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MIDDLE SOUTH UTILITIES SYSTEM

J. G. DEWEASE
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

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Mr. R.D. Martin
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive - Suite 1000
Arlington, TX 76011

SUBJECT: Waterford 3 Improvement Initiatives

References: 1) Letter, R.D. Martin to J.G. Dewease, dated November 6, 1987
2) Letter, T.E. Gagliardo to J.G. Dewease, 87-15 dated September 18, 1987
3) W3P87-2205, K.W. Cook to USNRC, "NRC Inspection Report 87-15," dated October 19, 1987
4) Letter, L.J. Callan to J.G. Dewease, 87-15 dated November 18, 1987

Dear Mr. Martin:

During the informational meeting documented by Reference 1, several issues were discussed regarding Waterford 3, including airborne activity within the Reactor Auxiliary Building, radiation monitors out-of-service and communications. Following critical examination of these issues, LP&L Management decided to initiate several actions as well as to accelerate implementation of actions previously planned to provide both near-term and long-term improvements in the areas discussed. In addition, I felt that it was desirable to document some of the information that was presented in an informal manner at the subject meeting.

Two technical items were discussed during the informational meeting on November 3, 1987. The first technical area discussed was the level of airborne activity in the Reactor Auxiliary Building (RAB). This has been of concern to LP&L management also, not because the level of activity is sufficient to result in significant personnel exposure, but because it has been a recurring problem. LP&L has applied considerable resources to resolution of the airborne activity problem which reduced the activity to a very low level for some period of time. In light of the recent recurrence of the airborne activity, LP&L has renewed its efforts to locate the sources and effect repairs. Recent investigations into the source of the activity have isolated three areas which will require hardware modifications or repairs during refueling outages to eliminate the source. It is believed that these

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areas contribute the majority of the ongoing release. However, these investigations also revealed that several recent instances in which increased airborne activity was observed were the result of personnel errors such as failing to close valves completely.

It should be noted that the reason for the occurrence of the high number of frisker alarms at Waterford 3 is because of the high sensitivity automatic friskers that have been installed and not because of excessive radioactivity releases. Such friskers are not installed at most plants. These sensitive friskers alarm at 20 counts per minute above background, where the typical hand-held frisker alarms at 100 counts per minute above background. Noble gases even plate-out on electrostatically charged polyester in clothing causing the friskers to alarm.

LP&L intends to maintain a high visibility and priority of the effort to reduce both liquid and gaseous releases and intends to institute a Leak Reduction Task Force to concentrate effort in this area.

The second technical area discussed was the amount of time that certain liquid and gaseous effluent and process radiation monitors had been out-of-service. At the time of the meeting, LP&L had received Inspection Report 87-15 (Reference 2) which outlined the Staff's concern in this area and had responded (Reference 3). However, the proximity of the meeting date to the submittal date likely prevented completion of the Staff review by the time of the meeting. Reference 4 provided a closure on the questions raised in Reference 2 based upon the actions outlined in LP&L's response. Summarizing the response, LP&L has contracted a team of radiation monitoring systems experts to work with LP&L personnel in investigating problems and implementing corrective actions to improve system reliability. This effort includes analysis of failure history and trends on radiation monitors, providing solutions for recurring problems, and development of a tracking system for the radiation monitor system database and a basis for the numbers contained in the database. Additional contract technicians have also been hired to allow LP&L to send technicians to vendor training on the General Atomic radiation monitoring systems.

LP&L intends to maintain a full-time system engineer for the radiation monitoring system as long as needed to alleviate the problems encountered. LP&L also plans to replace the five NMC radiation monitors, which are the least reliable monitors, with General Atomic monitors to establish a uniform system which should make maintenance easier.

It was clear from our discussions that the communications process between Waterford 3 staff and management, the Resident Inspectors and Regional Management was in need of attention. LP&L management instituted a series of immediate actions to assure that the information interchange between plant staff and the Resident Inspectors would be enhanced. These immediate actions included instructing the supervisor for the Event Analysis & Reporting unit to provide a briefing for the Resident Inspectors following any significant events at Waterford 3 and to provide a briefing on each Potential Reportable

Event (PRE) and Licensee Event Report (LER) periodically during the review and documentation process. The Plant Manager has instructed key plant personnel to provide the Residents with regular briefings on activities within their departments as well as discussing potentially significant events or conditions. The Plant Manager has also renewed efforts to discuss issues involving plant operation more frequently with the Resident Inspectors as well as to increase the frequency of communications with Regional Management. In the short time these immediate actions have been in effect, I am confident that the communication process has improved considerably. The Senior Resident Inspector has expressed his view that improvements have been evident to him also. We will continue to monitor this situation to assure the Residents receive the information they require in a timely manner.

To provide a more formal direction to the communication improvement process, I intend to issue an Executive Directive reiterating my management philosophy of maintaining an open and accurate communication process when dealing with external agencies.

As part of our longer term improvement process, LP&L has evaluated the current organizational structure and key management personnel assignments with a view toward enhancing plant operations and support functions as well as providing professional growth opportunities. This evaluation process resulted in several organizational changes which, despite their minimal impact in terms of organizational structure, are expected to strengthen our NRC interface, our event analysis capability and increase emphasis on implementation of advanced management systems.

The Nuclear Safety & Regulatory Affairs (NS&RA) Department has been separated from Nuclear Services and will report directly to the Senior Vice President-Nuclear Operations. Restructuring to elevate NS&RA to the group level will provide increased emphasis on the NRC interface and safety review functions. The direct reporting relationship will allow for additional licensing input into major technical and policy decisions being made at the senior manager level.

The Event Analysis and Reporting organization formed earlier this year has been quite successful. Experience to date has indicated a need to add staff to this organization due to the workload. In doing so, it was decided to also centralize trending activities and plant staff compliance efforts into this organization as well as to elevate the reporting level. The new organization, entitled Event Analysis Reporting & Response, will report to the Plant Manager. The newly structured organization is expected to bring the related areas of event analysis, reporting, trending, and NRC Resident Inspector interfacing into sharper focus and improve the communication process. In addition, the strengthening of this organization is expected to form a

basic building block in the personnel error reduction program being implemented by LP&L.

There has also been a repositioning of the Nuclear Operations Construction Manager who will now report to the Nuclear Operations Engineering Manager rather than the Vice President-Nuclear.

The remaining area of organizational restructuring involves separation of management systems planning, development and implementation from the Nuclear Operations Support & Assessment (NOSA) department and separation of computer applications from within the Nuclear Operations Engineering organization. This change will allow for increased emphasis on computer applications and management systems areas, as well as the support and assessment area, by placing each under a single manager who reports to the Vice President-Nuclear.

The second area of organizational changes involves reassignment of selected key personnel. LP&L has been evaluating the attributes of a rotational program among management and senior management for some time. It is expected that providing new assignments for key personnel will strengthen each area and provide for professional growth for the individuals involved. The rotational management program, now being implemented is part of the overall multi-phase organizational/people evolutionary plan which is an integral ingredient in continuing to achieve operational excellence at Waterford 3. The initial phase, Phase I, was implemented in October, 1986, with the organizational restructuring to increase operational efficiency by completing the transition from construction to full plant operation. A key factor in Phase I was the creation of the position Vice President-Nuclear, who is domiciled at Waterford 3 and reports to the Senior Vice President-Nuclear Operations. In July, 1987, Phase II was implemented to eliminate the contractor personnel that were performing specific essential activities and to become more self-sufficient. This resulted in the identification of 282 engineering, technical/professional, clerical and administrative permanent LP&L positions. With the progression of the operational mode at Waterford 3, it is felt that now is the time to implement the rotational management program.

As a result of the sudden death of Mr. K.W. Cook, Nuclear Safety & Regulatory Affairs Manager, Mr. R.F. Burski, Nuclear Operations Engineering Manager will step into the role of acting Nuclear Safety & Regulatory Affairs Manager, bringing with him a unique combination of previous licensing experience, operational and design engineering experience and strong management skills. The placement of an individual of this caliber and experience in this position is indicative of both management flexibility and the importance placed on the NRC interface.

Mr. M.J. Meisner, Licensing Programs Manager, has been designated acting Licensing & Regulatory Affairs Manager. This previously vacant position

will provide additional licensing support for Mr. Burski allowing him to be more available for some of his other activities such as SRC Chairman. Mr. Meisner has extensive licensing and NRC interface experience.

Mr. J.R. McGaha, Assistant Plant Manager-Operations & Maintenance, will assume the duties of Nuclear Operations Engineering Manager. His extensive plant knowledge and dynamic leadership will assure that the programs and projects within the engineering organization will be completed in a timely manner and that plant needs are adequately reflected in the design efforts.

Mr. D.F. Packer, Nuclear Operations Training Manager, will succeed Mr. McGaha as Assistant Plant Manager-Operations & Maintenance. Mr. Packer has had extensive operational experience, including having held an SRO license previously and has managed LP&L's highly successful training program for the past four years.

Mr. C.J. Toth, Operations and Maintenance Training Superintendent, will be acting Nuclear Operations Training Manager. Mr. Toth is an excellent selection to be acting in this position considering his extensive training experience and his cognizance of the Waterford 3 training program.

Mr. S.A. Alleman, formerly Assistant Plant Manager-Technical Services, has been named the Nuclear Quality Assurance Manager. Mr. Alleman has held an SRO license on Waterford 3, was Chairman of the Plant Operations Review Committee (PORC) which is responsible for reviewing all matters related to nuclear safety and advising the Plant Manager, and has managed many of the technical areas within the plant scope. Mr. Alleman's insights should provide a strengthening of the Nuclear Quality Assurance Department.

Mr. P.V. Prasankumar, Plant Engineering Superintendent, has been named to replace Mr. Alleman as Assistant Plant Manager-Technical Services. Mr. Prasankumar's wide variety of experience on Waterford 3 places him in a position of having been directly involved in many of the technical areas managed by this position as well as having demonstrated strong management skills in previous assignments.

Mr. P.N. Backes, acting Nuclear Quality Assurance Manager, will become Assistant to the Plant Manager-Special Projects. Mr. Backes has demonstrated management skills in many areas within the Nuclear Operations Department scope and should provide an enhancement of the Plant Management oversight of plant activities.

Mr. J.J. Zabritski, Operations Quality Assurance Technical Supervisor, will become the Operations Quality Assurance Manager.

Mr. A.S. Lockhart, Nuclear Operations Support & Assessments Manager, has been selected to head up the newly structured Management Information Systems

function due to his long-term involvement with the development and implementation of major systems such as the Station Information Management System (SIMS) and the Material Management Information System (MMIS).

Mr. L.W. Myers, Operations Superintendent, has been named to replace Mr. Lockart as Nuclear Operations Support & Assessments Manager. Mr. Myers' long-term operational experience and capability for solving operational problems places him in a unique position to manage the support and assessment functions.

Mr. R.S. Starkey, Assistant Operations Superintendent, will step up to Operations Superintendent to replace Mr. Myers. Mr. Starkey has considerable startup and operational experience on Waterford 3. Mr. Starkey has been undergoing extensive training for some time in anticipation of his placement in operational management and is prepared for assuming the Superintendent position.

Mr. T.H. Smith, Maintenance Superintendent, will assume the position of Plant Engineering Superintendent. Mr. D. Vinci, Electrical Assistant Superintendent, will assume the responsibilities of Maintenance Superintendent.

Mr. T.F. Gerrets, Nuclear Quality Assurance Manager, will succeed Mr. F.J. Drummond as Nuclear Services Manager. Mr. F.J. Drummond will assume the position of Manager-At-Large in charge of Prudence Assessment.

The technical programs, organization changes and personnel rotations described above reflect LP&L's desire to make Waterford 3 the best managed and best running plant possible. If you have any questions or desire further information regarding the material presented herein, please contact me.

Sincerely,

J.G. Dewease
Senior Vice President-
Nuclear Operations

JGD/RWP/plm

cc: E.L. Blake, W.M. Stevenson, J.A. Calvo, J.H. Wilson, D.L. Wigginton,
NRC Resident Inspector's Office (W3), Document Control Desk