

Master CR List

Davis-Besse
Corrective Actions Program
Improvement Plan

Description	4884 CAF	Description	4884 CAF	Description	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
						a. Review, benchmark and revise the NOP and Corrective Action Program Guideline against industry standards.	63				
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Description	4884 CAF	Description	4884 CAF	Description	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
					44	<p>at the MHP also has the following relevant actions:</p>	63	<p>a) Review benchmark and revise the NRI and Corrective Action Program Guideline against industry standards</p>	108	<p>Rebaseline Standards and Expectations in the Plant/Station Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance operational/decision-making hazards analysis, safety focus)</p>	109

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Description	4884 CAF	Description	4884 CAF	Description	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
					86	<p>2- Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities</p>	101	<p>Provide root cause evaluation teams with a formal charter of expectations.</p>	102	<p>Effectiveness Review Area: Review Standards and Expectations in the Plant (Station) Department with emphasis on lessons learned from this root cause evaluation (ie: procedure compliance, operational/decision-making hazards analysis - safety focus) Refer to CA 02-00891 46-48 62-75 76-83 104</p>	104
				Not a Cap Issue							

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Description	4884 CAF	Description	4884 CAF	Description	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
					55	a. Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions with focus on verifying that causes have been fixed, and provide training on the revised guidance.	63	a. Review, benchmark and revise the NOP and Corrective Action Program Guideline against industry standards.	87	1. Provide independence of effectiveness reviews. 2. Consider applying effectiveness reviews to basic cause evaluations.	
					44	a. The MHP/P also has the following relevant actions:					

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					44	<p>a. The MBRIP also has the following relevant actions:</p> <p>2. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.</p>	CA	55	<p>a. Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions with focus on verifying that causes have been fixed and provide training on the revised guidance</p>
					44	<p>a. The MBRIP also has the following relevant actions:</p> <p>2. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.</p>	CA	55	<p>a. Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions that causes have been fixed and provide training on the revised guidance</p>

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				46	<p>Class Study will be given which will consist of a review of the timeline of the event with site personnel to ensure all personnel understand how the event happened, what barriers broke down, missed opportunities, lessons learned, and what needs to be different in the future. Testing will be required.</p>					

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	
Conduct Case Study training to reinforce standards and expectations for procedure compliance and the need for work-practice rigor and the potential consequence of a failure to do so.	108	Rebaseline Standards and Expectations in the Plant/Station Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, operational/decision-making, hazards analysis, safety focus)	109	Rebaseline Standards and Expectations in the Quality Assessment Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, adequacy of audits/surveillances, oversight of DB Departments activities, safety focus)	110	Rebaseline Standards and Expectations in the Work Management Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, hazards analysis, safety focus)	111	Rebaseline Standards and Expectations in the Support Services Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, commitment/identification in TERMS, hazards analysis, safety focus)
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1. Provide root cause evaluation teams with a formal charter of expectations.	52	a. Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e. revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.	53	Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	54	Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations and recommend changes as appropriate to provide assurance of the quality of these evaluations.	80	Evaluate and revise, as necessary, the CAP NOP/ Guideline to perform generic implication reviews for all basic cause evaluations.	81

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Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data							

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
<p>Review the CR02-00891 management root cause and determine if the Program Compliance Plan adequately addresses the issues identified in the report and revise station programs to meet industry high standards of performance to support safe and reliable operation. Document the findings and implement actions identified.</p>	44	<p>a. The MHRIP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.</p>	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
<p>a. The MHRIP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.</p>	53	<p>b. Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.</p>	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA

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Review the CR 02-00891 management root cause and determine if the Program Compliance Plan adequately addresses the issues identified in the report and revise station programs to meet industry high standards of performance to support safe and reliable operation. Document the findings and implement actions identified	44	a. The MHPIP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors firstline supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities							

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Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.									

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48	48	53	55	60	66	66
<p>4. Case Study training will be given, which will consist of a review of the timeline of the event with site personnel to ensure all personnel understand how the event happened, what barriers broke down, missed opportunities, lessons learned, and what needs to be different in the future. Testing will be required.</p>	<p>a. Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so.</p>	<p>53 Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.</p>	<p>55 Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.</p>	<p>60 (a) Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions with focus on verifying that causes have been fixed and provide training on the revised guidance.</p>	<p>66 a. Provide training to applicable personnel (BACC Inspectors and ISI/IST VT-2 Inspectors) and managers on the need to remove boric acid from components, to inspect for signs of corrosion, and to perform inspections for signs of boric acid in component internals. This training shall consider periodic refresher training and revision to the JFG for new BACC Inspectors and ISI/IST VT-2 Inspectors.</p>	<p>66 a. Provide training to applicable personnel (BACC Inspectors and ISI/IST VT-2 Inspectors) and managers on the need to remove boric acid from components, to inspect for signs of corrosion, and to perform inspections for signs of boric acid in component internals. This training shall consider periodic refresher training and revision to the JFG for new BACC Inspectors and ISI/IST VT-2 Inspectors.</p>

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<p>Review and revise, as necessary, the criteria for CR categorization of repeat equipment failures to ensure they are appropriately categorized and utilized by station personnel. These criteria should be sufficient to elevate repeat Condition Adverse to Quality (CAQ) failure CRs to a Significant Condition Adverse to Quality (SCAQ) categorization, which requires utilizing of a higher evaluation method. Repeat conditions are to be treated as SCAQs</p>	51	<p>Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.</p>	78	<p>Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.</p>	CA	CA	CA
<p>Review and revise, as necessary, the criteria for CR categorization of repeat equipment failures to ensure they are appropriately categorized and utilized by station personnel. These criteria should be sufficient to elevate repeat Condition Adverse to Quality (CAQ) failure CRs to a Significant Condition Adverse to Quality (SCAQ) categorization, which requires utilizing of a higher evaluation method. Repeat conditions are to be treated as SCAQs</p>	51	<p>Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.</p>	78	<p>Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.</p>	CA	CA	CA

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a. Review and revise, as necessary, the criteria for CR categorization of repeat equipment failures to ensure they are appropriately categorized and utilized by station personnel. These criteria should be sufficient to elevate repeat Condition Adverse to Quality (CAQ) failure CRs to a Significant Condition Adverse to Quality (SCAQ) categorization, which requires utilizing of a higher evaluation method. Repeat conditions are to be treated as SCAQs	77	Review the Corrective Action Program for 1) CARB effectiveness; 2) CR categorization/evaluation level determination; and 3) equipment failure analysis	78	Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.	51	Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.	CA
Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.	50	Review and revise, as necessary, the criteria for CR categorization of repeat equipment failures to ensure they are appropriately categorized and utilized by station personnel. These criteria should be sufficient to elevate repeat Condition Adverse to Quality (CAQ) failure CRs to a Significant Condition Adverse to Quality (SCAQ) categorization, which requires utilizing of a higher evaluation method. Repeat conditions are to be treated as SCAQs	51	Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.	78	Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.	CA

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<p>0891 Corrective Action #</p> <p>a. Establish a Boric Acid Nuclear Operating Procedure for FENOC PWRs. The BACC Program Manual (NG-EN-00324) lists the CRDM nozzles as one of the probable locations of leakage.</p>	<p>CA</p> <p>75</p>	<p>0891 Corrective Action #</p> <p>83</p>	<p>0891 Corrective Action #</p> <p>98</p>	<p>0891 Corrective Action #</p> <p>116</p>	<p>CA</p> <p>51</p>
<p>Establish a FENOC-level policy emphasizing the station industrial and nuclear safety philosophy. The policy should be incorporated into procedures, guidelines, job descriptions and performance evaluations, as appropriate. Policies and procedures should include both management and worker responsibility in providing a safe work environment, personal protective equipment, training (including SCWE attributes) and working safely. [Note: The recommendation of the Team does not advocate a particular form that the policy may take, and in fact, the old 'policy book' could be eliminated in favor of an approach that is better connected with the Business Plan.]</p>	<p>a. Establish the FENOC decision-making process at D-B including hazards analyses As it relates to the hazard analysis the following is to be addressed: 1. Review station processes and procedures to determine if entry into hazard analysis (including decision-making) is required. 2. Update processes and procedures determined to require performance of hazard analysis to reference the applicable policy/guidelines for implementation. The guideline should provide examples of issues that warrant entry into hazards analysis.</p>	<p>Establish the FENOC decision-making process at D-B including hazards analyses As it relates to the hazard analysis the following is to be addressed: 1. Review station processes and procedures to determine if entry into hazard analysis (including decision-making) is required. 2. Update processes and procedures determined to require performance of hazard analysis to reference the applicable policy/guidelines for implementation. The guideline should provide examples of issues that warrant entry into hazards analysis.</p>	<p>Review the Policies and Standards for analysis of safety issues (the FENOC Hierarchy of Documents for D-B to ensure consistent policies and standards for analyses of safety issues, similar to other FENOC plants), including external information and internal OE. Refer to CA 02-00891-59.</p>	<p>Conduct a historical Alloy 600 review. The review should include documents associated with the CRDM nozzles. Summarize the results in a FENOC-level program document. Potential items for consideration include: * The 1994 EPRI Workshop Report.</p>	<p>CA</p>

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Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.							
	40	The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.					
	48	Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so					
	49	The MHIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.					
	52	Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.					
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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA		
Review Standards and Expectations in the Support Services Department with emphasis on lessons learned from this root cause evaluation (ie. procedure compliance commitment identification in TERMS, hazards analysis, safety focus). Refer to CA 02-00891-35, -46, -48, -62, -75, 83, -104, -111.	36	Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.	43	43 Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance, operational/decision-making hazards analysis, safety focus). Refer to CA 02-00891-46, -48, -62, -75, -83, -112.	44	44 a. The MRP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first-line supervisor behaviors, and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities.	101	101 Provide root cause evaluation teams with a formal charter of expectations.	102

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<p>0891 Corrective Action #</p> <p>a. The MHPIP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors, and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>40</p> <p>Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>48</p> <p>The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>49</p> <p>Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>52</p> <p>The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.</p>	<p>CA</p>
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Define and implement training on evaluation, (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.						<p>a. The MTR also has life following relevant actions.</p> <p>2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors, and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities.</p>			<p>Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.</p>	40	CA
									<p>The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.</p>	48	CA
									<p>Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so.</p>	49	CA

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0891 Corrective Action #	Rebaseline Standards and Expectations in the Support Services Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, commitment/identification in TERMS, hazards analysis, safety focus).	CA	112	0891 Corrective Action #	Rebaseline Standards and Expectations in the Technical Services/Nuclear Engineering Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, operational/decision-making hazards analysis, safety focus). Also, clarify technical staff expectations to ensure that degraded conditions in systems are promptly identified, evaluated, corrected and prevented from recurring.	CA	36	0891 Corrective Action #	Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.	CA	40	0891 Corrective Action #	The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.	CA	46	0891 Corrective Action #	Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so	CA	49
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<p>0891 Corrective Action #</p> <p>Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.</p>	<p>CA</p>
<p>0891 Corrective Action #</p> <p>Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.</p>	<p>CA</p>
<p>0891 Corrective Action #</p> <p>Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation, and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.</p>	<p>CA</p>	<p>0891 Corrective Action #</p> <p>Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.</p>	<p>CA</p>
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Corrective Actions Program

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
The Corrective Action Review Board (CARB) which reviews select corrective action document evaluations will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB	55	Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions with focus on verifying that causes have been fixed, and provide training on the revised guidance.	56	Revise the CAP Guideline to require the use of the Safety Precedence Sequence (Step 6 of Root Cause Analyses Reference Guide/ Attachment 13 of D-B Condition Report Process Guideline) for root cause and basic cause analyses. This step shall require the Safety Precedence Sequence for each corrective action.	71	Review the Corrective Action Program Guideline to identify whether it contains appropriate provisions for ensuring the timely resolution of conditions, and revise the Program as appropriate.	CA

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
0891 Corrective Action #	55	0891 Corrective Action #	56	0891 Corrective Action #	71	0891 Corrective Action #	CA
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Provide specific training (such as root cause training effectiveness reviews) for CARB members	87	Provide independent effectiveness reviews 2) Consider applying effectiveness reviews to basic cause evaluations	96	Perform periodic SCWE Survey and Assessments (Effectiveness Reviews) based on criteria and attributes derived from NRC policy and guidance. Review survey results and take actions where necessary to reinforce the site safety			

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<p>Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data</p>	97	<p>Effectiveness Review Area Review the Equipment Trending Program with emphasis on identifying repeat issues for elevating CR categorization/evaluation level or initiation of CRs when adverse trends are identified. Refer to CA 02-00897-50, -57, -58.</p>	57	<p>a. Develop and implement a site wide equipment trending program. This program should define what is to be trended periodically (e.g. vendor, failure mode, failure mechanism, environmental, material issues). Additional clarification Programmatically define guidance to establish and define areas for trending. Examples could include: component failures by vendor, performance criteria, and component type. Guidance should define how to document trends and develop conclusions. The value of trends should also be programmatically assessed to ensure trends are providing the station with meaningful information for improvement. Note: CAFs should not be closed to open work orders to protect trending information (such as age of open CAF).</p>	58	<p>Revise the trending program to require performance of trending of issues that occur only during outages. (e.g. boric acid found on reactor head in 10RFO, 11RFO and 12RFO) to provide management with an understanding of on-going outage related issues.</p>	CA

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1 Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.	58	Revise the trending program to require performance of trending of issues that occur only during outages. (e.g. boric acid found on reactor head in 10RFO, 11RFO and 12RFO) to provide management with an understanding of on-going outage related issues.	CA	97	Review the Equipment Trending Program with emphasis on identifying repeat issues for elevating CR categorization/evaluation level or initiation of CRs when adverse trends are identified. Refer to CA 02-00891-50, -57, -58.	CA	0891 Corrective Action #
							CA

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0891 Corrective Action # Revise the CAP to not permit closing MODE restraint Corrective Actions to Work Orders, but close the MODE restraints Corrective Action when the work is complete.									

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The Corrective Action Review Board (CARB) which reviews select corrective action document evaluations will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.							
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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA
Review Standards and Expectations in the Support Services Department with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, commitment identification in TERMS, hazards analysis safety focus). Refer to CA 02-00891-35, -46, -48, -62, -75, -83, -104, -111.	43	Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance, operational/decision-making, hazards analysis, safety focus). Refer to CA 02-00891-46, -48, -62, -75, -83, -112.	102	Review Standards and Expectations in the Plant (Station) Department with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, operational/decision-making, hazards analysis, safety focus). Refer to CA 02-00891-46, -48, -62, -75, -76, -83, -104.	103	Revise the Morning Management Communications and Teamwork Meeting agenda to regularly discuss procedural compliance at the MCTM meetings.	104	Conduct Case Study training to reinforce standards and expectations for procedure compliance and the need for work practice regarding the potential consequence of a failure to do so.	108

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a. Provide training to personnel who perform ISI/ST and BACC inspections on the BACC Procedure and ASME Code (AW-5250, item b) requirements, with emphasis on the need to inspect areas that are or have been covered with boric acid and find them source of the leak and areas of corrosion. This training shall consider periodic refresher training and revision to the JFG for new BACC inspectors and ISI/ST-VT-2 inspectors.	67	a. Provide training to the BACC Coordinator, ISI/ST and BACC inspectors to ensure they are aware of his responsibilities. Consider development of a BACC Coordinator JFG. This training shall consider periodic refresher training and revision to the JFG for new BACC inspectors and ISI/ST-VT-2 inspectors.	69	b. Complete the Program Compliance Plan detailed review of the ISI/ST Program by outside consultants and implement changes as necessary.	55	a. Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions with focus on verifying that causes have been fixed, and provide training on the revised guidance	0891 Corrective Action #
a. Provide training to personnel who perform ISI/ST and BACC inspections on the BACC Procedure and ASME Code (AW-5250, item b) requirements, with emphasis on the need to inspect areas that are or have been covered with boric acid and find them source of the leak and areas of corrosion. This training shall consider periodic refresher training and revision to the JFG for new BACC inspectors and ISI/ST-VT-2 inspectors.	67	a. Provide training to the BACC Coordinator, ISI/ST and BACC inspectors to ensure they are aware of his responsibilities. Consider development of a BACC Coordinator JFG. This training shall consider periodic refresher training and revision to the JFG for new BACC inspectors and ISI/ST-VT-2 inspectors.	69	b. Complete the Program Compliance Plan detailed review of the ISI/ST Program by outside consultants and implement changes as necessary.	55	a. Improve the CAP Guideline guidance on reviews of the effectiveness of corrective actions with focus on verifying that causes have been fixed, and provide training on the revised guidance	0891 Corrective Action #

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	40	b. The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.	47	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.	48	a. Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50 Appendix B, Criterion XVI, "Corrective Action" and the potential consequences of failures to do so.	49	The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective actions, document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.	CA	44

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA		
	40	by the Station Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.	47	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.	48	a. Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10 CFR 50, Appendix B Criterion XVI "Corrective Action" and the potential consequences of failures to do so.	49	The NRC also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.	44

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Effectiveness Review Area: Review the Corrective Action Program for: 1) CARB effectiveness; 2) CR categorization/evaluation level determination; and 3) equipment failure analysis	78	Additional actions Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.	79	Evaluate an enhancement to the CAP NOP Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	97	Effectiveness Review Area Trending the Equipment Review Program with emphasis on identifying repeat issues for elevating CR categorization/evaluation level or initiation of CRs when adverse trends are identified. Refer to CA 02-00891-50-57-58.	44	The MHP also has the following relevant actions: Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first-line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for the actual involvement in station activities.

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Establish policy for internal OE information that will establish the connection between the information and the applicable process or program. The information should be considered for inclusion into existing station procedures and it should also be referenced for easy retrieval for future use. 2. Improvements to the industry OE program will be made to ensure the appropriate actions identified from other plants or sources of information are properly tracked and implemented.

Effectiveness Review Area
Review the Policies and Standards for analysis of safety issues (the FENOC Hierarchy of Documents for D and standards for analyses of safety issues similar to other FENOC plants) including external information and internal OE. Refer to CA 02-0089159.

a. The MHPIP also has the following relevant actions:
2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors, and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities.

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47	47	47	47	103	104	104
Effectiveness Review Area: Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance, operational/decision-making hazards analysis, safety focus) Refer to CA 02-00891-46 -48, -62, -75, -83, -112	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.	44	103	103	104	104
Effectiveness Review Area: Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance, operational/decision-making hazards analysis, safety focus) Refer to CA 02-00891-46 -48, -62, -75, -83, -112	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.	103	103	103	104	104

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	
a. Review benchmark and revise the NOP and Corrective Action Program Guideline against industry standards	71	a. Review the Corrective Action Program Guideline to identify whether it contains appropriate provisions for ensuring the timely resolution of conditions, and revise the Program as appropriate	77	Effectiveness Review Area Review the Corrective Action Program for: 1) CARB effectiveness; 2) CR categorization/evaluation level determination; and 3) equipment failure analysis	79	Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	80	Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.

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Effectiveness Review Area Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance, operational operational/decision-making, hazards analysis, safety focus) Refer to CA02-00891- 46-48-62-75-83-112	47	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team	44	a. The MHRIP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first-line supervisor behaviors and individual worker behaviors. These standards will not only focus on expectations for manager involvement in station activities	49	The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.	CA

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Effectiveness Review Area Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance operational/decision making, hazards analysis, safety focus) (Refer to CA 02-00891 46, 48, 62, 75, 83, 112)	47	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.					

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CA						
40	b. The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT-review.					
47	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.					
48				a. Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so.		
49						The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.
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40	b. The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.	47	a. The Program Compliance Plan includes a detailed review of the Corrective Action Program by outside consultants. The Program Compliance Review includes a detailed latent issues review of the CAP. Complete program review and implement changes as approved by the DB Senior Management Team.	48	a. Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so.	49	The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.	50	CA

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Rebaseline Standards and Expectations in the Quality Assessment Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e., procedure compliance, adequacy of audits/surveillances, oversight of DB Departments activities, safety focus)	110	Rebaseline Standards and Expectations in the Work Management Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e., procedure compliance, hazards analysis, safety focus)	111	Rebaseline Standards and Expectations in the Support Services Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e., procedure compliance, TERMS' hazards analysis, safety focus)	112	Rebaseline Standards and Expectations in the Technical Services/Nuclear Engineering Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e., procedure compliance, operational/decision-making hazards analysis, safety focus). Also, clarify technical staff expectations to ensure that degraded conditions in systems are promptly identified, evaluated, corrected and prevented from recurring			

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Rebaseline Standards and Expectations in the Quality Assessment Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, adequacy of audits/surveillances, oversight of DB Departments activities safety focus)	110	Rebaseline Standards and Expectations in the Work Management Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, hazards analysis safety focus)	111	Rebaseline Standards and Expectations in the Support Services Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, hazards analysis TERMS, hazards analysis safety focus)	112	Rebaseline Standards and Expectations in the Technical Services/Nuclear Engineering Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, operational/decision-making hazards analysis safety focus). Also, clarify technical staff expectations to ensure that degraded conditions in systems are promptly identified, evaluated, corrected and prevented from recurring	0891 Corrective Action #
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0891 Corrective Action #	108	0891 Corrective Action #	109	0891 Corrective Action #	110	0891 Corrective Action #	111
Conduct Case Study training to reinforce standards and expectations for procedure compliance and the need for work-practice rigor and the potential consequence of a failure to do so.	Rebaseline Standards and Expectations in the Plant/Station Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, operational/decision-making hazards analysis, safety focus)	Rebaseline Standards and Expectations in the Quality Assessment Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, adequacy of audits/surveillance, oversight of DB Departments activities safety focus)	Rebaseline Standards and Expectations in the Work Management Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, hazards analysis safety focus)	Rebaseline Standards and Expectations in the Support Services Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, identification in TERMS, hazards analysis safety focus)			
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Develop and implement a formal systematic approach for collective significance reviews		82		85		Last copied			
		Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.		Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.					

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Rebaseline Standards and Expectations in the Technical Services/Nuclear Engineering Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, operational/decision-making hazards analysis, safety focus). Also, clarify technical staff expectations to ensure that degraded conditions in systems are promptly identified, evaluated, corrected and prevented from recurring.		22	Develop and implement a program for increased presence of management in the field both during outages and during normal operations to improve management oversight. Formalization of this program is intended to look for degraded conditions, open opportunities for coaching, and enforcement of management expectations. This Management Field Observation Program with weekly schedules is to be similar to the programs established at Perry and Beaver Valley.		25	Effectiveness Review Area Review Standards and Expectations in the Quality Assessment Department with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, adequacy of audits/surveillances, oversight of DB Department activities, safety focus). Refer to CA 02-00891-32, -72, -109, -46, -104, -75, -108.	
					28	Effectiveness Review Area Review Standards and Expectations in the Work Management Department with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, hazards analysis, safety focus). Refer to CA 02-00891-46, -48, -1.	
					33	Effectiveness Review Area Review Standards and Expectations in the Support Services Department with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, commitment identification in TERMS-hazards analysis, safety focus). Refer to CA 02-00891-35, -46, -48, -62, -75, -83, -104, -111.	
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Develop and implement a formal systematic approach for collective significance reviews		82	Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area		85	Provide specific training (such as root cause (alting effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.	

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67	75	82	85	86	CA
<p>Provide training to personnel who perform ISI/IST and BACC inspections on the BACC Procedure and ASME Code IAW-5250, Item b requirements, with emphasis on the need to inspect areas that are or have been covered with boric acid and find them source of the leak and areas of corrosion. This training shall consider periodic refresher training and revision to the JFG for new BACC Inspectors and ISI/IST VT-2 Inspectors.</p>	<p>a. Provide training to the BACC Coordinator, ISI/IST and BACC Inspectors to ensure they are aware of his responsibilities. Consider development of a BACC Coordinator JFG. This training shall consider periodic refresher training and revision to the JFG for new BACC Inspectors and ISI/IST VT-2 Inspectors.</p>	<p>a. Establish a FENOC-level policy emphasizing the station industrial and nuclear safety philosophy. The policy should be incorporated into procedures, guidelines, job descriptions, and performance evaluations, as appropriate. Policies and procedures include both management and worker responsibility in providing a safe work environment, personal protective equipment, training (including SCWE attributes) and working safety. [Note: The recommendation of the Team does not advocate a particular form that the policy may take, and in fact, the old policy book could be eliminated in favor of an approach that is better connected with the Business Plan.]</p>	<p>Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.</p>	<p>Provide specific training (such as root cause training effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.</p>	CA

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Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.	78	Provide periodic assessments of the CR categorization and CR evaluation methods assigned to determine if the site is categorizing conditions appropriately. Minimal numbers of basic and root causes could be indicators of inappropriate standards. Develop Performance Indicators to trend data.					

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0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA		
Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	79	Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	80	Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	81	Develop and implement a formal systematic approach for collective significance reviews.	82	84	Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.

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Effectiveness Review Area: Review Standards and Expectations in the Plant (Station) Department with emphasis on lessons learned from this root cause evaluation (ie, procedure compliance, operational/decision-making, hazards analysis, safety focus). Refer to CA 02-00891-46, -48, -62, -75, -76, -83, -104.	40	b. The Senior Management Team shall review and endorse all root causes. Revise the CAP Guideline to include this SMT review.	104	Conduct Case Study training to reinforce standards and expectations for procedure compliance and the need for work-practice rigor and the potential consequence of a failure to do so.	48	Ensure that the case study training of this and other events includes emphasis on the need to find and address the causes of adverse conditions as it relates to 10CFR50, Appendix B Criterion XVI, "Corrective Action" and the potential consequences of failures to do so.	49
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Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.	53	Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	54	Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	79	Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	80	Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	81

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53	54	79	80	81	CA	CA
The MHPPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.	Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	CA	CA

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52	53	54	79	80	CA
<p>The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.</p>	<p>Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.</p>	<p>Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.</p>	<p>Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations</p>	<p>Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.</p>	CA

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54	54	79	80	80	81	81	81
Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	79 Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	80 Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	80 Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	81 Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	81 Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	81 Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.
53	54	54	79	80	80	81	81
The MHPIP also has the following relevant action: The Corrective Action Review Board (CARB), which reviews select corrective action document evaluations, will be used to enforce higher standards for cause evaluations and effective corrective action. This board will be chaired by the Plant Manager or another director level individual. Revise the CARB charter to indicate that the Plant Manager or a Director level individual shall be the Chairman of the CARB.	Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	54 Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	79 Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	80 Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations	80 Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.	81 Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	81 Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.

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Rebaseline Standards and Expectations in the Plant/Station Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, operational/decision-making hazards analysis, safety focus)	109	Rebaseline Standards and Expectations in the Quality Assessment Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, adequacy of audits/surveillances, oversight of DB Departments activities safety focus)	110	Rebaseline Standards and Expectations in the Work Management Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, hazards analysis, safety focus)	111	Rebaseline Standards and Expectations in the Support Services Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, commitment identification in TERMSI hazards analysis, safety focus)	112	Rebaseline Standards and Expectations in the Technical Services/Nuclear Engineering Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (ie procedure compliance, operational/decision-making hazards analysis, safety focus). Also, clarify technical standards/expectations to ensure that degraded conditions in systems are promptly identified, evaluated, corrected and prevented from recurring	CA

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51	51	52	53	54	55	CA
a. The MHRIP also has the following relevant actions: 1. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors, first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities.	Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAO CRs for each issue identified. If any SCAO issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.	Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigors applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.	b. Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	Provide proceduralized period independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations.		

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a. The MHRIP also has the following relevant actions: 1. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities	51	Review open existing long standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues	52	a. Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered	53	b. Define and implement training requirements necessary for cause evaluations, especially for equipment analysis	54	Provide proceduralized periodic independent reviews and self assessments of apparent cause evaluations and recommend changes as appropriate to provide assurance of the quality of these evaluations	55

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a. The MHRIP also has the following relevant actions: 1. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors and first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.	103	Revise the Morning Management Communications and Teamwork Meeting agenda to regularly discuss procedural compliance at the MCTM meetings.	CA	104	Conduct Case Study training to reinforce standards and expectations for procedure compliance and the need for work-practice rigor and the potential consequence of a failure to do so.	CA	CA

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a. Review and revise, as necessary, the criteria for CR categorization of repeat equipment failures to ensure they are appropriately categorized and utilized by station personnel. These criteria should be sufficient to elevate repeat Condition Adverse to Quality (CAQ) failure CRs to a Significant Condition Adverse to Quality (SCAQ) categorization, which requires utilizing of a higher evaluation method. Repeat conditions are to be treated as SCAQs		51	Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.	52	a. Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.	53	b. Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.
						54	Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations.
							55

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51	51	52	53	54	55				
a. Review and revise, as necessary, the criteria for CR categorization of repeat equipment failures to ensure they are appropriately categorized and utilized by station personnel. These criteria should be sufficient to elevate repeat Condition Adverse to Quality (CAQ) failure CRs to a Significant Condition Adverse to Quality (SCAQ) categorization, which requires utilizing of a higher evaluation method. Repeat conditions are to be treated as SCAQs	Review open existing long-standing/recurring issues for potential nuclear safety-related concerns and initiate SCAQ CRs for each issue identified. If any SCAQ issues are discovered, use root cause evaluation techniques to obtain resolution of the issues.	a. Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.	b. Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.	54 Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations.	55				

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22	25	28	33			
<p>Rebaseline Standards and Expectations in the Technical Services/Nuclear Engineering Department and issue policies/handbook stating the standards/expectations with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, operational/decision-making hazards analysis/safety focus). Also, clarify technical staff expectations to ensure that degraded conditions in systems are promptly identified, evaluated, corrected and prevented from recurring</p>	<p>Develop and implement a program for increased presence of management in the field both during outages and during normal operations to improve management oversight. Formalization of this program is intended to look for degraded conditions, open opportunities for coaching, and enforcement of management expectations. This Management Field Observation Program with weekly schedules is to be similar to the programs established at Perry and Beaver Valley</p>	<p>Effectiveness Review/Area: Assessment Department with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, adequacy of audits/surveillances, oversight of DB Department activities, safety focus). Refer to CA 02-00891-32, -72, -109, -46, -104, -75, -109</p>	<p>Effectiveness Review/Area: Review Standards and Expectations in the Quality Management Department with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, hazards analysis, safety focus). Refer to CA 02-00891-46, -48, -104, -83, -62, -75, -110</p>	<p>Effectiveness Review/Area: Review Standards and Expectations in the Support Services Department with emphasis on lessons learned from this root cause evaluation (i.e. procedure compliance, commitment identification in TERMS, hazards analysis safety focus). Refer to CA 02-00891-35, -46, -48, -62, -75, -83, -104, -111</p>		

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Perform an assessment of the Corrective Action program. The purpose of the Self-Assessment is to ensure the categorization of issues, thoroughness of investigation and that initiation of Condition Reports occurs in accordance with programmatic requirements and management expectations.											
	43	Effectiveness Review Area Review Standards and Expectations in the Technical Services/Nuclear Engineering Department with emphasis on lessons learned from this root cause evaluation (procedure compliance, operational/decision-making, hazards analysis, safety focus). Refer to CA 02-00891-46, 48, 62, 75, 83, 112	CA	44	2. Management will ensure standards of excellence are communicated, and monitoring will ensure these standards are upheld at all levels. This entails management behaviors and individual worker, first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors, but also on the expectations for manager involvement in station activities.	CA	59	Develop and implement the FENOC Hierarchy of Documents for D-B to ensure consistent policies and standards for analyses of safety issues, similar to other FENOC plants. The following items are to be considered from the MORTI section on lack of hazard analysis. Establish policy for the use of external information that is specific enough for the user to understand. 2. Establish policy for internal OE information that will establish the connection between the information and the applicable process of the program. The information should be considered for inclusion into existing station procedures, and it should also be referenced for easy retrieval for future use. 3. Improvements to the Industry OE program will be made to ensure the appropriate actions identified from other plants or sources of information are properly tracked and implement.	CA		

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Strengthen and expand the procedural guidance for utilization of quarantine for station events. Training and expectations for this tool should be administered to station personnel.	99	Develop and implement apparent cause training (Suggestion is a one or two day problem solving class.) Obtain upper management approval of curriculum. Perform training for all personnel that perform apparent cause evaluations (Personnel that have completed root cause training should be exempted)	104	Conduct Case Study training to reinforce standards and expectations for procedure compliance and the need for work-practice rigor and the potential consequence of a failure to do so.	44	a. The MTRP also has the following relevant actions: 2. Management will ensure standards of excellence are communicated and monitoring will ensure these standards are upheld at all levels. This entails management behaviors first line supervisor behaviors and individual worker behaviors. These standards will not only focus on behaviors but also on the expectations for manager involvement in station activities.			

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0891 Corrective Action #		0891 Corrective Action #		0891 Corrective Action #		0891 Corrective Action #		
Assess the number of personnel that should be qualified and utilized to perform root cause analysis (e.g. a broad number of people [infrequent application], or a small-dedicated group [frequent application], or a combination of the two). Implement the recommendation from assessment. Provide justification for why the course chosen will improve the effectiveness of root causes.	85	Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.	86	Strengthen and expand the procedural guidance for utilization of quarantine for station events. Training and expectations for this tool should be administered to station personnel.	99	Develop and implement apparent cause training. (Suggestion is a one or two day problem solving class.) Obtain upper management approval of curriculum. Perform training for all personnel that perform apparent cause evaluations. (Personnel that have completed root cause training should be exempted.)	101	Provide root cause evaluation teams with a format charter of expectations.

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<p>0891 Corrective Action #</p> <p>Require the use of formal cause determination techniques for root and basic cause evaluations to ensure analytical rigor is applied to the analysis (i.e., revise CAP Guideline). A tiered approach to the number and type of techniques applied should be considered.</p>	<p>CA</p>	<p>53</p>	<p>0891 Corrective Action #</p> <p>Define and implement training requirements necessary for cause evaluations, especially for equipment analysis.</p>	<p>CA</p>	<p>54</p>	<p>0891 Corrective Action #</p> <p>Provide/proceduralize periodic independent reviews and self assessments of apparent cause evaluations, and recommend changes as appropriate, to provide assurance of the quality of these evaluations</p>	<p>CA</p>	<p>79</p>	<p>0891 Corrective Action #</p> <p>Evaluate an enhancement to the CAP NOP/Guideline to eliminate performing a basic cause analysis for an issue categorized as an SCAQ, relative to ensuring actions to prevent recurrence is effective. Revise the Guideline as necessary.</p>	<p>CA</p>	<p>80</p>	<p>0891 Corrective Action #</p> <p>Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.</p>	<p>CA</p>	<p>81</p>
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Develop and implement a formal systematic approach for collective significance reviews.		Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.	84	84 Assess the number of personnel that should be qualified and utilized to perform root cause analysis (e.g. a broad number of people [infrequent application], or a small-dedicated group [frequent application], or a combination of the two). Implement the recommendation from assessment. Provide justification for why the course chosen will improve the effectiveness of root causes.	85	85 Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.	86	86 Strengthen and expand the procedural guidance for utilization of quarantine for station events. Training and expectations for this tool should be administered to station personnel.	99

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Improvement Plan

0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA	0891 Corrective Action #	CA		
Develop and implement a formal systematic approach for collective significance reviews.	82	Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.	84	Assess the number of personnel that should be qualified and utilized to perform root cause analysis (e.g. a broad number of people [infrequent application], or a small-dedicated group [frequent application], or a combination of the two). Implement the recommendation from assessment. Provide justification for why the course chosen will improve the effectiveness of root causes.	85	Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.	86	Strengthen and expand the procedural guidance for utilization of quarantine for station events. Training and expectations for this tool should be administered to station personnel.	99

Master CR List

Davis-Besse
Corrective Actions Program
Improvement Plan

0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #	0891 Corrective Action #
81	81	82	84	85	86	86	86	86	86
Evaluate and revise, as necessary, the CAP NOP/Guideline to perform generic implication reviews for all basic cause evaluations.	Develop and implement a formal systematic approach for collective significance reviews.	Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.	Assess the number of personnel that should be qualified and utilized to perform root cause analysis (e.g. a broad number of people [infrequent application], or a small-dedicated group [frequent application], or a combination of the two). Implement the recommendation from assessment. Provide justification for why the course chosen will improve the effectiveness of root causes.	Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.					

Master CR List

Davis-Besse
Corrective Actions Program
Improvement Plan

0891 Corrective Action #	CA	84	CA	85	CA	86	CA	99	CA	101
Develop and implement a formal systematic approach for collective significance reviews.		Assess the number of personnel that should be qualified and utilized to perform root cause analysis (e.g. a broad number of people [infrequent application], or a small-dedicated group [frequent application], or a combination of the two). Implement the recommendation from assessment. Provide justification for why the course chosen will improve the effectiveness of root causes.		Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.		Strengthen and expand the procedural guidance for utilization of quarantine for station events. Training and expectations for this tool should be administered to station personnel.		Develop and implement apparent cause training. (Suggestion is a one or two day problem solving class.) Obtain upper management approval of curriculum. Perform training for all personnel that perform apparent cause evaluations. (Personnel that have completed root cause training should be exempted.)		
Develop and implement a formal systematic approach for collective significance reviews.	82	Define and implement training on evaluation (basic and apparent cause evaluation) techniques associated with equipment problem analysis to heighten expertise in this analysis area.	84	Assess the number of personnel that should be qualified and utilized to perform root cause analysis (e.g. a broad number of people [infrequent application], or a small-dedicated group [frequent application], or a combination of the two). Implement the recommendation from assessment. Provide justification for why the course chosen will improve the effectiveness of root causes.	85	Provide specific training (such as root cause training, effectiveness reviews) for CARB members. Revise the CARB charter to require specific training for CARB members.	86	Strengthen and expand the procedural guidance for utilization of quarantine for station events. Training and expectations for this tool should be administered to station personnel.	99	