

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

SORT BY BETA FINDING

GPU NUCLEAR CORPORATION
THIRD QUARTER 1983 STATUS UPDATE
NOVEMBER 1, 1983

PROCEDURES

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PDR ADOCK 05000289
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Preface

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

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

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

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

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

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

This report is sorted by BETA finding and recommendation.

Appendix A provides a listing of those GPUNC 1983 Corporate and/or Division Goals and Objectives referenced in recommendation responses contained in this report.

The GPUNC Response Report (sorted by BETA finding) will be updated quarterly. This revision contains 3rd quarter 1983 updated status. Since the last update, 31 additional open items have been completed (as noted by asterisk in the comment column) for a total complete or disagree of 83. Seventy-three items remain open.

10/28/83

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BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
Finding IV-E:	Problems in performance of the chemistry control program at Oyster Creek were found to be similar to the problems at TMI-1.				
IV-E	Rec: Continue upgrade of chem. program - designate key manager, standardize analytical procedures. Resp: Progress is being made consistent with recommendation. Chemistry function has been transferred from Engineering to Operations and the Chemistry Manager is providing the required leadership. Completion of Oyster Creek 1983 Objective 10 and related Operations Department Objectives 21 to 25 will complete response. Continued chemistry program upgrade results are highly satisfactory. NRC/QA audits have resulted in no findings. Procedure rewrite is 99% complete. New QA/QC procedure has been written, new instrumentation installed, daily review of all chemistry results, and current cognizance of chemistry of miscellaneous systems ongoing.	III.	T. F./ O. C.	B	4th Q 1983
Finding IV-F-1:	There are too many separate section level groups having engineers at Oyster Creek.				
IV-F-1	Rec: Provide lead site representative for each Division for nontechnical items. Resp: Will continue to evaluate but improved understanding of roles and Divisional internal guidance has largely achieved result.	II.	O. C./ TMI-1	D	4th Q 1983
P Finding IV-F-2:	The projected manpower level is high for the Oyster Creek Nuclear and Core Management group.				
IV-F-2 (a)	Rec: Develop operating procedures to reduce dependence on Core Management Group (Nuclear and Core Management). Resp: Implementation of power shape monitoring system will reduce dependence on Core Engineering. O.C. Plant Engineering Department Objective 46.	III.	O. C.	B	4th Q 1983
IV-F-2 (b)	Rec: Assure no duplicate efforts with TF Nuclear Analysis and Fuels section (O.C. Nuclear & Core Management) Resp: Review shows no overlap. Improved coordination has developed.	I.	T. F./ O. C.	A	Complete
IV-F-2 (c)	Rec: Re-evaluate and look to reduce staffing level of Core Management Group. Resp: Evaluation of requirements indicates a staffing of six engineers and a manager/supervisor is required. Reduction of one engineer from Plant Engineering planned for 1984, not specifically from Core Group.	II.	O. C.	E	Disagree

BEIA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
IV-G (f)	Rec: Look to decrease number of rad. techs. as work force practices good rad. work performance. Resp: Will be addressed in setting '84 & '85 authorized levels of manpower. Will reduce number of Company rad. techs as work practices improve.	II.	R&EC	B	3rd Q 1984 Complete for 1983.
IV-G (g)	Rec: Commence rad technician training to handle unusual situations not covered by written procedures (Rad. Con.) Resp: Emergency drills and seminars initiated and being held on a recurring basis. Each session is documented.	V.	R&EC/ O. C.	A	Complete
IV-G (h)	Rec: Utilize existing management systems to achieve improvement in radiological practices. Resp: All related recommendations are being carried out using the present management systems.	III.	R&EC/ O.C./M&C	A	Complete
P Finding IV-H:	Senior management people at Oyster Creek are spending too much time on PORC matters.				
IV-II	Rec: Review Tech. Specs to determine if present wording requires PORC to review documents beyond a scope considered appropriate. No rewrites by PORC of poorly written procedures. Resp: Tech Spec Change Request has been submitted which will meet this recommendation. Equivalent issue under new review procedure will be addressed during implementation of new administrative procedures.	III.	O. C.	B	2nd Q 1984 NRC action required. Expect implementation early 1984.
Finding IV-I:	The number of people assigned to administrative work at Oyster Creek appears excessive.				
IV-I	Rec: Reduce on-site clerical and administrative positions. (All divisions.) Office of the President set arbitrary number. Resp: Is being addressed in overall manning: Operations Analysis will study 1Q'84.	II.	O/P	D	1st Q 1984
Finding IV-J-1:	The purchasing operation at Oyster Creek is receiving inadequate clerical support.				
IV-J-1	Rec: Consider reassigning under-utilized clerical personnel to Purchasing to support processing of requisitions. Resp: Additional personnel assigned to purchasing. Routine requisitions sent to Parsippany to handle. Aspect of recommendation pertaining to under-utilized personnel will be covered in response to IV-I.	II.	O. C.	A	Complete

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
<u>Technical Functions Findings & Recommendations</u>					
<u>Finding VI-A:</u>	The overall effectiveness of Technical Functions in supporting TMI-1 and Oyster Creek is lacking.				
VI-A (a)	Rec: Maintain present manning levels within Tech Functions. Resp: Authorized level for 1983 was same as 1982. 1984 will be slightly lower.	II.	T. F.	A	Complete
VI-A (b)	Rec: Review methods to improve the management of the large engineering group within TF. Resp: A number of possibilities identified. Firm plan 4Q'83. Technical Functions Goals 1 and 2.	III.	T. F.	D	4th Q 1983
VI-A (c)	Rec: Evaluate and procure outside assistance to train TF Management in supervising a large engineering group. Resp: A number of possibilities identified. Firm plan 4Q'83. Technical Functions Goals 1 and 2.	III.	T. F.	D	4th Q 1983
<u>Finding VI-B-1:</u>	It is too hard and takes too long to get a Technical Functions procedure changed.				
VI-B-1	Rec: Respond to requests for changes to Engineering Procedures and Standards promptly. Resp: Initial issue of interface procedures complete. Timeliness improved and now adequate.	III.	T. F.	A	Complete*
<u>Finding VI-B-2:</u>	The Engineering Cost Analysis section is not analyzing costs.				
VI-B-2	Rec: Redirect the efforts of the Cost Analysis section away from cost reporting and toward cost estimating and analysis (the section's purpose). Resp: Cost estimating and analysis capability being developed. Initial action complete with assignment of Fiscal & Info Management person to T. F. to provide cost reporting.	III.	T. F.	A	Complete*
<u>Finding VI-B-3:</u>	Drawings have not been revised to show completion of modification work.				
VI-B-3	Rec: Revise drawings in D&D deemed necessary for operational and maintenance purposes when Design Correction Notices are received so that drawings are current as regards modifications so no applicable DCN will be more than 6 months old. Resp: Engrg. Procedure EP-025 issued and describes policy on updating. Being followed by Tech Functions. Backlog is being reduced.	III.	T. F.	A	Complete*

BETA FINDING/ RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
XII-A (j)	Rec: Trending of data to ascertain problem areas. Resp: The Activity Indicator Display program has been implemented and we will continue to examine problem areas. Some data currently being trended. Major effort still required. 1984 TMI-1 Division Goal. M&C has trending program as does R&EC Division.	III.	Admin. Gen./OP	B	3rd Q 1984
XII-A (k)	Rec: Corrective action for cases of personal appearance, demeanor, etc. - considered outside the norm. Resp: Day-to-day actions are being addressed. Policies will be issued and stressed by management on expected behavior and demeanor. AP-1029, Conduct of Operations, directly addresses. Managers briefed in standards of formality and professionalism. Policy memo issued on shoes and T-shirts at OC. M&C has addressed to management/supervisory level importance of attitude and business-like appearance.	III.	H. R. Gen./OP	A	Complete*
XII-A (l)	Rec: Color-code hard hats at the site to distinguish workers, foremen, officers, contractors. Resp: Color coding of hard hats has been revised at Oyster Creek. TMI-1 and O.C. Division Directors will review this item and coordinate on desirable further revisions. At TMI-1, exempt and non-exempt wear different color hard hats. No current plans to change system to include all categories of people listed. M&C supports; consideration must be given to contractor identification requirements.	IV.	TMI-1/ Gen./O.C.	D	3rd Q 1984
P Finding XII-B:	There is too much paper being generated and distributed throughout the GPUN organization.				
XII-B (a)	Rec: Each division director should help ensure distribution is necessary. Resp: A specific effort has been initiated at the officer level to identify and use "case studies." Examples of inappropriate distribution of documents. Corporate Goal 8 also addresses this issue. Operations Analysis study of paperwork at TMI underway.	III.	Admin. Gen./OP	B	4th Q 1984
XII-B (b)	Rec: Tighten signature authority; monitor for compliance. Resp: This issue is being (or has been) reviewed in each division to see whether more formal guidance is needed. Operations Analysis will be conducting a study (tentatively scheduled for 2Q '84) to determine whether there exists consistent and appropriate signature authority requirements throughout the GPUNC System.	III.	Admin. Gen./OP	B	2nd Q 1984

BETA FINDING/RECOMMEND.	PARAPHRASED RECOMMENDATION & SUMMARY RESPONSE	CAT.	DIVISION	STATUS CODE	COMMENTS
XII-B (c)	Rec: Correspondence control, action item tracking. Resp: Action Item Tracking System implemented. All Licensing Managers trained in use of system. Loading data base in progress.	III.	Admin. Gen./OP	A	Complete*
XII-B (d)	Rec: Control issuance of administrative procedures. Resp: GPUN Policy Plans and Procedure System has been issued and has been implemented for control of Administrative procedures.	III.	Admin. Gen./OP	A	Complete
XII-B (e)	Rec: Limit required concurrences on documents/procedures. Resp: OPR action on this issue will be continued. Further emphasis needed. Documents being considered as part of Corporate Paperwork Reduction Study. Formal procedure system has been streamlined to implement limits on required concurrence.	III.	Admin. Gen./OP	B	4th Q 1984
<u>Finding XII-C:</u>	There is an overall tendency within GPUN to force decision-making too high up in the organization.				
XII-C	Rec: All levels of management should review decision making in their groups to assure decisions are being made at the proper level commensurate with the need. Do not unnecessarily force decisions upward. Resp: This issue will be covered in the meetings being held to meet Corporate Goal 5. Must receive continued attention but consider much improvement has been achieved.	III.	OP/Gen.	A	Complete*
<u>Finding XII-D:</u>	There appears to be a reluctance within the GPUN system to take action either to improve the performance of poor performers or to terminate their employment.				
XII-D (a)	Rec: Review for practical usefulness, GPUN procedure addressing poor performers. Resp: Progressive discipline procedure developed and in use. H. R. will be working with each Division to review all Performance Appraisals of 3, 4 or below and specific plans for improvement will be developed where appropriate. Review to be completed 4Q '83, follow-up during 1984.	IV.	H. R./ General	B	4th Q 1983

APPENDIX A

GENERAL CORPORATE AND DIVISION GOALS AND OBJECTIVES
REFERENCED IN RESPONSES

1983 CORPORATE GOALS & OBJECTIVES

Corporate Objectives

5. Improve GPU Nuclear's functional capabilities within the authorized manning levels.

Corporate Goals

5. Provide an initial five-year corporate plan with defined milestones and objectives by June 1, 1983, to use for budget planning for 1984 and beyond.
8. Have mechanisms in place by June 1, 1983, for identifying and stimulating abolishment of unnecessary paperwork, documentation, or procedural complexity.
9. Conduct at least two hour discussion sessions with a minimum of 300 exempt employees below the department head level on the functions, responsibilities, and interactions of the various elements of the organization by July 1, 1983.

1983 DIVISION GOALS & OBJECTIVES

Oyster Creek Division

4. Improve working conditions and station appearance by: (a) reducing contaminated areas by 20%; (b) reducing areas requiring respiratory protection by 25%; (c) painting and refurbishing 100,000 sq. ft. of area.
5. Substantially improve the material condition of the Oyster Creek Plant by accomplishing a high percentage of the maintenance work scheduled during the 1983 outage.
7. Establish six operating shifts each with two Senior Reactor Operators (SROs).
10. Complete upgraded training programs for all chemistry technicians; initiate formal training programs for all Equipment Operators, and formalize all on-the-job training.
21. Completely revise the plant Chemistry procedures (800 series) by: (a) award contract; (b) begin rewrite; and (c) complete project.
22. Improve Chemistry Technician job performance proficiency by: (a) improve information flow; (b) complete Chemistry parameter trending; (c) increase supervisory oversight; and (d) upgrade documentation.
23. Expand Chemical Laboratory facilities by: (a) place temporary facilities in operation; (b) start construction of permanent facility; (c) complete construction of permanent facility; and (d) obtain all laboratory instrumentation.
24. Implement 24-hour Chemistry support of plant activities.
25. Upgrade Chemistry Technicians' training and complete training.
32. In conjunction with M&C Division, develop a GMS program for computerized equipment history, trending, and Preventive Maintenance scheduling.

46. Revise Plant Engineering organization to provide increased responsiveness in problem solution. Review engineering staffing at Oyster Creek in company with Technical Functions.

TMI-1 Division

2. Each Department Head/Manager discuss the GPU Nuclear Organization Structure and the role, responsibilities, interrelations and goals of the various divisions with all members of his staff by May 1, 1983. Vice President, TMI-1 to discuss this subject with all employees by July 1, 1983.
3. Develop a plan for all TMI-1 procedures to review, revise, update (as required) and achieve compliance with corporate Procedure 1218.01 by June 1, 1983.
5. Achieve a monthly radwaste generation rate of 1000 ft.³ or below and establish plans and schedules for reducing contaminated areas in the plant by March 1, 1983. Prepare monthly progress status reports for the Director, TMI-1.
8. Goals of 192 man-rem maximum total exposure, not including exposure associated with the OTSG repairs, and 0.0002 skin contaminations per RHP man-hour are established for the plant (includes all personnel, including personnel from other divisions and contractors).

Technical Functions Division

1. Develop a system for work load management in support of Technical Functions Departments.
2. Refine, expand and formalize the earned value performance measurement approach to include both Capital and O&M work. Support projects with engineering contractors.
14. Hire 12 new engineers for the Engineer Training Program. Transfer five Trainees to Oyster Creek and five to TMI-1 from the 1982 Trainee Group.

Nuclear Assurance Division - Training & Education Department

1. Develop and implement a plan for coordination of training activities at the three sites.
3. Increase use of behavioral learning objectives and criterion-referenced instruction to provide demonstration of knowledge and understanding by student.
4. Develop a method for test preparation and validation to improve the quality and results of testing in areas such as quiz and test grade evaluation and test question preparation and validation.
5. Complete implementation of instructor qualification and evaluation procedure.
6. Develop and present instructional modules utilizing the Basic Principles Trainer AT TMI.

Administration Division

3. Ensure and improve division and department responsiveness and visibility to plant and support divisions through (a) regular visitations (1-2 per month) per department and (b) supervisory communication meetings at each site.