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RELATED CORRESPONDENCE

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December 31, 1984

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

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

Dear Chairman Smith and Administrative Judges Wolfe and Linenberger:

On December 28, 1983, Licensee provided to the Appeal Board, Licensing Board, and interested parties a December, 1983 status report of Licensee's response to the RHR Report. Enclosed is the December 20, 1984 status report, which provides an update on the action steps taken by Licensee in response to the RHR report recommendations.

Sincerely,

Deborah B. Bauser/pr

Deborah B. Bauser
Counsel for Licensee

Enclosures
cc: Service List

D503

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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

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Administrative Judge
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Washington, D.C. 20555

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Commission
Washington, D.C. 20555

GPU Nuclear

Memorandum

Subject: Status Update - RHR Report on "Primary Concerns of Licensed Nuclear Operators"

Date: December 21, 1984
NA/804

From: VP, Nuclear Assurance - R. L. Long

Location: Parsippany - CHB

To:
President - P. R. Clark
Vice President, Oyster Creek - P. B. Fielder
Chairman, GORBs - I. R. Finfrock, Jr.
Vice President, Communications - W. L. Gifford
Vice President, R & EC - R. W. Heward, Jr.
Vice President, TMI-1 - H. D. Hukill
Executive Vice President - E. E. Kintner
Vice President, M&C - F. F. Manganaro
Director, Human Resources - D. G. Murray
Director, TMI-2 - F. Standerfer
Vice President, Tech Functions - R. F. Wilson

The December 1984 status update is provided for the action steps recommended in the RHR Report. As the summary chart and graphs show, significant progress has been made.

The specific status comments have been substantially revised since the last status update as a result of T. L. Myers efforts to coordinate a final company report.

RLLong/mmr

R. L. LONG
VP, Nuclear Assurance

RGH/RLL/mmr

Attachments

cc: Director, Training and Education - R. P. Coe
Organizational Development Director - T. L. Myers
Attorney, D. Bauser (Shaw, Pittman, Potts and Trowbridge)

RHR TABLE

12/20/84

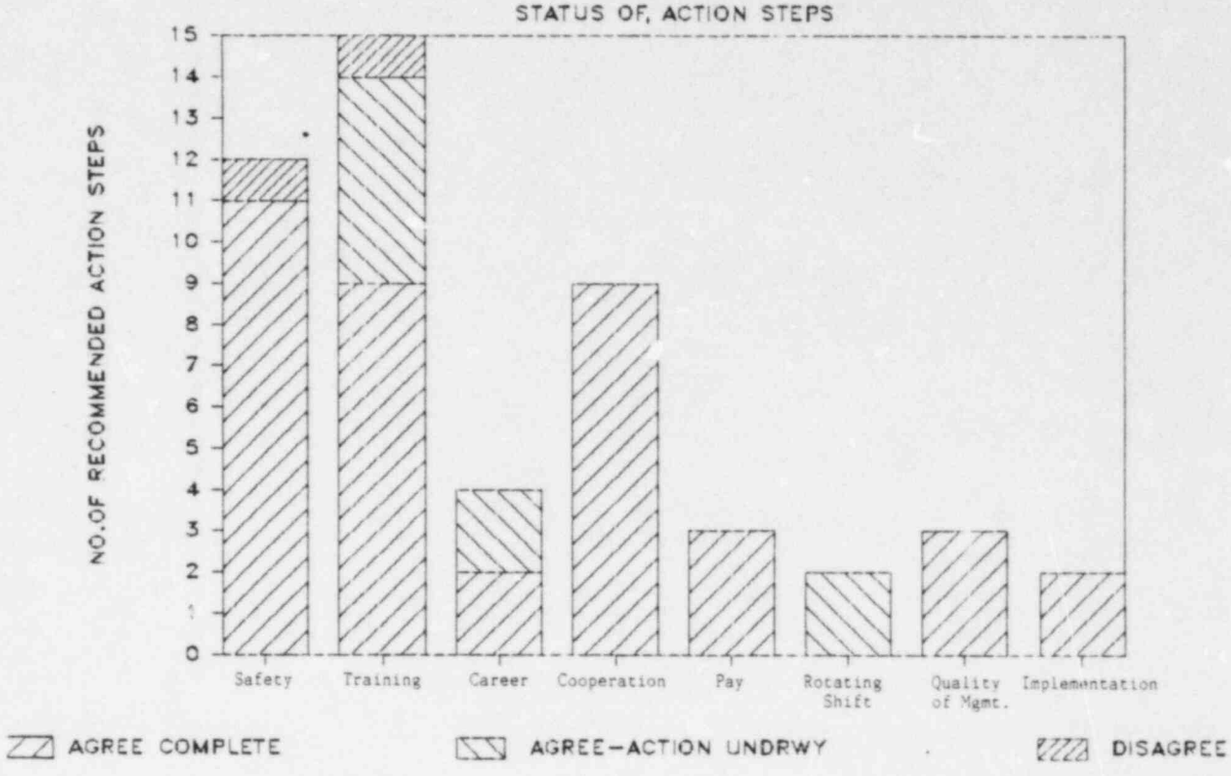
GPUNC RESPONSE TO RHR ACTION STEPS

RHR TABLE	(A) Agree - Complete*			(B) Agree - Action Underway or GPUN Goal			(C) Agree - Action to be Scheduled			(D) Under Evaluation			(E) - Disagree			TOTAL
STATUS DATE	5/83	12/83	12/84	5/83	12/83	12/84	5/83	12/83	12/84	5/83	12/83	12/84	5/83	12/83	12/84	
#1 Safety Action Steps	0	6	11	10	4	0	1	1					1	1	1	12
#4 Training Action Steps	1	4	9	11	10	5				3	0			1	1	15
#5 Career Action Steps	0	1	2	3	3	2				1	1					4
#6 Cooperation Between Depts Action Steps	1	8	9	7	1	0	1	0								9
#7 Pay Action Steps	1	1	3	1	2	0				1	0					3
#8 Rotating Shift Action Steps				1	2	2				1						2
#9 Quality of Management Action Steps	0	2	3	2	0					1	1	0				3
#10 Implementation Phase Action Steps	1	2	2				1	0								2
TOTAL	4	24	39	35	22	9	3	1	0	7	1	0	1	2	2	50

* Includes items where initial response is complete and continuing activity will be required.

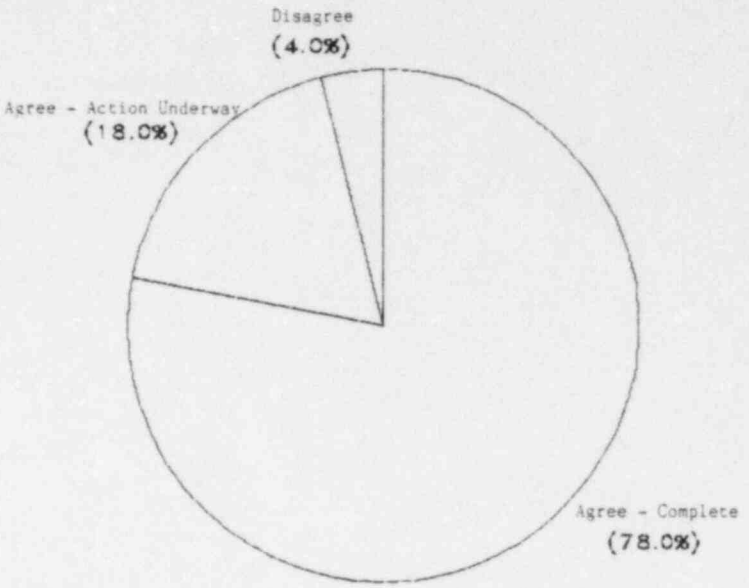
RHR REPORT

STATUS OF, ACTION STEPS



RHR REPORT

STATUS OF ACTION STEPS



GPU Nuclear

Status of the Rohrer, Hibler & Replogle (RHR) Report
on "Primary Concerns of Licensed Nuclear Operators"

R. L. LONG
VP, Nuclear Assurance Division

12/20/84

RHR REPORT

12/20/84

Response Summary

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
1	TMI-1 / NA TF & O.C.	#1: Safety	1983	Agree - Complete	Procedures - Simplification of emergency operating procedures.

STATUS: At Three Mile Island, Unit I (TMI-1) guidance for the use of 25 degree Farenheit subcooling margin has been replaced by Abnormal Transient procedures based on the Abnormal Transient Operating Guidelines (ATOG). Previous to ATOG we used 50 degree SCM. ATOG is based on input from Operators and their management and is a significant improvement and simplification over the emergency procedures they replaced. ATOG facilitates the process for identifying correct procedures for handling a plant transient and has been implemented at TMI-1. Special training on ATOG was conducted at the Babcock and Wilcox (B&W) Simulator in Lynchburg, Virginia. Existing Administrative procedures have been revised to conform to ATOG, and clearly indicate that cautions precede the action steps to which they apply and procedural steps are not contained in notes.

At Oyster Creek the new Emergency Operating Procedures (EOP) and Abnormal Operating Event Procedures (AOeP) have been prepared and were implemented following the 1984 training sessions. These procedures were included in the following training sessions.

A. License requalification training, continuous on-the-job, and six (6) days of training at the General Electric Simulator in Morris, Illinois.
B. Cyclic classroom training conducted every fifth week throughout the year. Thirty (30) hours on AOEP and forty-four (44) hours on Symptom Based Emergency Operating Procedures are included in each of these training sessions.
C. During the six (6) days of the simulator training EOP and AOEP use was stressed throughout the program wherever possible.

Approved versions of the Symptom Based Emergency Operating Procedures and the Abnormal Operating Event Procedures have been issued since initial training on the draft procedures was completed. A formal evaluation of the draft procedures was used for training, versus the approved version, was completed and additional required training was completed prior to plant restart October 27, 1984.

RHR REPORT

12/20/84

Response Summary

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
2	TMI-1 OC	#1: Safety	1983	Agree - Complete	Dialogue on and analysis of procedural compliance issues in special cases.

STATUS: Procedural compliance requirements are now regularly disucssed with Shift Supervisors, Senior Reactor Operators, and Reactor Operators at TMI and OC. The procedure owner concept is used that allows Operators to have direct input and identifies a specific contact person for any problems in a given situation. Plant operations procedures are usually assigned to a Senior Reactor Operator. Detailed instructions concerning procedural compliance are contained in the Administrative Procedures Manual 1029, Conduct of Operations. Similar instructions are provided at OC in Procedure 106. The manual contains instructions for emergency situations where a procedure cannot be followed or when an operator needs information on symptoms. For instance, it provides specific authority to take immediate action (a) to prevent or correct an unsafe or casualty situation which could adversely effect the health and safety of the public or (b) personnel safety or (c) lead to serious equipment/system damage, even when such actions are outside the requirements and guidelines of approved procedures.

At OC Operations Management continues to stress rigorous compliance with procedures. In line with this concept, a continuing dialogue is maintained with Shift Supervisors. This serves to identify and correct those areas where problems are caused due to unique plant conditions. Utilization of Procedure Control 107 at OC allows Operators to make changes, if conditions warrant, on a one-time basis to support the compliance requirements. GPUN's efforts in this area have received very positive feedback from the Nuclear Regulatory Commission (NRC) in the recent Systematic Assessment of Licensee Performance report on Plant Operations.

These actions are continuing and procedural compliance is stressed as an integral part of the Conduct of Operations

At TMI-1, Abnormal Transient Operating Guidelines (ATOG) have been implemented. These symptom based emergency procedures also reduce the volume of emergency procedures significantly. Additionally, administrative guidelines have been promulgated which require that cautions precede the action steps to which they apply and procedural steps are not contained in notes. These steps are being implemented in all procedures as a part of the biannual review process.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
3	TMI-1 OC	#1: Safety	1983	Agree - Complete	Improve speed of feedback on procedural change recommendations made by operators. Establish policy on this.

STATUS: The procedure owner concept has resulted in significant improvement at TMI. Additional efforts continue to streamline the required administrative and review processes. At TMI and OC the responsibility for operating procedures lies with the Plant Operations Division. Procedural compliance requirements are frequently reviewed with all members of the TMI-1 staff. The procedure owner concept has also been implemented at TMI-1. The Vice President of TMI-1 specifically covers this topic in his annual one-on-one discussion with each Licensed Operator. This concept places responsibility for every procedure to a specific individual. In this manner, every member of the plant staff knows exactly who to see if she has a correction or suggested improvement for a procedure. Plant Administrative Procedure 1029, Conduct of Operations, provides detailed guidelines for procedural compliance. These detailed guidelines include authority to take immediate action to prevent or correct an unsafe or abnormal situation which could adversely affect the health and safety of the public, personnel safety or lead to serious equipment/system damage even when such actions are outside the guidelines of approved procedures.

An OC Operations Department Staff Goal for 1983 was to "Improve Procedures and Enhance Procedures Review Compliance Through a Complete Evaluation/Review of all Operations Department Procedures." As of October 31, 1984, on-shift Operators had reviewed approximately 82 operating procedures which resulted in the submission of approximately 32 procedures change requests. In addition to the on-shift review, approximately 175 reviews had been made by the Operations Department. These combined reviews resulted in more than 140 Change Requests. This review is expected to be completed by December 1984, at which time the process will be repeated.

To speed up the feedback on procedural change recommendations at OC the responsibility for operating procedures can be temporarily reassigned from the Plant Engineering Department to the Plant Operations Department.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
4	TMI-1 OC	#1: Safety	1983	Agree - Complete	Improve mechanism of consultations with operations on development of procedures.

STATUS: At TMI the procedure owner concept has improved the consultation process. Communications and consultation with the Technical Functions Divisfon concerning procedures has improved.

At OC reviews of approximately sixty (60) new Abnormal Operating Event Procedures (AOEP) and thirty (30) new System Diagnostic and Restoration Procedures (SDRP) has been completed by Operators and the staff. All comments have been forwarded to the Plant Engineering Division for resolution. These procedures have been incorporated into the Operator Requalification Program in order to familiarize them with this new information. Operator comments are solicitied during Requalification to determine if a revision to the content is necessary.

5	TMI-1 OC	#1: Safety	1983	Agree - Complete	Improve process of review of procedures by operations prior to implementation.

STATUS: Major procedural changes, especially emergency procedues, are checked out on the Babcock and Wilcox (B&W) Simulator before being implemented at TMI. Once approved, all shifts are trained on these procedures.

During the 1983/1984 outage at OC, virtually all operations procedures were upgraded to include new plant modifications. New and revised procedures currently receive an independent safety review by the Technical Functions Division who performed a comprehensive technical and safety review of most of the operating procedures.

At OC, the review process for procedures has been impoved by obtaining Operator review when appropriate. Procedures primarily used by the Operations Department are forwarded to the Operations Control Manager who determines which procedures should be sent to Operators for review. Operator comments are collected, evaluated and procedure change requests submitted as appropriate.

In accordance with the Boiling Water Reactor (BWR) owners group recommendations, an entirely new set of emergency procedures was prepared to replace the old "Event Oriented" guidelines. These new "System Based" instructions do not require the Operator to figure out what caused the problem. Guidance is given to correct critical parameters, regardless of the reason if it is out of an acceptable range.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
6	TMI-1 OC / M&C	#1: Safety	1983	Agree - Complete	Cooperation Between Departments - Especially speed of repair of backup equipment.

STATUS: GPUN Corporate Goal 9, "Discussions With Exempt Employees on GPUN Organizations" and TMI-1, Goal 2, "Individual Discussions by the Vice-President, TMI-1 With Plant Employees," are specifically designed to improve interdivisional cooperation. Other divisions have taken similar action and are currently working together toward these common goals.

At OC the Operations Division interfaces daily with the Maintenance and Construction (M&C) Division and the Plant Material (PM) Department on identified needs to repair plant equipment. Joint plant tours are conducted on a weekly basis, with the major emphasis on improved housekeeping and mututal identification of plant concerns. A concentrated effort to improve cooperation between GPUN divisions/departments is being practiced at the managerial level and is strongly endorsed at the supervisory level. Included in this framework is the "Reduction of Backlog Maintenance Job Orders" as the number one priority on the urgent needs list generated by the Plant Division. The support of the Maintenance and Construction Division has resulted in a dedicated workforce to address this backlog. As a result of efforts and cooperation, all "short forms" designated by Plant Operations as required for restart were completed prior to plant startup.

Continuing efforts are being made to maintain good communications between Divisions/Departments. M&C demonstrates sensistivity to priorities for equipment repairs established by Plant Operations changes and improvements as necessary.

One of the TMI-1 goals for 1984 states, "Each department head/manager reviews the GPU Nuclear organizational structure and the role, responsibilities, interrelations and goals of the various divisions with all members of his/her staff during calendar year 1984." Management Interface meetings are conducted during each training cycle by senior members of TMI-1 management, during which overall corporation and departmental goals, progress, and achievements are reviewed with all personnel. Also, during the past two years, all Vice Presidents, as well as many senior Directors from other divisions, have attended the TMI-1 Managers meetings to review their department's objectives, concerns, and progress. The daily 4:00 p.m. meeting and the Biweekly Project Status meetings basically involve members from all divisions, and provide the opportunity to coordinate each division's efforts to support overall plant objectives and schedule.

(cont'd)

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
7	HR	#1: Safety	1983	Agree - Complete	Union and Management - At Oyster Creek. STATUS: On January 27, 1985, there was a meeting of RHR, Jersey Central Power and Light, and GPUN management representatives. The purpose of this meeting was to discuss the local union's original objection to the RHR Survey. The union's concern was minimized when the Company representatives explained the reasons for the survey to local union officials. It was determined that this item did not impair RHR's effectiveness nor did it involve operator concerns, and it is completed. In addition, the Company instituted supervisory training at both OC and TMI to assure that all supervision involved with contract administration was knowledgable of the Company's responsibilities to the Union. However, this training was not implemented as a result of the RHR study.
8	NA / TMI-1 OC	#1: Safety	1983	Agree - Complete	Operator Experience - Increase "hands-on" experience; more time of trainees in plant and with equipment; more coaching from shift supervisors; refine efforts for keeping instructors of trainees and licensed operators current on plant equipment, instrumentation and procedural changes. STATUS: At TMI-1 the Basic Principles Training Simulator has been installed and is being used to train Operators. The Replica Simulator is scheduled for delivery by late 1985 and will be located in the new training building at TMI. Licensed Operators were trained at the Babcock & Wilcox (B&W) Simulator in Lynchburg, Virginia during three different sessions in 1983, and twice in 1984, to give them more in-depth training on Once-Thru-Steam-Generator (OSTG) tube leak/rupture procedures, the Abnormal Transient Operating Guidelines (ATOG) and low power operations. Future simulator training will be given once a year with additional training as necessary. The Replacement Operator Training Program has been revised and includes guidelines for action, knowledge, and skills required for successful completion of each On-The-Job Training (OJT) task or checkout. The recommendations of the Operator Training Review Team were included in the revised OJT guidelines. Startup OJT qualification cards have been developed for all Operators and will be completed during hot plant testing and the initial startup and test period.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE
8	CONT'D			

ACTION STEP

In 1984, a Task Force was appointed to conduct a job analysis of the TMI Operator positions. The results of the Task Force's findings will be used to validate and revise present and future classroom, simulator and OJT training programs. INPO accreditation of the TMI-1 Licensed Operator training program is in progress and should be completed in early 1985.

Licensed and Certified Instructors at TMI-1 are required to maintain proficiencies by attendance at classroom training for Licensed Operator Requalification. In addition, Licensed Operators are required to meet minimum watchstanding requirements. At OC a revised formal On-The-Job Training program, expanded from thirteen (13) to twenty (20) weeks for the Replacement Operator training, has been established.

During 1984, OC has revised and expanded its formal Replacement Operator training program from fourteen (14) to twenty-five (25) weeks, established plans for instructor participation in Licensed Operator Requalification Training, and increased the length of Replacement Operator Certification at the Morris Simulator from six (6) to eleven (11) days.

A Basic Principles Training Simulator is scheduled for delivery in the First Quarter 1985 at OC. It will be utilized in the same manner as the TMI Simulator. A formal qualification program, which includes practical hands-on experience, has been established and implemented for Operator Training Instructors.

After an extended outage the OC Startup Plan incorporated refresher "hands-on" training for Licensed Operators. Training included taking reactor critical system line-up changes, additional surveillance testing and additional system equipment operations.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
9	HR	#1: Safety	1983	Agree - Complete	Personnel and Family Problems - Determine utilization rates by licensed operations of Stress Control Services. STATUS: Ten (10) Control Room Operators previously utilized the Employee aissistance Program (EAP) under the direction of Stress Control, Inc. at OC and TMI through March 1984. This represents approximately 20% utilization while the national average group utilization of an EAP is in the 4% to 6% population range. The Operators who participated in the EAP expressed no concern about confidentiality. In April 1984, the services provided by Stress Control were transferred to EQUIFAC, INC. for psychological screening, and to the Institute of Human Resources for employee assistance. The psychologist from the Institute of Human Resources has given a presentatiton to Shift Supervisors and Shift Foremen at TMI-1.
10	HR / TMI-1 OC	#1: Safety	1983	Agree - Complete	Disseminate information on confidentiality and on availability of services through Stress Control and alternate sources. We are recommending use of the Employee Assistance Program when appropriate for employees at TMI-1. STATUS: GPUN continues to recommend the use of the Employee Assistance Program (EAP) when appropriate to all employees at the Company sites. As discussed in Number 9, Stress Control services were transferred to two private consulting firms in April 1984. An employee's use of the EAP is structly confidential unless his/her unescorted access is impacted. This is to be determined by the EAP psychologist/psychiatrist, whose goal is to rehabilitate and efforts are designed to return the employee to his/her previous assignment. A designated company representative can be contacted to help if necessary. In addition, each site Human Resources Department has a complete listing official agencies which provide employee assistance and is available upon request.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
11	NA	#1: Safety	1983	Disagree	Consensus on Components of Safety - Develop consensus between top management and operators on those factors contributing to safety on which there is divergence. STATUS: Table #11 of the RHR Report, "Mean Weights of Operators and Top Management on Contribution of Components of Safety to Overall Public Safety," was reviewed in an Office of the President/Vice President staff meeting on April 12, 1983. The differences between Operators and top management were felt to be consistent from their respective viewpoints.
12	NA	#1: Safety	1984	Agree - Complete	Develop consensus within top management on those factors contributing to safety on which there is divergence. STATUS: A distribution of the responses made by management was obtained from RHR. A discussion of those items from the Table of Mean Weights of Operators and Top Management on Contribution of Components to Safety to Overall Public Safety was held at a December 1983, Vice Presidents staff meeting. A further disucssion of the nine (9) items which appear to have divergences in which the distribution of responses was spread over five or more numbers, was held at the Office of the President Staff Meeting on Friday, January 13, 1984. The meeting resulted in a general agreement and clear understanding that the divergence resulted from a variety of interpretations of the particular item. Subsequently, documentation of concurrence was issued to GPUN Directors, in memorandum NA/514, "Consensus on Factors Contributing to safety," dated January 17, 1984 by R. L. Long. The following is a brief summary of the conclusions reached on each of these items. Item 178: Operator Knowledge of Emergency Regulatory Standards. It was generally agreed that emergency regulatory standards are moderate to strong contributors to public safety. The one response indicating "no" contribution relfected the individual's interpretation that all regulatory standards which are required for the Opertor have been implemented into emergency procedures. Therefore, the Operator was not required to be specifically familiar with the source of the standards, providing s/he was very familiar with the implementing procedures. Item 182: Operators Adherence to Procedures. It was agreed the Operator adherence to procedures is a strong contribution to public safety.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
12	CONT'D				

Item 184: Operators Appreciation of the Role of Support Departments.
and
Item 185: Operators Appreciation of Public, Regulatory, and Political Concern about Nuclear Safety.

These two (2) items had the widest divergence of responses. This was due to the variety of interpretations of the meaning of these two (2) items. There was general agreement these items could affect one's attitude toward one's job and if that attitude was adversely effected, there could be some contribution to safety.

Item 188: Operator Morale.

It was generally agreed the Operator's morale is of a moderate to strong importance to public safety. It was unanimous that if morale problems did exist, it would be necessary to take steps to correct them immediately.

Item 189: Operator Workload

There was general agreement that either extremely high or low workloads could have an impact. If not corrected it would be a moderate to strong contribution to public safety.

Item 190: Operator Boredom.

It was agreed that boredom could have a moderate to strong contribution to public safety if corrective action was not taken.

Item 197: Supervisors Tightness of Discipline on Procedural Compliance.

It was agreed that tightness of discipline has a moderate to strong contribution to safety.

Item 199: Control Room Crowding.

The divergence was related to the degree of discipline exercised when large numbers of people were in the control room. It was generally agreed crowding was of moderate to strong importance in maintaining safety.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
13	NA / TF	#4: Training	1983	Disagree	Requalification - Eliminate "comprehensive test" portion of requalification test. STATUS: After a thorough review of the concerns and educational advantages created by the comprehensive annual requalification examination, Operations and T&E Management jointly agreed that the annual examination should be continued. A contributing factor was the difficulty of preparing for and scheduling the Nuclear Regulatory Commission's periodic independent comprehensive examinations, which are given on a random sampling basis. Operators at both plants were advised. It will remain an ongoing practice.
14	NA / TMI-1 OC	#4: Training	1983/1984	Agree - Complete (Ongoing Effort)	Make repetitive parts of requalification training more attractive. STATUS: The Basic Principles Trainer (BPT) at TMI has had a significant impact on this concern and has been enthusiastically accepted by the Operators. Installation and use of the Replica Simulator will make the repetitive parts of requalificaton training even more attractive, interesting and worthwhile. The use of the BPT enables instructors to directly relate theoretical concepts in the areas of reactor theory and principles and heat transfer, fluid flow, and thermodynamics to practical applications in the plant via demonstrations and exercises on the simulator and the use of its CRT's OC will be acquiring a BPT during First Quarter 1985 which will also be integrated into the requalification training program. More student hands-on involvement is a training goal.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
15	NA	#4: Training	1983	Agree - Action Underway	Post schedule for coming year of requalification training including outline of content on operator Bulletin Board at each facility. STATUS: Each Trainee gets a copy of the training schedule for the subsequent six (6) months. During the first cycle of training time is spent discussing plans for the year. Similar scheduling procedures are used at TMI and OC. Corporate Training and Education has developed plans to publish an annual schedule at the three (3) GPUN sites which will be updated quarterly and supplemented with a more detailed quarterly schedule. Weekly schedules will continue to be published and contain final details such as classroom location and instructor assignments.
16	NA/TMI-1 OC	#4: Training	1983	Agree - Complete	Content and Methods - Include industry and community issues as well as GPU Nuclear approach to these issues in the training of operators. STATUS: Operations at OC conducts plant status/discussion sessions with each shift during the training week. The OC Communications Department works with Plant Training and Plant Operations to periodically present current status of important issues during the discussion sessions with the Operators. This will be evaluated for effectiveness by Plant Operations. Through the Operating Experience and Assessment Group Required Reading Program and the internally controlled Plant Operations Division Required Reading System, industry issues, events and information are transmitted to the operating shifts on a regular basis. At TMI a management interface session is scheduled as part of [illegible] requalification training where such issues are addr[illegible] and available to answer questions on these issues. The Communications Division provides all employees w[illegible] activities, industry and community issues.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
17	NA	#4: Training	1984	Agree - Complete	Reintroduction of "systems approach" for Navy trainees to understand role of equipment in plant. STATUS: Current Control Room Operator programs on-shift time have been expanded. At TMI, the Ex-Navy trainees receive additional systems training and complete practical factors that are required as part of the AO program. Additionally, the basic CRO program for all candidates has been changed such that three (3) weeks have been added to the in-plant on-the-job training portions of the program. The OC schedule and systems instruction are tailored to Ex-Navy Nukes and on-shift time has been increased from two (2) to four (4) weeks. The qualification cards, which include systems knowledge, have been developed and are being implemented.
18	NA	#4: Training	1983/1984	Agree - Action Underway	Develop diversified approach for mastery of theory for ex-Navy Nukes and trainees coming up from plant. STATUS: The Basic Principles Training Simulators (BPTS) will aid in this area by reducing the number of classroom lectures, and allowing Operators hands on experience at the simulator on all systems they are required to know and operate. The BPTS is highly interactive and allows a graphics display of the fundamentals underlying principles behind power plant operations. The theory instruction to Non-Licensed Operators has been increased to provide up to six (6) months of training in the areas of reactor theory, heat transfer, chemistry, individualized controls, mechanical and electrical fundamentals, math, physics, and radiation control. Additionally, TMI has recently introduced voluntary programs in reactor theory for those AO's who desire to become Control Room Operators TMI also permits Ex-Navy trainees for Reactor Operator licenses to take the validation examination ("test out") in theory. The Equipment Opeator program at OC has been upgraded to include theoretical training on all of the systems AO's operate.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
19	TF / NA	#4: Training	1982-1985	Agree - Action Underway	Simulator specific to TMI. STATUS: The TMI-1 Replica Simulator is scheduled to be delivered by December 1985. The TMI replica will replace use of the B&W simulator in Lynchburg, Virginia, which is currently utilized in the training programs for Licensed Operators and Shift Technical Advisors. At OC T&E management has made a recommendation to acquire a Replica Simulator and the recommendation is under consideration by the Office of the President.
20	NA	#4: Training	1983/1984	Agree - Action Underway	Develop method for trainee to gauge his growth in competency to operate during training period. STATUS: The Basic Principles Training Simulators (BPTS) will aid in this area, as will increased guidance in the form of the On-The-Job (OJT) qualification cards. At OC the new Control Room Operator class on-shift time has been increased from fourteen (14) to twenty-five (25) weeks so that the students can complete the qualification card system. The training programs require qualification check-offs from which each trainee should be able to judge his own growth and accomplishments. The trainee, through his interaction with qualified Operators, will obtain an assessment of his knowledge relative to the requirements needed to operate plant systems and the overall plant while taking plant walkthroughs and obtaining qualification checkoffs. Revised guidelines for OJT training checkoffs were issued for Control Room Operator and Senior Reactor Operator (and Equipment Operator) programs conducted at OC during 1984. This checkoff list provides minimum uniform standards of required knowledge with all requirements broken down into specific increments.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
21	NA / TMI-1 OC	#4: Training	Early 1983	Agree - Complete	Tighten standards and evaluation of trainees.

STATUS: The qualification checkoffs are used to establish and insure tighter performance standards for trainees. Revised On-The-Job (OJT) Training Guidelines for the Reactor Operator Training Program were issued in February 1984, at TMI, and in May 1984, at OC.

In addition to the information contained in Item #8, the Licensed Operator Certification procedures contribute to high standards and in-depth evaluation of trainees. The completion of the Operations Plan Manual systems sections has provided the Operator with learning objectives for each of the plant's systems. These objectives can be used to conduct evaluations on systems knowledge.

22	NA	#4: Training	Mid 1983	Agree - Complete	Evaluate instructors on pedagogic skills with view to coaching and improving.

STATUS: This is being done on a continuing basis through the Instructor Evaluation Program and the Instructor Training Program conducted at all sites.

The system assessing instructional skills allows for each instructor to be evaluated up to a total of eight (8) times per year. One of the evaluations is done by the Educational Development Section. Each Manager and Supervisor conducts his/her own evaluations which are factored into the periodic coaching/appraisal meetings held with the instructor. Additional audits of the training sessions are performed periodically by Quality Assurance. Educational Development also looks for both specific and generic weaknesses. The content of the Basic and Advanced Instructor Training Programs are reviewed relative to this data. Individual coaching is arranged through Educational Development on an ongoing basis.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
23	NA	#4: Training	1983-on	Agree - Complete (Ongoing Effort)	Develop method for monitoring and improving consistency between training for licensing and requalification and testing for the same.

STATUS: In the area of initial licensing examinations prepared and administered by the Nuclear Regulatory Commission (NRC), signifiant progress has been made in improving the consistency between the company's training programs and the Commissions examinations by providing the NRC with updated training materials and procedures, including the learning objectives, prior to each examination. Questions from our examination bank are also provided.

In the area of company administered examinations. consistency has been improved by an increased emphasis placed on testing to the behavioral learning objectives presented in the classroom. At TMI, the INPO Accreditation Team concurred that the behavioral learning objectives are tested. It is expected that the work being done in the job analysis areas will lead to further improvement by improving and refining the behavioral learning objectives. Additionally, letters on the requalification examination are sent to the Operators annually. These letters provide broad guidance on the major topics covered on the examinations and aid the students in preparing for the examinations by refreshing their memories on what has been covered and will be testable.

The Operator Training Review Committees address this issue thru in-depth review of the operator training.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
24	NA / TMI-1 OC	#4: Training	1983-on	Agree - Complete (Ongoing Effort)	Develop methods for monitoring and improving consistency between training and ability to operate.

STATUS: The Training and Education Department regularly seeks feedbck from Operations and other user groups concerning their perception of training effectiveness. Regular Operations/Training meetings at OC and TMI assure this feedback process. This systematic approach results in identifying exactly what training is required and the most effective and efficient ways to present it. At OC and TMI, Training and Education and Operations Management frequently meet to discuss mutual concerns, define time spent by Operators and assess training needs, content and administration. Comments are evaluated and concerns addressed by making changes to training programs where appropriate. Training thoroughly evaluates feedback/comments and applies those suggestions in the upgrading training.

General course material such as "Tour Training" for Equipment Operators has been modified and implemented to recognize the specific conditions at OC.

The results of job and task analysis has and will continue to improve consistency between training and the ability to operate by more closely tying the training program to performance based objectives.

A Training Systems Development (TSD) Model has also been developed by the Training and Education Department for all sites to provide better guidance on systematically developing performance based training.

These models will be incorporated into a series of guidelines to be used by Training to develop lesson materials. Training and Education has reviewed all of their theory courses to ensure correlation with plant examples.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
25	NA / TMI-1 OC	#4: Training	1983/1984	Agree - Action Underway	Task analyses of what operators actually do as basis for training relevance.

STATUS: The Training and Education Department subscribes to the task analysis approach.

A GPUN Training Systems Development (TSD) Model has been developed and approved by INPO. At TMI the INPO Job Task list for the Babcock and Wilcox (B&W) Pressurized Water Reactor (PWR) was utilized to conduct surveys which have resulted in TMI specific task lists. The lists are being refined and compared to existing programs to determine what changes, if any, are required. This will result in further upgrading of On-The-Job (OJT) Training programs prior to the start of the next class in each area.

At OC an effort has been started which will provide for the completion of the Control Room Operator (CRO) task analysis by April 1985. One hundred ninety one (191) site specific items have been validated by INPO. Current plans call for completion of the remaining one hundred five (105) items by March 1985.

At TMI the INPO accreditation process for the Licensed Operator Programs requires an analysis which is being conducted by the Task Analysis Task Force described in Item #3.

26	NA / TMI-1 OC	#4: Training	1983	Agree - Complete	Administration - Promote improved relationships between operations and training personnel.

STATUS: To address this issue, the Director of Training and Education has the Managers of Plant Training regularly attend the staff meetings of the site Vice Presidents.

The Training and Education Department established a Training Advisory Council in 1983, which continues to address this issue and others. The council membership consists of a representative from each division who reports direct to the Division Vice President.

At OC site monthly Operation/Training meetings have promoted improved relationships.

At TMI the joint efforts of the Operations Divsion and the Training and Education Department in developing the Abnormal Transient Operations Guidelines (ATOG) Program and the transfer of a Senior Reactor Operator and two (2) Auxiliary Operators from Operations to Operator Training has improved relationships between the two organizations. The involvement of the Operators in the Training and Education Department's Simulator Development efforts has further improved

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
27	NA	#4: Training	Early	Agree - Complete	Targeted interviews in Training Department to explore issues, and other departments. STATUS: The Training and Education (T&E) Department has held several follow-up discussions with RHR. The various T&E responses to the RHR recommendations were reveiwed and RHR helped clarify the issues as they applied to TMI-1 and OC. It was decided not to use RHR to conduct interviews of instructors. The various issues have been addressed through the Operatror Training Review Committees at each site, and T&E Management is responsible for soliciting instructor input and concerns during the feedback meetings after every evaluative classroom observation. The Director of Training and Education meets annually with all new instructors to discusss this issue and a variety of other training related matters.
28	HR	#5: Career	1983-on	Agree - Complete	Entry - Improve pay differential between licensed operators and other departments. STATUS: Since the Reactor Operators are members of the International Brotherhood of Electrical Workers (IBEW), all compensation matters are subject to negotiation between Jersey Central Power and Light for OC, and Metropolitan Edison for TMI. Prior to each negotiation, the Companies undertake a compensation survey with other utilities for key bargaining unit positions to assure that Company rates are competitive with the industry, i.e., hourly rates, bonuses and shift differentials.
29	NA	#5: Career	1983	Agree - Complete	Provide some training in theory to AO's with potential for RO. STATUS: The Training and Education Department has increased theory training for Non-Licensed Operators. The Auxiliary Operator (AO) initial training program provides extensive theory training to prepare them for: A. A better appreciation and understanding of the Reactor Operator's job, knowledges required, and to build confidence to enable them to ultimately perform as a Reactor Operator; B. Provide a better appreciation of the consequences of their actions in accurately performing their current duties.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
30	NA / HR	#5: Career	1983/1984	Agree - Action Underway	College Credentials - Facilitate getting of degrees; credits for in-house courses, programs in area colleges, Career Counsel.

STATUS: The Training and Educaion Department continues to develop and deliver educational career counseling programs. Additional programs from local colleges/universities are being considered to be brought to GPUN sites. At OC, a Masters degree in Business Administration and a Bachelor of Science degree in Mechanical Engineering programs have started on-site. At TMI a Bachelor of Science degree in Mechanical Engineering was initiated in 1984.

Human Resources has established a divisional goal to offer career counselling as a company-wide program.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
31	HR / ALL	#5: Career	1983/1984	Agree - Action Underway	Career Paths - Develop and publish possible career paths and qualifications for them. STATUS: Draft progressions are in the process of development. Additional career path opportunities are being reviewed and will be made available to employees, provided sufficient flexibility can be worked into shift schedules. A Nuclear Committee was established with representatives from TMI-1, TMI-2, and OC to review and develop applicable recommendations to management. Committee members are: T. L. Myers, Chairman - Organization Development Director N. Boulware - Safety Review Engineer, OC J. Reopell - Group Operating Supervisor, OC R. R. Harper - Preventative Maintenance Manager, TMI-1 M. J. Ross - Manager, Plant Operations, TMI-1 H. A. McGovern - Shift Supervisor, TMI-2 Initial efforts of the Group were delayed but Committee action will commence in the January 1985 timerrame. Individual counseling is avilable through the site Human Resources Department.
32	NA	#6: Cooperation	Early 1983	Agree - Complete	Emphasis on Cooperation - Discussion of issues with department heads. STATUS: The entire RHR Report has been reviewed with the Office of the President and Division Vice Presidents. Divisions have discussed the need for interdivisional cooperation with all of their employees and periodic follow-up sessions are held by Department Heads. Organizational effectiveness through interdivisional cooperation is emphasized in many management development programs.
33	NA / OP	#6: Cooperation	1983	Agree - Complete	Reinforce concept of organizational structure that operations is a key function and other departments have support function. STATUS: There is a continuing effort to improve organizational understanding and cooperation. All Department Heads are held accountable by upper management to increase interdepartmental cooperation. Roundtables with senior management are conducted at the end of management and supervisory development programs. See Item #35.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
34	NA / OP	#6: Cooperation	1983	Agree - Complete	Make cooperation between departments a GPU Nuclear Corporation Objective. STATUS: Corporate Objective No. 5, is to "..Improve GPU Nuclear's functional capabilities." All Divisions are emphasizing the "concept" of cooperation through staff and employee meetings, interdivisional meetings, and when needed, development of interface agreements and procedures. This is an ongoing activity.
35	HR	#6: Cooperation	1983	Agree - Complete	Develop system for evaluating managers on cooperation. STATUS: This was included in the Performance Appraisal Form implemented in 1983. Section 3, under Performance Factors is a follows: "3. Working Relationships F. Communication G. Leadership H. Teamwork I. Employee Development" Further, the Performance Factors - Rating Definitions, defines TEAMWORK as "contributing to, and cooperating with others in a common effort." In each evaluation, this factor is to be reviewed by the immediate supervisor and those sections of departments with which they interface. Emphasis is included in the Management/Supervisory Development Programs and the Performance Appraisal Program. No other formal action is planned at this time. It will, however, be incumbent upon each Division and the Human Resources Department to assure that the issue is properly addressed during the 1984 Performance Appraisal process.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
36	NA / ALL	#6: Cooperation	1983	Agree - Complete	Facilitating Cooperation - Identification of problems at interfaces between pairs of departments. Intergroup problem solving meetings.

STATUS: This was covered under Corporate Objective No. 5, "...to improve GPUN's functional capabilities." Staff and employee meetings emphasize the "concept" of cooperation. This is a continuing activity.

The Vice President of Nuclear Assurance holds regular employee meetings to explore issues such as this.

Evidence of progress in this respect could be seen in the very supportive attitude of various organizational groups during the final weeks of the recently completed Oyster Creek outage. Completion of the Restart Certification Book leading to final signoff by the Plant Director required hundreds of verficiation signatures, numerous successful problem solving meetings of several organizational elements, and successful resolution of thousands of items.

The Vice President of Technical Functions is presently working with Training and Education on a major effort to address this issue.

At TMI-1, the successful completion of major plant jobs, such as the replacement of a main coolant pump and the steam generator repairs, required continual and close interaction and cooperation among all departments.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
37	NA / ALL	#6: Cooperation	1983	Agree - Complete	Educate departments on each other's roles. STATUS: The following steps have been taken to promote a greater understanding between departments: A. A synopsis of the Organizations Plan has been distributed to all employees at each site and is on file in each Control Room. B. Organization and division functions are discussed by a designated representative in each training program, including Control Room Operator training. The Training and Education Department schedules designated representatives from each Divsiion to discuss their roles at these meetings. C. The role of each Department is reinforced through the "Nuclear Today" publication - "Did You Know." D. At OC an organizational guide has been published which lists the reporting relationship and responsibilities for all management personnel at the Oyster Creek/Forked River sites. E. At TMI an Organization Plan and Organization Chart which reflect new assignments or changes is sent to the Control Room each month. F. Senior Management recently conducted a two (2) day management retreat to identify and discuss current organizational issues and to reinforce the role of each department in the GPUN organization.
38	NA / ALL	#6: Cooperation	1983	Agree - Complete	Training: Train supervisors in cooperation, operators in persuasion vs authoritarian approach, support department members fresh from school in importance of cooperation. STATUS: The GPUN Supervisor Training Program addresses this issue. Key segments of the program, which is behavior modeling based, emphsizes the importance of leadership, productivity, cooperation, and overall performance management.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
39	NA HR / ALL	#6: Cooperation	Early 1983	Agree - Complete	Get people acquainted across departments. Post photographs of both licensed operators and support department foremen and supervisors at each facility with name and function, circulate current rosters of department foremen with areas of responsibility location and phone. STATUS: Corporate directories are published to address part of this issue. At present site management has not approved the concept of posting photographs. Training and Education is planning to photograph and post the names of its personnel at the training centers. Both supervisory and management development programs bring students together from the various organizations. The management development program conducted at all three (3) sites provides students with an opportunity to meet and interface with personnel from other sites as well as senior management.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
40	TMI-1 OC/HR NA	#6: Cooperation	1983	Agree - Action Underway	Work toward sufficient flow of trainees so that those with operational experience can join support departments.

STATUS: At OC, an objective of the Operations Division is to provide a career path and options for Operators to move into areas where their experience and knowledge can benefit the Corporation. With the achievement of the six (6) shifts in 1985 there will be more emphasis on moving Operators into other areas, i.e., Group Operating Supervisor, Group Shift Supervisor and Operting Shift Assistance positions into Training and other support divisions.

TMI-1 now has fifteen (15) licensed Senior Reactor Operators (SRO) and seventeen (17) Licensed Reactor Operators (RO) on their operating crews. This provides the flexibility to move people to support divisions and still maintain enough Licensed Operators to support the six (6) shift rotation. During the past two (2) years the following moves have been made:

Oyster Creek

- 1 SRO - Promoted to Radwaste Manager
- 1 SRO - Assigned as Operations Maintenance Coordinator (Rotating Assignment)
- 1 SRO - Transferred to Fossil Plant Manager
- 1 SRO - Temporarily Transferred to Training for Simulator Development
- 1 RO - Transferred to Quality Assurance/Quality Control
- 1 RO - Transferred to Radwaste Shipping

TMI

- 1 SRO - Transferred to Training as Supervisor of Licensed Operator Training.
- 2 AO's - Transferred to Taining as Instructors
- 1 SRO - Transferred to Training for Operator Training
- 1 RO - Transferred to Training as Instructor
- 2 RO's - Temporarily assigned to Training for Simulator Development

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
41	HR	#7: Pay	1983	Agree - Complete	Pay Differentials - Develop data on pay differentials between licensed operators and other disciplines at GPU Nuclear.
					AND
42	HR	#7: Pay	1983	Agree - Complete	Develop data on pay differentials in Nuclear Plants run by other utilities. STATUS: GPUN performs annual salary surveys with other utilities for key bargaining unit positions to assure that Company rates are competitive, i.e., hourly rate, bonus and shift differentials. Internally, GPUN attempts to maintain a salary differential between the Reactor Operators, Supervisory positions, Group Shift Supervisors, and Group Operating Supervisors to provide upgrading and promotion potential to management positions for Reactor Operators. Specific salary information is available from supervisors or the site Human Resources Department.
43	HR	#7: Pay	1983/1984	Agree - Complete	Use data to reassess policies and plan appropriate action steps. STATUS: Inasmuch as GPUN wage and license bonus amounts are subject to local bargaining unit agreements, differentials can only be adjusted through union negotiation. Several actions have been taken in the past few years to ensure equitable pay for Licensed Operators and to make certain that we remain competitive with surrounding utilities.
44	HR / OC	#8: Rotating Shift	1983/1984	Agree - Action Underway	Work to initiate 6 shifts at Oyster Creek as soon as possible. STATUS: The is currently being done at TMI. At the time of the study, OC was on a four (4) shift rotating schedule. This was increased to five (5) shifts in February 1983. OC Operations Division plans to implement a six (6) shift rotation in January 1985. Action by Maintenance and Construction has also been taken to implement a six (6) shift rotation of a maintenance crew to provide operational maintenance support. It is planned that the on-shift maintenance crew will rotate in parallel with the Operations Department so that increased training, better cooperation, and round-the-clock support to the Control Room will be available.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
45	HR / OC	#8: Rotating Shift	1983	Agree - Action Underway	Shift Scheduling - Study feasibility of each rotation being consistently eight hours later than previous at O.C. Study feasibility of twelve-hour shifts. STATUS: This matter needs extensive review and study by the Nuclear Assurance and the Human Resources Departments with applicable divisional management and operating company labor relations representation. While other options may be available, the twelve (12) hour shift concept is not feasible for the following reasons: o fatigue factor, o difficulty in scheduling, o reduced altertness and productivity, and o the need to negotiate item with the union. The present focus is on establishment of a six (6) shift rotation at OC. After its implementation, the rotating shift concept will be re-evaluated.
46	TMI-1 OC	#9: Quality of Management	1983-on	Agree - Complete	Provide advance warning of changes in shift scheduling. STATUS: Advance warning of changes in shift scheduling is being provided whenever possible. At TMI the Agreement Between the Metropolitan Edison Company and the International Brotherhood of Electrical Workers, Article 3.1 and #25 Memorandum of Understanding, notification to the Union at least forty-eight (48) hours prior to a shift change is required. The Company attempts to notify the Union where possible, well in advance of the forty-eight (48) hour contractual obligation. At OC the Operations Division is committed to providing as much advance notice of shift scheduling changes as possible. In addition, Operations has submitted a proposed schedule change based on Operator input to the Jersey Central Power and Light, Human Resources Department for Union concurrence. This proposed shift schedule is the one preferred by the Operators and implementation is indicative of Management's desire to respond to their concerns.

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
47	NA	#9: Quality of	1984	Agree - Complete	Interviews with cross-section of management on issues, concerns and quality of management.

STATUS: It was decided not to use RHR to conduct further interviews of GPUN management. However, several other efforts assist us in identifying concerns of supervisors and managers.

The Management Development and Supervisor Development Programs provide opportunities to identify and address concerns to Senior Management. Several Division Heads have had meetings with various groups of employees, as well as individual interviews. The Technical Functions Division has undertaken a major effort, with the help of Training and Education, to interview various levels of management and follow-up with action plans to address concerns.

The Director of Training and Education and the Vice President of Nuclear Assurance have discussed this issue with various managers. Human Resources has recently distributed a training needs assessment survey. Training and Education reviewed programs available to evaluate and assess individual management styles and practices. A senior level program has been identified. The Training and Education Department has also reviewed follow-up alternatives to the present Management Development Program. Recommendations for action were implemented early in 1984.

RHR REPORT
Response Summary
(cont'd)

12/20/84

NO.	RESPONSIBILITY LEAD/SUPPORT	RHR REPORT TABLE	TIME	RESPONSE	ACTION STEP
48	NA	#9: Quality of Management	1983-on	Agree - Complete	Assessment of managers; developmental coaching with individual managers; Management training. STATUS: The Management Development Program has been revised to target behavioral objectives and managerial skill development. The Human Resources and the Training and Education Departments are working together to guide effective assessment of managerial performance. A senior level program has been selected. This is a continuing activity.
49	NA / ALL	#10: Implementation Phase	Early 1983	Agree - Complete	Presentation of findings to Departments (so that Departments understand background of Action Steps). STATUS: The RHR Report has been distributed to management personnel in each Division. Regular tracking and status reports of RHR action items were distributed by the Nuclear Assurance Division.
50	NA / ALL	#10: Implementation Phase	1984	Agree - Complete	Review of suggested Action Steps to determine feasibility, timing, and participants. STATUS: The report of RHR to management has been made on an ongoing basis. A full report is being written for the Operators, which will be completed in January 1985.