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## Summary

The Business Plan reflects an understanding of the issues and problems confronting Waterford 3. We recognize that Waterford 3 had experienced a loss of regulatory focus, and that we must regain the confidence of the NRC. In addition, over time, Waterford 3 had developed an insular attitude and had become isolated from the rest of Entergy as well as the nuclear industry as a whole. As a result, there was a failure to seek out and adopt appropriate good practices, which were proven valuable elsewhere. This was unacceptable and does not reflect the current expectations of Entergy or of Waterford 3 management.

Waterford 3 is committed to fostering an environment which supports continuous improvement of our performance, and the implementation of this Business Plan. Integral to this environment, Waterford 3 managers fully support the identification, correction and prevention of the occurrence or recurrence of adverse conditions to safety. Furthermore, improvements to the plant are vigorously pursued.

Our commitment to improving the station's performance extends to a healthy self-critical and questioning attitude. The Waterford 3 staff holds itself accountable for plant performance. Employees are aware of plant issues and NRC concerns, and teamwork with management continues to improve in identifying and resolving issues.

Success will be measured by the actual results achieved and not by the number of activities completed. During the implementation of performance improvements, a formal assessment of our progress will be conducted and reviewed by other Entergy Operations managers to provide an objective opinion of whether or not Waterford 3 is achieving the Plan's objectives. Periodic meetings will be held to review Waterford's progress and remove barriers to successful Plan implementation. A Coordinator, assigned to the Business Plan, will oversee the process, monitor the results, and report observations, progress and results to the Site Management Team.

We are determined to move to a state of excellence. Waterford's primary goal is to achieve *Best in Class* performance; employees are committed to initiatives and programs that will help Waterford 3 achieve this end result. We have defined our standards for meeting *Best in Class* performance by (1) incorporating Entergy's goals and performance indicators into Waterford's; (2) fully incorporating the Timeless Principles into the performance of daily work activities as well as personal interactions; and, (3) focusing on the basic building blocks for achieving excellence in nuclear operations based on the True North Goals.

We have identified specific strategies and associated actions, which taken together, will result in marked improvement and resolution of the performance problems we have identified. Resolution will take time, but needs to be expedited as much as possible without sacrificing quality and safety.

To date, there has been meaningful improvement in the overall situation and environment at Waterford 3. Timeless Principles and True North Goals are being internalized across the Waterford 3 organization. Results of this process are starting to emerge; behavior is changing.

Examples of specific, tangible results include:

- Enhancement of the Employee Concerns Program.
- Promotion of a healthy problem identification culture.
- Improvement of Operations ownership of the plant.
- Resolution of known equipment deficiencies during the current refueling outage.
- Self-Assessments
- Improvement of Industrial Safety and ALARA Programs.
- Development of Phase 1 of the Engineering Request (ER) Process, which consolidates the method for requesting Engineering support.
- Improvement in the quality of information provided by Engineering to the Control Room.
- The Procedure Initiative, using a Quality Action Team.

Most importantly, following recommendations from Corporate reviews and 1996 Focus Plan results, Waterford 3 began to enhance its Final Safety Analysis Report (FSAR) and Design Bases. Major programs are being planned for the FSAR and Design Basis Documents including a focus on retrieval, confirming assumptions, eliminating inconsistencies, preserving margin and recapturing original design margin. In addition, the Improved Technical Specification and Inservice Testing Programs (IST) are in progress, and preliminary work is complete on improving the "Reload Ground Rules" document.

Though these and other examples are indicative of real progress, we are not satisfied. Much more needs to be accomplished to meet the NRC's, Entergy's, and Waterford's expectations. This message is being communicated and reinforced throughout the plant site.

## **Actions**

This section of the Waterford 3 Performance Improvement Plan identifies actions which were determined to be significant from a regulatory viewpoint. Strategies were developed to clearly reflect the steps necessary to demonstrate achievement of the True North Goals. Actions were then organized under the relevant strategies.

Additionally, the Performance Improvement Plan identifies a sponsor for each strategy. This individual is responsible for ensuring that completion of the actions tied to that strategy accomplishes the intended results. Although the individuals are not identified here, each action is also assigned to an accountable individual in the Waterford 3 Business Plan.



# WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

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## True North Goal: 1. Operate Waterford 3 Safely

Action	Due Date
<b>Strategy: A - Achieve excellence in human performance</b>	
<b>Sponsor: T.R. Leonard</b>	
1 Strengthen the observation of plant evolutions, work activities and training by managers	3rd Qtr 1997
2 Promote the use of the Waterford 3 Timeless Principles	3rd Qtr 1997
3 Hold quarterly Human Performance Awareness days	3rd Qtr 1997
4 Train plant workers using the INPO Human Performance Program	2nd Qtr 1998
5 Implement improvements in hands-on practical training	3rd Qtr 1998
6 Increase supervisor presence in the field	4th Qtr 1997

## Strategy: B - Improve safety culture

**Sponsor: E.C. Ewing**

1 Establish periodic internal communications of regulatory issues at all hands meetings.	3rd Qtr 1997
2 Establish periodic external communications of regulatory issues with NRC.	3rd Qtr 1997
3 Reinforce need for questioning attitude and encourage fixing problems	2nd Qtr 1997
4 Conduct regulatory sensitivity and knowledge training for selected groups	4th Qtr 1997
5 Respond promptly to employee concerns and questions	2nd Qtr 1997
6 Assess corrective action program effectiveness and processes	3rd Qtr 1997
7 Perform safety culture assessment	4th Qtr 1997

## Strategy: C - Improve teamwork and communications

**Sponsor: E.C. Ewing**

1 Conduct team building at Waterford 3 senior management level	4th Qtr 1997
2 Implement communication improvements, both internal and external	4th Qtr 1997
3 Install Emergency Planning communication improvements	4th Qtr 1997
4 Increase organizational focus on quality and safety	4th Qtr 1997
5 Improve management/grassroots communications interface	4th Qtr 1997



## WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

5/8/97 11:43:24 AM

**True North Goal:** 1. *Operate Waterford 3 Safely*

Action

Due Date

**Strategy:** D - Operate within and improve the understanding of the Design and Licensing bases

**Sponsor:** A.J. Wrape

1	Conduct training on design and licensing basis for Operations, Maintenance, Licensing, and Engineering personnel	3rd Qtr 1998
2	Perform an effectiveness assessment of the revised 10CFR50.59 Safety Evaluation process	4th Qtr 1997
3	Submit a full conversion to the new Combustion Engineering Standard Technical Specifications (NUREG-1432)	2nd Qtr 1998
4	Review selected sections of the USFSAR for accuracy and completeness	4th Qtr 1998
5	Complete discovery phase of the Design Bases Review Program for the risk significant mechanical systems	1st Qtr 1998
6	Complete discovery phase of the Design Bases Review Program for the balance of the selected mechanical systems	1st Qtr 1999
7	Complete the upgrade of mechanical calculations identified as unsatisfactory in the discovery phase of the Design Bases Review Program	4th Qtr 1999
8	Develop Safety System Functional Inspection Assessment Plan	3rd Qtr 1997
9	Upgrade design and testing bases for selected areas	3rd Qtr 1998



# WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

5/8/97 11:43:25 AM

## True North Goal: 2. Maintain Equipment in Top Notch Working Order

Action	Due Date
<b>Strategy: A - Develop an effective work control process</b>	
<b>Sponsor: D.L. Shipman</b>	
1 Establish Work Week Managers	3rd Qtr 1997
2 Implement 12 week rolling schedule process	3rd Qtr 1997
3 Improve pre-job briefings	3rd Qtr 1997
4 Implement Preventive Maintenance Program improvements to ensure alignment with 12 week work schedule	2nd Qtr 1998

## Strategy: B - Improve quality of work and testing

**Sponsor: R.G. Azzarello**

1 Complete planned activities in the IST program. Submit updated plan for second ten year interval. Resolve emergent deficiencies expeditiously.	4th Qtr 1997
2 Perform self assessment of maintenance work quality and implement improvements	3rd Qtr 1998
3 Perform assessment of the Motor Operated Valve Program and implement improvements	1st Qtr 1998
4 Perform assessment of the Air Operated Valve Program and implement improvements	1st Qtr 1998
5 Perform assessment of the Check Valve Program and implement improvements	1st Qtr 1998
6 Assess predictive maintenance and implement recommendations	3rd Qtr 1998





# WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

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**True North Goal:** 3. *We Should Find Our Own Problems*

Action	Due Date
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**Strategy: A** - Conduct thorough and comprehensive Root Cause Analyses

**Sponsor:** E.C. Ewing

1 Assess the Root Cause Analysis process and implement changes as necessary to improve the process	1st Qtr 1998
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**Strategy: B** - Continue to aggressively identify plant problems

**Sponsor:** E.C. Ewing

1 Assess the Condition Report process, implement changes and train personnel to improve process effectiveness	4th Qtr 1997
2 Assess the process for identification of adverse trends	1st Qtr 1998

**Strategy: C** - Measure critical parameters to aggressively identify equipment problem areas

**Sponsor:** D.W. Vinci

1 Establish roles, responsibilities and accountabilities for evaluating equipment trend information and forwarding the results to IHEA for inclusion into the Global Trend System	4th Qtr 1997
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**Strategy: D** - Upgrade the effectiveness of audit and assessment programs

**Sponsor:** F.J. Drummond

1 Redefine and reinforce management expectations for the performance of the Quality Assurance organization	3rd Qtr 1997
2 Conduct an assessment of the Quality Assurance organization. Evaluate its effectiveness, including an evaluation of technical expertise and capabilities. Implement the assessment recommendations.	4th Qtr 1997
3 Develop guidelines and implement a sitewide assessment oversight process	3rd Qtr 1997
4 An independent corporate assessment team, led by the Chief Operating Officer, will conduct an assessment to evaluate plant performance as well as to evaluate the effectiveness of Waterford 3 and Corporate assessments	3rd Qtr 1997



# WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

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## True North Goal: 4. *Expediently Fix Problems Once*

Action	Due Date
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**Strategy:** A - Improve engineering process, including station change processes

**Sponsor:** A.J. Wrape / D.W. Vinci

1 Implement a site-wide Engineering Request Process	4th Qtr 1997
2 Conduct a self assessment of the Waterford 3 Operating Experiences Evaluation process to address efficient processing of industry experience and interface with other processes	4th Qtr 1997
3 Improve project management and prioritization processes	4th Qtr 1997

**Strategy:** B - Resolve long-standing issues

**Sponsor:** A.J. Wrape / D.W. Vinci

1 Establish targets and reduce backlog to manageable levels	1st Qtr 1998
2 Develop a Top Ten Equipment Problem List	3rd Qtr 1997
3 Implement Technical Specification change to resolve Condensate Storage Pool vortexing issue	2nd Qtr 1997
4 Implement Technical Specification change for Reactor Coolant System boron concentration lower limit	2nd Qtr 1997
5 Implement Technical Specification change for use of Wet Cooling Tower basins for Emergency Feedwater	2nd Qtr 1997
6 Implement Technical Specification change for Containment Fan Coolers	2nd Qtr 1997
7 Implement Technical Specification change for trisodium phosphate surveillance	2nd Qtr 1997
8 Implement Technical Specification change for Containment Vacuum Relief penetrations	2nd Qtr 1997
9 Implement Technical Specification change for Cycle Independent Shape Annealing Matrix (CISAM)/Core Protection Calculator (CPC) power calibration	2nd Qtr 1997
10 Implement Technical Specification change for Low Pressure Safety Injection venting surveillance	2nd Qtr 1997
11 Implement modification to eliminate need for -4' elevation, Reactor Auxiliary Building entry to close Component Cooling Water containment isolation valves	2nd Qtr 1997
12 Implement modification to resolve Auxiliary Component Cooling Water system deficiencies	2nd Qtr 1997
13 Replace Emergency Diesel Generator synchronization switch	2nd Qtr 1997
14 Replace failed channels of Valve and Loose Parts Monitoring System	2nd Qtr 1997
15 Replace fasteners for targeted motor operated valves	2nd Qtr 1997
16 Install additional vents on Low Pressure Safety Injection/High Pressure Safety Injection containment penetration high points	2nd Qtr 1997
17 Implement modification to resolve Containment Vacuum Relief instrument line boundary	2nd Qtr 1997



# WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

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## True North Goal: 4. *Expediently Fix Problems Once*

Action	Due Date
18 Implement modification to install additional Safety Injection Sump Trisodium Phosphate baskets	2nd Qtr 1997
19 Reposition High Pressure Safety Injection orifice	2nd Qtr 1997
20 Implement modification to relocate Refueling Water Storage Pool level instrument vents	2nd Qtr 1997
21 Adjust blowdown ring settings for remaining Crosby relief valves	2nd Qtr 1997
22 Implement modification to add additional steam traps and drains on Emergency Feedwater System	2nd Qtr 1997
23 Implement modification to slow stroke time for selected Component Cooling Water valves	2nd Qtr 1997
24 Implement modification to enhance monitoring of 6.9kv bus transfer circuitry	2nd Qtr 1997
25 Test remote safe shutdown panel (LCP-43)	2nd Qtr 1997
26 Test Wet Cooling Tower Basin Cross-connect line	2nd Qtr 1997
27 Ensure that requirements of GL 96-01 are implemented	2nd Qtr 1997
28 Perform testing of targeted valves to confirm the adequacy of accumulators	2nd Qtr 1997
29 Resolve Reactor Coolant Pump fill oil line issues related to 10CFR50 Appendix R	2nd Qtr 1997
30 Resolve Post Accident Sampling compliance issues	2nd Qtr 1997
31 Resolve Ultimate Heat Sink design basis issues	2nd Qtr 1997
32 Implement modification to resolve Reactor Coolant System RTD cable grounding problems & hot leg RTD seal environmental qualification lif issues	4th Qtr 1998
33 Implement modification to reduce Wet Cooling Tower overspray	4th Qtr 1998
34 Implement modification to resolve the fuel oil storage capacity issue for the Emergency Diesel Generators	4th Qtr 1998
35 Implement modification to change the valve operator/power supply on MS-407 (Emergency Feedwater steam line emergency drain valve) to Direct Current	4th Qtr 1998
36 Implement modification to provide backup cooling water supply to the Primary Sampling System	3rd Qtr 1998
37 Implement modification to provide backup cooling water supply to the Secondary Sampling System	3rd Qtr 1998
38 Implement modification to enhance security lighting	3rd Qtr 1998
39 Implement modification to add remote manual operating capability for containment isolation valve CVC-209	4th Qtr 1998
40 Implement modification to provide Emergency Feedwater Heat Trace Reliability improvements	2nd Qtr 1997
41 Implement modification to replace Broad Range Toxic Gas Monitor	3rd Qtr 1998
42 Implement modification to provide Component Cooling Water design pressure re-rate	3rd Qtr 1998



**True North Goal: 9. Procedures Are to be Simple, Clear, Correct and Followed**

Action	Due Date
<b>Strategy: A - Improve procedure compliance</b>	
<b>Sponsor: C.M. Dugger</b>	
1 Complete Root Cause Analysis on procedure compliance and identify corrective actions	4th Qtr 1997
<b>Strategy: B - Improve procedure process and upgrade procedures</b>	
<b>Sponsor: T.G. Murphy</b>	
1 Revise procedure W4.101, "Operability/Qualification Confirmation Process" to improve the guidance on timing for evaluations, the role of engineering supervision, and interaction with shift supervision	4th Qtr 1997
2 Implement the Waterford 3 Procedure Improvement Initiative to streamline and enhance the procedure process	3rd Qtr 1997
3 Complete a comprehensive sitewide assessment of departmental procedure improvement activities and develop a long term continuous procedure improvement plan	1st Qtr 1998
4 Revise the Emergency Operation Procedures(EOP) to incorporate revised CEN-152 standards	2nd Qtr 1998



## WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

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**True North Goal: 10. Make Waterford 3 the Cleanest Station in the Country**

Action	Due Date
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**Strategy: A** - Improve housekeeping, material condition and site appearance

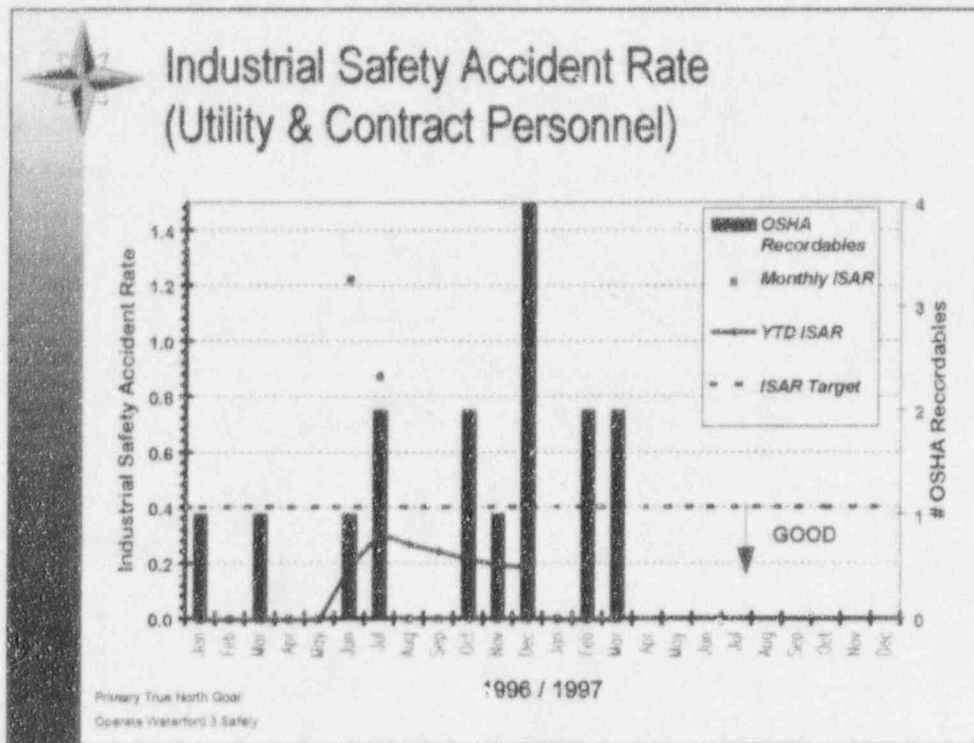
**Sponsor:** R.F. Burski

- |   |              |
|---|--------------|
| 1 Complete the Site Appearance Plan                                       | 4th Qtr 2002 |
| 2 Improve access to plant equipment and reduce long term scaffolding      | 4th Qtr 1998 |
| 3 Perform Zone Inspections and assign accountability for plant appearance | 3rd Qtr 1997 |

## **Performance Indicators**

The following Performance Indicators have been assembled for this Plan to clearly quantify and trend characteristics where improvement in Waterford 3 performance is targeted. We anticipate frequently reviewing these performance indicators as a monitor of our own progress but also, we expect to discuss these same charts at the bimonthly management meetings between the NRC and Waterford 3.

Some of these Performance Indicators were created just for this Performance Improvement Plan. The Performance Indicators are expected to remain the same, however, as we gain experience and as new data is incorporated, annual target levels may be modified to reflect more realistic targets.

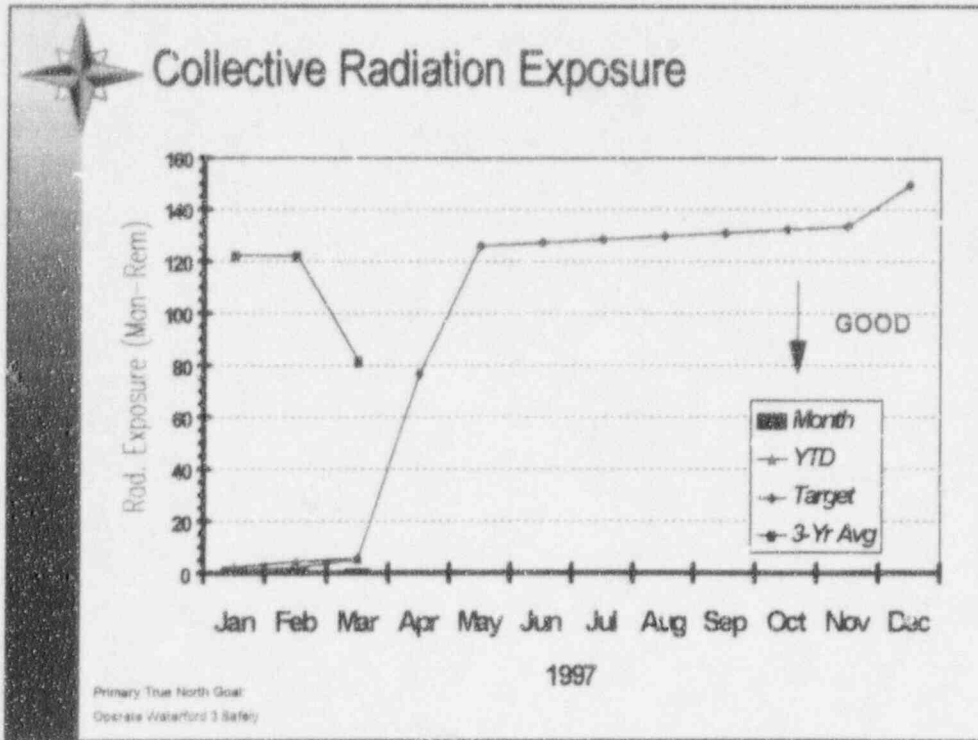


**Industrial Safety Accident Rate (ISAR)** - Monitors monthly and Year-to-Date (YTD) accident rate. The YTD ISAR is calculated as follows:

$$\text{ISAR} = \frac{(\# \text{ fatalities} + \text{lost time accidents} + \text{restricted duties}) \times 200,000}{\text{YTD total man-hours}}$$

**Note:** This graph also records the number of Occupational Safety & Health Administration (OSHA) recordable events for each month.

**1997 Target** for ISAR is  $\leq 0.4$

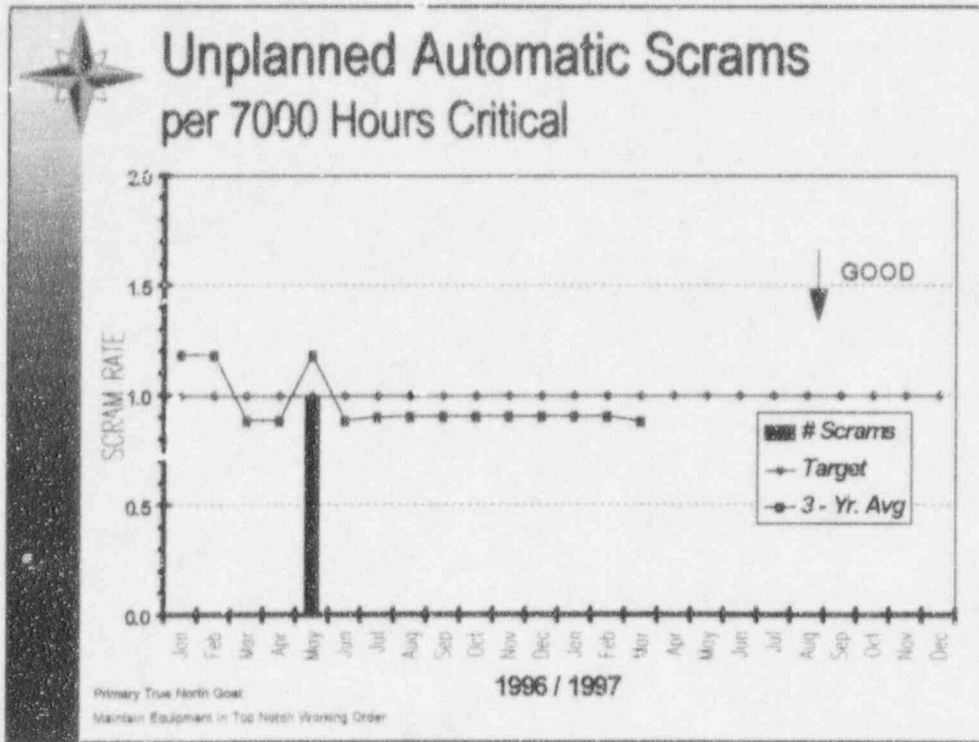


**Collective Radiation Exposure** - Monitors collective radiation exposure in man-rem. Shows dose by month, YTD, and 3-year rolling average.

**Note:** The Feb/Mar decline in 3-year average relates to RFO6 which began 3/4/94.

**1997 Target** for cumulative Man-Rem is  $\leq 150$ .

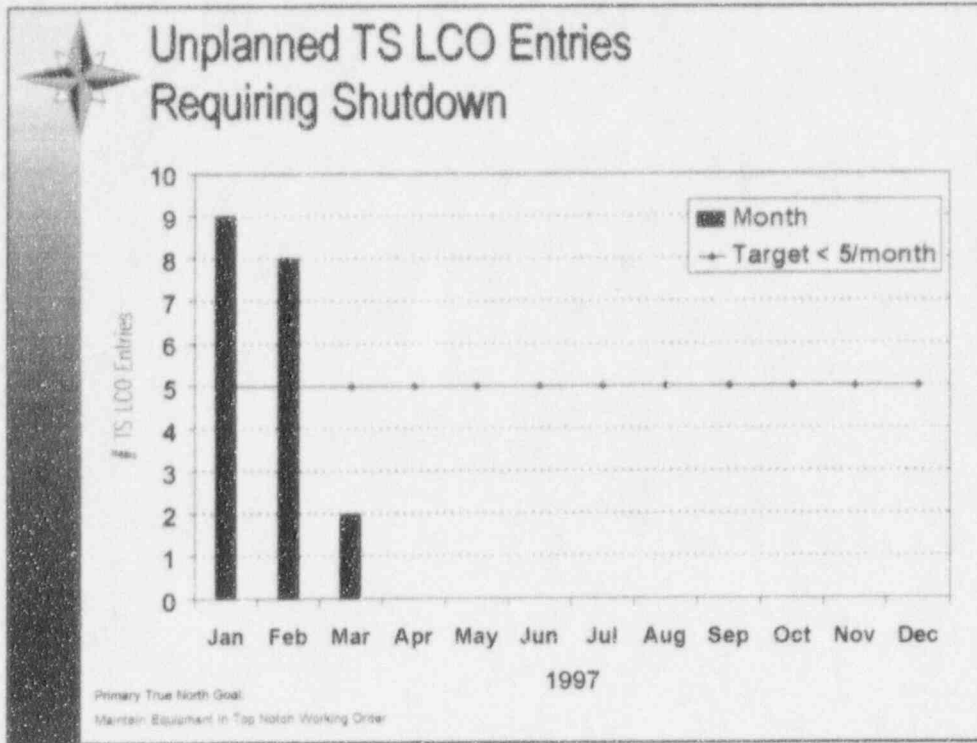




**Unplanned Automatic Scram Rate** - Monitors the number of unplanned automatic scrams (UAS) (reactor trips). The UAS Rate (Unplanned Automatic Scrams per 7,000 hours critical or UA7) tracks the median scram (automatic shutdown) rate for 7,000 hours (approximately one year) of operation.

**Note:** Manually actuated scrams are not included to avoid discouraging conservative actions. 5/17/96 Scram was due to 'A' MG set voltage regulator

**1997 Target** for UAS is  $\leq 1$

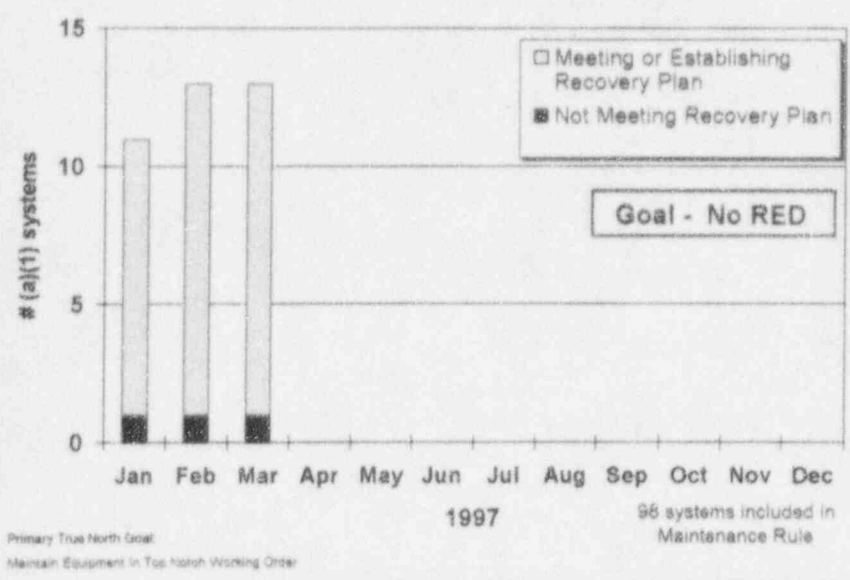


**Unplanned Technical Specification (TS) Limiting Condition for Operation (LCO) Entries Requiring Shutdown** - Monitors the number of times per month the plant entered an unplanned TS LCO requiring a plant shutdown.

**1997 Target** for LCO entries per month is < 5

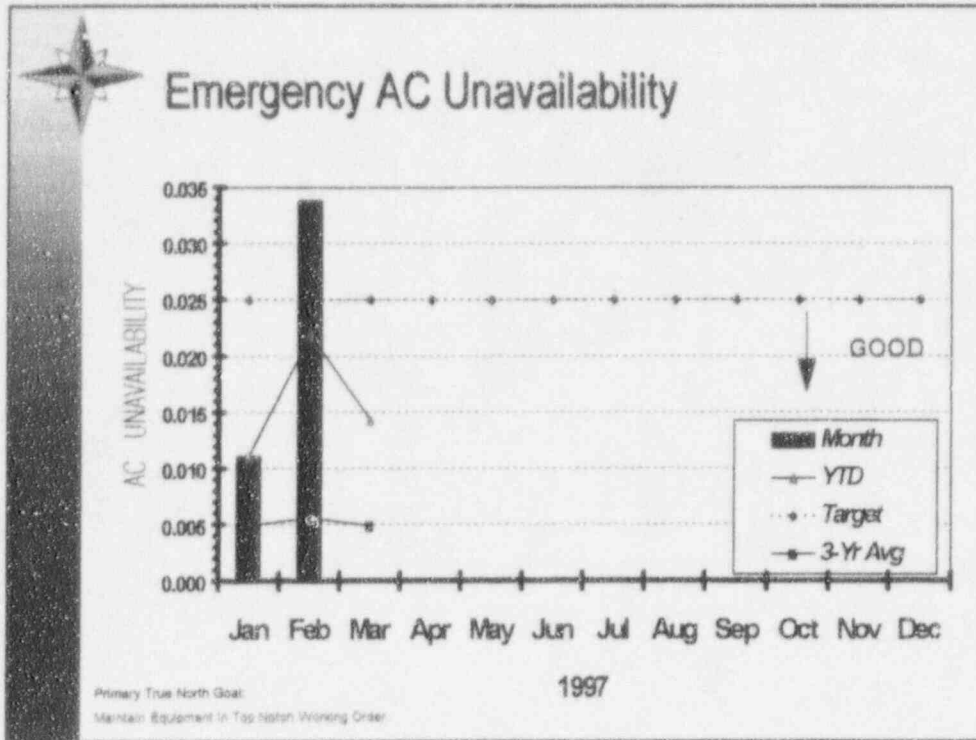


## Maintenance Rule - (a)(1) Systems



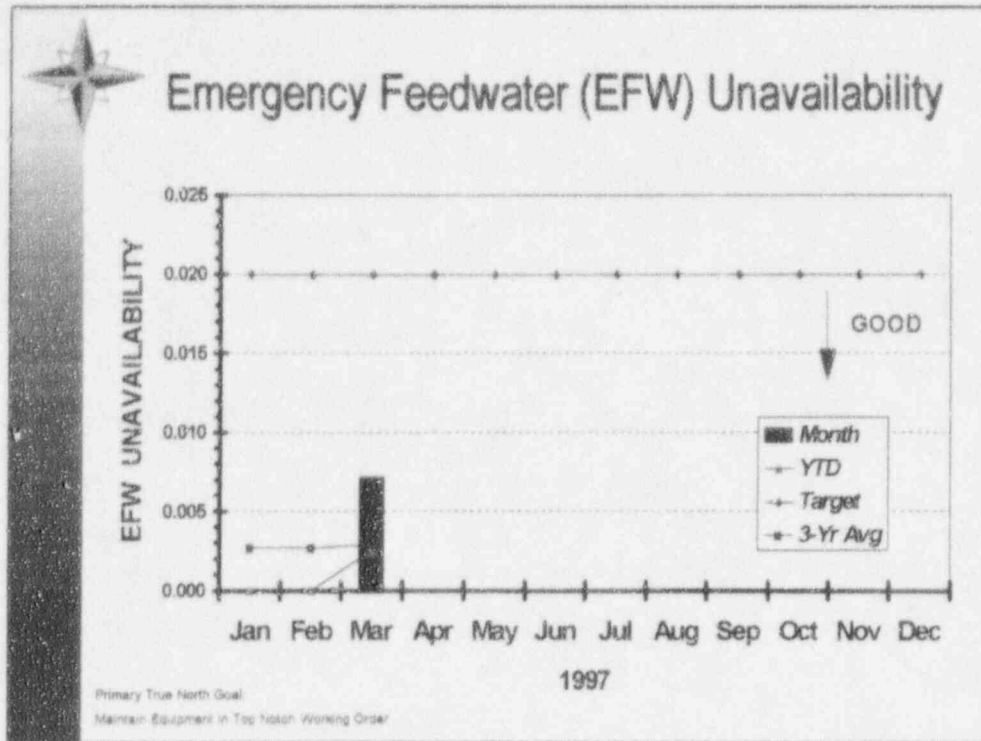
**Maintenance Rule - (a)(1) Systems** - Monitors number of plant systems placed into the (a)(1) category. Systems are placed into this category when their performance is unacceptable with respect to established criteria. A recovery (corrective action) plan is prepared and approved for these systems. Indicator tracks the total (a)(1) systems, as well as the ones not meeting the recovery plan.

**1997, 1998 Target** for systems not meeting Recovery Plan is 0



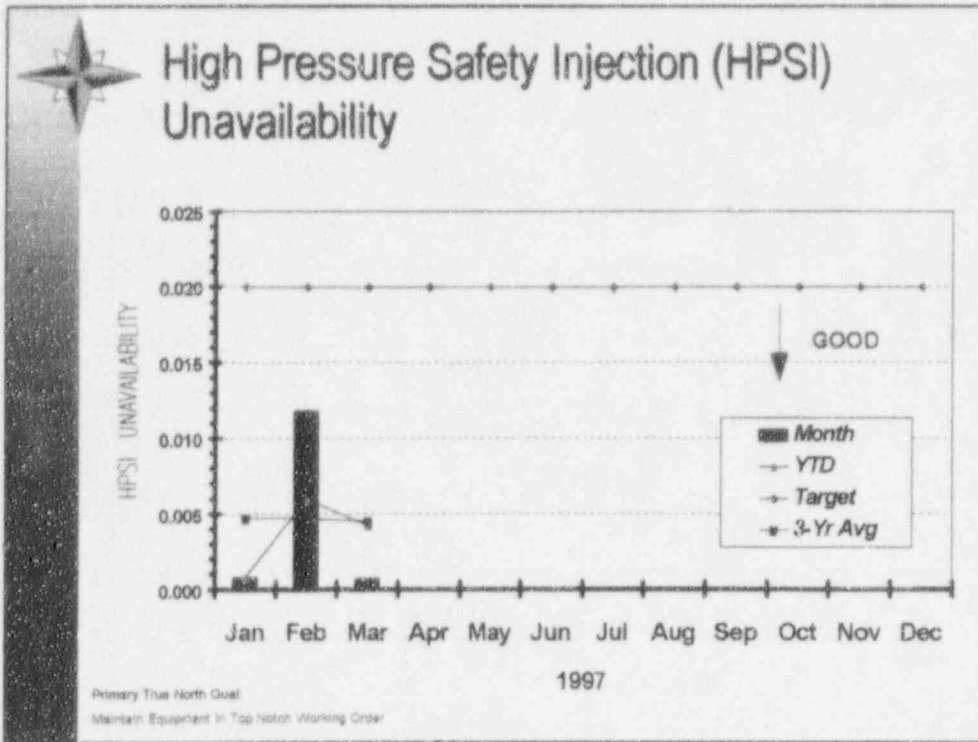
**Emergency A/C Unavailability** - Monitors availability of emergency A/C power trains to mitigate off-normal events, thereby encouraging a high state of readiness. Indicator is calculated by dividing the number of trains in the systems times the number of hours the system was required, into the number of hours that a system train was unavailable due to any component, during the observed time period.

**1997 Target** is  $\leq 0.025$



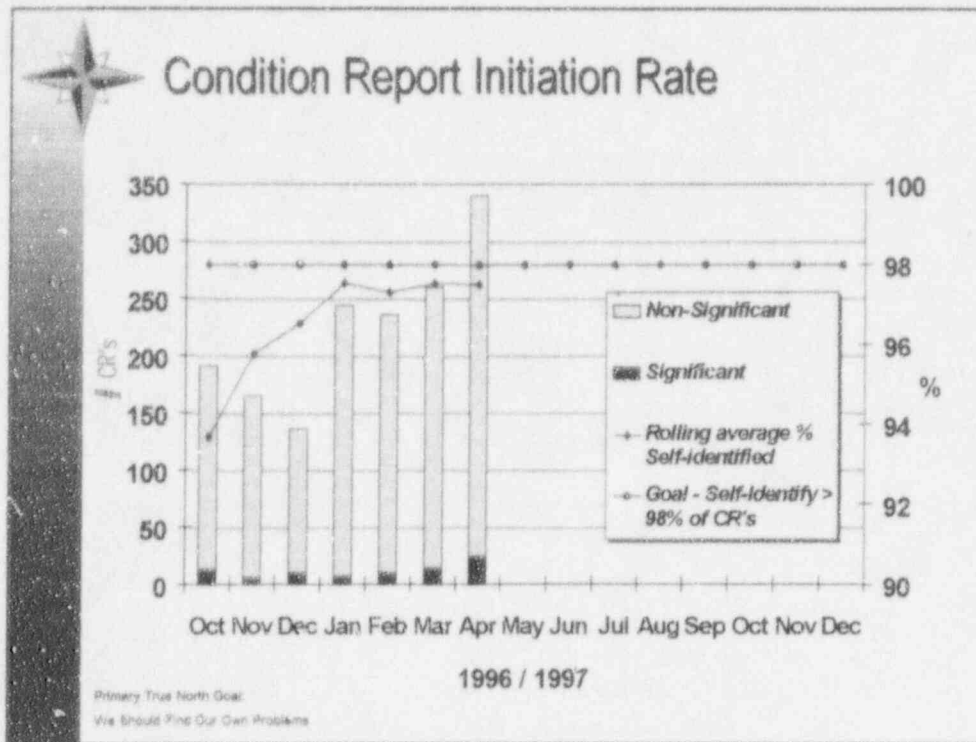
**Emergency Feedwater (EFW) Unavailability** - Monitors availability of EFW trains to mitigate off-normal events, thereby encouraging a high state of readiness. Indicator is calculated by dividing the number of trains in the system times the number of hours the system was required, into the number of hours that a system train was unavailable due to any component, during the observed time period.

**1997 Target is  $\leq 0.02$**



**High Pressure Safety Injection (HPSI) Unavailability** - Monitors availability of HPSI trains to mitigate off-normal events, thereby encouraging a high state of readiness. Indicator is calculated by dividing the number of trains in the system times the number of hours the system was required, into the number of hours that any component makes a system train was unavailable due to any component, during the observed time period.

**1997 Target** is  $\leq 0.02$

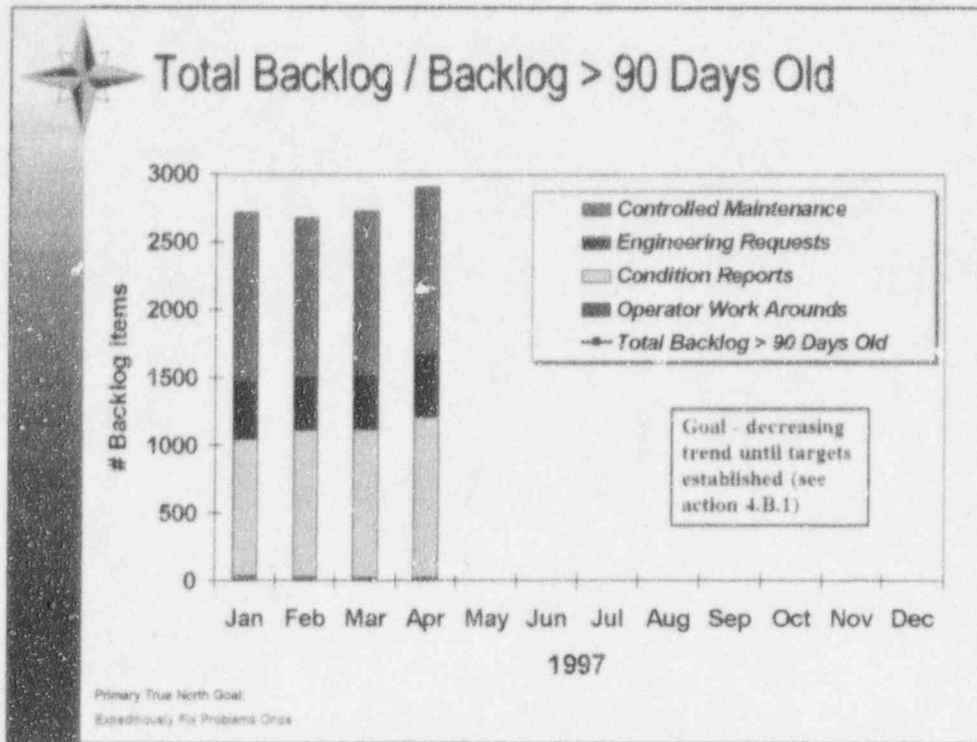


**Condition Report (CR) Initiation Rate** - Monitors number of CR's initiated each month. CR's are divided into *significant* and *non-significant*. Percentage of self-identified CR's is also tracked.

**Note:** CR's are coded as Self-Identified if someone from Entergy or under Entergy direction identified the concern that led to the CR initiation.

Coding of self identification is an evolving process and based on best judgment. Improvements in this Performance Indicator are expected as we gain experience.

**1997 Target** for self-identified CR's is > 98%



**Total Backlog/Backlog > 90 Days Old** - Monitors, on a monthly basis, the backlog of four (4) major programs implementing corrective actions. Number of total backlog items open for a period > 90 days is an indication of the timeliness of corrective action (started in April, 1997).

- Controlled Maintenance items include minor maintenance, equipment repair and system outage work orders. Refuel and forced outage items are not included.

- Engineering Requests (ER's) are written requests to Engineering Design & Plant Changes (from initiation until PORC approval), PEIR's, SPEER's, DN's, Commercial Grade Exceptions, and Vendor Exceptions are included in this backlog.

- Condition Reports (CR's) are considered adverse conditions.

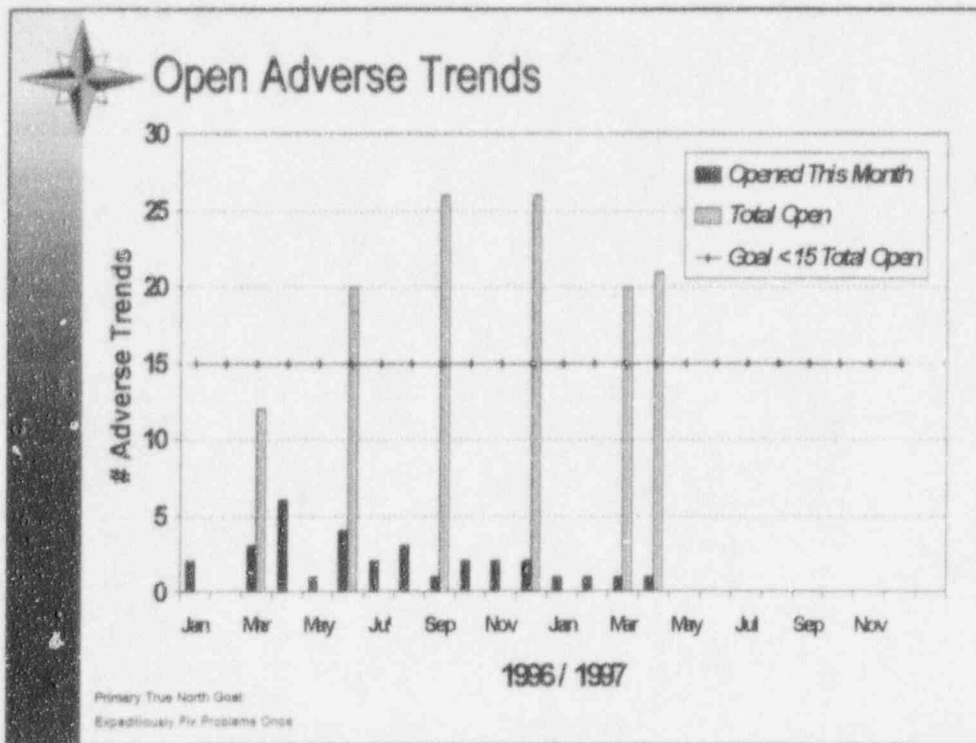
- Operator Work-Arounds are issues considered by Operations staff that present a significant burden or create added work. Only non-refuel items are included.

**Note:** Since this is a new indicator, historical data is not readily available for verification. The numbers of backlog items prior to April'97 are estimated only. The best available data was used, however, the numbers cannot be verified at this time.

Duplicate items in the backlog count may occur.

**1997 Target** is to have a declining trend until targets established (see action 4.B.1)

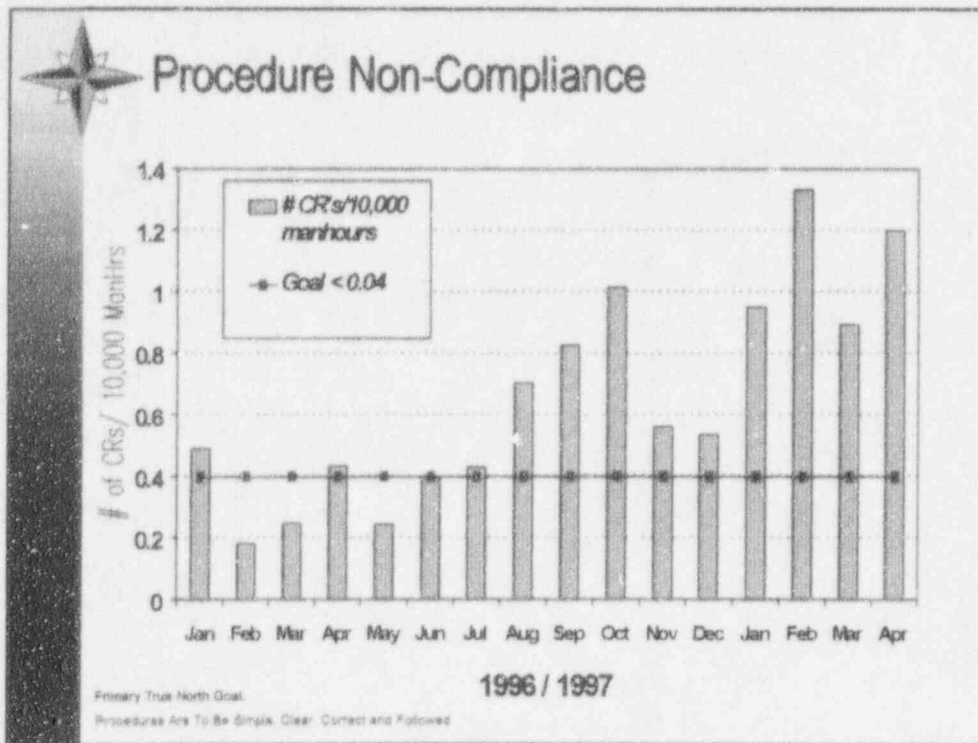




**Open Adverse Trends** - Monitors number of Condition Reports (CR's) initiated each month for identified adverse trends, as well as the total number of adverse trend CR's open.

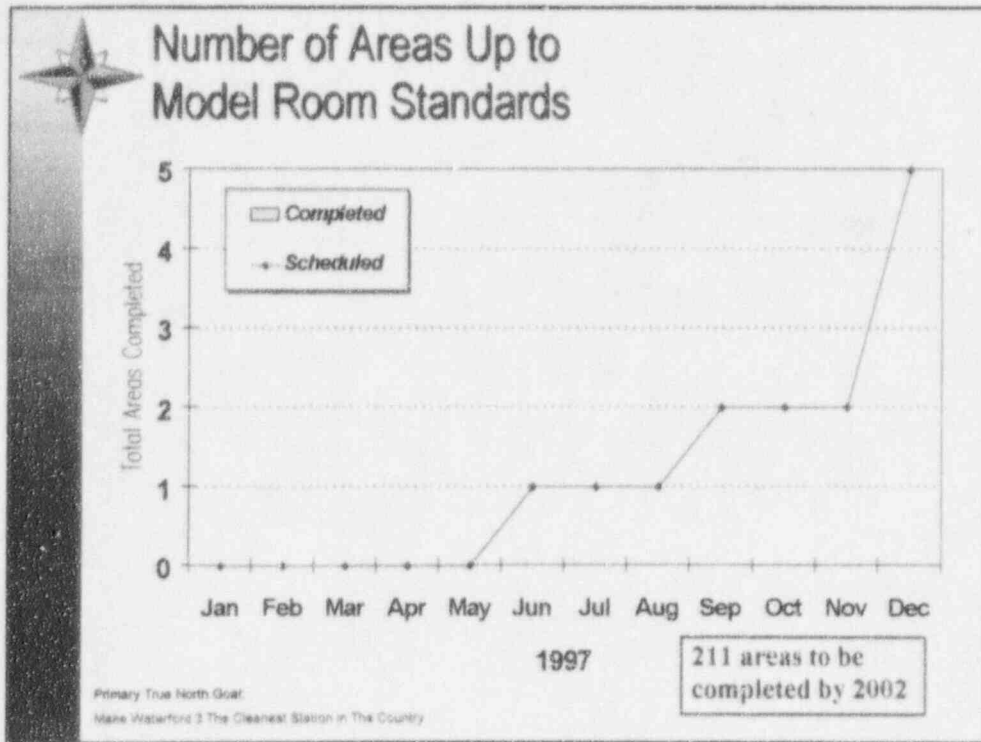
**Note:** Total open adverse trend CR's were tracked on a quarterly basis prior to March, 1997.

1997 **Target** for open Adverse Trends is < 15 open.



**Procedure Non-Compliance** - Monitors the rate of procedure non-compliance. This is the number of Condition Reports (CR's) per month attributed to procedure non-compliance, divided by the total number of site man-hours expended.

**1997 Target** is < 0.4

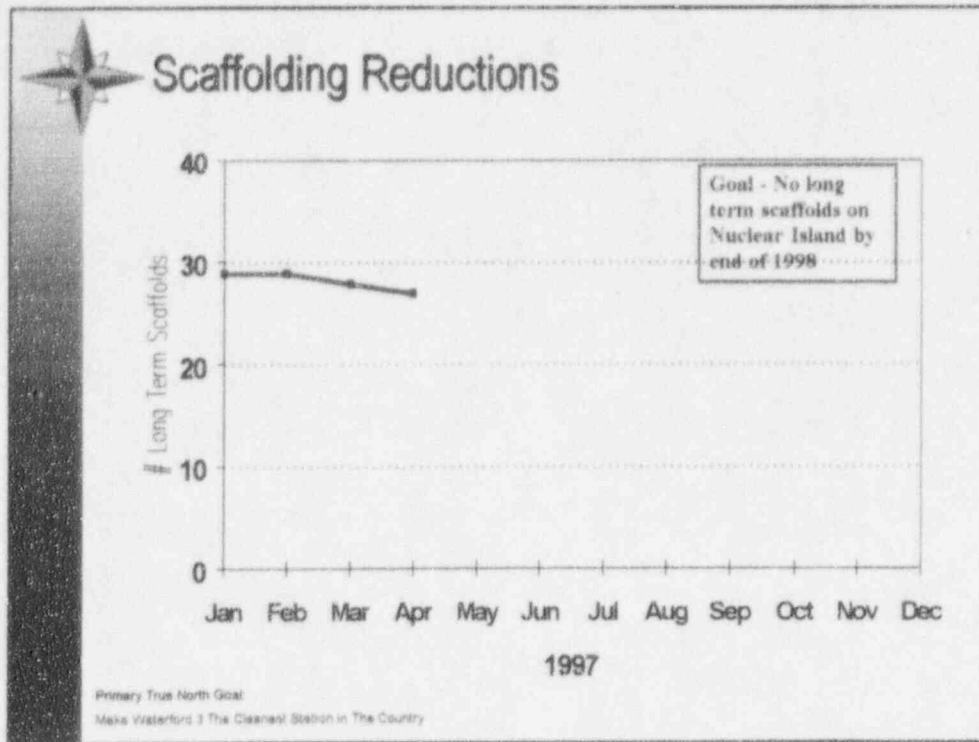


**Number of Areas Up to Model Room Standards** - Displays total number of areas brought up to Model Room standards.

**Note:** The Model Room was designed for use as an example of how a room should look after upgrade completion.

**1997 Target** is 5 areas

**1998 Target** (cumulative) is 48 areas



**Scaffolding Reductions** - Displays progress of long-term scaffolding (on the Nuclear Island) reductions.

**1998 Target** (long term scaffolds) is 0

APPENDIX A

TIMELINE

# Timeline for Strategy Completion

