

August 30, 2007

NRC 2007-0078
CAL 3-04-01
Revision 1

Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Point Beach Nuclear Plant, Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

Corrective Action Program Commitment Status Update

References: (1) NMC Letter Dated February 10, 2006 (ML060440285)
(2) NMC Letter Dated June 11, 2007 (ML071640182)


Reference (1) contained one commitment associated with the Point Beach Nuclear Plant (PBNP) Corrective Action Program (CAP):

1. Perform alternating independent assessments and self-assessments of CAP at six-month intervals over the next two years.

Reference (2) transmitted the plan for the second independent assessment of CAP. The assessment was conducted during the period July 16 - 20, 2007. A summary of the assessment report is presented in Enclosure 1 of this letter. The recommendations have been entered into PBNP's Corrective Action Program.

Summary of Commitments

There are no new commitments or revisions to existing commitments in this letter.



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Nuclear Management Company, LLC

cc: Document Control Desk
NRR Project Manager, Point Beach Nuclear Plant, USNRC
Resident Inspector, Point Beach Nuclear Plant, USNRC

ENCLOSURE 1

SUMMARY OF POINT BEACH NUCLEAR PLANT INDEPENDENT CORRECTIVE ACTION PROGRAM ASSESSMENT JULY 2007

Purpose

Provide an independent and comprehensive evaluation of the Corrective Action Program (CAP) at Point Beach Nuclear Plant (PBNP). The assessment evaluates the quality of implementation of the three phases of the corrective action program – problem identification, problem evaluation and problem resolution.

Objectives

1. Effectiveness of Actions Taken in Response to 2006 NRC PI&R Inspection
2. Effectiveness of Management Overview, Involvement, and Reinforcement of CAP
3. Verify Station Problems are being Identified, Reported and Properly Screened
4. Verify Evaluation of Problems and Identification of Corrective Actions are Commensurate with the Significance of the Problem
5. Effectiveness of Corrective Actions Resolving Identified Problems
6. Effectiveness of Performance Indicators and CAP Trending
7. Assess Actions Taken from January 2007 CAP Self-Assessment

Checklists for these objectives covered a total of 28 elements.

Assessment Team Composition

- John Hamilton, John Hamilton & Associates (Team Leader)
- John Tortora, Watts Bar
- Bill Bryan, St. Lucie
- Mark Poland, LaSalle

Assessment Scope

The assessment reviewed products and results of the PBNP corrective action program to measure their quality. Examples of products used were CAPs, apparent cause evaluations, root cause evaluations, operability recommendations, and corrective actions. The assessment team limited their review to products completed within the past year.

Conclusions

- The team concluded that although measurable improvement in the CAP has been achieved over the last 12 months, there are several opportunities for improvement which need to be addressed in order to achieve a higher level of CAP performance.

Overall opportunities for improvement included:

- The effectiveness and overall quality of apparent cause evaluations (ACEs) needs to be improved.
- The number of CAP performance indicators above target with no detailed recovery plan indicates that timeliness continues to be an issue. The backlog of open CAPs, in particular, has been steadily increasing.
- Ease of CAP initiation in Passport and providing feedback to the CAP originator of those CAPs closed by the CAP Screen Team were identified as a potential threshold issue.
- Trending has not been effective at identifying adverse trends through the quarterly Department Roll-Up Meetings and Passport issues continue to impede effective trending.
- Effectiveness reviews for Corrective Actions to Prevent Recurrence need to consider effectiveness from a broader perspective.

Overall positive feedback included:

- Management is highly engaged in CAP and the CAP Screen Team appears to be highly effective.
- Root cause evaluations are thorough and comprehensive, and effectiveness review criteria are clearly specified.
- Format consistency has improved for apparent cause evaluations, effectiveness reviews and departmental roll-up meeting reports.
- The Performance Assessment Review Board is involved in reviewing the backlog of open CAPs by department.
- Most actions taken to address issues from the January 2007 CAP Self-Assessment have resulted in measurable improvement.

Recommendations

The assessment team's plant-specific recommendations have been entered into the PBNP Corrective Action Program.