

DCS

01 JUN 1988

Docket Nos. 50-277
50-278

Philadelphia Electric Company
ATTN: Mr. Corbin A. McNeill
Executive Vice President-Nuclear
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: Request For Additional Information On Plan For Restart of Peach
Bottom Atomic Power Station, Revision I

On April 8, 1988 we received revision 1 to your "Plan for Restart of Peach
Bottom Atomic Power Station (PBAPS), Section I, Corporate Action and Section II,
PBAPS Action along with a schedule for completion of the corrective action
activities listed in the plan. On May 19, 1988 members of our staff met with
your staff in Rockville, Maryland to discuss our questions on the plan.

Attached are requests for additional information based on our review of the
subject Plan. Attachment I are questions on the Plan Section I and Attach-
ment II are questions on Section II.

In order for us to proceed with our review, please provide a schedule for your
response to these questions so that we can effectively plan our review and our
next meeting.

Sincerely,

Original Signed By
WILLIAM T. RUSSELL
William T. Russell
Regional Administrator

Enclosures: As stated

OFFICIAL RECORD COPY

ADD INFO REQ - PB RESTART PLAN -

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cc w/encl:

- J. W. Gallagher, Vice President, Nuclear Services
- E. C. Kistner, Chairman, Nuclear Review Board
- Dickinson M. Smith, Vice President, Peach Bottom Atomic Power Station
- Jack Urban, General Manager, Fuels Department, Delmarva Power & Light Co.
- John F. Franz, Plant Manager, Peach Bottom Atomic Power Station
- Troy B. Conner, Jr., Esquire
- W. H. Hirst, Director, Joint Generation Projects Department,
Atlantic Electric
- Bryan W. Gorman, Manager, External Affairs
- Eugene J. Bradley, Esquire, Assistant General Counsel (Without Report)
- Raymond L. Hovis, Esquire
- Thomas Magette, Power Plant Siting, Nuclear Evaluations
- W. M. Alden, Director, Licensing Section
- Doris Poulsen, Secretary of Harford County Council
- Public Document Room (PDR)
- Local Public Document Room (LPDR)
- Nuclear Safety Information Center (NSIC)
- NRC Resident Inspector
- Commonwealth of Pennsylvania

bcc w/encl:

- Region I Docket Room (with concurrences)
- Management Assistant, DRMA (w/o encl)
- Section Chief, DRP
- Robert J. Bores, DRSS
- Brent Clayton, EDO

See as follows w/walt Butler

RI:DRP Linville/rhl 5/25/88	RI:DRP Wenzinger Gallo 5/27/88	RI:DRS 5/27/88	RI:DRSS Bellamy 5/ /88	NRR Regan 5/ /88	RI:DRP Boger 5/27/88	RI:DRP Kane 5/26/88
RI:DRMA Allan 5/27/88	RI:RA Russell 5/31/88					

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ATTACHMENT 1

Section I

<u>No.</u>	<u>Page</u>	<u>Question</u>
I-1	(ES) 6	Explain why the commitment to have senior management, plant management, et. al. meet with the NRB has been deleted in Revision 1.
I-2	5	Describe the accountability of other employees and workers addressed in the last topic under item (1) which talks about "... employees assigned to site work locations on a permanent bases are accountable ..."
I-3	5	Item 2 discusses self assessment and problem resolution however, the action items concentrate on problem resolution and third party problem identifications. Explain what line management will do themselves to identify problems and self assess their own organization (aside from measuring progress against performance goals).
I-4	6	NRB review of organizational and personnel performance issues has been deleted from the plan. Explain who will address these issues.
I-5	9	Identify the changes to figure 1.
I-6	11	Identify the changes to figure 2.
I-7	12	Describe key accountabilities and responsibilities for the Senior Vice President - Nuclear as all of the other Executive Vice President direct reports are given in this section.
I-8	17	Describe the process used by the Manager, Organization and Management Development Division to monitor progress toward meeting objectives for culture changes and how it differs from other assessments of work management processes.
I-9	24	Correct the inconsistency between figure 4 which shows LGS-2 construction management reporting to a Manager under the Vice President Nuclear Engineering and figure 1 which shows LGS-2 construction management report to the Senior Vice President Nuclear.

ATTACHMENT 1 (continued)

Section I

<u>No.</u>	<u>Page</u>	<u>Question</u>
I-10	27	Explain whether nuclear maintenance in Nuclear Services is really limited to nuclear activities.
I-11	29	Identify the changes to figure 5.
I-12	27	Explain how the long standing weaknesses in this area are expected to improve with the limited experience and talent in the Health Physics Group.
I-13	31	Explain why the Manager, Nuclear Training should not be held accountable for the effectiveness of the training conducted.
I-14	36	Explain why the ideas of direct observation and involvement in on going activities as a way of monitoring performance should not be added.
I-15	40	QA audits appear to be expanded in scope to include comprehensive technical and performance based factors. Section II, Executive Summary, page 12, states that staffing of the new site Quality organization has resulted in the recruitment and selection of a significant number of new experienced personnel. These statements indicate there has been an increase in QA/QC personnel on site. Provide more information to describe the increase in personnel and scope of audits.
I-16	43-45 (Sec 3.5 and 3.6)	Describe whether the Commitment Tracking program is included in the Information Management and Reporting Systems Program and how these two program activities differ. The function of commitment management/tracking is also included in the functional organization description for the site Support Manager, the site Superintendent-Technical and the corporate Nuclear Services division. Provide a description of the Commitment Tracking program including the inputs to the program, how the progress of a commitment's various elements will be followed, including how the three groups named above will coordinate their efforts, and how completion of all of a commitment's elements will be verified and documented.

ATTACHMENT 1 (continued)

Section I

<u>No.</u>	<u>Page</u>	<u>Question</u>
I-17	53	Discuss how the wide range of independent assessment methods including the monitoring of the independent assessment functions will work without undermining accountabilities in the line organization and without undermining the confidence that upper management places in line management.
I-18	54	Compare NRB technical expertise with technical specification requirements.
I-19	55	Describe the NCB members qualifications to be able to perform the duties described in the charter and the time they will have to devote to this activity. Explain the extent of the NCB responsibilities relative to review of the inspection reports.
I-20	57	Explain what is intended by private NCB meetings with the Administrator NRC Region I.
I-21	63	Activity Number CA4-1.1.3. Explain why it is acceptable to limit staffing assignment completion to the senior engineer level.
I-22	64	Activity Number CA4-1.3.2. Explain why each position description should not state what the incumbent will be accountable for, and why the position descriptions are limited to senior engineer level. In addition, explain how incumbents indicate their acceptance of their responsibilities and accountabilities.
I-23	65	Activity Number CA4-1.4.1. Describe to whom employees not assigned permanently to site work will be accountable. It is not clear how this activity accomplished the goal stated at the top of the page (for all those assigned to both sites permanently).
I-24	65	Explain how the assurance of quality philosophy will be implemented.
I-25	65	Describe the caliber of individual who will be selected to fill the QA positions in terms of experience, technical ability and QA professional experience.

ATTACHMENT 1 (continued)

Section I

<u>No.</u>	<u>Page</u>	<u>Question</u>
I-26	68	Activity Number CA4-2.7.5. Explain why performance evaluation training for supervisors should not be conducted before restart.
I-27	68	Activity Number CA4-2.8.1. Explain why written guidelines with respect to meetings, timely communications, problem identification and analysis and followup corrective action activities are limited to Nuclear Service and Nuclear Engineering personnel.
I-28	69	Activity Number CA4-2.9.1 Explain how this item addresses the corrective action of "Establish interactive communications and problem solving between line management and independent assessment organizations"
I-29	69	Activity Number CA4-2.9.2. Justify deleting the shift inspectors job description and reporting.
I-30	70	Activity Number CA4-3.2.3. Explain why revision 1 changed the NRB chairman from a full time back to a part time position. Describe the changes to the NRB charter.
I-31	71	Activity Numbers CA4-3.4.1-3. Explain why these items regarding independent assessment of review and feedback processes used by independent assessment groups were deleted. In addition, describe what aspects of the restart plan will be assessed in the scheduled Self Assessment. Who will perform the Self-Assessment? Will written audit procedures or plans be used in this Self Assessment? How will these procedures or plans be prepared, reviewed and approved? How will these documents be used in the assessment. What other inputs will be used in reaching conclusions or recommendations in the Self Assessment?

ATTACHMENT 2

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-1	18	Explain how PECO will "capture" the knowledge and experience that was lost by the personnel changes at Peach Bottom.
II-2	20	The chain of command has been shortened in going from the operators to the Vice President. Explain how the command chain has been shortened for other workers such as HP, ISEG, QA, QC, and Maintenance.
II-3	23	Project Manager, third item - Define "minor modification" and explain what coordination/review/approval will be required from the engineering group.
II-4	29	Discuss how planned job rotation of shift operators will impact a knowledge or awareness of plant and industry history.
II-5	32	Describe the goal regarding nominal and maximum overtime to be worked by the SROs and ROs.
II-6	38	Describe the PECO schedule for staffing licensed positions listed.
II-7	47	Explain whether this definition means to a) emphasize or b) limit assurance of quality to the workers doing a task.
II-8	53-54	Explain why the activities in the omitted paragraphs, such as meetings in small groups with development of recommendations and feedback were deleted.
II-9	59	Describe the "underlying attitudes" that promoted unacceptable behavior in the control room. Explain why the MAC problem root cause assessment should not be included as an appendix or by reference for completeness of response to the Order as it was in the earlier CTE plan.
II-10	61	Provide a schedule for the followup Peach Bottom simulator shift team training.

ATTACHMENT 2 (continued)

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-11	63	We understand that approximately 20% of the comments provided to "Tell it to the Manager" have not been responded to. Provide your evaluation of the impact of this on the program effectiveness.
II-12	67	Describe the infractions that were the cause of the personnel terminations made by the Plant Manager. Explain why the action was taken at the Plant Manager level.
II-13	68	Describe the implementation of the performance evaluation system for 1987.
II-14	69	The criteria listed for procedure revision requirement all use the word "would", "would result in misoperation", "...would compromise ... safety" rather than "could." Explain the use of "would" instead of "could."
II-15	70	Explain why the criterion of understandability was not used for procedures upgraded prior to restart.
II-16	71	Second paragraph. Describe what procedures are the "specified procedures".
II-17	72	Explain how improvements to support procedural compliance address the subject of ease and mechanisms of making both temporary and permanent changes to procedures. Describe the temporary procedure change process. Explain when it can be used. Describe how it is intended to be used.
II-18	74	Explain why the four work management processes being assessed for improvement should not be completed prior to restart.
II-19	75	Define what is meant by "key plant systems" and explain why the preventive maintenance system should not be completed prior to restart.
II-20	79	Provide a clearer description of "The Nuclear QA management team(s)", the team(s) composition, and the team(s) responsibilities.

ATTACHMENT 2 (continued)

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-21	87	Activity Number CA1-1.1.1. Explain why selection of qualified candidates is limited to superintendent level and up.
II-22	88	Activity Number CA1-2.2.1. Explain how the reorganization of control room work activities will provide for increased backshift activity to further assure operator alertness.
II-23	89	Activity Number CA2-1.1.1. Explain how PECO management will determine that each operating crew is ready for plant restart. Describe whether the process will include certification on the Peach Bottom simulator and whether the certification will verify completion of training on revised procedures, the operations administration manual and the watchstanders manual. Describe the training on these procedures and manuals.
II-24	89	Activity Number CA2-1.2.1. Describe the schedule for implementing higher entry standards and appropriate compensation schedules for recruitment and hiring of future licensed operator candidates.
II-25	89	Activity Number CA2-1.2.2. Provide plans for additional operator training to provide ongoing reserve of licensed operators. Explain how and when the Peach Bottom simulator will be used to certify licensed operator candidates.
II-26	89	Activity Number CA2-1.3.1. Explain whether the blocking and support group rotates with the shift crew and when this group will be staffed.
II-27	89	Activity Number CA2-1.3.2. Explain who comprises the work control group, and describe their responsibilities and qualifications. Describe the extent to which they establish work priorities and when the group will be staffed.
II-28	90	Activity Numbers CA2-2.2.1 and 2. Describe the scheduled goal for implementing selected degree and certificate programs.

ATTACHMENT 2 (continued)

Section 2

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-29	92	<p>Activity Number CA3-2.1.3. In addition to training for managers/supervisors developed as a result of a "training needs assessment survey", explain how a formalized training program for managers/supervisors will address:</p> <ol style="list-style-type: none">(1) How to coach and support subordinate levels of supervision,(2) How to evaluate training program effectiveness of subordinate staff, and(3) How to reinforce training given to subordinate staff. <p>Describe the schedule for developing and implementing a manager/supervisor training program following the training needs assessment survey.</p> <p>Explain the similarities and differences between the Manager Training Program, PFE and MFE, and the reasons for them. Explain how the Manager/Supervisor Training Program will relate the Technical Staff/Manager Training area of the Accreditation Program. Provide the Manager/Supervisor Training Program syllabus.</p> <p>Describe processes in place to ensure that the nuclear training organization receives regular input from plant management about training needs and the effectiveness of training programs.</p> <p>Describe the training (similar to PFE, MFE, PE and TEAM) that will be developed for new hires and for transfers from other parts of PECO.</p>
II-30	92	<p>Activity Number CA-3-2.2.2. In addition to a PFE for first and second line supervisory personnel, describe what similar training will be given to non-operations personnel below supervisory level and why it should not be complete prior to restart.</p>

ATTACHMENT 2 (continued)

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-31	92	Activity Number CA3-2.2.3. Explain why manager supervisors should not be trained on conducting face-to-face performance appraisal interviews prior to restart. In addition to training for managers/supervisors on conducting face-to-face performance appraisal interviews, describe the training they will receive on writing performance standards and on writing effective performance evaluations.
II-32	92	Activity Number CA3-2.2.4. Explain why the training on disciplinary policies and work rules should not be completed prior to restart.
II-33	92	Activity Number CA 3-3.2.1. Explain how the licensed operator training program addresses a supervisory/leadership curriculum. Provide the training syllabus.
II-34	94	Activity Number CA3-3.4.1. Describe the followup PFE and MFE training. Provide a schedule for and syllabus of this followup training.
II-35	95	Activity Number CA3-3.7.2 Describe the followup processes in place to respond to suggestions/recommendations/concerns made by the employee involvement program (P.B TEAM).
II-36	95	Activity Number CA3-3.7.3. In addition to meetings of the Plant Manager with Superintendents, Assistant Superintendents, Senior Engineers and Lead Vendor personnel to discuss work priorities, work progress and problem areas, describe any regularly scheduled meetings station management has with shift managers.
II-37	95	Activity Number CA3-3.7.4. Describe the organizational survey, and feedback process. Describe whether this survey focused on PECO or on Peach Bottom. Explain how the survey met the intent of the MAC recommendation.

The PBAPS Action Plan states that 15% of PBAPS managers, first line supervisors and employees participated.

- (1) Were the number of people surveyed from each group 15% of the total number of employees in that group? If not, explain how the 15% was distributed across groups.

ATTACHMENT 2 (continued)

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
		(2) In addition to managers and 1st line supervisors receiving the survey data and making recommendations, will employees who participated in the survey have the survey results reported to them and will they have the ability to make recommendations (i.e., beyond discussing the manager's and first line supervisor's recommendation).
		(3) Provide the results of the organizational survey and managements' response to the survey items.
II-38	95	<p>Activity Number CA3-4.1.2. Describe the processes used to communicate the disciplinary and grievance policies to site employees, and to respond to questions/classifications.</p> <p>Describe what tracking procedure has been developed to ensure that each step in the grievance process has been accomplished.</p> <p>Describe the generic schedule to ensure timely resolution of grievances.</p>
II-39	96	<p>Activity Number CA3-4.3.1. Describe the schedule established for developing performance standards for each employee and for coaching employees on their role in the performance evaluation process. Explain why more frequent performance evaluations should not be conducted until employee performance has stabilized (e.g. every six months) as one way of monitoring/evaluating the continuation of positive attitudes/culture changes among the managers/supervisors/staff.</p>
II-40	95	<p>Activity Number CA3-4.4.1. Describe the formal procedure change initiation process and the process for developing new procedures, and the schedule for turn-around time from operator feedback through accomplishment.</p>
II-41	97	<p>Activity Number CA3-4.4.4. Explain why all training on revised procedures should not be complete prior to restart. Describe the tracking system for ensuring that new and revised procedures are incorporated into training programs.</p>

ATTACHMENT 2 (continued)

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-42	97	Activity Number CA3-4.4.7. Explain why all procedures should not be reviewed prior to restart.
II-43	98	Activity Number CA3-4.5.1. Identify the areas in which site quality organizations and the site line organization have improved working relationships.
II-44	98	Activity Number CA3-4.5.2. Explain why continuous QA/QC monitoring of operating activities should not be continued during restart of both units. Indicate how the appropriate level of QA coverage for ongoing operations at PBAPS will be determined. Provide a schedule for operations training of nuclear QA personnel.
II-45	98	Activity Number CA3-4.5.3. Clarify how developing a technically based audit program within Nuclear Operations QA has contributed to self-assessment efforts within site operations. Specify what important areas for improvement have been identified and any resulting improvements. Describe the standards set in the 1988 Nuclear QA Goals which assure the maximization of performance based audits and surveillances. Describe improvements which have been made in the processes and formats by which Nuclear QA reports independent assessment feedback to site and corporate management.
II-46	98	Activity Number CA3-4.5.4. Explain when improved QA reporting practices will be in place.
II-47	99	Activity Number CA3-4.6.7. Describe the schedule for development and implementation of interface agreements between site training and corporate training departments.
II-48	99	Describe the processes established for: identifying problems, developing corrective actions, tracking corrective action commitments, and evaluation of effectiveness of actions.

ATTACHMENT 2 (continued)

Section II

<u>No.</u>	<u>Page</u>	<u>Question</u>
II-49	99	Describe the schedule for assessing work management processes and implementation of recommended changes in these processes.
II-50	99	Activity Number CA3-4.6.8. Explain when the Nuclear Performance Management Program will be in place.
II-51	103	Explain why shutdown issue number 9 involving a management focus on compliance rather than acknowledgement and correction of the root causes of problems is not correlated with root cause number one involving a lack of adequate personal leadership skills on the part of senior management at the plant.