

ComEd

**Nuclear
Generation
Group**

Corrective Action Program



**NRC Presentation
June 15, 2000**

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Corrective Action Program (CAP)

June 15, 2000

Corrective Action Program

- Importance of CAP
 - Reliance on CAP
 - Line management ownership of corrective actions
 - Support move toward risk informed decision making
- Rollout in Progress
- Executive/Senior Management Commitment

Overview

- Case For Change (What, Why, How)
- Change Strategy
- CAP Process and Key Process Changes
- CAP Rollout
- CAP Procedure and Handbooks
- Changes to Root Cause/ACE Methodology
- Software Changes
- Integration of CAP As a Line Function
- Conclusion

What Are We Changing

- **Corrective Action Program (CAP)**
 - More emphasis on our corrective action program
 - Find and correct our own problems
 - Identify improvements

Why Are We Changing

- Multi-Site CAP Assessment Results
 - Management Expectation for:
 - ◆ Root cause report quality
 - ◆ Effectiveness reviews
 - ◆ Use of root cause checklist
 - ◆ Use of ACE checklist

Why Are We Changing (cont'd)

- Improve CAP Efficiency
 - More line involvement and ownership
 - Better reporting of low level human performance non-consequential events
 - Supervisor's ability to closeout minor conditions
 - Improved CAP trend coding and trend analysis

How Are We Changing

- Line Management Involvement (CRG/MRC)
- Distribution of Administrative Function Throughout the Organization
 - Department CAP Coordinators
- Program Improvements
 - Senior management involvement prioritized to the more significant issues
 - Supervisor closing out low level issues
 - Minor issues dispositioned without unnecessary Shift involvement

Change Strategy

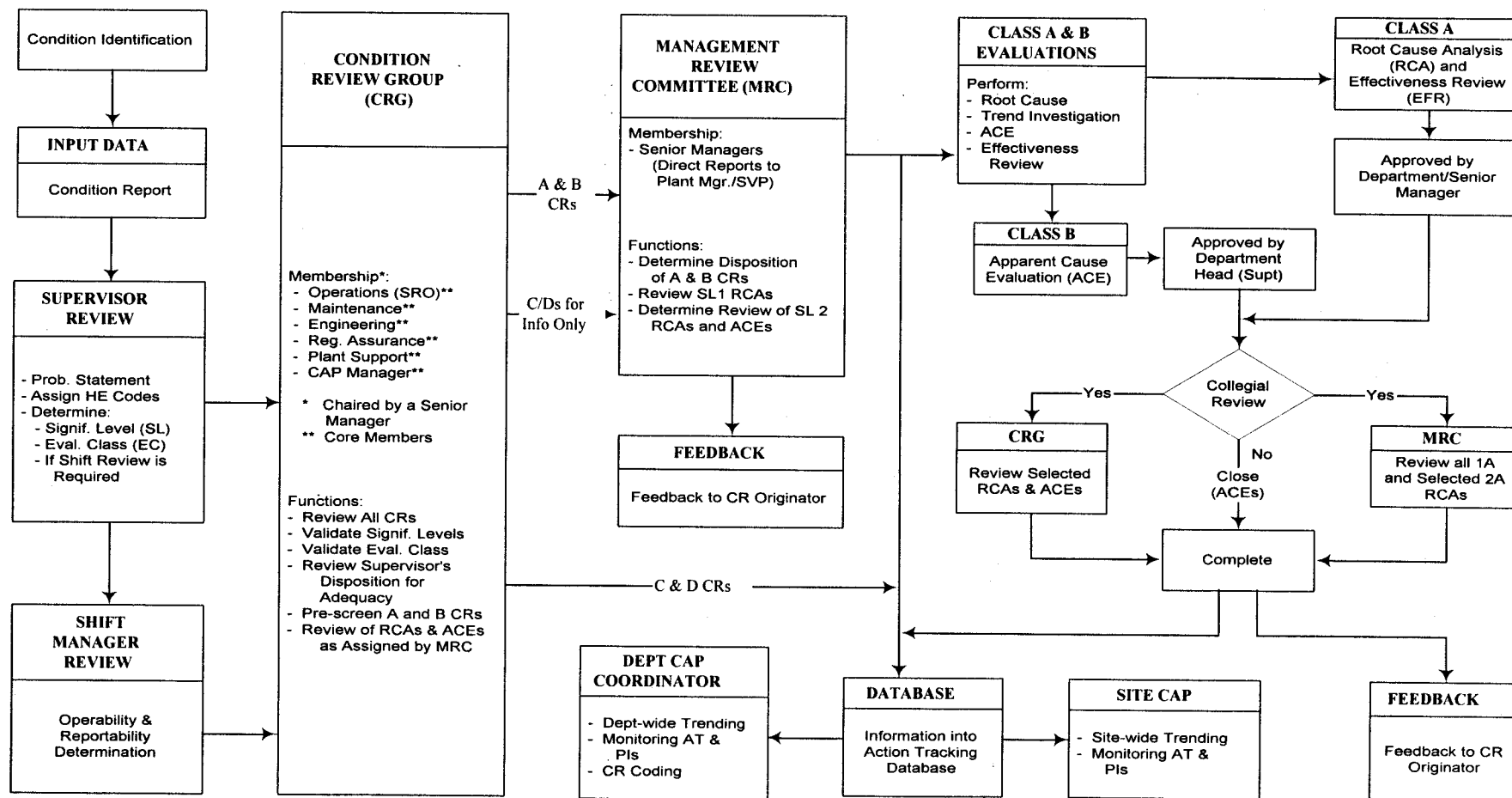
- INPO & Industry Participation
- Benchmarked Other Utilities
- Multi-Discipline, Multi-Site CAP Improvement Team
 - All sites presented
 - Bargaining unit involved
 - Implementation of High Impact Team (HIT)
- Survey from and Interviews with Employees
- Review with Site Executive Staffs

Change Strategy (cont'd)

- Rollout At Sites
 - Designed “Event” based on Fermi model
 - Involve department CAP coordinators to facilitate the Event
 - Involve other site representatives
 - Orient all site employees
 - Monitor implementation of enhanced CAP

CAP Process

Proposed Enhanced CAP Process Flowchart



Key Process Changes

- New Name (PIF to CR)
- Supervisor Review - Expanded Scope
 - Conduct a preliminary evaluation to determine the Condition Statement
 - Determine the Significance Level & Evaluation Class
 - Assign a precursor and barrier code for human performance related conditions
 - Decide if shift review is required
 - Evaluate extent of condition
 - Identify actions required for closure

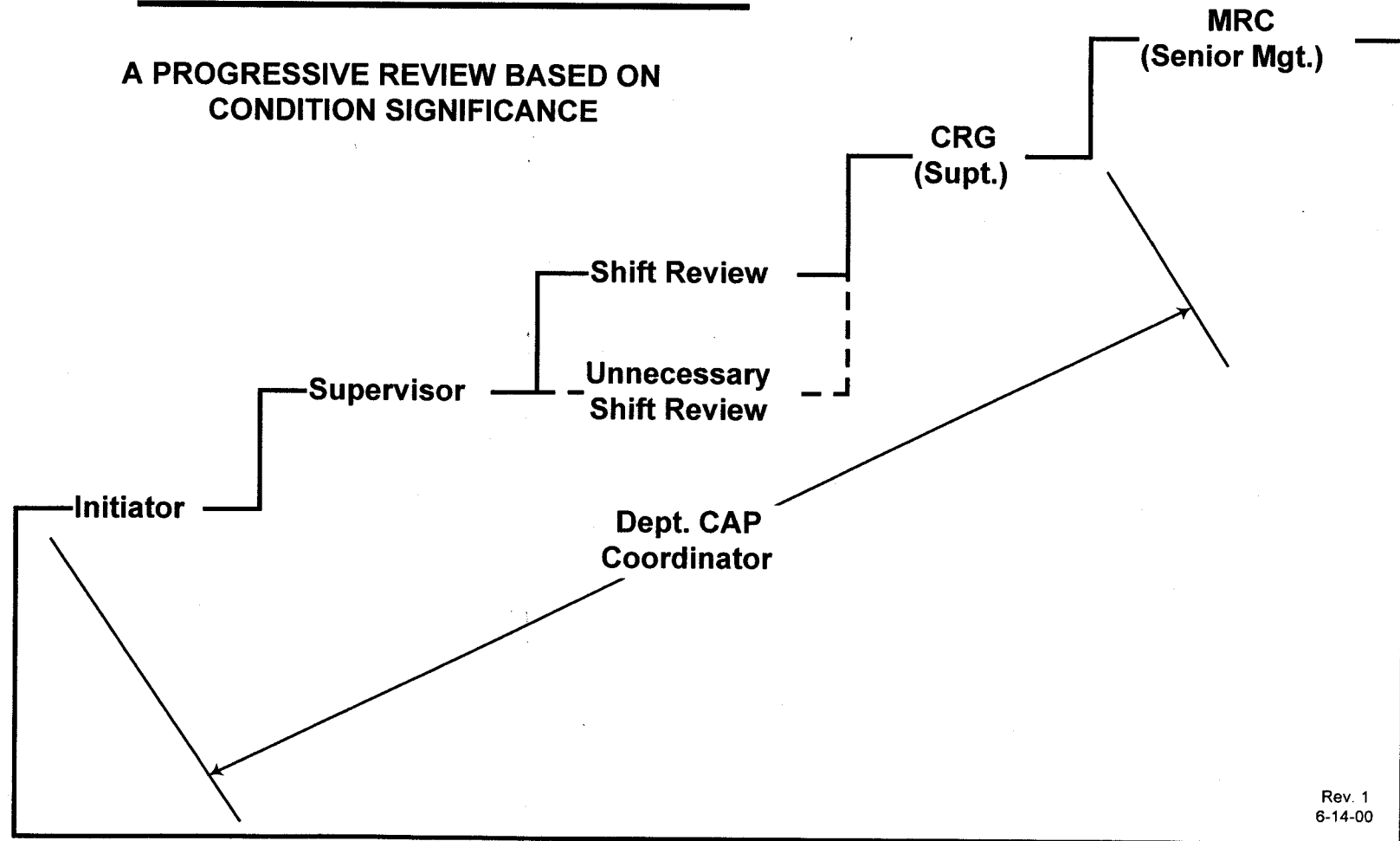
Key Process Changes (cont'd)

- Condition Review Group (CRG)
 - Department Head/Superintendent level
- Management Review Committee (MRC)
 - Department/Senior Manager level
- Department CAP Coordinator
- Significance Level
- Evaluation Class

Key Process Changes (cont'd)

STEPS TO SUCCESS

A PROGRESSIVE REVIEW BASED ON
CONDITION SIGNIFICANCE



CAP Rollout

- Rollout Schedule (June 5 to August 11)
- One Week Rollout at each Site
- Use Department CAP Coordinator to Facilitate
- Train the Trainer “Department CAP Coordinator” Prior to Rollout (1 day class)
- Department CAP Coordinator Will Train People Who Miss Rollout Event

CAP Procedure and Handbooks

- AD-AA-106, The CAP Procedure
- CAP Handbooks:
 - Root Cause Investigation & Report
 - Common Cause Analysis
 - Effectiveness Reviews
 - Coding & Trending
 - PassPort AT Record Retention
 - Apparent Cause Evaluation
 - CAP Process Instructions
 - CAP Process Expectations

Changes to Root Cause/ACE Methodology

- Interim Changes
 - Corporate collegial review of selected root cause reports
 - Performed root cause analysis on root cause quality
 - Conducted root cause workshop for Nuclear Oversight Managers
 - Develop short term action plan to address identified root cause deficiencies
 - Conduct workshop for root cause analysts from all sites

Changes to Root Cause/ACE Methodology (cont'd)

- Root Cause Evaluations
 - Revised criteria for initiating root cause evaluation
 - Established criteria for root cause analysis quality
 - Timeliness criteria revised based on significance
 - Review/Approval based on significance
 - Improved causal factor chart
 - ♦ Based on TapRoot technology
 - ♦ Consistent evaluation results using chart

Changes to Root Cause/ACE Methodology (cont'd)

- Apparent Cause Evaluations (ACE)
 - Revised criteria for initiating an ACE
 - ACE quality criteria defined
 - Timeliness criteria revised based on significance
 - ◆ Shorter time to conduct an ACE for relatively more significant issues
 - Review/Approval based on significance
 - ◆ CRG review of ACEs for relatively more significant issues

Changes to Computer Software

Current Phase

- What Changed:
 - CAPSYS (Data Entry Software)
 - CAP Admin (Reporting Software)
- Why:
 - Consistent with new process
 - Ensure consistency among sites
 - Common trend codes
 - Streamline reporting and data

Changes to Computer Software (cont'd)

Next Phase

- What Will Change:
 - Implement action tracking (AT) to replace CAPSYS
 - Consolidate data from all sites
- Why:
 - Increase speed (Access-based CAPSYS too slow)
 - Enhance search/trend capabilities
 - Streamline reporting

Integration of CAP as a Line Function

- Site CAP - Move to Regulatory Assurance
- Establish Department CAP Coordinators
- Department CAP Coordinators Responsible for:
 - Change agent
 - Department coding & trending
 - Pre-screening
 - Action tracking creation and administration
 - Root cause expert
 - Human performance 'one-on-one' observations

Conclusion

- New Name (PIF to CR)
- Focus on Low Level Reporting
- Maximize Line Engagement
- CAP Function Distributed Across Organization
- Improved Problem Solving/Condition Resolution
- Enhanced Department Trending
- Progressive Review Based on Significance
- Improved Software

CAP Improvement Project Roll-Out Event Milestones

Milestone	Resource	Braidwood	Byron	Dresden	Quad Cities	LaSalle
Vice President's Workshop	Station & N.O. Personnel	5-18				
Site Senior Managers Presentation	Site & DG N.O. Personnel	5-19	5-17	TBD	TBD	5-23
Dept. CAP Coordinator Orientation (Technical & Facilitation Skills)	Site CAP Manager & Consultant	5-16	5-17	5-18	5-19	Will Attend Session at Dresden
Dept. CAP Coordinator "OJT" (During the Roll-Out Week)	Site CAP Personnel	Wk of 6-5	Wk of 6-19	Wk of 7-10	Wk of 7-24	Wk of 8-7
Site CAP Personnel Orientation	Site CAP Manager	5-16 Plus On-Going	5-17 Plus On-Going	5-18 Plus On-Going	5-19 Plus On-Going	5-18 Plus On-Going
Roll-Out Event Dry Run	Site N.O. Personnel	Wk of 5-29	Wk of 6-12	Wk of 7-3	Wk of 7-17	Wk of 7-31
Refresher Root Cause (E&CF Charting) Workshop	DG CAP Personnel	6-6 & 6-7	6-20 & 6-21	7-11 & 7-12	7-25 & 7-26	8-8 & 8-9
Roll-Out Event	Dept. CAP Coordinators; Site, Other Sites & DG CAP Personnel; & Consultant	Wk of 6-5	Wk of 6-19	Wk of 7-10	Wk of 7-24	Wk of 8-7
All Hands - First Two Hours						
Supervisors - Third Hour						
CRG / MRC Members - Fourth Hour						
Site CAP Turn-on	Site CAP & IS	6-12	6-26	7-17	7-31	8-14