

Enclosure

The Detroit Edison Company
Fermi 2
Nuclear Operations Improvement Plan

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April 30, 1986

NUCLEAR OPERATIONS IMPROVEMENT PLAN

INTRODUCTION

The Nuclear Operations Improvement Plan (NOIP) includes a comprehensive set of specific actions and related performance indicators directed at bringing about significant improvement in overall performance throughout the Fermi 2 Nuclear Operations organization. The specific actions were developed by the Fermi 2 senior managers, with significant input from most of the Fermi 2 Management Team members. This plan has been approved for implementation by the Vice President - Nuclear Operations.

The NOIP establishes due dates and assigns specific responsibility to one or more Nuclear Operations groups. Where more than one group is involved, the group with lead responsibility is identified. Each affected manager and supervisor is responsible for identifying and applying the necessary resources within his or her organization, for maintaining appropriate interfaces with other affected organizations, and for ensuring that the required actions are completed in an effective and timely manner. The NOIP specifically addresses accountability for accomplishing the identified actions by requiring that the actions be included in individual Annual Work Plans.

The NOIP contains ten performance indicators to monitor and measure the effectiveness of the Plan. These performance indicators and the specific actions of the Plan will be reviewed at least monthly by Fermi 2 management to ensure that the necessary improvements are being obtained and to identify areas where further action is necessary.

The NOIP is a plan for improvement of the Nuclear Operations organization. Its success depends on the individual efforts and contributions of every Nuclear Operations employe involved.

04/30/86

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| Action | Deliverables | Resp (1) | Due Date |
|---|--|------------------|-------------|
| 1. Review Nuclear Operations Management Plan documents (Nuclear Operations Directives, Nuclear Operations Programs, Operational Quality Assurance Policies, Quality Assurance Program Requirements) and revise as necessary to eliminate redundancy and clarify programmatic direction. | Plan reviewed & criteria developed | NO | 6/86 |
| | Documents reviewed & prioritized for revision and begin high priority revisions. | NO | 8/86 |
| | Appropriate documents revised | NO | 1988 |
| 2. Improve administrative controls and work processes to provide more effective support to the operating authority. Examples include: clarification of requirements, responsibilities and accountabilities; elimination of redundancy; simplification of processes, where possible; and, reduction of time to process paper and complete tasks. a. Revise identified processes or controls | PM program revised | *NP | 7/86 |
| | DER process revised | NE | 7/86 |
| | LER preparation process revised | RA | 9/86 |
| | PN-21 process revised | | 11/86 |
| | Procedure preparation controls and guidelines revised | | 9/86 |
| | EOP Process revised | *NE NP NOS | 1st Qtr '87 |
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| Action | Deliverables | Resp (1) | Due Date |
|--|---|-------------------------|-----------------|
| (Item 2 cont'd) | | | |
| b. Review other processes and controls to identify needed revisions, determine priority and revise. | Review completed & priorities established | *NP NE NOS | 12/86 |
| | Process controls revised | NO | 4th Qtr '87 |
| 3. Upgrade existing procedures, as part of normal review cycle, based on revised procedure preparation guidelines (See Item 2a above) which will address human factors considerations, need for procedure, level of detail, flexibility, and elimination of redundancy and unnecessary detail. | Revisions completed | *NOS NP NE NQA | 1988 |
| 4. Initiate coordinated involvement of affected Nuclear Operations organizations to develop and maintain integrated plans and schedules. | Integrated Plans/Schedules maintained | *NP NE NOS | 7/86 & On-going |
| 5. Assign organizational and individual responsibility, authority and accountability for controlling and accomplishing elements of the integrated plans and schedules. | Initial Task Managers/Leads assigned | *NP NOS NE | 5/86 |
| | New assignments as necessary | *NP NOS NE | On-going |

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| Action | Deliverables | Resp (1) | Due Date | |
|---|---|-------------------------------|-------------|-------|
| 6. Upgrade engineering capability to support operation of Fermi 2. a) Perform third party review of Nuclear Engineering procedures in support of 10CFR50.54(f) response. | Review Group established and plan for review complete. | NE | 6/86 | |
| | Review complete | NE | 11/86 | |
| | Recommendations evaluated & implemented as appropriate | NE | 2nd Qtr '87 | |
| | b) Evaluate adequacy of permanent engineering expertise and upgrade as appropriate. | Evaluation completed | NE | 9/86 |
| | | Required recruiting initiated | NOS | 12/86 |
| 7. Establish and communicate guidelines for improved, systematic problem solving. | Guidelines communicated | *NE NP | 7/86 | |
| 8. Evaluate and upgrade existing methods for identifying and incorporating "lessons learned" into day-to-day activities. | Evaluation completed | NO | 1st Qtr '87 | |
| | Upgrade completed | NO | 3rd Qtr '87 | |

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|---|--|-----------|----------|
| 9. Improve knowledge of industry experiences through increased participation in, and utilization of, INPO peer evaluations. | Policy for increased utilization established | NO | 12/86 |
| 10. Communicate the Nuclear Operations Improvement Plan to affected organizations and individuals. | Methodology developed | *NI NO | 5/86 |
| | Plan communicated | NO | 5/86 |
| 11. Include NOIP action items in Annual Work Plans of Nuclear Operations Management Team members as part of individual performance appraisal process. | Work Plans revised | NO | 7/86 |
| | Monitor performance and provide feedback at least quarterly. | NO | On-going |
| 12. Complete Reactor Operations Improvement Program | a) Evaluate and identify program elements to determine items which should be incorporated into existing administrative controls. | NP | 9/86 |
| | | | |

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|--|-----------------------------|-----------|-------------------|
| 13. Improve Technical Specification interpretations & applications: | | | |
| a) Complete current upgrading of Interpretation Log | Upgrading completed | NP | 7/86 & Ongoing |
| b) Identify specific Tech Spec changes necessary to reduce ambiguity and request appropriate amendments. | Needed changes documented | NP | 8/86 & Ongoing |
| | Initiate amendment requests | RA | 9/86 & Ongoing |
| 14. Develop & implement a scram reduction program utilizing techniques found successful by INPO and other industry groups. | Program implemented | NP | 12/86 |
| 15. Complete Nuclear Security Improvement Plan | Plan completed | NOS | 12/86 |
| 16. Implement Radiological Control Improvement Plan | Plan implemented | *NP NO | 6/86 |

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|--|---|-------------|-------------|
| 17. Improve QA awareness by identifying key elements of program and developing a training approach which emphasizes those aspects of program that apply to various levels and types of workers/supervisors/managers. | Training approach determined | *NQA NOS | 9/86 |
| | Training material developed | *NQA NOS | 12/86 |
| | Training implemented | NOS | 1st Qtr '87 |
| 18. Improve methods to increase & maintain awareness of industry, regulatory and public concerns | Methodologies identified | *RA NO | 6/86 |
| | Implementation plans developed & approved | *RA NI | 8/86 |
| 19. Recruit and select qualified individuals for the Nuclear Operations permanent work force to reduce contractor dependency in positions of organizational leadership. | Positions identified & prioritized | NO | 8/86 |
| | Recruiting initiated | NOS | 8/86 |
| 20. Meet Corporate commitments regarding INPO accreditation of training programs. | SER's submitted | NOS | 6/86 |

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|---|--|----------|-------------|
| 21. Improve management information systems by consolidating existing systems to eliminate redundancy and delete outmoded systems or unnecessary data. | Systems needing improvement identified (user organization) | NOS | 12/86 |
| | Implementation plan developed and approved | NOS | 2nd Qtr '87 |
| 22. Maintain industrial safety record by continued emphasis on personal safety and the analysis of near injury events. | Formal safety program implemented | NO | On-going |

Notes:

Resp (1) is the responsible organization as follows:

- NO = Nuclear Operations
- NP = Nuclear Production
- NE = Nuclear Engineering
- RA = Regulatory Affairs
- NI = Nuclear Information
- NOS = Nuclear Operations Services
- NQA = Nuclear Quality Assurance

Nuclear Quality Assurance will be involved in essentially all actions of the Nuclear Operations Improvement Plan (NOIP) as a normal part of their function.

* Indicates Lead Organization

Nuclear Operations Improvement Plan

Performance Measures

Fermi 2 Management will review the following ten performance measures at least monthly to assess progress and to identify further actions which may be required to improve operating performance. The NRC has indicated that they will monitor and evaluate our progress in implementing the plan on a monthly basis.

1. **Collective Radiation Exposure:** total amount of whole body radiation exposure received by all personnel at Fermi 2.
2. **Unplanned Radiological Releases:** number of liquid or gaseous releases to the environment which were either unplanned or unmonitored.
3. **Unplanned Safety System Actuations:** the number of unplanned ECCS actuations and emergency AC power system actuations.
4. **Chemistry out of Specification:** number of hours that reactor coolant, feedwater and condensate chemistry was out of specification.
5. **Volume of Low Level Solid Radioactive Waste:** number of cubic feet of low level solid radioactive waste shipped for disposal.
6. **Startup Test Phase Schedule:** measure of actual startup test performance milestones compared to scheduled startup test milestones.
7. **Total Noncompliances:** number and severity level of NRC notices of violation.
8. **Reportable Occurrences (LER's):** number of written Licensee Event Reports submitted.
9. **Time Sensitive LCO's:** number of unplanned time sensitive Limiting Conditions of Operations.
10. **QA Findings Delinquent:** number of delinquent NQA audit and surveillance findings.

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