vision in developing strategies. The data

and analysis associated with these process inputs is discussed in this section.

4.2.1 Performance Issues

Current performance issues were culled from recent evaluations and assessments performed by NPG and external parties such as the NRC. These evaluations included the NRC Special Evaluation Team findings and the May 27, 1994, July 1, 1994 and August 2, 1994 Confirmatory Action Letters; the Diagnostic Self Assessment Team report; the NPG 1994-1997 Business Plan, Phase 1 Performance Improvement Plan, Integrated Enhancement Program plan, and other self assessments and management initiatives.

The issues raised in these various documents had been previously examined and screened for restart issues for inclusion in the Phase 1 Plan. For purposes of the Phase 2/3 plan, these issues were further evaluated to determine their significance to achievement of NPG's vision and top level goals. Although they came from many different sources, the data provided consistent indications of the areas where performance problems were occurring.

These different views of the performance issue data were considered by the management team to identify and describe the most significant problems and characterize performance gaps. The term "performance gap" is used to denote a difference between our desired level of performance in the long term and our actual performance, taking into account the progress that is being made prior to startup via Phase 1 improvements. Thus, Phase 2/3 activities will provide the next increments of performance improvement beyond that needed for restart, and needed to sustain and elevate NPG's performance to competitive levels. Identified in this manner, performance gaps are the basis for developing strategies and assuring a competent linkage to improvement activities.

4.2.2 CNS Competitiveness

The analysis described in the previous section focused on specific issues affecting recent performance and their implications for long term improvement. Another useful perspective is gained by reviewing NPG's recent performance benchmarked against the industry. Experience indicates that long-term competitiveness requires performance at the upper range of the industry.

CNS was in a very good economic competitive position through 1992. However, operating and cost performance declined in 1993 and 1994. This decline can be correlated with a decline in regulatory performance.

Long-term competitiveness means achieving our top level goals: upper quartile regulatory, operating and cost performance. Attaining the top quartile will require meeting or exceeding the following quantitative targets[1]:

- SALP   ≤1.25
- Capacity Factor ≥85%
- Cost   ≤$18/MWH

NPG's recent cost performance and a range of projections for this year and next are shown in **Figure 4-1**. This figure also highlights the cost challenge facing NPG: over the next several years we will need to capture the cost efficiencies associated with improved performance to regain competitive budget levels.
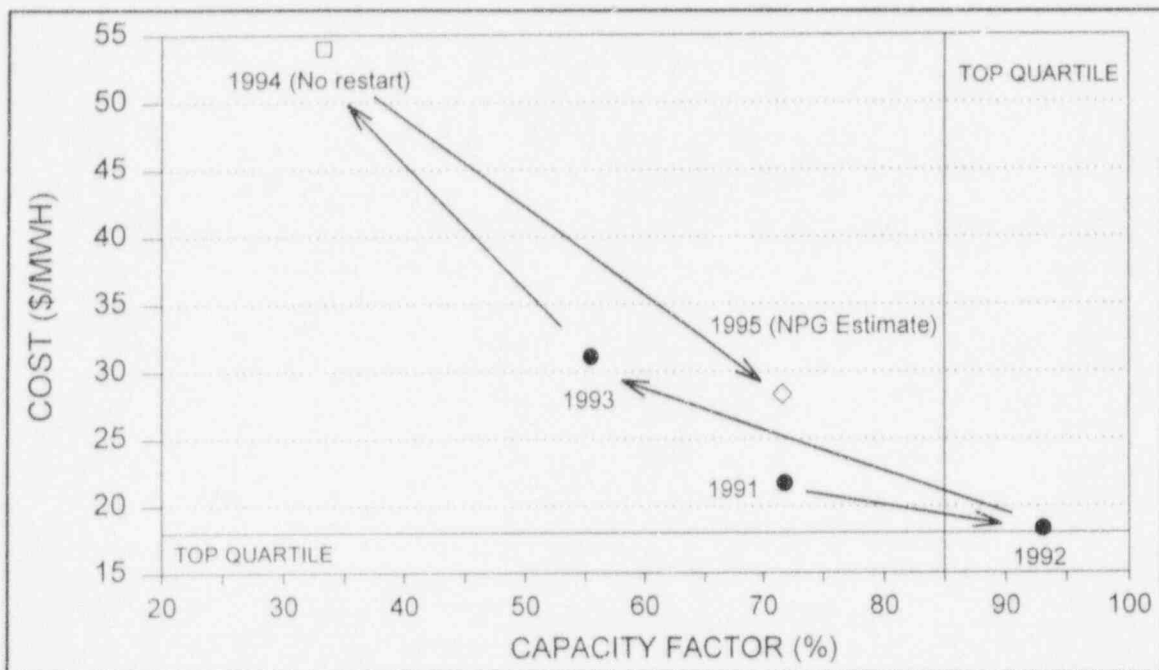

Figure 4-1 Historical and Projected NPG Cost Performance

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[1] These targets are estimates based on projections of current industry performance.

External factors also affect and establish standards for NPG performance. They include regulatory and industry influences and NPPD's overall competitive situation.

As noted, regulatory and industry performance standards are expected to continue to rise. This expectation has been factored into the upper quartile estimates but these will be updated on an annual basis.

NPPD's situation is expected to become more competitive. Nebraska is a low-cost energy state. Although there are no investor-owned utilities (IOUs) in the state, the various public agencies are constantly searching for lower-cost sources of reliable power. The biggest customer for CNS product (50% of plant output) is an out-of-state IOU. They are more directly exposed to competitors than Nebraska agencies and also need low-cost suppliers in order to retain their customers.

4.3 Performance Gaps

From every point of view, NPG faces significant performance gaps between its current path and necessary future performance. The management team examined the analysis of current issues, the changes required to realize the NPG vision and the performance necessary to meet the top level goals to determine the nature and extent of the performance gaps. Importantly, these gaps relate to both organizational and plant performance.

4.4 Strategy Development

Strategies correlate directly to the identified performance gaps. This continues the linkage from the vision and other inputs to required actions. Strategies express how performance improvements will be brought about. They focus on how to change the current situation, practices, beliefs, etc. and include some verifiable indication of exactly what will change. Strategies describe fundamental courses of action and focus on the causes of problems and performance deficiencies.

The seven base strategies define the framework and set the direction for NPG performance improvements. The strategies establish principles for the way NPG will conduct its business. Each strategy focuses on one important performance area. All of the strategies have a wide application and require interdisciplinary approaches that cut across department boundaries. Each strategy has an identified management sponsor.

4.5 Supporting Programs and Action Plans

The supporting programs and action plans were developed in accordance with specific objectives to implement all or part of the associated strategy. The programs required to implement each strategy were identified by the NPG management team during the planning workshop. These programs were categorized as Phase 2 (implemented and effects visible in 2-3 months) or Phase 3 (18-24 months).

Each program has its own action plan which details the specific activities, schedules and resources necessary to accomplish the program objective(s). The action plans also include performance measures and expected results to provide objective evidence of the effectiveness of program actions. A program leader has been identified for each program. A common planning template was used to facilitate program development and management review, permit comparisons and show linkages between programs, and simplify measurement. Review and comparison are used to ensure that NPG's programs fit together, i.e., they are internally consistent and mutually supportive.

Program descriptions, including specific implementing activities, responsibilities, and performance milestones for Phase 2 activities, are provided in Section 7 of this release of the Phase 2/3 Plan.

4.6 Critical Success Factors

Critical success factors are the things that absolutely have to be done right in order for NPG organization to be successful. These factors are described below; they should be identifiable implicitly throughout this plan and visible as the plan is implemented.

- Improved external relationships

NPG must reestablish satisfactory levels of confidence and credibility with the NRC. Resolving regulatory concerns is essential to a successful restart and high capacity factor plant operations.

NPG must perform in accordance with projections and forecasts provided to the Participants who have contracts to take CNS product.

- Cost competitiveness

Notwithstanding increased resource requirements associated with needed improvement programs, NPG must recover to competitive budget levels as soon as possible.

- Managing risks

NPG must actively manage risks while implementing major changes. The organization must take a comprehensive approach to understanding and managing the operating, regulatory and economic risks that it faces.

5 Linkage of NPG Plans and Initiatives

5.1 Phase 1 Plan

The Phase 1 Performance Improvement Plan addressed those significant issues identified in the DSAT, the CAL and open inspection report items, and management self-identified issues that must be resolved prior to plant startup. Some Phase 1 issues have additional follow-on scopes of activity which are reflected in the Phase 2/3 plans.

5.2 Phase 2/3 Plan

This Phase 2/3 plan addresses the need for post-restart and long-term performance improvement within the context of an overall business plan. The Phase 2/3 strategic programs cover the most important new work that will be performed in NPG during the next few years.

Phase 2 involves essential actions that will be accomplished within the next two to three months. Because this phase has a short duration, only a few high-priority issues will be addressed. Phase 2 provides a bridge between startup and the full implementation of Phase 3.

Phase 3 is the long-term strategic planning phase. It provides the framework for managing performance improvement actions essential to meet long-term goals for safety/regulatory, operating and cost performance.

5.3 NPG Business Planning

The Phase 2/3 Plan, in conjunction with NPG budgets and financial plans, will comprise the NPG Business Plan. Budgets and financial plans are developed in accordance with NPPD standard practice and schedules. They integrate resources identified in each of the Action Plans with resources required to perform normal baseline activities that are a necessary and continuing part of our nuclear operations. An integral part of the Phase 2/3 management process is the regular prioritization of our workload to ensure that available resources are being applied to the most important activities. This prioritization will be a dynamic process that permits new items to be added when necessary and redirects resources from lower value work.

The NPG 1994-1997 Business Plan developed in early 1994 and the CNS Integrated Enhancement Program plan are superseded by this Phase 2/3 Plan.

6 Management of the Phase 2/3 Plan

6.1 Strategy and Program Management

The key to making progress on implementing the Phase 2/3 Plan is to measure and manage performance. Each program action plan will have a management sponsor and plan manager, a defined implementation schedule and performance measures to compare actual progress against expected results. In addition, there will be a Phase 2/3 project manager with overall coordination responsibilities.

As with Phase 1 plans, periodic management reviews will be conducted. Changes to established schedules will require management review and approval.

A reporting framework will be established to monitor plan implementation. Performance indicators developed for key programs and processes will be used to measure strategy impact and effectiveness. Periodic reporting, coupled with active oversight and involvement by NPG managers, will keep NPG personnel aware of and focused on plan activities and implementation progress.

At least annually, an overall NPG management team review (similar to the workshops used to develop the Phase 2/3 plan) will be held to review progress, identify any required actions to realign actual implementation with the plan and propose any necessary adjustments to programs, schedules or priorities. Given the major changes taking place, an overall NPG management team review will be scheduled in about six months to revisit the Phase 2/3 Plan and make any needed adjustments.

6.2 Schedule and Milestones

Figure 6-1 is a top-level schedule and milestone chart for the completion of the Phase 2/3 Plan.

Figure 6-2 is a level 1 schedule and milestone chart for the development of the Phase 2 and 3 plans. Detailed milestone charts are included with each plan in Section 7.

FIGURE 6-1

TOP LEVEL PHASE 2/3 MILESTONE SCHEDULE

NUCLEAR POWER GROUP PHASE 2 PERFORMANCE IMPROVEMENT PLAN

ID	Name	10/9	10/16	10/23	10/30	11/6	11/13	11/20	11/27	12/4	12/11
1	1 Phase 2/3 - Performance Improvement Plan										
2	1.1 Prepare Workplan and Schedule										
3	1.2 Data Collection										
4	1.3 Workshop Preparation										
5	1.4 Conduct PIP Workshops										
6	1.4.1 Situation Analysis										
7	1.4.2 Strategy Development/Action Plans										
8	1.5 Prepare Performance Improvement Plan										
9	1.5.1 Phase 2 Issue Plans - Team Draft										
10	1.5.1.1 Form Teams										
11	1.5.1.2 Analysis										
12	1.5.1.3 Review with Strategy Sponsor										
13	1.5.1.4 Coordinate Commitments										
14	1.5.1.5 Submit and Distribute Draft										
15	1.5.2 Standup Review with Management										
16	1.5.3 Standup Review with Management										
17	1.5.4 Revise Phase 2 Plans										
18	1.5.5 Overall PIP Text										
19	1.5.5.1 Develop PIP Outline										
20	1.5.5.2 Approve PIP Outline										
21	1.5.5.3 Develop Extended Outline										
22	1.5.5.4 Approve Extended Outline										
23	1.5.5.5 Develop Draft of PIP Text										
24	1.5.5.6 Issue Phase 2 Plans and Draft PIP Text										

12/8/94

Figure 6-1

FIGURE 6-2

PHASE 2 ACTION PLAN MILESTONE SCHEDULES

NUCLEAR POWER GROUP PHASE 2 ACTION PLAN IMPLEMENTATION

ID	Name	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12
1	1 Focus on Operations												
2	1.1 Conduct of Operations												
3	1.1.1 Pilot Workshop on Procedure Use and Adhere												
4	1.1.2 Revise Workshop Approach Based on Pilot												
5	1.1.3 Conduct Workshops in Other Areas												
6	1.1.4 Implement Actions Defined in Workshops												
7	1.2 Shift Crew Performance												
8	1.2.1 Benchmark How Crews Conduct Business												
9	1.2.2 Benchmark Operations-Training Interfaces												
10	1.2.3 Conduct Shift Crew Workshops												
11	1.2.4 Link to Conduct of Ops Action Plan (1.1)												
12	1.2.5 Evaluate Other Organizational Approaches												
13	1.2.6 Define Mgmt Involvement in Training												
14	1.2.7 Upgrade Operator Training												
15	1.2.8 Develop Ops Dept Self-Assessment Process												
16	1.3 Prioritization of NPG Workload												
17	1.3.1 Identify Options												
18	1.3.2 Select Best Option												
19	1.3.3 Present Recommendation												
20	1.3.4 Identify Affected Processes/Procedures												
21	1.3.5 Develop Prioritization Procedure												
22	1.3.6 Revise or Create Procedures												
23	1.3.6.1 Draft NPG Directive 4.9												
24	1.3.6.2 Draft Engineering Procedures												
25	1.3.6.3 Draft Plant Procedures												
26	1.3.6.4 Draft O&M Procedures												
27	1.3.6.5 Get Procedures Approved												

NUCLEAR POWER GROUP PHASE 2 ACTION PLAN IMPLEMENTATION

ID	Name	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12
28	1.3.7 Train/Indoctrinate										▓▓▓▓	▓▓▓▓	
29	1.3.8 Apply to Fall Outage												
30	1.4 Organizational Focus (Engineering Reorganizatio	████	████	████	████	████	████	████	████	████	████	████	████
31	1.4.1 Phase 2: Develop Long-Term Org	████	████										
32	1.4.1.1 Complete Organization Study												
33	1.4.1.2 Define and Communicate Personnel Poli												
34	1.4.1.3 Approve/Announce Long-Term Organiza												
35	1.4.1.4 Initiate Necessary Policy Changes	▓▓▓	▓▓▓										
36	1.4.1.5 Identify Process/Procedure Changes												
37	1.4.1.6 Staff the New Organization												
38	1.4.2 Phase 3: Implement Long-Term Org	████	████	████	████	████	████	████	████	████	████	████	████
39	1.4.2.1 Address Config Mgmt/Design Basis	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓
40	1.4.2.2 Make Necessary Process Changes	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓
41	1.4.2.3 Initiate Long-Term Organization Change												
42	1.4.2.4 Communicate Changes and Plans	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓
43	1.4.2.5 Put in Place Plan for Contractors	▓▓▓	▓▓▓	▓▓▓									
44	1.4.2.6 Upgrade Information Systems	████	████	████	████	████	████	████	████	████	████	████	████
45	1.4.2.6.1 Identify Needs and Develop Plan	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓				
46	1.4.2.6.2 Acquire or Upgrade Systems								▓▓▓	▓▓▓	▓▓▓		
47	1.4.2.7 Monitor and Adjust Organization								▓▓▓	▓▓▓	▓▓▓		
48	2 Configuration Management	████	████	████	████	████	████	████	████	████			
49	2.1 Surveillance Program Upgrade	████	████	████	████	████	████	████	████	████			
50	2.1.1 Complete STVP Review of Remaining SPs	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓				
51	2.1.2 Evaluate Safety Significance and Resolve	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓				
52	2.1.3 Revise SPs for Divisional Separation	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓	▓▓▓			

NUCLEAR POWER GROUP PHASE 2 ACTION PLAN IMPLEMENTATION

ID	Name	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12
53	**3 Resource Allocation and Work Management**												
54	**3.1 Integrated Planning, Scheduling and Work Contro**												
55	3.1.1 Establish Planning Milestones												
56	3.1.2 Establish Outage Management Function												
57	3.1.3 Move the Clearance Function												
58	3.1.4 Staff Scheduling with Permanent Personnel												
59	3.1.5 Implement Outage Performance Measures												
60	3.1.6 Implement MWR Process Improvement												
61	**4 Continuous Improvement**												
62	**4.1 Corrective Action Program Improvement**												
63	4.1.1 Analyze Backlog Data												
64	4.1.2 Prioritize Existing Backlog												
65	4.1.3 Implement Interim Process Fixes												
66	4.1.4 Work Off Excess Backlogs												
67	4.1.5 Establish Performance Indicators												
68	4.1.6 Conduct Initial Training												
69	4.1.7 Staff CAP Group												
70	**4.2 Assessments**												
71	4.2.1 Staff IRG Advisor Positions												
72	4.2.2 Establish Scope and Goals												
73	4.2.3 Assess Current Weaknesses												
74	4.2.4 Implement Program Improvements												
75	4.2.5 Enhance Skills and Knowledge												
76	**4.2.6 Perform Prototype Assessment**												
77	4.2.6.1 Perform Self-Assessment												
78	4.2.6.2 Obtain Independent Appraisal												
79	4.2.6.3 Implement Lessons Learned												

12/8/94

Figure 6-2

6.3 Revisions

The Phase 2/3 plan is a working tool for management to establish and communicate direction and priorities for NPG. New information, changing circumstances or new input from external parties may require changes to the plan. Any changes or revisions to the Phase 2/3 plan, including the implementing action plans, will be handled as described in this section.

Proposed changes to specific programs will be prepared by the program manager. The cognizant sponsor will review and approve all program changes. Changes that affect relationships among multiple programs must be approved by the cognizant management sponsor(s). The Site Manager must ultimately approve all changes to the Phase 2/3 plan, including the program plans.

The Phase 2/3 Plan Change Form will be used to document plan and program changes, including necessary approvals, activity completion and closures. The contents of all change forms will be tracked in the Phase 2/3 program log.

6.4 Responsibilities

NPG recognizes that a plan alone will not produce performance improvements. The primary contributor to success is clear assignment of implementation responsibilities, ensuring that responsible individuals have the resources and authority to complete their assignments. As outlined below, these elements have been established for the Phase 2/3 plan:

- The Site Manager has overall responsibility for Phase 2/3 plan content, coordination, performance tracking and successful implementation. The Site Manager will approve all significant additions, deletions, or revisions to the Phase 2/3 Plan scope or schedule. In addition, the Site Manager will initiate strategic changes to the Phase 2/3 Plan when necessary due to changes in management direction, strategic considerations, or concerns about the effectiveness of the plan.

- The Phase 2/3 Project Manager is responsible for coordinating the development and implementation of the Phase 2/3 plan, monitoring and reporting plan progress, tracking revisions and updates, reviewing and concurring with changes to action plans

and schedules, informing senior management when action is
necessary to ensure milestones, objectives and performance
expectations are met, and developing any documentation
necessary to fulfill these responsibilities.

- Each strategy has a sponsor. The sponsor is responsible for
ensuring that the strategy is effective and coordinating the
activities of the program managers. The sponsor is also
responsible for reviewing progress against plan schedules and
milestones, and for evaluating the effectiveness of plan
implementation.

- Each strategic program has a program manager. The program
manager is responsible for coordinating resource requirements
and assignments for individual activities, and ensuring that
milestones are met and program activities have their intended
positive impact on plant and organizational performance.

The NPG management team will monitor overall plan implementation and
meet, at least annually, to review progress and new issues or problems and,
as necessary, propose changes to program managers or strategy sponsors.

The individuals who occupy the roles described above have personal
responsibility and accountability for achieving results in their assigned areas.
Strategy sponsors and program managers are also responsible for providing
monthly status reports to the Phase 2/3 project manager. Such reports will
cover progress and any problems, issues or changes in their assigned areas.

All NPG employees have a personal stake in CNS' future. The contents of
the Phase 2/3 plan will be shared with NPG employees to provide them with
the information necessary to make decisions consistent with NPG's top level
goals and strategies.

6.5   Closure and Effectiveness

6.5.1 Plan Closure Process

The Phase 2/3 project manager, as part of his project monitoring
responsibility, will track schedule progress, milestone achievement, activity
completion and program closure for all Phase 2/3 programs. The program
closure process will clearly identify any activities that have a continuing

component and specify how the program will be subject to "continuous improvement" after its official closure. The specific closure activities will be comparable to the Phase 1 Plan process.

6.5.2 Evaluation of Plan Effectiveness

Assessments will be performed to verify completion of activities and the effectiveness of Phase 2/3 strategies and program plans. Effectiveness reviews will be performed at both the program level and the strategy level. Program level effectiveness is directed at the results of the specific actions laid out in the program plan to accomplish the expected changes in performance levels. Strategy level effectiveness is directed at the synthesized results of a number of programs, and must account for the possible impact or interaction associated with other top level strategies.

In all effectiveness reviews the objectives will be as follows:

- Determine that plant and personnel performance results have improved commensurate with the needed level of change and the timing of the effectiveness review.

- Verify that the causes of prior performance problems have or are being addressed.

6.5.3 Measures of Effectiveness

Effectiveness reviews will be based on objective evidence of progress or the desired impact of program activities, not just the completion of activities or achievement of milestones. The following types of measures will be used as appropriate to the specific situation:

- Performance measures identified in the program plan.

- Absence of repeat problems or repetitive failures.

- People's awareness, knowledge and commitment to changed behaviors.

- Results of communications and training.

6.5.4 Effectiveness Reviews

Effectiveness reviews will be performed in accordance with predetermined criteria. For program plans, effectiveness will be reviewed each six months, or at plan completion if the plan is completed within six months. Reviews also can be performed at the request of the Site Manager, strategy sponsor or program manager. Six month reviews will be conducted throughout the term of the Phase 2/3 plan which is expected to be 18-24 months. For completed plans this will involve followup reviews at six month intervals. The specific schedule will take into account "natural" milestone or break points in the program or the end of a set of related activities. It will allow time after completion of activities for the results to "take effect" and be measurable.

Effectiveness reviews will include performance data collection and analyses; document reviews and interviews; observations and/or verifications of activities and other modes as may be appropriate. A written report will be prepared to document the results of each effectiveness review. It will summarize the materials and information reviewed, report conclusions, and identify any additional actions or changes needed to achieve effectiveness.

7   Strategies and Program Action Plans

This section contains detailed descriptions of the seven strategies, their implementing programs and supporting action plans (Phase 2 plans are included in this release of the Phase 2/3 plan). This is the heart of the Phase 2/3 plan. Each of the strategies focuses on one important performance area. Taken together, the strategies define the framework and set the direction for performance improvements. The programs will implement the changes in business practices, operating philosophy and culture that are required to achieve NPG's top level goals. As these programs are implemented, they will result in permanent changes to NPG's business approach and methods.

The program tree in **Figure 7-1** shows the seven top level strategies and their associated programs.

Each of the subsections which follow address one top level strategy and its associated programs. An expanded view of the strategy tree delineates the relationship of strategy, programs and Phase 2 implementing activities. Phase 2 Action Plans are located behind the expanded view figure.

7.1 Focus on Operations Strategy

This strategy will focus our efforts on safe operation by redefining the roles and responsibilities of functions and individuals. We will establish uniform work priorities, set standards for performance and restructure programs and processes to facilitate the completion of work and the focus on operational needs. In addition we will apply safe operating principles in establishing work priorities and in the conduct of operation and a disciplined approach to execution and accountability for operational performance results.

The strategy will be implemented through four programs, listed below, and illustrated in the box at the bottom of the page:

- Management Expectations for Operations

- Prioritization of NPG Workload

- Operations Critical Work Processes

- Organizational Focus

Figure 7.1-1 provides an expanded view of the Phase 2/3 programs and Phase 2 activities.

Strategy Sponsor: P. Dirito
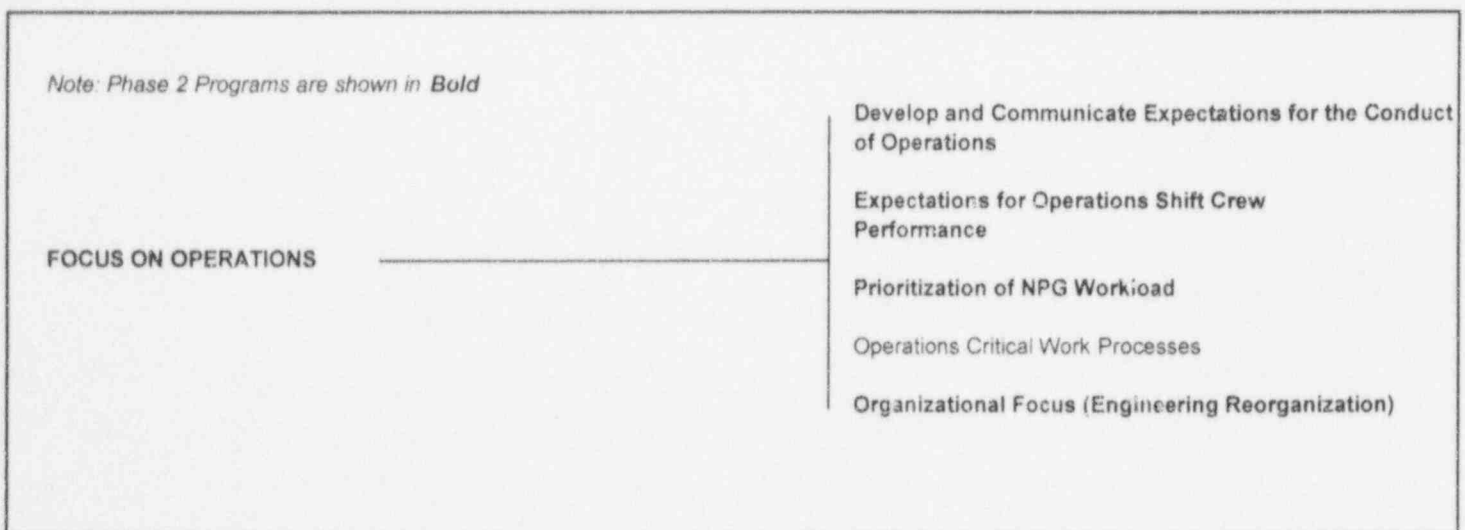
Note: Phase 2 Programs are shown in **Bold**

FOCUS ON OPERATIONS —————————
- **Develop and Communicate Expectations for the Conduct of Operations**

- **Expectations for Operations Shift Crew Performance**

- **Prioritization of NPG Workload**

- Operations Critical Work Processes

- **Organizational Focus (Engineering Reorganization)**

FOCUS ON OPERATIONS ——————————————
STRATEGY: *Focus our efforts on safe operation by redefining the roles and responsibilities of functions and individuals. Establish uniform work priorities, set standards for the performance of (quality, timeliness, and cost), and restructure programs and processes to facilitate the completion of work and the focus on operational needs. Apply safe operating principles in establishing work priorities and in the conduct of operation and a disciplined approach to execution and accountability for operational performance results.*

- Develop and Communicate Expectations for the Conduct of Operations
- Expectations for Operations Shift Crew Performance
- Prioritization of NPG Workload
- Operations Critical Work Processes
- Organizational Focus (Engineering Reorganization)

CONFIGURATION MANAGEMENT ——————————————
STRATEGY: *Establish a clear understanding of the rules for managing the configuration of the plant for all operations, maintenance and change activities. Assign responsibility for ownership of configuration programs, define the interface responsibilities, and clarify responsibility for decision making.*

- Surveillance Program Upgrade
- Design Basis Usability
- Design Basis Use

RESOURCE ALLOCATION AND WORK MANAGEMENT ——————————————
STRATEGY: *Establish resource allocation and work management systems that ensure achievement of NPG top-level goals.*

- **Integrated Planning, Scheduling and Work Control**
- Budgeting and Resource Allocation
- Eliminating Low Value Activities and Processes

CONTINUOUS IMPROVEMENT ——————————————
STRATEGY: *Continuously improve NPG's performance by routinely assessing performance, including review of operating experience, and identifying both improvements and problems. Reduce the impact and recurrence of problems, ensuring they are closed out effectively by follow-up and feedback after corrective actions.*

- **Corrective Action**
- Operational Experience Review
- **Assessments**

MANAGEMENT PRACTICES AND SYSTEMS ——————————————
STRATEGY: *Implement systems and practices that communicate and link the NPG vision and business objectives to individual performance expectations and accountability.*

- **Business and Strategic Planning (Phase 2/3 Plan)**
- Setting Management Expectations
- Performance Management
- Performance Appraisal
- Incentive System
- Management Information Systems

SKILLS AND QUALIFICATIONS ——————————————
STRATEGY: *Develop the capabilities and depth of the organization by defining required organizational development attributes, evaluating personnel against these attributes, and developing or recruiting individuals*

- Organizational Development/Required Skills
- Assessment of Managers and Supervisors
- Succession Planning (Recruiting and Development)

EXTERNAL RELATIONS ——————————————
STRATEGY: *Establish mechanisms to communicate operational and regulatory status and issues to Participants and regulators. Hold periodic meetings with Participants to ensure coordination of longer-term business plans.*

- Communications Between NPPD/NPG and NRC
- Operations-Related Communications With External Parties
- Participant Involvement in Management Meetings

Figure 7-1 Phase 2/3 Strategies and Programs

FIGURE 7.1-1
FOCUS ON OPERATIONS
Phase 2/3 Expanded View

Conduct pilot workshop on procedure use and adherence

Revise workshop approach

Develop and Communicate Expectations for the Conduct of Operations (Short Term) [VanDerKamp] Objective: *Increase the focus on safe plant operation through specific improvements in the conduct of plant operations.*

Conduct workshops on handling discrepant or abnormal conditions, job completion and performance standards, and personnel conduct and interface

Implement improvements in target areas

Perform benchmarking at top plants and conduct shift crew workshops

Evaluate potential process and organizational improvements

FOCUS ON OPERATIONS
[Dirito]
STRATEGY: *Focus our efforts on safe operation by redefining the roles and responsibilities of functions and individuals. Establish uniform work priorities, set standards for the performance of (quality, timeliness, and cost), and restructure programs and processes to facilitate the completion of work and the focus on operational needs. Apply safe operating principles in establishing work priorities and in the conduct of operation and a disciplined approach to execution and accountability for operational performance results.*

Expectations for Operations Shift Crew Performance (Short Term) [VanDerKamp] Objective: *Establish, communicate, and reinforce high performance standards for the shift crews to set high standards for operations.*

Communicate and reinforce performance expectations

Review alternative approaches

Prioritization of NPG Workload (Short Term) [Kuser] Objective: *Develop and institutionalize a prioritization method for NPG work activities, projects and investments.*

Develop prioritization process and procedure

Revise or create supporting NPG procedures

Apply prioritization method to the Fall 1995 outage

Operations Critical Work Processes (Long Term) Objective: *Establish clear ownership and accountability for those processes critical to safe operations.*

Complete long-term organization study

Define and communicate personnel policies

Organizational Focus (Engineering Reorganization) (Short Term) [Walden] Objective: *Reorganize Engineering to increase their focus on supporting CNS operation and maintenance.*

Obtain approval for and announce long-term organization

Initiate necessary policy changes to reflect organization and mission changes

Identify necessary process and procedure changes

Staff the new organization

PHASE 2 ACTION PLAN

Develop and Communicate Expectations for the Conduct of Operations

ACTION PLAN

PROGRAM TITLE

Develop and Communicate Expectations for The Conduct Of Operations

PROGRAM MANAGER

Dave VanDerKamp
Operations Supervisor

PROGRAM COMPLETION DATE

Three months after unit restart.

DESCRIPTION

Develop and communicate expectations for the conduct of plant operations and maintenance of plant material condition. Expectations will address items such as how to maintain conservatism in decision making, interface between departments, protocol and formality of interface with the control room, discrepant conditions including operability determinations, managing anomalous conditions, support to operations, procedure usage and adherence, completing work in an error free manner, ensuring availability and reliability of equipment to control room operators, teamwork and mutual support, and training. Expectations will be developed using a workshop format with various plant organizations to ensure ownership and accountability with all plant staff personnel. Results will be communicated to the organization through development or revision of procedures, meetings with plant organizations, and training (as appropriate).

OBJECTIVES

The objective of this action plan is to increase the focus on safe plant operation through specific improvements in the conduct of plant operations. Specific objectives are as follows:

Establish expectations and standards for plant operations and the interface with, and support of, the control room operations staff;

Increase and perpetuate the level of conservatism in operations;

Establish expectations for the material condition of the plant; and

ACTION PLAN

Create the tools and procedures necessary to establish ownership of operations standards and expectations with the plant operations staff.

PERFORMANCE MEASURES

Quantitative and qualitative performance measures related to this program area will be based on performance measures defined in the workshop areas described below. These performance measures will relate to the four overall objectives described above for this Action Plan. The performance measures defined in the workshops will address the following three items:

1. The parameter or indicator to be measured.

2. A brief explanation of how/why this parameter is an indicator for a particular aspect of performance. Representative historic data will be reviewed (as available and appropriate) and the expected behavior of the parameter under anticipated changes/improvements will be explained.

3. The target value(s) for the parameter and time frame.

ACTIVITIES

This Action Plan will be implemented via a workshop approach designed to establish organizational ownership. The following four areas will be addressed:

1.   Procedural Usage and Adherence **(Pilot Workshop)**

     This workshop will define standards, expectations, implementing and reinforcing methods and performance measures for the following specific items (and others as defined by the workshop participants):

          Expectations for following the intent and specific procedural steps
          Expectations and actions to be taken for ambiguous or discrepant items
          Standards for performance and non-compliance
          Training needs to establish understanding and personal accountability

     Procedural Usage and Adherence will serve as the pilot workshop for this Action Plan. The workshop approach for the remaining three areas will be finalized

ACTION PLAN

based on the results of the pilot effort. Each workshop will be facilitated by members of the Action Plan team to ensure consistency of approach and to ensure that the intent of the Action Plan is being implemented. The pilot workshop will be implemented in a three step approach as follows:

a. One or more members of this Action Plan team will meet with each of the following groups: I&C Shop, Mechanical Maintenance, Electrical Maintenance, Chemical/HP, Operations, Engineering, and Training. The purpose of the meetings is to obtain input from the personnel that will be responsible for implementing these actions such that ownership and accountability for performance can be established.

b. Collect and collate results to define appropriate implementing actions. The team responsible for this Action Plan will be responsible for defining these implementing actions.

c. One or more members of the Action Plan team will conduct a follow-up workshop with one or two members of each of the seven groups identified in item A. The purpose of this workshop is for the Action Plan team to present the consolidated set of implementing actions and to obtain any additional feedback from the representatives of these groups. The implementing actions will be finalized following this workshop and communicated back to each of the seven groups.

2. Discrepant or Abnormal Conditions

This workshop will define standards, expectations, implementing and reinforcing methods and performance measures for the following specific items (and others as defined by the workshop participants):

Conservatism in decision making
Dealing with anomalies during off-normal conditions and times
Expectations and focus on blackboard conditions (red arrow items, controllers in manual, etc.)
Operability determinations
Prioritization of items requiring repair
Interim or compensatory measures
Operator work-arounds
Notification and communication of conditions

ACTION PLAN

Voluntary LCO engagement and implementing actions
Training needs to establish understanding and personal accountability

3.   Job Completion and Performance Standards

This workshop will define standards, expectations, implementing and reinforcing methods and performance measures for the following specific items (and others as defined by the workshop participants):

Expectations for equipment performance following maintenance or modification activities (availability, reliability, operation within performance specifications, etc.)
Expectations for personal accountability of work products (complete, thorough, error free, verified, etc.)
Expectations for support of operations by other departments (including priorities, off-shift support, etc.)
Training needs to establish understanding and personal accountability

4.   Personnel Conduct and Interface

This workshop will define standards, expectations, implementing and reinforcing methods and performance measures for the following specific items (and others as defined by the workshop participants):

Protocol and personnel standards of conduct in the control room and when interfacing with the control room staff
Interfaces between departments
Communications
Establishing mutual expectations between personnel and groups
Training needs to establish understanding and personal accountability

ACTION PLAN

SCHEDULE

Activity	Accountable Person	Start Date	End Date
Conduct pilot workshop on Procedural Usage and Adherence	VanDerKamp	Restart + 1 weeks	Restart + 2 weeks
Revise Workshop approach for remaining three areas based on results of the pilot	VanDerKamp	End of Pilot Workshop	Restart + 3 weeks
Conduct workshops for the three remaining areas	VanDerKamp	Restart + 3 weeks	Restart + 6 weeks
Implement actions defined for each of the four areas	TBD based on actions defined	End of Applicable Workshop	Restart + 12 weeks

PHASE 2 ACTION PLAN

Expectations for Operations Shift Crew Performance

ACTION PLAN

PROGRAM TITLE

Expectations for Operations Shift Crew Performance.

PROGRAM MANAGER

Dave VanDerKamp
Operations Supervisor

PROGRAM COMPLETION DATE

Restart plus three months.

DESCRIPTION

Benchmark top-performing plants to identify methods to improve standards for operations and training, hold workshops to establish expectations for shift crew performance, and implement effective feedback and training processes.

OBJECTIVES

Establish, communicate and reinforce operations expectations for the shift crews to set and maintain high standards for performance. Expectations for shift crew performance will be established as a minimum in the following key focus areas:

    Conservative operating decisions
    Preventing human errors
    Ownership and resolution of plant problems
    Adequacy and currency of training
    Availability of plant equipment
    Consistency of shift operations; shift-to-shift and in the simulator and the control room
    Control and Implementation of plant schedules
    Use of self assessment and peer observations

ACTION PLAN

PERFORMANCE MEASURES

1. Consistently high standards in shift crew requalification and retraining as measured through effectiveness observations from plant management and requalification/retraining results. Crew performance in retraining and requalification are a direct indicator of qualification and skills of the crews to perform successfully in the plant.

2. A high level of schedule discipline is attained through operations involvement in and ownership of setting plant priorities.

3. Achieving and sustaining operations goals in important shift-related indicators (temporary modifications and other work-arounds, red arrows, out-of-service hours for designated equipment, schedule discipline, and open caution tag orders and operator aids).

ACTIVITIES

1. Develop and communicate expectations for shift crew performance.

    a) Perform benchmarking at top-performing plants to assess and determine how their shift crews conduct business (e.g., Calloway or Brunswick). As a minimum, determine how the key focus areas in the objective are addressed.

    b) Perform benchmarking at top-performing plants to assess and determine effective operations and training interfaces. (e.g., Millstone Unit 1)

    c) Conduct shift crew workshops to define clearly the expectations for performance. Include in the crew workshops as a minimum the Shift Supervisor, CRS, STA, ROs, Station Operators, HP/Chemistry Tech, Training representative, Operations Support representative(s), and work control.

    d) Link the results from the action plan on Expectations for the Conduct of Operations to this action plan.

2. Evaluate alternative or improved processes or organizational approaches that may be used to upgrade shift crew performance to support action item #1 (e.g., at FitzPatrick for department coordinators). The intent is to support the expectations by improved methods of doing business.

ACTION PLAN

3. Communicate and reinforce the expectations. Establish processes to assure they are reinforced and made lasting, including

    a) Set requirements and expectations for management involvement in shift crew training.
    b) Incorporate the expectations for shift crew performance through a systematic approach to training in the accredited training program requirements for initial and continuing operator training.
    c) Develop an effective Operations Department self-assessment process to support the objective of this action plan linked to the action plan for Assessments. Develop and implement effective peer assessment processes.

ACTION PLAN

SCHEDULE

See attached Gantt chart.

Activity	Accountable Person	Start Date	End Date
1.a Perform benchmarking at top-performing plants to assess and determine how their shift crews conduct business.	VanDerKamp	Restart + 1 Week	Restart + 2 Weeks
1.b Perform benchmarking at top-performing plants to assess and determine effective operations and training interfaces.		+ 1 Week	+ 4 Weeks
1.c Conduct shift crew workshops to define clearly the expectations for performance.		+ 5 Weeks	+ 8 Weeks
1.d Link the results from the action plan on Expectations for the Conduct of Operations to this action plan.		+ 5 Weeks	+ 8 Weeks
2 Evaluate alternative or improved processes or organizational approaches that may be used to upgrade shift crew performance to support action item.		+ 1 Week	+ 8 Weeks
3.a Set requirements and expectations for management involvement in shift crew training.		+ 9 Weeks	+ 12 Weeks
3.b Incorporate the expectations for shift crew performance through a systematic approach to training in the accredited training program requirements for initial and continuing operator training.		+ 9 Weeks	+ 12 Weeks
3.c Develop an effective Operations Department self-assessment process to support the objective of this action plan. Develop, train and implement effective peer assessment processes.		+ 5 Weeks	+ 12 Weeks

PHASE 2 ACTION PLAN

Prioritization of NPG Workload

ACTION PLAN

PROGRAM TITLE

Prioritization of NPG Workload

PROGRAM MANAGER

Dave Kuser

PROGRAM COMPLETION DATE

Six Months Prior to the End of the Fall 1995 Outage (Phase 2)

DESCRIPTION

An approach for prioritizing and making decisions about NPG activities, projects, investments, etc., will be selected and developed. NPG processes and procedures will be modified to apply it. The approach will be used to allocate budget and human resources effectively.

OBJECTIVES

Develop and institutionalize a prioritization method for assigning priorities and making decisions about NPG work activities, projects, etc.

PERFORMANCE MEASURES

Prioritization approach applied to all work activities and projects.

Fall 1995 outage scope, length, and budget fixed 6 months prior to the outage start.

These measures will provide an indication of the initial effectiveness of the prioritization approach and the commitment of management to prioritization and decisions regarding activities and projects and associated resource allocation.

ACTION PLAN

ACTIVITIES

1. Identify and review options available for prioritization (consider approaches used at other stations).
2. Select best option.
3. Present recommendation to management and obtain feedback
4. Identify affected processes/procedures or any new procedures required for implementation.
5. Develop prioritization process and procedure .
6. Revise or create procedures as necessary to support prioritization process.
   - 6.1 Draft NPG Directive 4.9 for Work Planning and Management linkage to the prioritization process.
   - 6.2 Draft Engineering procedures.
   - 6.3 Draft Plant procedures.
   - 6.4 Draft Outage & Maintenance procedures.
   - 6.5 Get procedures approved.
7. Train/indoctrinate employees who will use the approach.
8. Apply prioritization approach to NPG activities and projects to establish scope, length, and budget for the Fall 1995 outage

SCHEDULE

Activity	Accountable Person	Start Date	End Date
1. Identify options.	D. Kuser	R	R+2
2. Select best option.	D. Kuser	R+1	R+3
3. Present recommendation.	D. Kuser	R+3	R+4
4. Identify affected processes/procedures.	D. Kuser	R+3	R+4
5. Develop prioritization procedure.	J. Flaherty	R+4	R+8
6. Revise or create procedures.	------	------	------
6.1 Draft NPG Directive 4.9.	D. Kuser	R+4	R+8
6.2 Draft Engineering procedures.	J. Flaherty	R+4	R+8

ACTION PLAN

Activity	Accountable Person	Start Date	End Date
6.3 Draft Plant procedures.	J. Brown	R+4	R+8
6.4 Draft O&M procedures.	M. Wolken	R+4	R+8
6.5 Get procedures approved.	D. Kuser	R+8	R+10
7. Train/indoctrinate.	J. Dutton	R+10	R+12
8. Apply to Fall 1995 outage.	R. Jansky	Outage start - 28	Outage start - 24

Schedule dates are in weeks relative to completion of restart. Restart is attainment of 100% power plus one week.

PHASE 2 ACTION PLAN

Engineering Reorganization

ACTION PLAN

PROGRAM TITLE

Engineering Organizational Focus

PROGRAM MANAGER

Kim Walden

PROGRAM COMPLETION DATE

August 1, 1995

DESCRIPTION

Engineering is being reorganized in three phases in order to increase the focus on support for operation and maintenance. The first phase of reorganization, the implementation of an "interim" engineering organization, is being accomplished in November 1994 to improve plant support and to move selected resources to the station. In the second phase, the long-term engineering organization concept will be developed by December 31, 1994 and staffed (selected) by January 31, 1995. The long-term organization will be fully implemented, in Phase 3, by June 1, 1995.

The schedule for reorganization has been established by a memo from the Vice President Nuclear. Consequently, the timing of Phases 2 and 3 of the Engineering reorganization differs somewhat from the other Phase 2 and 3 action plans.

OBJECTIVES

Reorganize Engineering in order to focus on four key mission elements supporting operation:

- participating actively in decisions on station priorities, physical plant risk and regulatory risk management, and economic improvements;

- resolving emergent plant operational, maintenance, and regulatory issues;

ACTION PLAN

- protecting and improving the physical plant material condition and system performance; and

- establishing and maintaining the plant design and licensing basis.

PERFORMANCE MEASURES

New organization defined and announced by January 1, 1995

Individuals selected for new positions and notified by January 31, 1994

Design change scope for fall outage identified six months prior to outage start

Fewer than 10% of safety evaluations submitted to SORC are returned for quality or technical inadequacy

Engineering Backlogs continuing to decrease significantly:
    Plant temporary modifications
    EWRs
    Design Changes
    DCNs
Specific values for these measures, which would reflect significant reductions, are to be developed.

ACTIVITIES

For completeness, Phase 1 and 3 activities are shown here. As explained above, the timing of these phases differ somewhat from the other Phase 2 and 3 action plans.

1. <u>Phase 1: Develop and Implement the "Interim" Engineering Organization.</u>
    1.1 Conduct management workshop.
    1.2 Develop "interim" organization.
    1.3 Complete planning.
    1.4 Approve, announce, and initiate "interim" organization.
    1.5 Arrange logistics for additional on-site staff.
    1.6 Change processes to accommodate "interim" organization.

ACTION PLAN

2. <u>Phase 2: Develop the Long-term Engineering Organization.</u>
   2.1 Complete long-term organization development study.
       2.1.1 Visit 1-2 other nuclear generation and support organizations.
       2.1.2 Prepare input analysis.
           2.1.2.1   Develop benchmark information from other organizations.
           2.1.2.2   Review NPG historical cost data.
       2.1.3 Establish long-term cost and performance goals.
       2.1.4 Develop long-term organizational strategy through an additional planning meeting.
       2.1.5 Estimate and aggregate projected engineering workload.
       2.1.6 Complete analysis of benefits, impacts, and costs.
       2.1.7 Define organizational structure and size and define responsibilities:
           Functions
           Programs
           Interfaces
           Resources
           Location
           2.1.7.1   Prepare list of functions and activities
           2.1.7.2   Propose assignments
           2.1.7.3   Approve assignments
           2.1.7.4   Size organization
       2.1.8 Prepare report and briefings
   2.2 Define and communicate personnel policies.
   2.3 Obtain approval for and announce long-term organization.
   2.4 Initiate necessary policy changes to reflect organization and mission changes.
   2.5 Identify necessary process and procedure changes.
   2.6 Staff the new organization.
       2.6.1 Develop people skill and qualifications requirements and selection criteria.

ACTION PLAN

2.6.2 Develop new or modified position descriptions; define grades.

2.6.3 Compare existing skills and qualifications with requirements.

2.6.4 Post positions; select people for positions.

2.6.5 Announce selection.

2.6.6 Implement training and development programs to address skill, knowledge, and qualification short-falls.

    2.6.6.1 Analysis of needs.

    2.6.6.2 Training program development.

    2.6.6.3 Delivery of training.

    2.6.6.4 Individual development plans (in conjunction with programs supporting Skills and Qualifications strategy).

2.6.7 Recruit any additional employees or managers.

3. Phase 3: Implementation of the Long-term Engineering Organization

    3.1 Address configuration management and design basis concerns.

        3.1.1 Consider and accommodate the activities and results of the Configuration Management strategy and associated programs.

        3.1.2 Complete the Design Basis Project.

        3.1.3 Define the full scope of and complete the vendor manual project.

    3.2 Make necessary process changes.

        3.2.1 Identify process changes necessary due to organization changes and performance problems; consider the following:

            Temporary modifications, EWRs, and design changes

            Support for plant operations and maintenance

            Management of engineering programs

            Design control

            Drawing revision and control

            Vendor manual control

        3.2.2 Identify changes desirable for efficiency and effectiveness.

        3.2.3 Form process change groups.

ACTION PLAN

3.2.4 Develop new or revised processes.

3.2.5 Implement changes.

3.3 Initiate long-term organization changes.

3.4 Communicate changes and plans:

3.4.1 Employee meetings

3.4.2 Customers and NRC

3.4.3 Other NPPD organizations

3.5 Develop and put in place plan for use of contractors.

3.5.1 Identify type and amount of work.

3.5.2 Define strategy for contractor use.

3.6 Upgrade, acquire, or replace information systems.

3.6.1 Identify needs and develop plan; consider:

CAD/CAE

Engineering mechanics

Design guides and standards

Calculation tools

Data bases

Process/management information systems

3.6.2 Acquire or upgrade systems

3.7 Monitor performance and adjust organization accordingly.

ACTION PLAN

SCHEDULE

Activity	Accountable Person	Start Date	End Date
1. <u>Phase 1: Implement "Interim" Org.</u>	K. Walden	10/19/94	11/14/94
1.1 Conduct management workshop	K. Walden	11/1/94	11/1/94
1.2 Develop "interim" organization	K. Walden	10/19/94	11/9/94
1.3 Complete planning	K. Walden	11/1/94	11/14/94
1.4 App., ann., and initiate "interim" org	K. Walden	11/9/94	11/14/94
1.5 Arrange logistics	K. Walden	11/7/94	11/14/94
1.6 Change processes	K. Walden	11/9/94	11/30/94
2. <u>Phase 2: Develop Long-term Org.</u>	K. Walden	11/1/94	1/31/95
2.1 Complete organization study	K. Walden	11/1/94	12/31/94
2.2 Define/comm. personnel policies	G. Kruse	12/1/94	12/31/94
2.3 Approve/announce long-term org.	G. Horn	12/31/94	1/6/95
2.4 Initiate necessary policy changes	K. Walden	1/6/94	2/28/95
2.5 Identify process/procedure changes	K. Walden	12/15/94	1/31/95
2.6 Staff the new organization	K. Walden	12/15/94	1/31/95

ACTION PLAN

Activity	Accountable Person	Start Date	End Date
3. Phase 3: Implement Long-term Org.	K. Walden	12/15/94	8/1/95
3.1 Address config mgmt/des. basis	K. Walden	12/15/94	6/1/95
3.2 Make necessary process changes	K. Walden	1/31/95	6/1/95
3.3 Initiate long-term org changes	K. Walden	6/1/95	8/1/95
3.4 Communicate changes and plans	K. Walden	12/1/94	6/1/95
3.5 Put in place plan for contractors	K. Walden	1/6/95	3/1/95
3.6 Upgrade information systems	K. Walden	2/1/95	8/1/95
3.6.1 Identify needs and develop plan	K. Walden	2/1/95	4/1/95
3.6.2 Acquire or upgrade systems	K. Walden	4/1/95	8/1/95
3.7 Monitor & adjust organization	K. Walden	4/1/95	12/1/95

7.2 Configuration Management Strategy

This strategy will establish a clear understanding of the rules for managing the configuration of the plant for all operations, maintenance and change activities. It will assign responsbility for ownership of configuration programs, define the interface responsibilities, and clarify responsibility for decision making.

The strategy will be implemented through three programs, listed below, and illustrated in the box at the bottom of the page:

- Operations Critical Procedures

- Design Basis Usability

- Design Basis Use

Figure 7.2-1 provides an expanded view of the Phase 2/3 programs and Phase 2 activities.

Strategy Sponsor: J. Gausman

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*Note: Phase 2 Programs are shown in **Bold***

CONFIGURATION MANAGEMENT ———————————————

Surveillance Program Upgrade

Design Basis Usability

Design Basis Use
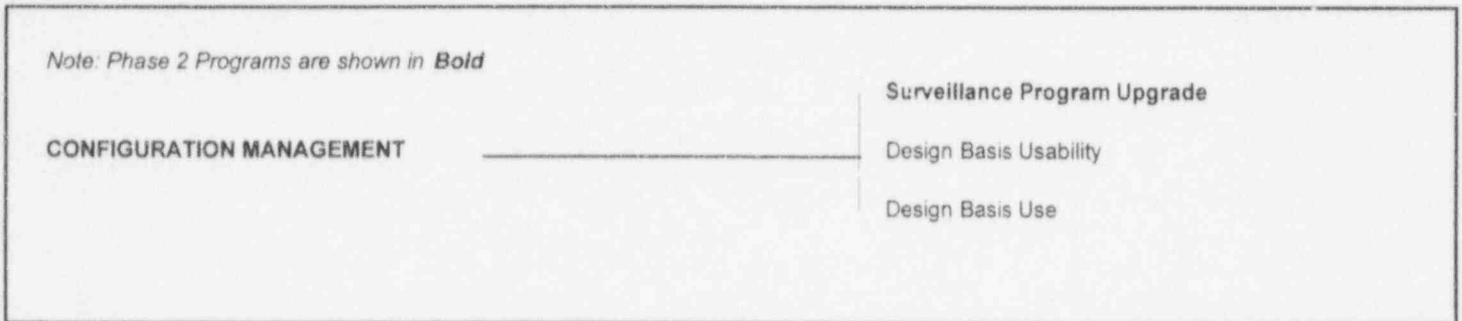
FIGURE 7.2-1
CONFIGURATION MANAGEMENT
Phase 2/3 Expanded View

Complete the Surveillance Testing Validation Program and resolve safety significant discrepancies

Surveillance Program Upgrade (Short Term)
[Mace] Objective: *Resolve significant program discrepancies and upgrade the program to better support divisional work control practices.*

Revise SPs to reflect divisional separation by section within the procedure

CONFIGURATION MANAGEMENT
[Gausman]
STRATEGY: *Establish a clear understanding of the rules for managing the configuration of the plant for all operations, maintenance and change activities. Assign responsibility for ownership of configuration programs, define the interface responsibilities, and clarify responsibility for decision making.*

Design Basis Use (Long Term) Objective: *Upgrade NPG knowledge, availability, and usage of design basis information through training, ownership, and improvement in critical configuration control programs.*

Design Basis Usability (Long Term)
Objective: *Improve the accuracy, completeness, and accessibility of the design basis.*
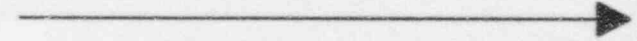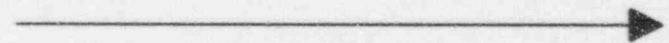
PHASE 2 ACTION PLAN

Surveillance Program Upgrade

ACTION PLAN

PROGRAM TITLE

Surveillance Program Upgrade

PROGRAM MANAGER

E. M. Mace

COMPLETION DATE

April 3, 1995

DESCRIPTION

Verify technical compliance of the surveillance program with USAR and Technical Specifications by completion of the Surveillance Testing Validation Program. Upgrade the Surveillance Program to better support divisional testing.

OBJECTIVES

Validate the surveillance program to ensure that the surveillance program tests all safety functions and to ensure that administrative or technical discrepancies are resolved.

Continue upgrade of Surveillance Program to better support divisional work control practices.

PERFORMANCES MEASURES

1.   Technical quality of surveillance procedures is improved, such that there are no reportable occurrences due to surveillance procedure inadequacy.

2.   Performance of surveillance testing by division ensures avoidance of LCOs and safety challenges.

ACTION PLAN

ACTIVITIES

1.   Plant Improvement Plan (PIP) Phase 1 Action Plan Item 4.5 conducted the Surveillance Testing Validation Program (STVP) which performed a detailed systematic review of surveillance procedures for CSCS (LPCI, CS, ADS, HPCI), RPS, SBGT, Control Room HVAC, and Reactor Building HVAC to verify that testing is being conducted in accordance with USAR, Technical Specifications, IST, ASME Code, and NUREG-1482 requirements, as appropriate. Under this PIP-Phase 2 Action Plan, the STVP effort will continue and be completed for the remaining surveillance procedures.

   1.1   Complete STV.ᵖ review effort for the remaining (400) surveillance procedures including documentation of potential discrepancies.

   1.2   Evaluate for safety significance and generic impact, and resolve noted discrepancies.

2.   Plant Improvement Plan (PIP) Phase 1 Action Plan Item 8.5 screened out and identified those surveillance procedures that are not divisionally separated by section within a procedure, and established a short-term method to accommodate divisional testing. This Action Plan will revise these screened procedures (~ 200) to upgrade them to a divisional section format. This will reduce the likelihood of divisional test performance errors, and provide a uniform foundation for future Surveillance Procedure upgrades to be performed in PIP-Phase 3.

   2.1   Revise those Surveillance Procedures that are not currently divisionally separated by section into a format of divisional separation by section within the procedure.

ACTION PLAN

SCHEDULE

Activity	Accountable Person	Start Date	End Date
1.1 Complete STVP reviews of remaining 400 SPs.	W. Baruth	R-9	R + 8
1.2 Evaluate for safety significance and resolve.	W. Baruth	R-9	R + 8
2.1 Revise SPs to reflect divisional separation by section within the procedure.	C. Holm	R-3	R + 9

7.3 Resource Allocation and Work Management Strategy

This strategy establishes resource allocation and work management systems that ensure achievement of NPG top-level goals.

The strategy will be implemented through three programs, listed below, and illustrated in the box at the bottom of the page:

- Integrated Planning, Scheduling and Work Control

- Budgeting and Resource Allocation

- Eliminating Low Value Activities and Processes

Figure 7.3-1 provides an expanded view of the Phase 2/3 programs and Phase 2 activities.

Strategy Sponsor: J. Herron

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*Note: Phase 2 Programs are shown in **Bold***

RESOURCE ALLOCATION AND WORK MANAGEMENT

Integrated Planning, Scheduling and Work Control

Budgeting and Resource Allocation

Eliminating Low Value Activities and Processes

FIGURE 7.3-1
RESOURCE ALLOCATION AND
WORK MANAGEMENT
Phase 2/3 Expanded View

Establish planning milestones

Establish outage management function

Move the clearance function to the WCC

Staff the scheduling function with permanent personnel

Develop outage performance measures

Develop/implement MWR process improvements

Integrated Planning, Scheduling and Work Control (Short Term)   Objective: *Implement long term actions to support work planning and scheduling for the next refueling outage.*

RESOURCE ALLOCATION
AND WORK MANAGEMENT
[Herron]
STRATEGY: *Establish resource allocation and work management systems that ensure achievement of NPG top-level goals.*

Budgeting and Resource Allocation (Long Term) Objective: *Plan and allocate resources consistent with strategic objectives and with the ability to accomodate emergent work.*

Eliminating Low Value Activities and Processes (Long Term) Objective: *Ensure expenditures are directed at work activities that contribute to NPG's goals and priorities*.

PHASE 2 ACTION PLAN

Integrated Planning, Scheduling and Work Control

ACTION PLAN

PROGRAM TITLE

Integrated Planning, Scheduling and Work Control

PROGRAM MANAGER

Dave Kuser

COMPLETION DATE

Restart plus three months

DESCRIPTION

Continue the implementation of actions and process revisions to support both on-line maintenance and outage planning, scheduling and implementation.

OBJECTIVES

The primary focus of Phase 2 will be implementation of long term actions to support work planning and scheduling for the next refueling outage.

Ensure that the objectives of the work control process implemented in Phase 1 are effective in meeting the defined objectives of the process.

PERFORMANCE MEASURES

Effectiveness of the work control process in identifying and controlling outage scope. Establish the work scope of the current and future outages and track all additions and deletions to the scope.

Ability of the organization to accomplish planning and support activities to enable the accomplishment of work when first scheduled. Establish an approved Outage Work List (OWL) for the current and future outages and track the planning status of all items on the OWL to "task ready" status.

Quality of the schedule and the effectiveness of the work force in meeting schedule commitments. Track the number of work items started in accordance with the schedule and completed in accordance with the schedule.

ACTION PLAN

ACTIVITIES

Phase 1 activities that have been completed and additional activities that are expected to be completed prior to start-up are shown here in order to help in understanding Phase 2 activities:

Phase 1 Activities (Completed)

1.   Improve work planning/package preparation
  1.1.   Prepare and issue implementing directives and desk guides.
  1.2.   Define and implement requirements to accomplish "task ready" planning.
  1.3.   Train planners in the revised work planning requirements.
  1.4.   Review requirements and adjust staffing of Maintenance Planning to perform work planning activities formerly performed by the shops and additional activities required to support the preparation of "task ready" work packages.
2   Improve work scheduling
  2.1.   Revise the existing organization to create an Integrated Scheduling function that combines both daily and outage scheduling.
3.   Provide operations control in establishing priorities
4.   Establish a work control center outside the control room, to allow an SRO to control work.
  4.1   Establish and charter an ad hoc work control planning and design group.
  4.2   Design, test and obtain approval of a revised work control process concept.
  4.3.   Select, train and assign personnel to staff the Work Control Center.
  4.4.   Establish and equip a Work Control Center (WCC) facility in the vicinity of the Control Room.
  4.5.   Establish a validation function for all new work items processed by the WCC.
  4.6.   Conduct training of shop personnel in the revised work control process.
5.   Establish divisionalized work control for the current outage
6.   Improve short-range work control by developing an interim schedule to transition to a 12-week schedule.
  6.1.   Provide preliminary man-hour and duration estimates for all items in the outage scope.

Additional Follow-on Activities Expected to be Completed Prior to Start-up

ACTION PLAN

1. Establish an approved Outage Work List to identify all items formally approved for inclusion in the restart work scope. (Includes priority "A" work items only.)
2. Establish a rigorous work scope control process for the current outage in accordance with the restart plan.
3. Produce a preliminary resource loaded outage schedule of mandatory restart work items, surveillances and preventive maintenance.
4. Establish additional performance measures to determine the effectiveness of the revised work control process in meeting the initiative objectives.
5. Review and upgrade or prepare work control process desk guides for the following functions:
   - WCC Screening of Condition Reports
   - Maintenance Planning
   - Work Item Validation
   - Work Package Assembly and Routing
   - Shop Review of Work Packages
   - Emergent Work Processing
   - On-line Schedule Development
   - Clearance Preparation
   - Work Package Closure
6. Permanently assign a maintenance clerk to the staff of the Work Control Center and establish a policy for appropriate duty tours for personnel assigned to the WCC to perform validation and SRO functions.
7. Equip the Work Control Center with the necessary computer equipment and access required to support operation of the Clearance Function in the WCC.
8. Commence preparation of preliminary clearances for scheduled work at about 3 weeks before scheduled job start date.
9. Locate real estate and collocate scheduling personnel in one area under one supervisor.

10. Identify and implement changes to the Work Item Tracking System (CWITS) to improve the ability to monitor the status of work items from inception) through planning, issue, and completion.
11. Establish a feedback mechanism to update preliminary resource and duration estimates with Planning estimates when available.
12. Initiate outage work scope, schedule logic, and work item estimate adjustments to produce an achievable outage schedule that meets management expectations for duration and cost for the current outage.

ACTION PLAN

13. Designate a specific planning area and establish a "work package coordination" function to centralize and coordinate final package assembly, routing, storage, and the timely accomplishment of shop reviews and resolution of shop issues.
14. Produce a resource-loaded on-line rolling schedule.
15. Fill the Scheduling Manager position with a full time employee.
16. Identify hardware, software, and staffing requirements to facilitate the feedback of procurement and material availability information to Planning and Scheduling.

Phase 2 Activities

1. Establish planning milestones for the next refueling outage.
2. Establish an effective outage management function. Include consideration of
   - Scope identification and control
   - Risk management and work prioritization
   - Contractor mobilization and contractor management
   - Outage management organization
     - Roles and responsibilities
     - Interface with WCC
   - Outage manual
3. Move the Clearance function from the Control Room to the WCC
4. Staff Integrated Scheduling with permanent personnel.
5. Develop and implement outage planning performance measures.
6. Develop and implement MWR process improvements. Consider:
   - PMs
   - LCO tracking

ACTION PLAN

SCHEDULE

Activity	Accountable Person	Start Date	End Date
1. Establish planning milestones.	R. Jansky	R-2	R+3
2. Establish outage mngmnt function.	Scheduling Manager	R-2	R+3
3. Move the Clearance function.	J. Brown	R-6	R-3
4. Staff Scheduling with permanent personnel.	Scheduling Manager	R-4	R
5. Develop/implement outage perf. measures.	Scheduling Manager	R+4	R+6
6. Develop/implement MWR process improvements.	R. Gardner	R+2	R+6

Schedule dates are in weeks relative to completion of restart (R). Restart is attainment of 100% power plus one week.

7.4 Continuous Improvement Strategy

This strategy is to continuously improve NPG's performance by routinely assessing performance, including review of operating experience, and identifying both improvements and problems. In addition, reduce the impact and recurrence of problems, ensuring they are closed out effectively, by follow-up and feedback after corrective actions.

The stragegy is implemented through three programs, listed below, and illustrated in the box at the bottom of the page:

- Corrective Action

- Operational Experience Review

- Assessments

Figure 7.4-1 provides an expanded view of the Phase2/3 programs and Phase 2 activities.

Strategy Sponsor: R. Godley

Note: Phase 2 Programs are shown in **Bold**

CONTINUOUS IMPROVEMENT ———————————————— **Corrective Action**

Operational Experience Review

Assessments
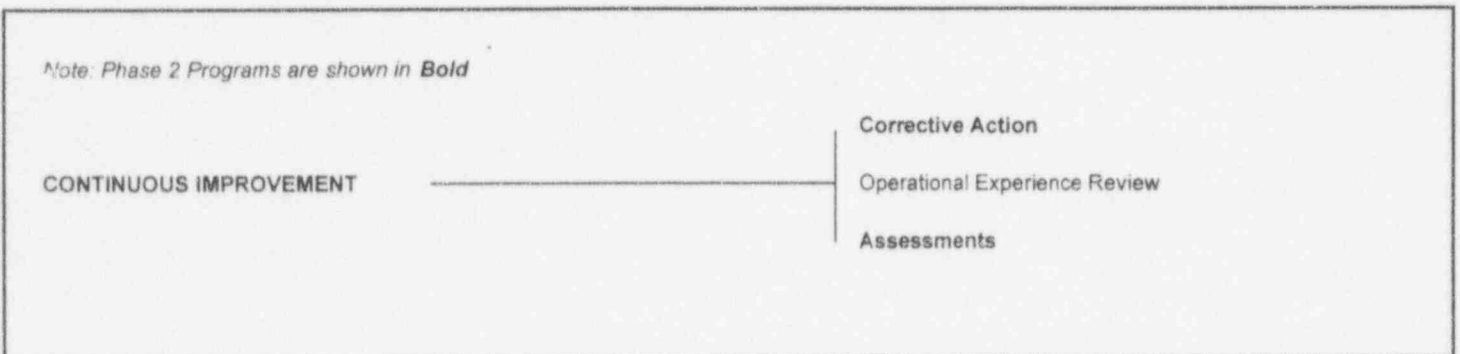
FIGURE 7.4-1
CONTINUOUS IMPROVEMENT
Phase 2/3 Expanded View

CONTINUOUS IMPROVEMENT
[Godley]
STRATEGY: *Continuously improve NPG's performance by routinely assessing performance, including review of operating experience, and identifying both improvements and problems. Reduce the impact and recurrence of problems, ensuring they are closed out effectively by follow-up and feedback after corrective actions.*

Corrective Action Program [Gaines]

(Long Term) Objective: Implement additional CAP process efficiencies that improve the throughput rate, further lowering the expected amount of CR work in process at any given time.

(Short Term)
Objective: *Reduce accumulated backlogs and begin managing CR workload against defined criteria. Establish permanent CAP group.*

Analyze data to determine causes of backlogs.

Screen and prioritize accumulated backlog of outstanding work.

Identify and implement interim process fixes to facilitate backlog reduction.

Implement dedicated team to expedite workoff of accumulated backlog.

Establish controls and performance indicators for CR backlog

Conduct training for department coordinators and teams including quality expectations

Staff the CAP group.

Operational Experience Review
[Gaines] (Long Term)

Assessments
[Moeller]

(Short Term)
Objective: *Improve the NPG's ability to self-identify problemsn and performance improvements. Foster a healthy and active self assessment culture and develop core SA capabilities throughout the organization.*

Staff Independent Review Group.

Establish assessment program scope and goals.

Assess current program against defined scope

Implement program improvements.

Enhance NPG self-assessment skills.

Perform program prototype self-assessment

(Long Term)
Objective: *Benchmark against other stations.*

ACTION PLAN 2

Corrective Action

ACTION PLAN

PROGRAM TITLE

CAP Improvement Plan

PROGRAM MANAGER

C. R. Gaines
Events Analysis Manager

PROGRAM COMPLETION DATE

100 Percent Power + 1 Quarter

CAP PHASE 2 PLAN

DESCRIPTION

This Phase 2 plan will eliminate the accumulated excess backlog of CR related workload, including open and overdue items. Both Level 1 (CR evaluations and root causes) and Level 3 (implementing corrective actions) work will be addressed. At the end of Phase 2, the CR workload will be at a level commensurate with effective implementation of the current CAP program. In addition, ongoing CR work will begin to be managed against defined criteria to assure management control of backlogs going forward.

In Phase 3, one objective will be to implement additional CAP process efficiencies that improve the throughput rate, further lowering the expected amount of CR work "in process" at any given time.

OBJECTIVES

1. Identify and eliminate the excess backlog of CR workload.

2. Implement high-priority interim process changes to reduce inefficiencies that contribute to backlogs.

3. Begin managing CR workload against criteria that will maintain backlogs at appropriate levels.

ACTION PLAN

4. Improve the quality of completed condition reports.

5. Establish the permanent staff for the CAP group and start development of long term procedures.

ACTIVITIES

1. Analyze backlog data to determine contributing causes and sources of backlogs.

    1.1 Apply performance measure criteria to determine the amounts and composition of excess backlogs, and to establish specific backlog reduction goals.

    1.2 Analyze throughput, process times and aging characteristics of existing backlogs by responsible department, category, and level. Correlate to process steps and characteristics to identify basis for observed trends and identify areas for immediate improvements.

    1.3 Review internally and externally performed evaluations of the CR process to identify weaknesses and recommendations. Confirm recommendations and proposed improvements through discussions with CR owners.

    1.4 Develop periodic reports and data analyses to monitor causes and sources going forward.

2. Screen and prioritize accumulated backlog of outstanding work.

    2.1 Re-assess assigned category based on current guidance and definitions.

    2.2 Re-assess response needs and proposed actions to resolve.

    2.3 Establish criteria for prioritization of the excess backlog and prioritize the work to be done.

3. Identify and implement interim process fixes to facilitate backlog reduction.

ACTION PLAN

4. For impacted organizations, implement dedicated teams or other methods to work off excess backlogs. Establish plans and schedules for each area.

5. Establish controls and performance indicators to maintain control of CR backlog.

6. Conduct initial training for departmental coordinators and teams including quality expectations.

7. Staff the CAP group. Finalize CAP staffing, including selection of key departmental coordinators, and develop and implement internal program management procedures.

PERFORMANCE MEASURES

The following measures will be achieved by the end of Phase 2. Several of these measures will be further reduced in Phase 3 following implementation of additional process improvements.

1. Backlogs are reduced to acceptable, defined levels.

2.* New CR evaluations are <u>completed</u> in less than:

Category 1/2 = 100% in 14/30 days
Category 3 = 90% in 60 days; none > 90 days

3.* Category 1 and 2 corrective actions to resolve the issue and prevent recurrence are completed within established due dates.

4.* Category 3 corrective actions (non-outage):

Average age < 90 days, but none older than 180

5. All open positions in CAP group filled.

6. Rejection rate of CR evaluations performed by CAP and QA due to significant concerns is less than 5%.

ACTION PLAN

* Due to the Phase 2 timeframe, these performance measures can only be applied to a limited set of CR reponses and actions. The trends and projections of these performance measures will be assessed to aid in determining achievement of the objectives.

SCHEDULE

Activity	Accountable Person	Start Date	End Date
1	CAP SUPVR	Week 1	Week 1
2	CAP SUPVR	Week 1	Week 2
3	CAP SUPVR	Week 2	Week 4
4	RESP DEPT MGR	Week 3½	Week 12
5	CAP SUPVR	Week 4	Week 8
6	TRAIN MGR	Week 3	Week 4
7	EA MGR	Week 1	Week 8

Start Date = 100% Power + 1 Week

PHASE 2 ACTION PLAN

Assessments

ACTION PLAN

PROGRAM TITLE

Assessment

PROGRAM MANAGER

C. R. Moeller, Nuclear Safety Support Manager

PROGRAM COMPLETION DATE

Plant Restart + 12 Weeks

DESCRIPTION

The goal is to continuously improve performance within the Nuclear Power Group relative to safety, reliability, and cost control by routinely assessing programs and performance to identify both problems and potential enhancements. In support of this goal, this Action Plan will develop an effective tool for performing self-assessments and test its effectiveness. The plan specifies examining the desired scope and philosophy of NPG assessments and setting common expectations. The expectations will be benchmarked against past practices and industry experience to identify needed changes in programs and documentation. Upon implementation of these changes, the program will be "test driven" by performing a prototype assessment and evaluating effectiveness.

OBJECTIVES

1. Improve the Nuclear Power Group's ability to self identify problems and performance improvements.

2. Foster a healthy and active self-assessment culture within the Nuclear Power Group such that it is a tool which is used for continuously improving performance.

3. Establish a core self-assessment group in the Independent Review Group to facilitate the development of self-assessment capabilities throughout the organization.

PERFORMANCE MEASURES

þ   All IRG Advisor positions filled.

ACTION PLAN

þ   Improved quality of self-assessment results as recognized by independent overview and customer feedback of a prototype self-assessment.

þ   Greater than 90% of the prototype self-assessment recommendations accepted for implementation.

The improved quality in self-assessments will demonstrate the effectiveness of the self-assessment process. Further, the percentage of recommendations acted upon and the timeliness of actions taken is an indicator of departmental acceptance of the value of self-assessment and, hence, is an indicator of the effectiveness of the self-assessment tool established by this plan. The implementation of an effective process and departmental acceptance of the value of self-assessment will lead to improved departmental performance as demonstrated in departmental performance indicators, and ultimately to improved Nuclear Power Group performance as gauged by both internal and external measures.

ACTIVITIES

1.   Staff Independent Review Group by filling the three authorized positions.

2.   Establish assessment program scope and goals.

   2.1   Develop and obtain management concurrence on program "white paper" that establishes clear expectations for the self-assessment program.

3.   Assess current program for specific areas for improvement based on approved "white paper."

   3.1   Review existing program documentation relative to white paper expectations.

   3.2   Review selected previous self-assessments for programmatic weaknesses and lessons learned.

   3.3   Review self-assessment programs from other utilities and evaluate elements for inclusion in the Nuclear Power Group program.

   3.4   Review self-assessment practices used by Training in the re-accreditation process to identify elements for inclusion in the Nuclear Power Group program.

ACTION PLAN

4. Implement program improvements in applicable administrative documents.

   4.1 Revise NPG Directive 3.29, Self Assessment Program.

   4.2 Revise NPG Directive 3.31, Independent Review Group.

   4.3 Develop self-assessment implementing guidelines in support of NPG Directive 3.29.

5. Enhance self-assessment skills and knowledges.

   4.4 Identify and address specific weaknesses in skills and knowledges.

   4.5 Define and conduct training for Independent Review Group Advisors, potential self-assessment team leaders, line managers, etc.

5. Perform program prototype self-assessment.

   5.1 Perform self-assessment facilitated by Independent Review Group.

   5.2 Obtain independent appraisal of self-assessment accomplished above.

   5.3 Based on appraisal results and lessons learned during self-assessment, analyze NPG Directive 3.29 and implementing guidance for necessary revisions.

ACTION PLAN

SCHEDULE

Activity	Accountable Person	StartDate*	EndDate*
1. Staff IRG Advisor positions	Moeller		2
2. Establish scope and goals	IRG Advisor	0	2
3. Assess current weaknesses	IRG Advisor	0	4
4. Implement program improvements	IRG Advisor	4	8
5. Enhance skills and knowledges	Moeller	0	6
6. Perform prototype assessment			
6.1 Perform self-assessment	TBD**	8	10
6.2 Obtain independent appraisal	IRG Advisor	10	11
6.3 Implement lessons learned	IRG Advisor	11	12

*Schedule dates are in weeks relative to completion of plant restart.
**To be determined based on functional area being self-assessed.

7.5 Management Practices and Systems Strategy

This strategy implements systems and practices that communicate and link the NPG vision and business objectives to individual performance expectations and accountability.

The strategy is implemented through six programs, listed below, and illustrated in the box at the bottom of the page:

- Business and Strategic Planning (Phase 2/3 Plan)

- Setting Management Expectations

- Performance Management

- Performance Appraisal

- Incentive System

- Management Information Systems

Figure 7.5-1 provides an expanded view of the Phase 2/3 programs and Phase 2 activities.

Strategy Sponsor: R. Jones

Note: Phase 2 Programs are shown in **Bold**

MANAGEMENT PRACTICES AND SYSTEMS ——————— Business and Strategic Planning (Phase 2/3 Plan)

Setting Management Expectations

Performance Management

Performance Appraisal

Incentive System

Management Information Systems
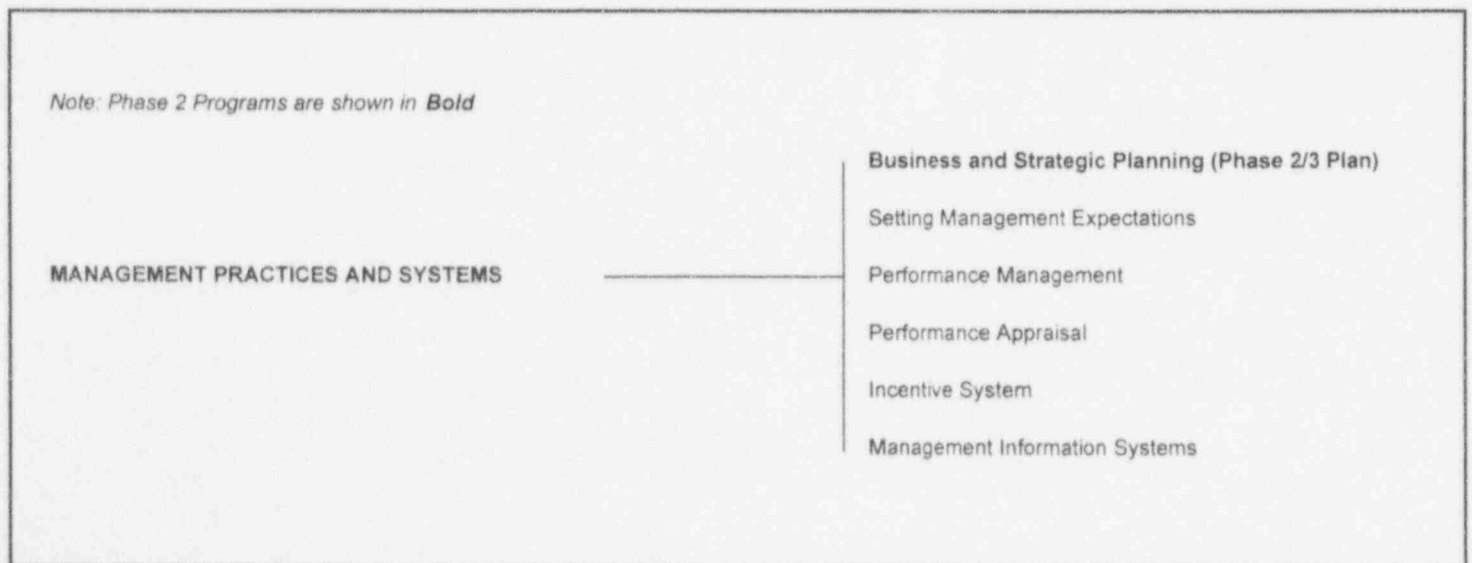
FIGURE 7.5-1
MANAGEMENT PRACTICES AND SYSTEMS
Phase 2/3 Expanded View

Business and Strategic Planning (Phase 2/3 Plan) (Short Term) Objective: *Provide an integrated plan following restart to continue performance improvements and achieve top level goals.*

Develop top level strategies and scope implementing programs

Prepare plan text

Prepare Phase 2 action plans and conduct management

MANAGEMENT PRACTICES AND SYSTEMS
[Jones]
STRATEGY: *Implement systems and practices that communicate and link the NPG vision and business objectives to individual performance expectations and accountability.*

Setting Management Expectations (Long Term) Objective: *Establish process for management expectations to be identified, communicated, and enforced regarding teamwork, ownership and accountability.*

Performance Management (Long Term) Objective: *Develop performance indicators that provide management with timely feedback on performance levels and trends.*

Performance Appraisal (Long Term) Objective: *Implement performance appraisal system that is directly tied to performance goals.*

Incentive System (Long Term) Objective: *Establish an incentive structured, pay for performance compensation system.*

Management Information Systems (Long Term) Objective: *Enable management to monitor and adjust priorities to meet overall and emerging business objectives.*
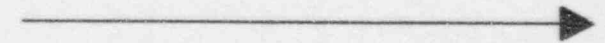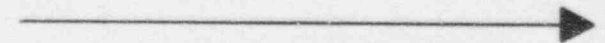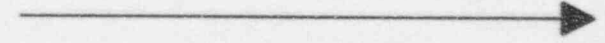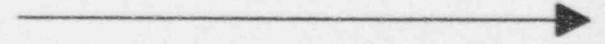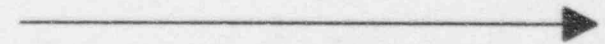
7.6 Skills and Qualifications Strategy

This strategy develops the capabilities and depth of the organization by defining required organizational development attributes, evaluating personnel against these attributes, and developing or recruiting individuals accordingly.

The strategy is implemented through four programs, listed below, and illustrated in the box at the bottom of the page:

- Organizational Development/Required Skills

- Assessment of Managers and Supervisors

- Succession Planning (Recruiting and Development)

- Establish Onsite HR Function

Figure 7.6-1 provides an expanded view of the Phase 2/3 programs and Phase 2 activities.

Strategy Sponsor: K. Walden

Note: Phase 2 Programs are shown in **Bold**

SKILLS AND QUALIFICATIONS ———————————— Organizational Development/Required Skills

Assessment of Managers and Supervisors

Succession Planning (Recruiting and Development)
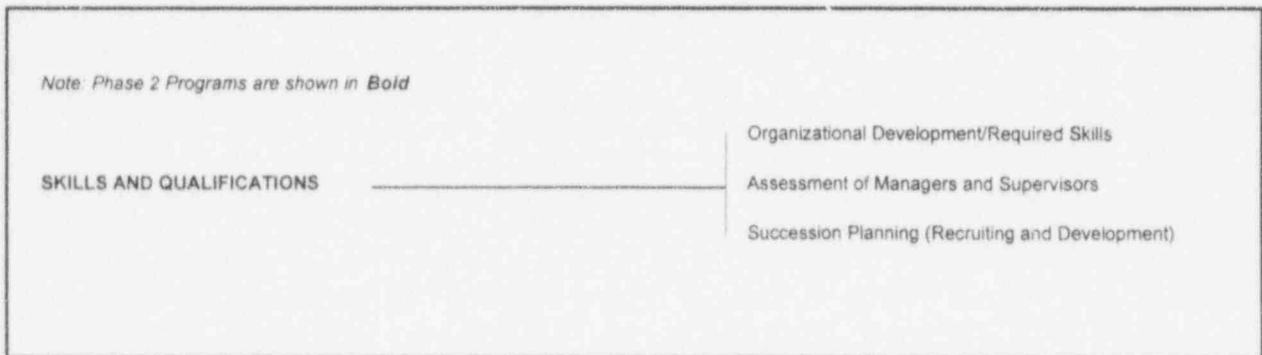
FIGURE 7.6-1
SKILLS AND QUALIFICATIONS
Phase 2/3 Expanded View

Organizational Development/Required Skills (Long Term) Objective: *Align OD principles and objectives with NPG vision and define required skills and competencies.*

SKILLS AND QUALIFICATIONS
[Walden]
STRATEGY: *Develop the capabilities and depth of the organization by defining required organizational development attributes, evaluating personnel against these attributes, and developing or recruiting individuals accordingly.*

Assessment of Managers and Supervisors (Long Term) Objectives: *Establish baseline management capabilities and define actions to address needed improvements.*

Succession Planning (Recruiting and Development (Long Term) Objective: *Implement a succession planning process to continuously address gaps in bench strength and assign priorities for recruiting and development.*
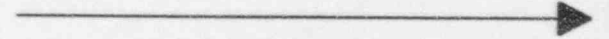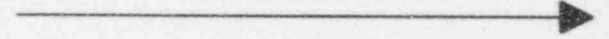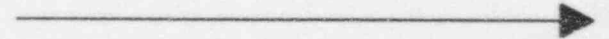
7.7   External Relations Strategy

This strategy establishes mechanisms to communicate operational and regulatory status and issues to Participants and regulators. Hold periodic meetings with Participants to ensure coordination of longer-term business plans.

The strategy is implemented through three programs, listed below, and illustrated in the box at the bottom of the page:

- Communications Between NPPD/NPG and NRC

- Operations-Related Communications With External Parties

- Participant Involvement in Management Meetings

Figure 7.7-1 provides an expanded view of Phase 2/3 programs and Phase 2 activities.

Strategy Sponsor: J. Mueller

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*Note: Phase 2 Programs are shown in **Bold***

EXTERNAL RELATIONS ————————————————— Communications Between NPPD/NPG and NRC

Operations-Related Communications With External Parties

Participant Involvement in Management Meetings
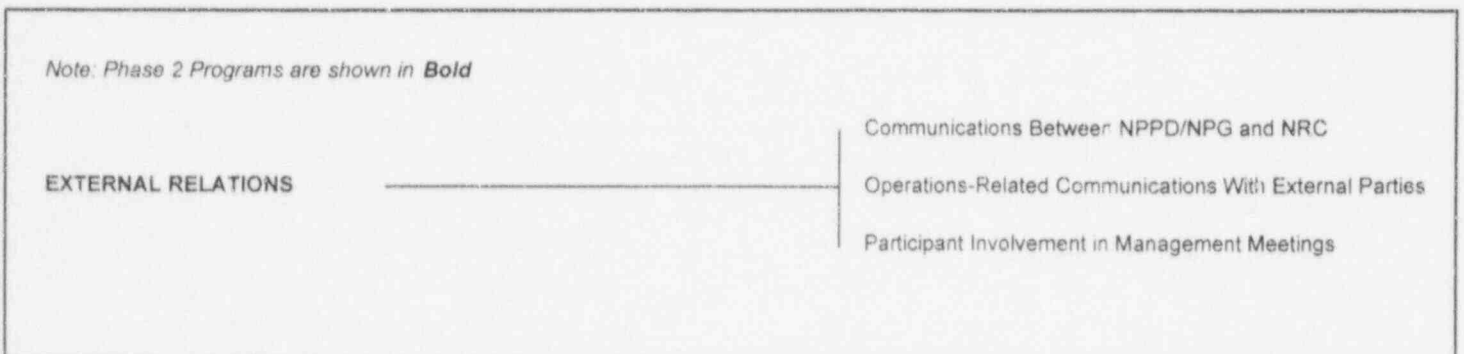
FIGURE 7.7-1
EXTERNAL RELATIONS
Phase 2/3 Expanded View

EXTERNAL RELATIONS
[Mueller]
STRATEGY: *Establish mechanisms to communicate operational and regulatory status and issues to Participants and regulators. Hold periodic meetings with Participants to ensure coordination of longer-term business plans.*

Communications between NPPD/NPG and the NRC (Long Term) [Godley] Objective: *Establish formal communications links with the NRC.*

Define specific managers' responsibilities for communicating with the NRC

Establish a mechanism to feed back NRC comments to NPG management

Operations-related Communications (Long Term) [Mace] Objective: *Develop and implement mechanisms for communicating operations information to external parties.*

Develop daily plant status reports

Publicize the existence of the plant status reporting system

Develop a forced outage reporting mechanism

Participant Involvement in NPG Management Meetings (Long Term) [Mace] Objective: *Develop a mechanism for Participants to take part in the NPG monthly management meetings.*

Establish a format for Participants to provide input and receive meeting materials

Establish a protocol for participating in the monthly meetings

December 21, 1994

Nebraska Public Power District
ATTN: Guy R. Horn, Vice President - Nuclear
P.O. Box 499
Columbus, Nebraska 68602-0499

SUBJECT: FEMA IDENTIFIED DEFICIENCY AT THE NOVEMBER 16, 1994 COOPER EXERCISE

Enclosed is a copy of the letter from Mr. John A. Miller, Federal Emergency
Management Agency (FEMA) Region VII Director, dated November 23, 1994, which
notified the state of Nebraska of a Deficiency identified during the
November 16, 1994 exercise with Cooper Nuclear Station.

The Deficiency involved the capability to coordinate the formulation and
dissemination of accurate information to the public using the Emergency
Broadcast System (EBS). This Deficiency was assessed against the Nebraska
Field Command Post/Information Authentication Center. We request that you
assist off-site officials with corrective action as required and track the
state's corrective actions for this Deficiency. Please keep this office
informed of the status of the resolution of this item.

Sincerely,

Samuel J. Collins, Director
Division of Radiation Safety
and Safeguards

Enclosure: As stated

Docket: 50-298
License: DPR-46

cc w/enclosure:
Nebraska Public Power District
ATTN: G. D. Watson, General Counsel
P.O. Box 499
Columbus, Nebraska 68602-0499

Nebraska Public Power District
ATTN: John Mueller, Site Manager
P.O. Box 98
Brownville, Nebraska 68321

9412290067

A/46

Richard L. Semm, Assistant Director
State Civil Defense Agency
1300 Military Road
Lincoln, Nebraska 68508-1090

Dear Mr. Semm:

SUBJECT: Correction of Deficiency Observed at the November 16,
          1994, Cooper Nuclear Station Exercise - Response Due:
          January 27, 1995

We have completed our review of the proposed plan amendment
submitted in response to our letter, dated November 23, 1994,
concerning the requirement for remedial action to correct the
deficiency observed at the November 16, 1994, Cooper Nuclear
Station Exercise. The proposed plan amendment clearly indicates
that critical information concerning protective actions (areas
affected, landmarks, evacuation routes, and reception centers)
will be provided concurrently to the public.

Based upon the proposed plan amendment, the requirement that a
remedial exercise be conducted to demonstrate objective number
11 is hereby rescinded. This action is being taken because the
EBS messages included in the plan amendment do not require the
insertion of critical information such as landmark descriptions
and locations of reception centers. This eliminates the require-
ment to assemble multiple messages into one message and the
possible errors such procedures could cause.

The deficiency will be closed upon the submission of fourteen
copies of the plan amendment to this office, by January 27, 1995,
for distribution to the RAC members and the certification that
the plan amendment has been distributed to all other plan
holders.

Nebraska Public Power District
ATTN: Robert C. Godley, Nuclear
        Licensing & Safety Manager
P.O. Box 98
Brownville, Nebraska   68321

Midwest Power
ATTN: James C. Parker, Sr. Engineer
907 Walnut Street
P.O. Box 657
Des Moines, Iowa   50303

Lincoln Electric System
ATTN: Mr. Ron Stoddard
11th and O Streets
Lincoln, Nebraska   68508

Nebraska Department of Environmental
  Quality
ATTN: Randolph Wood, Director
P.O. Box 98922
Lincoln, Nebraska   68509-8922

Nemaha County Board of Commissioners
ATTN: Larry Bohlken, Chairman
Nemaha County Courthouse
1824 N Street
Auburn, Nebraska   68305

Nebraska Department of Health
ATTN: Harold Borchert, Director
        Division of Radiological Health
301 Centennial Mall, South
P.O. Box 95007
Lincoln, Nebraska   68509-5007

Nebraska Department of Health
ATTN: Dr. Mark B. Horton, M.S.P.H.
        Director
P.O. Box 950070
Lincoln, Nebraska 68509-5007

Department of Natural Resources
ATTN: R. A. Kucera, Department Director
        of Intergovernmental Cooperation
P.O. Box 176
Jefferson City, Missouri   65102

Kansas Radiation Control Program Director

Nebraska Public Power District   -4-

bcc to DMB (IE35)

bcc w/enclosure:

L. J. Callan   Resident Inspector
Branch Chief (DRP/C)   Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
MIS System   DRSS-RIB File (Hodges)
Branch Chief (DRP/TSS)   Project Engineer (DRP/C)
RIV File   Senior Resident Inspector - River Bend
Senior Resident Inspector - Fort Calhoun
C. A. Hackney, SLO   B. Murray, DRSS/RIB

DOCUMENT NAME: G:\HODGES\DOCUMENT\FEMA
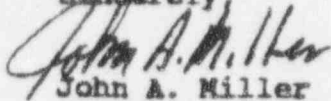
To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

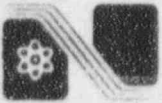| C:RIB		DD:DRSS	D:DRSS				
BMurray		RAScarano	SJCollins				
12/(\/94		12/18/94	12/26/94				

OFFICIAL RECORD COPY

If you have any questions, please contact Robert Bissell at (816) 283-7004.

Sincerely,

John A. Miller
Regional Director

cc: Kathryn Cole, PT-EX-RG
    Sue Perez, PT-EX-RG
    Charles Hackney NRC IV
    Mike Krumland, NPPD

NLS940119
December 23, 1994

Mr. L. J. Callan
Regional Administrator
NRC Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011

Dear Mr. Callan:

On August 25, 1994, you provided the District with a letter that outlined certain concerns regarding the Cooper Nuclear Station Operations Review Committee (SORC). Your letter stated in part:

> [O]ur preliminary review has also resulted in our having serious concerns about the functioning of the Station Operations Review Committee (SORC). It is clear from a review of the report [by the Office of Investigations] that members of the SORC did not, in this instance, implement their assigned duties and responsibilities. In addition, it is not apparent that the processes utilized by the SORC functioned to ensure that the SORC's oversight responsibilities were sufficiently independent from outside influences such as senior management and schedular pressures.

As you are aware, the District has responded in separate correspondence to the NRC regarding alleged outside influences by senior management and alleged schedular pressures on SORC. Accordingly, the following discussion focuses on the functionality of SORC and its ability to implement assigned duties and responsibilities.

Several NRC concerns with SORC have been supported by the District-sponsored September 1, 1994 Diagnostic Self-Assessment Team (DSAT) report and the NRC's November 29, 1994 Special Evaluation Team report. The District agrees with these conclusions and has taken significant steps to improve SORC beginning with an October 5, 1994, management meeting at which the Site Manager provided his expectations regarding SORC performance. He stressed the oversight mission of the SORC, reinforced high standards and expectations, and provided guidance on how the SORC's mission should be completed. The new Plant Manager expressed similar expectations during the October 6, 1994 SORC meeting. More details regarding additional actions taken to achieve these improvements are provided below.

Personnel

SORC membership has changed significantly with the addition of the new Plant Manager (Chairman), the new Engineering Manager, and the new Operations Manager. These personnel have provided a fresh perspective to SORC and provide the appropriate higher safety standards required for continued performance improvement at CNS.

Independent Assessments

In September 1994, a group was convened to review how other utilities conduct the onsite review function, including membership, procedures, and meeting methods. Recommendations from this group included:

- Revise the controlling procedure to eliminate the identification of membership by specific title to provide greater flexibility in establishing the SORC membership.

- Implement a "qualified reviewer" process and/or the use of subcommittees to review and identify items requiring SORC review.

- Upgrade meeting minutes documentation.

- Clearly establish expectations for committee membership and for items being presented for SORC review.

These recommendations were accepted and corrective actions taken. They have led to improved efficiency and quality of SORC assessments.

Also in September 1994, the District brought onsite a recognized authority in the area of nuclear performance assessment and independent oversight improvement to serve as a mentor and coach to the SORC. The initial task of the mentor, however, was to synthesize and evaluate information contained in the DSAT report pertaining to independent assessment activities, including the SORC. This task was performed in conjunction with the external members of the Safety Review and Audit Board (SRAB). During this effort, several weaknesses were revealed regarding independent assessment. These matters have been addressed through the SORC-specific issues that are addressed in the Phase 1 Action Plan Issue closeout (Item 1.2).

On September 23, 1994, CNS Quality Assurance (QA) issued an assessment report to the site manager on SORC. In sum, the QA concerns and recommendations were consistent with conclusions reached by other assessment organizations. On October 27, 1994, the Plant Manager responded to QA by outlining actions that would be, or had been taken, o. the stated concerns. QA has since determined that the Plant Manager's actions are acceptable.

Mentorship

Since mid-September, the SORC mentor/coach has w rked with CNS line managers to enhance the effectiveness of oversight meetings through various activities, including frequent attendance at meetings, commentary on meeting proceedings and content, promulgation of oversight expectations, individual coaching and feedback for the SORC members, input into Procedure 0.3 revisions, and assumption of a lead role in the development of a training course for the SORC presenters. Also, the mentor/coach has worked closely with new managers throughout their transition at CNS.

Procedure Modification

On November 3, 1994, Procedure 0.3, "Station Operations Review Committee" was revised to describe SORC activities more accurately. Changes included the following.

- Based SORC membership on disciplines (as described in Technical Specifications). Previously, SORC membership was based on position titles.

- Utilization of a matrix format to identify primary and alternate members of the SORC.

- SORC's primary responsibility was clarified to focus on issues relevant to nuclear safety, and to ensure that nuclear safety implications are recognized and properly addressed.

Training

A training course for SORC members and alternates was presented to address the fundamentals of nuclear safety concepts and culture. The training program consisted of two full days in the classroom and covered all aspects of nuclear safety from fundamental philosophy to the bases for design and licensing. In addition, performance-based concepts and evaluation techniques were presented in the training to provide essential skills for applying critical, results-oriented thinking and evaluation techniques for technical, administrative, and organizational problems. Also, the course led to improved insight by SORC members of potential safety impacts of reviewed information.
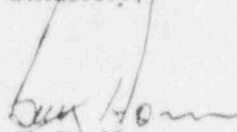
Conclusion

The District recognizes that the quality of the function that SORC performs is dependent on the attitude of its members, as well as, controlling procedures and processes. Procedures and processes can be changed, but the key ingredient to the success of SORC is the ability to

differentiate between line-management functions and those of independent assessment. Consistent with this approach, new SORC personnel already have improved SORC effectiveness. Items are being presented in more effective ways, and deliberations are clearly focused on nuclear safety. Improved processes and procedures have led to increased efficiency. The actions described in this letter also have resulted in the appropriate intrusive attitude regarding issues being discussed.

As a final note, the District notes its awareness that it must ensure that SORC members have the proper priority between SORC activities and routine job activities. Without this protocol, unacceptable backlogs in SORC issues or work activities could result. The combined actions discussed in this letter respond to NRC concerns. More importantly, these actions respond to what District management believes is necessary for a successfully functioning SORC. Based on the actions that we have taken, the District concludes that all restart issues pertaining to SORC have been resolved.

Sincerely,

G. R| Horn
Vice-President, Nuclear

cc: U. S. Nuclear Regulatory Commission
        Attention: Document Control Desk

        NRC Resident Inspector Office
        Cooper Nuclear Station

        NPG Distribution