



# IMC 0350 Meeting

December 6, 2004

# Desired Outcomes

- Demonstrate Davis-Besse's operations continue to be safe and conservative
- Status the improvement initiatives and Confirmatory Order Independent Assessments



**Mark Bezilla**  
Vice President

# Meeting Agenda

- Plant Performance.....Barry Allen
- Independent Assessments
  - Operations Performance.....Barry Allen
  - Corrective Action Program Implementation...Bob Schrauder
- Safety Culture/SCWE.....Mark Bezilla
- Backlog Reduction .....Barry Allen
- Mid-Cycle Outage Preparations.....Barry Allen
- Oversight Perspective.....Ray Hruby

# Plant Performance

**Barry Allen**  
**Director - Site Operations**



# *People with a strong safety focus delivering top fleet operating performance*



## ■ Plant Status

- ~100% power
- ~ 925 Mwe
- 121 continuous days of service
- 60 Human Performance success days



# Plant Performance



## ■ Noteworthy items

- September 16 - October 1 - Confirmatory Order Independent Assessment - Corrective Action Program Implementation
- September 29 - NRC Inspection of SC/SCWE Cycle 14 OIP Items
- September 29 - Routine NRC Exit
- October 4 - NRC inspection of Service Water System Problems affecting Safety-Related equipment (GL 89-13)
- October 4 - 9 - SCWE Survey Conducted
- October 5 - 6 - NEIL Boiler and Machinery Evaluation
- October 5 - 7 - Industry Representative Site Visit

# Plant Performance

## ■ Noteworthy items (continued)

- October 6-7 - NEIL conducted Annual Property Insurance Survey
- October 7 - NRC Region III Deputy Administrator site visit
- October 11- 22 - Confirmatory Order Independent Assessment - Engineering Program Effectiveness
- October 11 - 13 - Oversight personnel conducted annual safety culture/safety conscious work environment interviews
- October 15 - Successfully completed Emergency Plan Drill
- October 18 - Nuclear Oversight 3<sup>rd</sup> Quarter Continuous Assessment Exit



**NRC Region III Deputy Administrator  
Site Visit**

# Plant Performance

- Noteworthy items (continued)
  - October 20 - Conduct Monthly Performance Review
  - October 21 - FirstEnergy General Staff Meeting in Akron
  - October 25 - NRC inspection of ALARA, Access Control and NRC Performance Indicator
  - October 25 - NRC inspection of Alert and Notification System Reliability
  - October 25 & 26 - Conducted annual Safety Culture Assessment
  - October 29 - Achieved compliance with the NRC Security Order



**FENOC President meets with Employees**



# Plant Performance



- Noteworthy items (continued)
  - November 1 - 5 - NRC Security Baseline Inspection
  - November 1 - 19 - Confirmatory Order Independent Assessment - Safety Culture and Safety Conscious Work Environment (Information gathering)
  - November 8 & 9 - National Board "VR" stamp renewal review
  - November 12 - Mid-cycle outage readiness review
  - November 14 - 16 - Company Nuclear Review Board

**National Board Renewal Certification**

# Plant Performance

## ■ Noteworthy items (continued)



**Mid-Cycle Outage Preparation**

- November 14 & 15 - Industry Accreditation Team Manager Visit
- November 15 - Licensed Operator Requalification NRC Inspection
- November 16 - NRC (Region 1 & 3) / FENOC Senior Management Meeting
- November 17 - Routine NRC Exit
- November 29 - NRC Problem Identification and Resolution Inspection
- December 1 & 2 - Industry Site Representatives Visit

# Plant Performance

**FENOC Vision**

**People**

**with a strong safety  
focus delivering top fleet  
operating performance**

**Beaver Valley • Davis-Besse • Perry • Akron • BETA**

## ■ 2005 Key Events Calendar

- January 17 - Mid-cycle outage commences
- January 17 - 28 - NRC Mid-cycle ISI Special Inspection
- March 14 - 28 - Industry Training Accreditation
- May 17 - Evaluated Emergency Preparedness Exercise
- August - Industry Plant, Corporate, & Simulator Evaluation

# Conclusion

## **FENOC**

### ***Strategic Objectives:***

- ▶ Safe Plant Operations
- ▶ People Development and Effectiveness
- ▶ Improved Outage Performance
- ▶ Excellent Materiel Condition
- ▶ Fleet Efficiency and Effectiveness

- Davis-Besse's operations continue to be safe and conservative



# Independent Assessments

**Barry Allen**  
**Director - Site Operations**



# Independent Assessments Confirmatory Order Action Plan

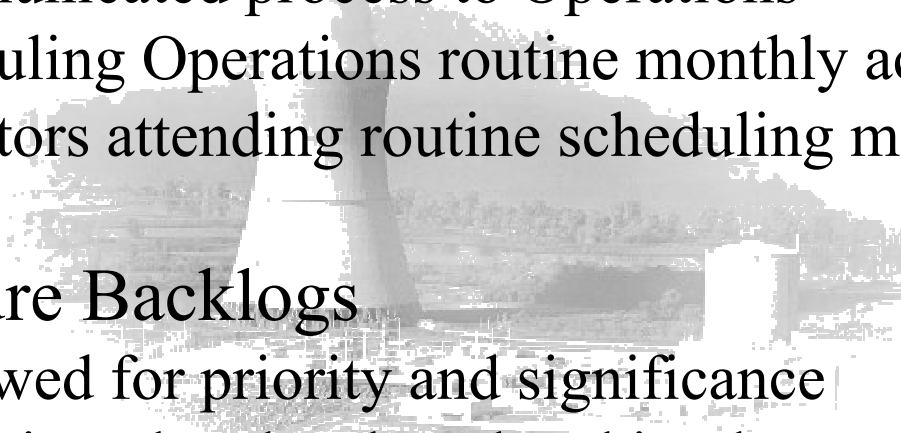
## ■ 2004 Schedule

- \* Operations Performance (August)
- \* Corrective Action Program Implementation (September)
- \* Engineering Program Effectiveness (October)
- Organizational Safety Culture, including SCWE (November)

**\* Completed**

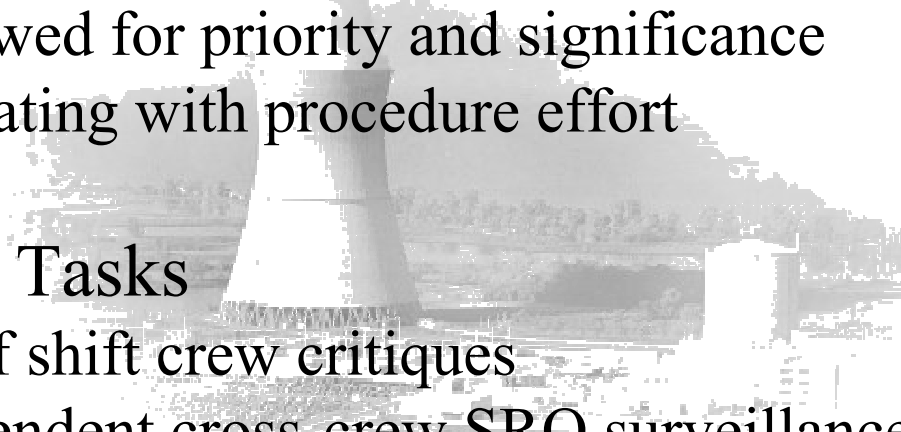
# Independent Assessments

## Operations Performance

- 
- A faded, grayscale background image of a nuclear power plant, showing a large cooling tower and other industrial structures.
- Work Management Interface
    - Communicated process to Operations
    - Scheduling Operations routine monthly activities
    - Operators attending routine scheduling meetings
  - Procedure Backlogs
    - Reviewed for priority and significance
    - Reduction plan developed and implemented
    - Additional resources assigned

# Independent Assessments

## Operations Performance

- 
- Corrective Action Program Backlog
    - Reviewed for priority and significance
    - Integrating with procedure effort
  - Routine Tasks
    - End of shift crew critiques
    - Independent cross-crew SRO surveillance review
    - Operations Management review



# **Independent Assessments**

## **Corrective Action Program Implementation**

**Bob Schrauder**  
**Director - Performance Improvement**



# Independent Assessments

## Corrective Action Program Implementation

- Dates: September 13 - October 1, 2004
- Assessment Team found the corrective action program at Davis-Besse to be marginally effective
- Areas reviewed:
  - Identification, Classification and Categorization of Conditions Adverse to Quality
  - Evaluation and Resolution of Problems
  - Corrective Action Implementation and Effectiveness
  - Effectiveness of Program Trending
  - Effect of Program Backlogs
  - Effectiveness of Internal Assessments Activities, and
  - Corrective actions taken in response to the NRC Special Team Inspection - Corrective Action Program Implementation (Report 05000346/2003010)

# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - Some Organizations were not initiating Condition Reports (CRs) as required
- Actions to Improve Performance
  - Review and evaluate the CR threshold initiation criteria
  - Issue expectations directive to communicate and reaffirm CR initiation criteria
  - Perform self-assessment to evaluate the effectiveness of CR initiation

# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - Process for prioritizing, scheduling, and extending work does not consistently support the timely implementation of actions to fix long-standing problems
- Actions to Improve Performance
  - Create and implement a comprehensive Integrated Backlog Reduction Plan



# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - Review of open Corrective Action implementation extensions classified as non-restart should be conducted to ensure appropriate compensatory actions are in place
- Actions to Improve Performance
  - Review backlog of SCAQ & CAQ Root and Apparent Cause Preventive and Remedial corrective actions to consider interim actions or accelerated completion
  - Update CREST to require evaluation for and documentation of the consideration of interim action extensions
  - Issue an expectation directive to have SCAQ & CAQ Root and Apparent Cause extension requests evaluate and document whether interim actions are required

# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - Davis-Besse has not aggressively worked to correct Corrective Action Trending Program deficiencies identified in previous self-assessments or oversight findings
- Actions to Improve Performance
  - Benchmark other sites
  - Enhance the Quarterly trend report
  - Improve guidance concerning timeliness for performing and completing Collective Significance Reviews
  - Develop & implement a site wide equipment trending program
  - Develop a FENOC common trending program

# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - Improvement is warranted in the documentation of organizational Collective Significance Self Assessments with respect to minimal procedure guidance, expectations, documentation, documentation of CRs and overall performance rating
- Actions to Improve Performance
  - Revise governing Business Practice to clarify expectations relative to documentation of Collective Significant Self-Assessment Reports
  - Establish expectations for format, documentation and overall rating

# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - The Self-Assessment Process does not provide a mechanism for identifying and correcting programmatic concerns or trends identified during the course of the assessment
- Actions to Improve Performance
  - Revise governing Business Practice to clearly identify the need to consider the potential aggregate impact of programmatic concerns or trends



# Independent Assessments

## Corrective Action Program Implementation

- Area for Improvement
  - Additional emphasis is warranted on timely correction of items identified by self-assessments and Nuclear Quality Assurance findings
- Actions to Improve Performance
  - Benchmark how other nuclear sites prioritize CRs from self-assessment and NQA findings and revise the governing procedure
  - Perform a sampling of current self-assessment - as necessary and NQA-initiated CRs to determine if Davis-Besse is completing those Corrective Actions at a comparable rate

# Independent Assessments

## Corrective Action Program Implementation

### ■ Positive Observations

- Systematic approach to Training of CR analysts and CARB
- CARB is effective with good consensus among members
- Management is knowledgeable and involved
- Backlog is decreasing
- Independent Assessment reflects Davis-Besse self-assessments

# **Safety Culture/ Safety Conscious Work Environment**

**Mark Bezilla**  
Vice President



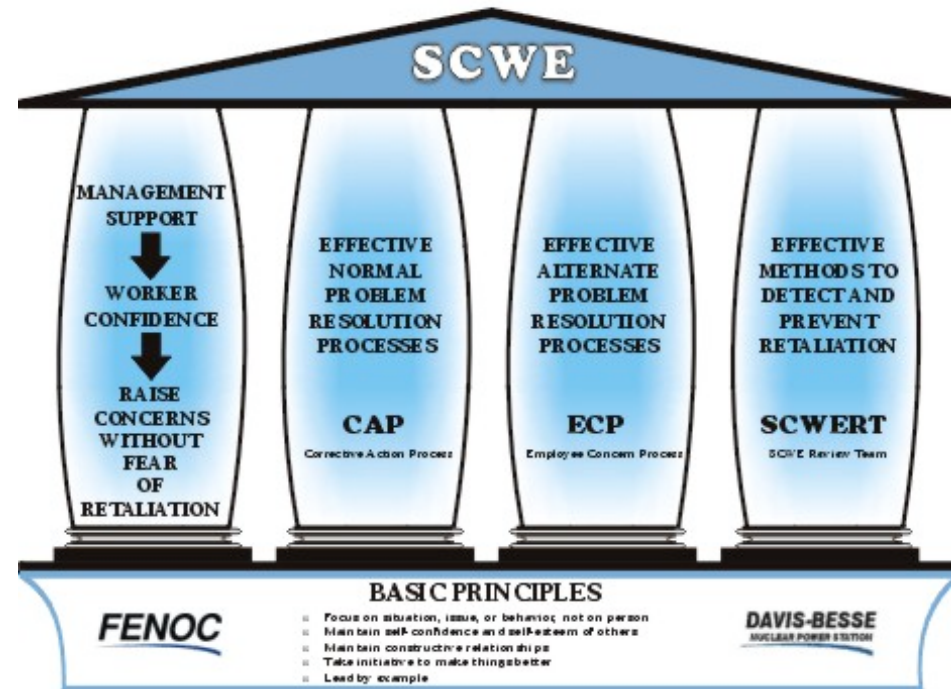
# Safety Culture/ SCWE Activities

- September 29 - NRC Inspection of SC/SCWE Cycle 14 OIP Items
- October 4 - 9 - Annual SCWE Survey conducted
- October 11 - 13 - Oversight personnel conducted annual safety culture/safety conscious work environment focused interviews
- October 25 & 26 - Annual Safety Culture Assessment conducted
- November 1 - 19 - Confirmatory Order Independent Assessment  
- Safety Culture and Safety Conscious Work Environment  
(Information gathering)

# Safety Conscious Work Environment Survey

- Annual survey conducted October 4 - 9
- Issue
  - Some less positive results
- Actions
  - Reviewed results (comments)
  - Obtained external (Organizational Development Consultants) assistance
  - Discussed results with site population
  - Determining “Drivers”
  - Will develop actions to address the “Drivers”
  - Will compare to COIA SC/SCWE Report Results

## FOUR PILLARS OF A SAFETY CONSCIOUS WORK ENVIRONMENT





# FENOC Safety Culture Model

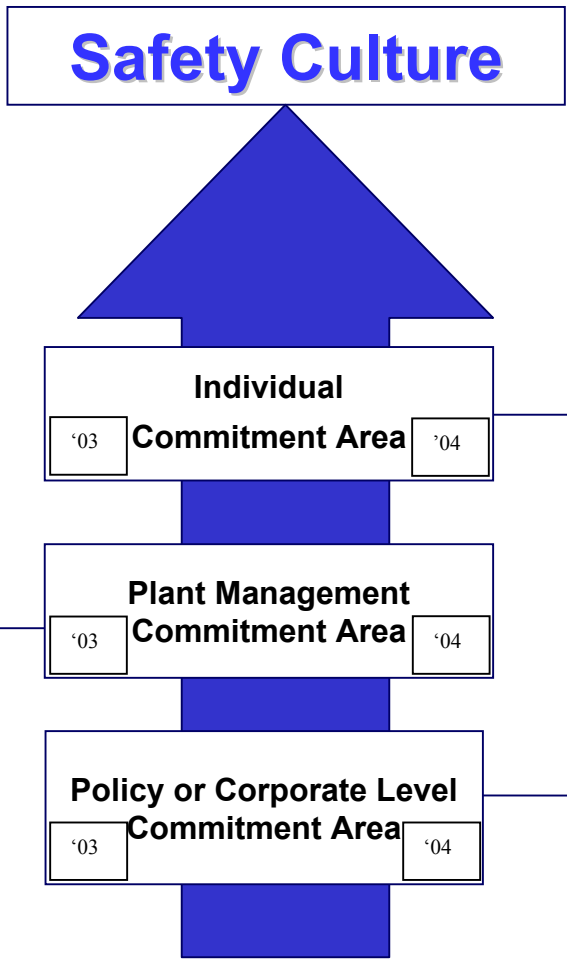
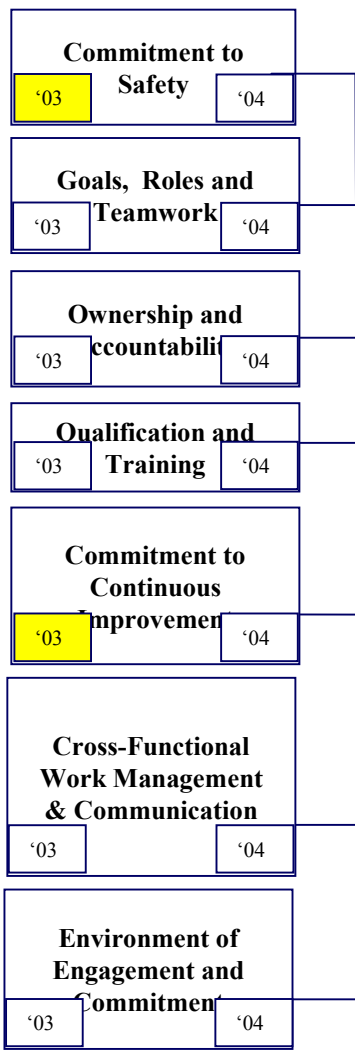
**Color Key**

All major areas are acceptable with a few minor indicator deviations

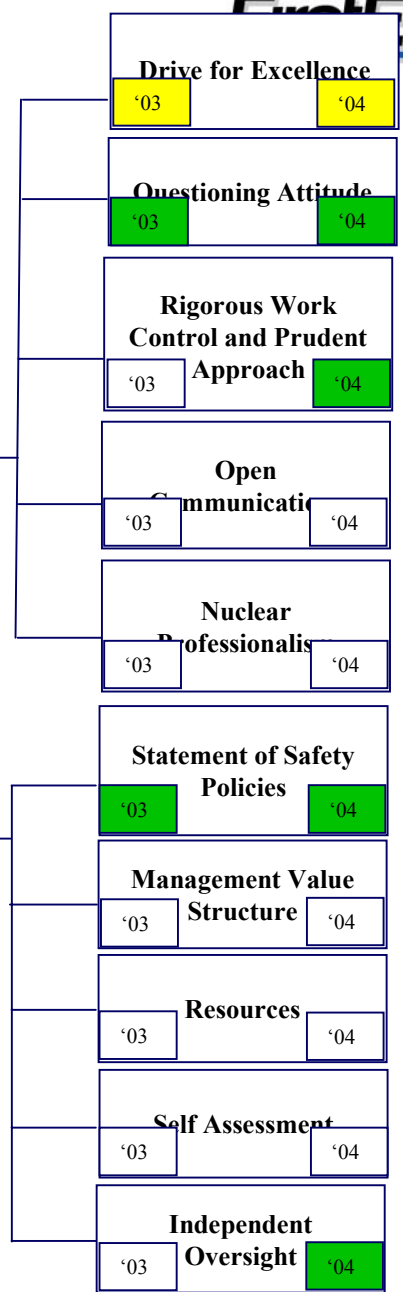
All major areas are acceptable with a few indicators requiring management attention

All major areas are acceptable with several indicators requiring prompt management action

Several major areas do not meet acceptable standards and require immediate management action



October 2004



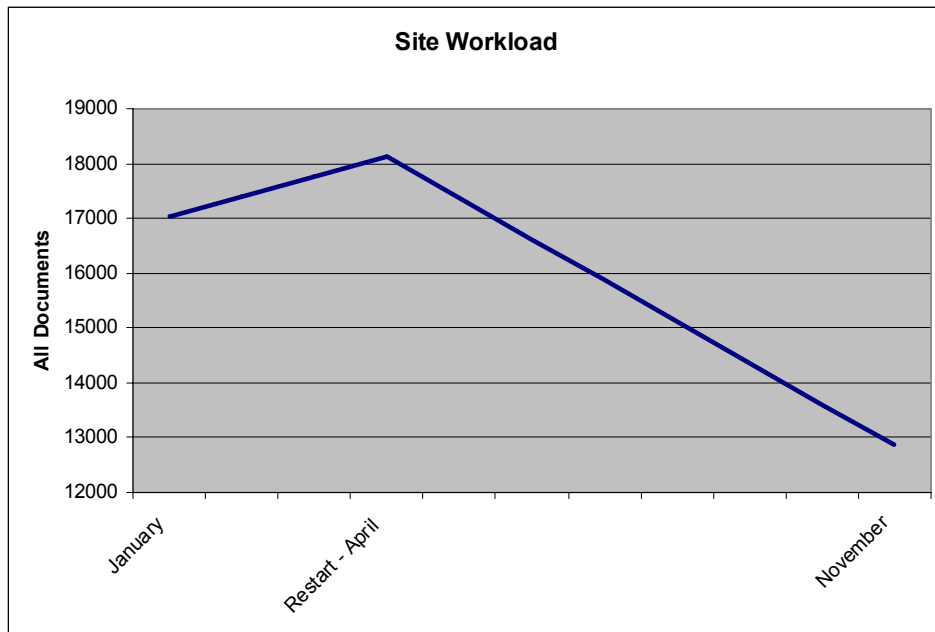
# Backlog Reduction

**Barry Allen**  
**Director - Site Operations**



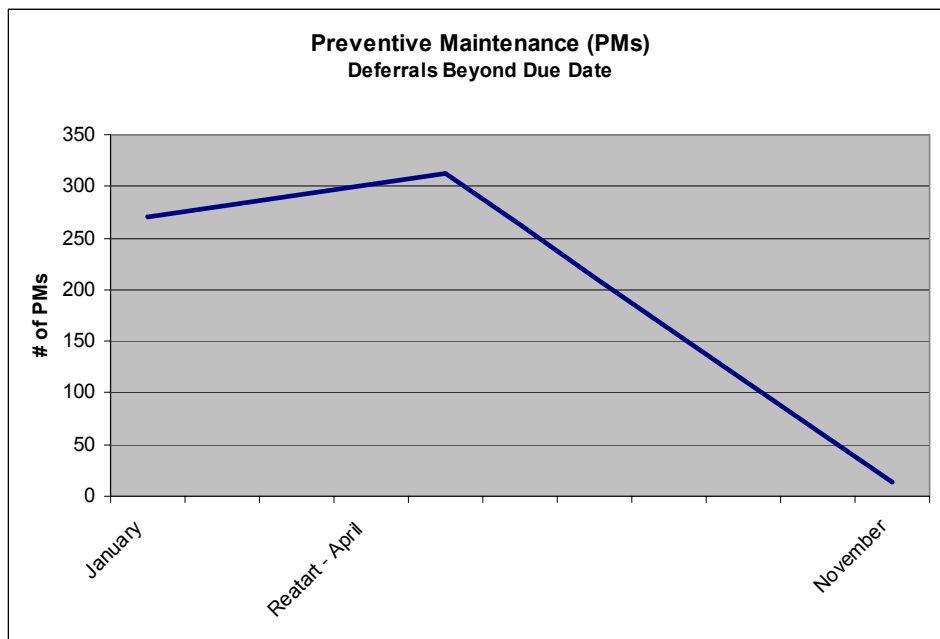
# Backlog Reduction

- Site Workload  
(all documents)
  - Peak: April 2004 - 18,124
  - November 2004 - 12,865



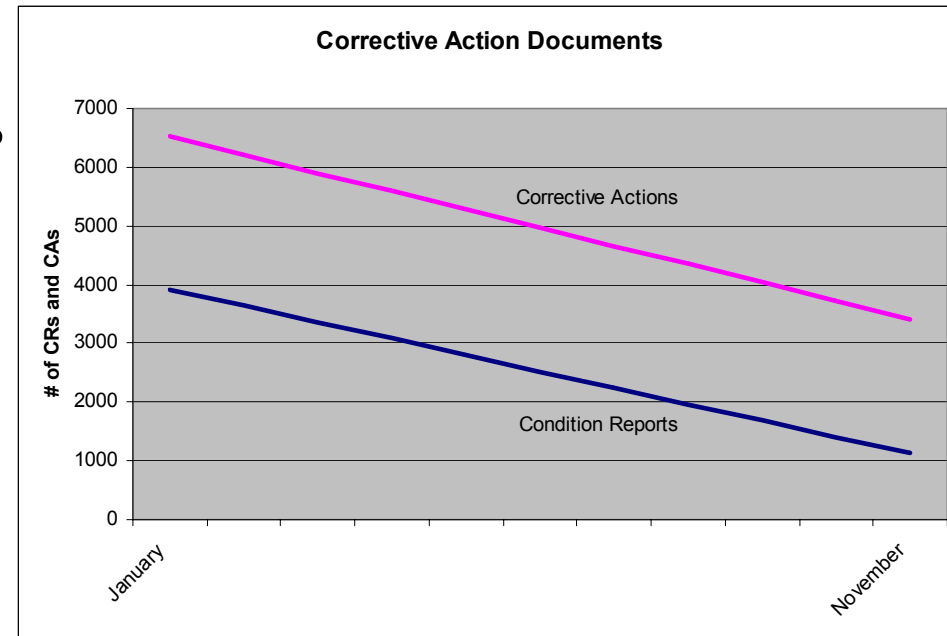
# Backlog Reduction

- Preventive Maintenance
  - Peak: May 2004 - 312
  - November 2004 - 13



# Backlog Reduction

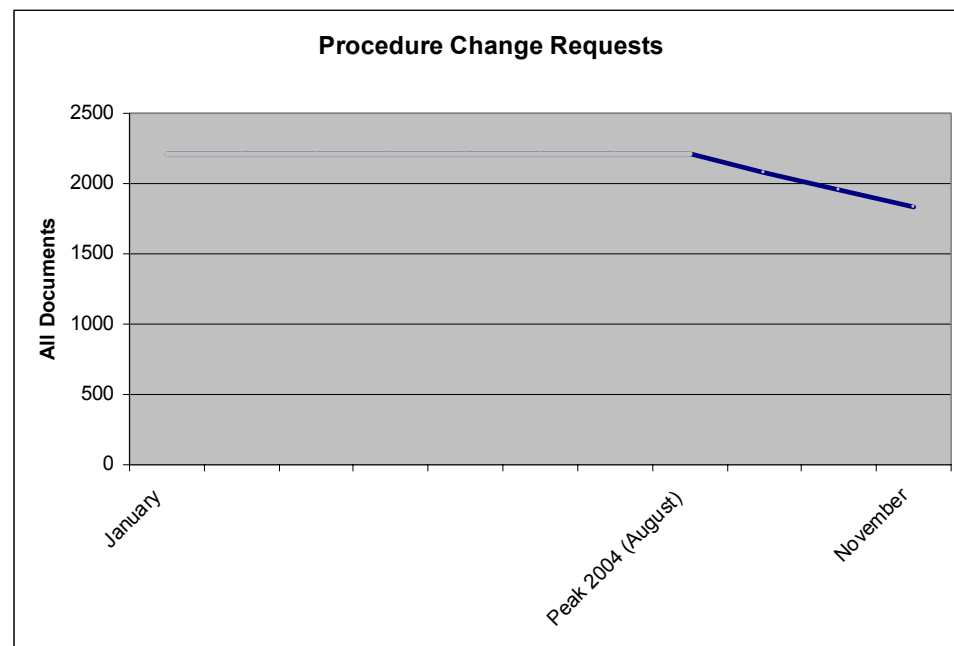
- **Corrective Action Documents**
  - Condition Reports
    - January 2004 - 3,921
    - November 2004 - 1,123
  - Corrective Actions
    - January 2004 - 6,522
    - November 2004 - 3,419





# Backlog Reduction

- Procedure Change Requests
  - Peak 2004 (August) - 2,209
  - November 2004 - 1,828



# Actions for Continuous Improvement

- Integrated Restart Report dated November 23, 2003 & Supplement to report dated February 6, 2004
  - Appendix A Commitments 38
  - Closed to date 27
- Cycle 14 Operational Improvement Plan
  - Appendix D Commitments 94
  - Closed to date 59

# Mid-Cycle Outage Preparations

**Barry Allen**  
**Director - Site Operations**



# Mid-Cycle Outage Preparations

- Scheduled start date ~ January 17, 2005
- Project List includes
  - Once-Through Steam Generator Eddy Current Testing
  - Reactor Head and Vessel Inspections
  - Boric Acid Corrosion Control Inspections
  - Reactor Coolant Pump Inspections
- Preparation for Success
  - July 30 - FENOC Readiness Review
  - November 12 - Mid-cycle Outage Readiness Review
  - Status outage readiness with senior management

# Oversight Perspective

**Ray Hruby**

**Manager – Nuclear Oversight - DB**





# Oversight Perspective

## 3<sup>rd</sup> Quarter Assessment Report

- Audited 25 Primary Elements
  - 6 rated Effective
  - 12 rated Satisfactory
  - 7 rated Marginal
- Continuous Assessment Process

# Oversight Perspective

## Insights and Future Focus Areas

- Corrective Action Program Implementation
- Organizational Behaviors
- Procedure Use and Adherence
- Future Focus Areas
  - Operations Performance
  - Recent FENOC Reorganization Implementation
  - Training
  - Corrective Action Program Implementation
  - Emergency Preparedness

# Oversight Perspective

## Oversight SCWE Interview Results

- Good Correlation with the recent SCWE Survey
- Observations
  - Issues with Some Management Behaviors
  - Impact of the Recent Reorganization
  - Strong Belief That the Davis-Besse Safety Culture Supports the Safe Operation of the Plant
  - Personnel Believe That They Can Raise Nuclear Safety or Quality Issues Without Fear of Retaliation
  - Increasing Use of the Corrective Action Program

# Closing Comments

**FENOC Vision:**

People with a strong safety focus  
delivering top fleet operating  
performance

**Mark Bezilla**  
Vice President

