

Detroit Edison



October 5, 2005
NRC-05-0062

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Letter from Mr. Eric R. Duncan, NRC, Region III, Chief,
Reactor Projects Branch 6, Division of Reactor Projects to
Mr. William T. O'Connor, Jr., Vice President, Nuclear Generation,
Detroit Edison, "Mid-Cycle Performance Review and Inspection
Plan - Fermi Power Plant," dated August 30, 2005

Subject: Response to Request for Action Plan Details Regarding
Substantive Cross-Cutting Human Performance Issue

The purpose of this letter is to provide the NRC with the information requested in Reference 2 regarding actions taken at Fermi 2 Nuclear Power Plant to address the substantive cross-cutting human performance issue.

In Reference 2, the NRC concluded that the area of human performance continues to be a substantive cross-cutting issue at Fermi 2. This conclusion was based on the results of continued NRC monitoring of performance in the human performance area through the baseline inspection program in the first two quarters of this year. The substantive cross-cutting human performance issue was initiated in the annual assessment letter for the year 2004 based on inspection findings sharing the common causal factor of human performance errors in 2004.

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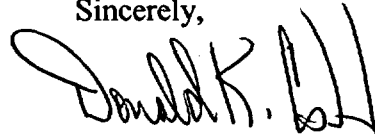
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Reference 2 requested Detroit Edison to provide the NRC with a response, within 30 days of the receipt of the NRC letter, which details the actions that have been taken to address this substantive human performance issue and other future planned actions with the corresponding implementation dates.

Enclosure 1 to this letter provides details of the corrective action plan for improving station performance in the human performance cross-cutting area. Many provisions of the plan have been implemented and are currently in place, while others are pending completion. The status of each item is provided in Enclosure 1.

Actions described in this letter are provided for information only and are not considered regulatory commitments. Should you have any questions regarding this letter, please contact Mr. Ronald W. Gaston, Manager, Nuclear Licensing, at (734) 586-5197.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald K. Cobb", with a stylized flourish at the end.

Donald K. Cobb
Director – Nuclear Generation

Enclosure

cc: D. P. Beaulieu
E. R. Duncan
T. J. Kozak
NRC Resident Office
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

ACTION PLAN DETAILS FOR PERFORMANCE IMPROVEMENT IN THE SUBSTANTIVE CROSS-CUTTING HUMAN PERFORMANCE ISSUE

A formal evaluation of a negative site-wide trend in consequential Human Performance (HP) events was initiated in March 2005. A team was chartered with examining procedural, personnel, programmatic, and managerial issues associated with the trend, and providing recommendations to prevent recurrence.

The team analyzed information from various site resources such as departmental and site-wide Event Free Day (EFD) resets, Nuclear Quality Assurance audit reports, Self Assessment reports, site and department Health Reports, training Performance Indicators and the Corrective Action database to identify the most probable causes for this negative HP trend. Systematic analysis tools such as Fault Tree Analysis, Gap Analysis, Operating System HP models and Performance Improvement and Learning Action Request (PILAR) were used to organize and filter the information to derive the primary probable causes.

The following three primary causes for the negative HP trend were identified:

1. **Lack of Procedure Adherence:** Individuals took actions that did not comply with the required procedures, either in part or in full.
2. **Unclear Management Expectations:** Quality of supervisory involvement needs improvement to ensure successful performance of tasks. This includes defining and communicating expectations, oversight of work-in-progress and control of work assignment.
3. **Process Weakness:** Although written documents may be adequate as written, errors were caused by deficiencies in the mechanics of the process, such as lack of coordination with other documents; and by not utilizing existing performance data to predict and prevent performance trends.

Based on these probable causes, the team developed a number of recommendations:

1. **Reiterate/ reinforce the expectations for procedure use and adherence per Fermi Business Practice (FBP) Number 38, "Human Performance Program."** The use of this tool will also serve as an additional barrier for identifying procedural ambiguity and steps requiring revision.
2. **Develop and implement a coaching and mentoring training program** to assist in the development of these skills and ensure that individuals understand how to provide and receive feedback. The training should also provide opportunities to practice and receive feedback on the use of these skills.
3. **Create and develop a performance improvement team** comprised of individuals from a cross-section of the organization. This team would have the responsibility for the aggregate analysis of performance information and providing feedback in a systematic avenue to the site organizations.

To effect the desired change, specific detailed actions were developed based on each one of these recommendations. These actions and other site initiatives developed to address performance improvement areas identified in various other site assessments are briefly described below, including the status of each one and the schedule for completion, as applicable:

- A gap analysis performed on site-wide procedure use and adherence as compared to other Nuclear Power Plants identified several areas for improvement. Gaps were identified in the requirements for considering certain steps of a procedure as not applicable, procedure classification, and placekeeping expectations. Based on resulting recommendations to improve site procedures in these areas, General Administration Conduct Manual, MGA03, "Procedure Use and Adherence", was revised to incorporate the recommendations and to strengthen management expectations. A Just-In-Time training on the subject was also conducted to all work groups on site.
- A training module titled, "The Constructive Leader: Accountability and Coaching in the Workplace" has been developed. The training is designed to help leaders in defining the expectations for accountability across the site and to build personal skills for coaching employees to improve performance. The training includes the opportunity to practice coaching skills, as well as receive mentoring on the use of the skills. This training is part of the station's commitment to improve management oversight and the overall culture at Fermi 2. All leaders, managers and directors will attend the initial training by October 31, 2005. Additionally, weekly follow up sessions will be conducted to share results and to promote and reinforce the new accountability model.
- The site Human Performance Department Coordinators, the Training Department and the Managers of the Operations, Maintenance and Radiation Protection Departments have formed a Human Performance Steering Committee chaired by the Plant Manager. The committee meets weekly to discuss agenda items designed to challenge standards and elevate priority on HP issues. To date, the committee has revised goals and expectations for Supervisor field observations, specified goals for Production managers to perform paired observations with supervisors, and identified focus areas to key observers to watch for and reinforce. In addition, the committee works to aggressively identify low level trends based on observation feedback, CARDS and training input. Lessons learned and coaching success stories are made public and will be fed back into the culture change team.
- A new enhancement to the site HP tool "Stop, Think, Act and Review" (STAR) has been recently launched. The new enhancement is labeled "Take Two." This performance standard requests workers in the plant to Take Two minutes and focus on the Stop and Think steps of STAR as they relate to the task they are about to perform. During the two minutes pause, workers are encouraged to consider the expected response of any actions they are about to perform, roles and responsibilities of each individual, the surrounding area and any potential hazards.

- A new Nuclear Corrective Action and Performance Assessment group has been formed in the Nuclear Assessment organization. The group will have responsibility for the administration of the plant Corrective Action Program, including trending and tracking of corrective action documents; administration of the root cause analysis program; and administration of operating experience, human performance, self-assessment, and benchmarking programs.
- An assessment of the organization culture in 2004 identified some organization behavioral norms that are more passive-defensive and aggressive-defensive than constructive. Organizations known for achievement and high levels of accountability tend to be predominantly constructive in behavior and interactions. Fermi 2 is committed to make a long term culture change by defining and promoting accountability throughout the site. A Culture Change Steering Committee whose membership represents a diagonal slice of the organization will work with the leadership team to help the station move toward its desired culture. The steering committee is in its early stages, working on finalizing its charter and identifying activities in various major focus areas.

We are seeing good preliminary results from the various initiatives described herein. We have significantly increased our performance monitoring initiatives to aid in achieving the desired results. The site has recently achieved the longest single interval of over 200 days between EFD resets. However, we are well aware that improvements to further reduce the significance and number of human performance issues will be required on a continuous basis. Fermi 2 is fully committed to relentlessly continue to drive down the site human performance error rate and march towards excellence in human performance.