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SUBJECT: Responds to concerns re operations,maint/surveillance, engineering/technical support & safety assurance.

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Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO NPF-21
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
(SALP REPORT 88-08)

In the cover letter to the subject SALP Report, the NRC concluded that the performance of the Supply System was acceptable and directed toward safe facility operation. However, the NRC also identified specific concerns with regard to four key functional areas (Operations, Maintenance/Surveillance, Engineering/Technical Support and Safety Assurance/Quality Verification), and requested that the Supply System respond to those concerns associated with Plant Operations and Engineering/Technical Support within 30 days after the SALP Management Meeting which was held on August 18, 1988.

Accordingly, the purpose of this letter is to describe Supply System plans to improve performance in the areas identified in the SALP Report. It should be noted that the following responses are based on those commitments presented during the pre-SALP Management Meeting held on June 7, 1988 and the August 18, 1988 SALP Management Meeting.

Concerns common to the four functional areas included 1) insufficient management involvement in activities, and 2) insufficient follow-through on commitments and corrective actions. The following is a description of our plans to improve performance in these areas.

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- Management Involvement

  The Supply System recognizes the need for more management involvement and personnel accountability in the conduct of activities at WNP-2. Accordingly, several enhancement efforts are currently in process which should result in fewer human errors, better design products, and a safer and more reliable plant. Specific plant management enhancement efforts are discussed in the functional area responses of this letter.

  In a series of meetings with all Supply System employees, the Assistant Managing Director for Operations stressed the need for improvement in Supply System programs and performance. In a continuation of this effort, the Assistant Managing Director for Operations will hold bi-monthly meetings with Supply System employees regarding plant status, concerns and management expectations.

  In addition, the Managing Director will hold quarterly meetings with all Supply System managers to provide status, direction and expectations. In the near future, the Managing Director will also hold a meeting with all Supply System employees to address these items.

- Commitment/Corrective Action Follow-Through

  The Plant Tracking Log (PTL) monitors the processing of external and other commitments by tracking initial entry, document processing and final closeout. Part of the process requires the responsible organization to maintain an auditable file which documents the commitment and closure process, where applicable by procedural requirements.

  However, PTL effectiveness will be improved by providing for increased accountability for assigned tasks through additional supervisory and management involvement. As part of this process, plant managers and supervisors will be provided with a list of open PTL commitment items on a weekly basis. A PTL task force has also been established to review the accuracy of information in PTL, update the assigned responsibility for each task, and re-prioritize and re-establish scheduled completion dates for each PTL entry. The task force is comprised of a point of contact in each of the major work functions within the plant. Initial actions to make PTL an accurate information data base will be completed by November 1988. Periodic followup status reviews, to ensure completion of assigned actions, will also be performed at various levels in the organization.

In addition, the Assistant Managing Director for Operations will review selected NRC and INPO commitments and provide a status of each to the Supply System Executive Board on a quarterly basis.

The following is a description of those plans to improve performance in the four functional areas:

A. OPERATIONS

1. Concerns

The number and type of personnel errors resulting from insufficient operator attention to plant procedures, proceeding in the face of uncertainty, and inadequate preparation of equipment clearances.

2. Response

The Supply System in recent Management Meetings has presented initiatives and programs designed to significantly reduce errors associated with inattention to plant procedures, eliminate instances of proceeding in the face of uncertainty, and upgrade the quality of clearance orders. Implementation of these initiatives and programs is proceeding and management will ensure that they are successfully implemented. A summary of the initiatives and programs and their current status are presented below, and are grouped into three general categories: Operations organization changes, increased management involvement, and operations performance initiatives.

- Operations Organization Changes

The Operations department has recently undergone significant organizational changes. The changes were implemented to enhance operational crew strength, strengthen license operator training, expand the operating procedure review group, and establish a permanent clearance order review group. By establishing a five crew rotation personnel resources became available to staff the two groups described in the following paragraphs.

A new Operations Procedure group was formed. The group staffing consists of a Licensed Control Room Supervisor and at least one Licensed Reactor Operator. Group staffing will be maintained by rotating licensed personnel through these positions.

The success of the temporary clearance order group during the R3 outage will be sustained by the establishment of a permanent clearance order review group. This group consists of a licensed exempt coordinator, a licensed equipment operator and a shop foreman matrixed from the Electrical Maintenance department. This group will review and recommend clearance orders for all scheduled Maintenance Work Request and preventive maintenance work. This function reports to the Plant Operations Manager.

In an effort to strengthen and promote teamwork between Operations and Licensed Operator Training, a Shift Manager will be assigned to the position of Licensed Operator Training Supervisor. This is intended to be a two-year rotational assignment. The first Shift Manager will assume the supervisor position during October 1988. In addition, a new Manager of Nuclear Licensed Training has been named. This individual has extensive experience and has participated in the INPO accreditation of Licensed Operator Training programs at numerous facilities.

- Management Involvement

Each week, the Plant Operations Manager, or Assistant Plant Operations Manager, observe and evaluate operating crews during simulator training sessions. At the conclusion of the session, feedback is given to the operating crews as to their performance in relation to management expectations. In addition, the Operations or Assistant Operations Manager has a weekly one on one meeting with the Duty Shift Manager, which is followed by a full crew meeting. These meetings are designed to communicate plant issues and initiatives to ensure all personnel have a clear understanding of management expectations. Personnel performance, procedure compliance, problem management, and clearance orders are among the topics which have been discussed in recent meetings. In addition, Senior Management (Plant Manager, Assistant Plant Manager, and the Assistant Managing Director for Operations) are scheduled to observe and evaluate operator crew simulator training sessions.

The Operations department is agressive in its implementation of the peer review process of operational events. The peer review process allows Senior Management to foster management/personnel teamwork by implementing peer review corrective actions. One example of this interaction is the commitment to evaluate the installation of a motor driven feedwater pump in response to a recommended corrective action. Another area of management involvement is in simulator performance. Senior Management is committed to provide Plant Operations/Training a simulator which accurately models actual plant performance. These improvements include both hardware and software. A decision on whether to upgrade the current simulator or purchase a new simulator is expected by October 1, 1988.

- Operations Performance Initiatives

The Operations department is mid-way into a two-year effort to upgrade plant operating procedures. This effort is focused on improving technical accuracy and developing procedures which are consistent in operational philosophy (approach) and format. Consistency is achieved by the utilization of a uniform procedure writers guide (based on the latest industry standards and INPO recommendations) and a procedure reviewers checklist. Technical accuracy is being achieved by having licensed reactor operators on a long term rotational basis perform the procedure reviews. Consistency of format and operational approach plus improved technical adequacy will help improve operator reliance on plant procedures.

The peer review process also allows the individuals involved in an event to meet with a group of their peers and assist in the determination of the cause of the event and corrective actions to prevent reccurence of the event. To date, seven peer reviews associated with plant events have been initiated.

A Plant Troubleshooting procedure has been developed and refined within the past year. This procedure provides the methodology for utilizing plant resources to develop a troubleshooting action plan. Operations is a key contributor in this process and all action plans require Shift Manager approval before proceeding. Implementation of the troubleshooting action plan enables Operations to monitor actual plant response to expected responses. This is an important process which allows thought out actions to be implemented when faced with off-normal plant conditions. This process is fully implemented.

A plant disciplinary policy aimed at enforcing procedure implementation was initiated following the February 1988 reactor scram. Management implementation in a fair and equitable manner has encouraged plant personnel to recognize their responsibilities to use plant procedures in accordance with management expectations. Employees recognize that they will not be disciplined if plant procedures are followed. This policy is fully implemented.

The operations procedure group is preparing a revised clearance order procedure. Current industry standards, including INPO guidelines, are being utilized in the procedure preparation. Implementation of this procedure revision is scheduled for November 1988.

The Operations staff is committed to a program to emphasize the basic elements of operational performance. This will be formalized in a Conduct of Operations procedure. It is expected that the procedure will be implemented by November 1988. The elements of problem management, personnel performance, accountability etc., will be delineated in this document.

B. MAINTENANCE/SURVEILLANCE

1. Concerns

Maintenance personnel not following procedures and insufficient control over work performed on vital maintenance work requests.

2. Response

Maintenance activities to address NRC concerns include initiatives and programs which are grouped into four areas: management involvement, procedural compliance, vital maintenance work requests and training.

- The Plant Maintenance department has been strengthened with the specific intent of improving management involvement in plant activities.

  - o To improve accountability and quality the department has made changes in the supervision in the electrical shop with the addition of a new supervisor, in the mechanical shop with the transfer of the Plant QA Manager to the Mechanical Supervisor position, and the addition of the Mechanical Systems Supervisor from the Technical group to assist the Maintenance Manager position. The skills that these individuals bring to the department will truly enhance the management of Maintenance programs.

  - o Addition of ten exempt craft assistant work supervision positions for the purpose of work direction, quality on the job, procedural compliance and performance feedback.

  - o Addition of three middle line work control supervisors for the overview, planning and supervision of all work functions with Maintenance.

  - o Addition of three maintenance engineering supervisor positions to oversee the work development, planning and problem resolution associated with the preventive and corrective maintenance aspects of the department.

  - o Addition of a plant safety and material condition engineer for the purpose of coordination and implementation of the safety program. He will serve as the point of contact for all safety and material condition problems in the plant, and also ensure adequate root cause and corrective actions in this area.

  These changes and additions to the department will increase involvement in maintenance activities in the plant, improve craft performance and accountability, improve job planning, backlog reduction, and work quality. With the added supervisory positions, the section supervisor will be able to focus on more programmatic issues, long range planning and management expectations. All the above mentioned positions will be active by December 1, 1988.

- Several recent changes have been made and others are underway to minimize the personnel error problems identified. These changes include:

- o A strong post-modification/maintenance testing program (completed).

- o Revision to the lifted lead/jumper procedure to include technical/safety reviews prior to the application of lifted leads or jumpers (completed).

- o A separate review team for independent review of clearance orders (completed).

- o Complete divisional separation of all Reactor Protection System and Nuclear Steam Supply Shutoff System Channels within the surveillance procedures will be implemented so that different channels with the potential of tripping the system are not contained in the same procedure.

- o Implementation of a 28 day cycle for surveillance testing that will enable the system to establish divisional days for surveillance activities. This task will be complete by January 10, 1989.

- o Writers and reviewers guide for use in all maintenance procedures. will be in place by December 1, 1988

- o Use of the plant disciplinary policy for lack of performance and/or procedural compliance.

It is felt that the programs which control basic work activities are sound, and through improved communication, continued emphasis on attention to detail, and additional supervision, the quantity and severity of personnel errors will diminish.

- The problems identified with the vital MWR process are recognized by management. There is a significant challenge in being responsive to critical plant hardware maintenance needs on a priority basis while retaining the necessary checks and balances required by existing programs. A review of this process will be conducted with the following added controls considered:

  - o Limit the time that a vital MWR can be maintained open.

  - o Stricter limitations on use of vital MWRs.

  - o Increased management awareness of open vital MWRs.

  - o Require increased review of the planned work activity.

The review of this process and its application will be completed by November 1, 1988.

- There is an ongoing effort within the WNP-2 Technical Training organization to correct the deficiencies with the training program, including those in the area of administrative controls applicable to maintenance activities. This effort includes:

  - o Administrative controls training modules will be presented to maintenance personnel during scheduled quarterly training sessions. Those areas specifically identified will be addressed by these modules.

  - o The training program for journeymen is also being restructured to include specific criteria for content and frequency for each craft discipline within the Maintenance department and those areas of deficiencies identified will be included in this restructuring.

  - o As an interim measure, specific training in these areas will be provided in individual shop meetings.

The overall restructuring of the maintenance training program is scheduled for completion and implementation by January 1, 1989.

C. ENGINEERING/TECHNICAL SUPPORT

1. Concerns

Insufficient understanding of plant design, inadequate control of design process, and discrepancies in the design data base.

2. Response

The NRC's SSFI inspection, conducted in August 1987, looked primarily at design performed by the architect engineer. In order to determine the quality of work performed by Supply System Engineering, formal design reviews were initiated in December 1987 on six designs scheduled for implementation during the R-3 refueling outage. These reviews were conducted using independent engineering personnel and representatives from Quality Assurance, Plant Technical and Maintenance or Bechtel personnel. The results of these reviews identified design errors similar to those found by the NRC SSFI team. In March 1988, Plant Technical identified errors in the ATWS/ARI package which

required correction. Also, in March 1988, as a result of the errors found by the formal design reviews noted above and the ATWS/ARI problem, Engineering management initiated the development of an Engineering Improvement Program coincident with the Quality Assurance organization conducting an independent root cause evaluation of several selected design packages including ATWS/ARI. The Engineering Improvement Plan was developed by a select group of senior engineers and submitted to management in May 1988. Implementation of priority recommendations of this plan has begun as planned, and a formal milestone schedule for remaining initiatives is being developed for issuance in November 1988. The QA Engineering Assurance organization has reviewed this plan and found it to be comprehensive and responsive to the Quality Assurance root cause recommendations.

It is our belief that completion of the work elements outlined in the Engineering Improvement Plan will address the concerns pertinent to the engineering/technical support areas, as identified in the 1988 NRC SALP report issued in August 1988. Specific responses to SALP recommendations are as follows:

- Supply System management is committed to ensure high levels of personal involvement and assessment in the engineering and technical area. This commitment includes more proactive involvement by Plant Technical and Engineering management and engineers on plant problems and more Engineering communications with the plant staff.

  Recently, a practice has been implemented where each design engineer is required to convene a Plant Modification Committee at the front-end of all proposed design changes. The Plant Modification Committees consist of representatives from Maintenance, Operations, and Plant Technical, and continue in existence through detailed design and implementation. This committee assures that all organizations have a full understanding of the problems to be solved and that all organizational inputs are considered in the final design.

  As recommended in the Engineering Improvement Plan, reduced span-of-control in design engineering will become effective September 17, 1988 by creation of 12 supervisory positions. This will increase the amount of management involvement, improve technical direction, and provide more time for departmental management to assess overall performance and take appropriate action.

The Engineering Assurance (EA) organization has been established at the WNP-2 site reporting to the Director, Licensing and Assurance. The purpose of EA is to perform activities to assure that the appropriate level of safety, reliability and quality are maintained by Supply System technical functions. The EA organization will perform this function through independent assessments of Supply System technical products and performance against regulatory and industry quality standards. This will be done on a sampling basis and will include technical products and functions of both design engineers and technical support engineers.

- The Engineering Improvement Plan identified a need to simplify the design data base and its use. Additionally, the NRC SSFI conducted in August 1987, and our Quality Assurance Department root cause analysis identified the design data base as a problem.

  The Supply System is currently developing a program to prepare system level design bases documents for all safety systems, many important non-safety systems, and for important specialty topics (e.g., seismic design, environmental qualification, electrical separation, etc.). The program was begun in January 1988, resulting in completion of a design basis document for the Low Pressure Core Spray System (LPCS). A copy of this document has been provided to NRC, Region V. An additional design basis document will be completed by July 1989 for the on-site AC electrical distribution system. These two pilot programs will give the Supply System hands-on experience with preparing the documents and will provide the basis for budgeting a five-year effort starting July 1989.

  Engineering management has committed to complete the upgrade of all Quality Class I motor operated valve electrical wiring diagrams by October 1, 1988. In addition, Plant Operations has prioritized the plant system electrical wiring diagrams and the magnitude of engineering effort required to upgrade these documents will be estimated and scheduled during the November/ December 1988 time frame. Initial efforts will be devoted to 12 Priority 1 systems with the remaining balance of 96 system level electrical wiring diagrams to follow. Other on-going design data base programs include completion of a computerized design data base for all penetration seals and expansion of the computerized cable and raceway schedule capabilities.

Management has approved a 5-year, 1.5 million-dollar program to procure computer equipment which will enable all engineers to electronically access various plant data bases as they become available on a central data base and will also upgrade a larger portion of the plant design and drafting to the computer automated design (CAD) system.

The Design Bases Document (DBD) Program will utilize both design and operations support staff personnel in the review/approval process for each DBD; this will provide these personnel with a concentrated view of the design data base as it pertains to the subject of the particular DBD under review. This DBD preparation and review process will assist in familiarizing the staff with the WNP-2 design data base. Preparation of these documents will organize the design bases of plant systems and enhance retrievability.

The Engineering Improvement Plan recommends that an improved training program be developed to train Engineering personnel in a number of important areas, including design data base organization and location, FSAR/Technical Specification content and layout, WNP-2 criteria and specifications, etc. Development of this training plan is underway. Additionally, in accordance with the Engineering Improvement Plan, an Engineering working group has been established to evaluate the design data base structure and provide a plan for simplifying its use. This will include consideration of document hierarchy, cross references to drawings and data, simplification of retrieval systems, and identification of plant requirements.

- Overextending the resource was identified as a problem in the Engineering Improvement Plan and the Quality Assurance Root Cause Report. These reports recommended stronger plant-wide scheduling as well as improved scheduling within Generation Engineering.

  Management has focused increased attention and importance on planning and scheduling by elevating the plant scheduling function to a departmental level, reporting to the Plant Manager. Currently, the Plant Technical and Generation Engineering organizations are reviewing all proposed R-4 outage and 1989 non-outage plant modifications to control scope within the capabilities of available manpower within the two organizations. This process is reprioritizing all modification work scope resulting in the development of FY 1990 and FY 1991 modification schedules. This will provide the foundation for one of the near-term goals of the Planning and Scheduling organization to establish a long-range plan for WNP-2.

The recommendations for improved scheduling in the Engineering Improvement Plan are already being implemented within the Engineering Division by augmenting the staff assigned to planning and scheduling of engineering activities. Engineering management has directed that all R-4 outage and FY 1989 non-outage engineering design changes be scheduled by mid-October 1988. These schedules will provide for increased checking and design verification to enhance quality. In addition, Engineering is integrating design schedules with the overall modification process through the use of a common scheduling program. We recognize that on-going assessments of resource versus commitments will always be necessary to match quality performance with expectations.

Preliminary engineering estimates have been provided for the R-4 outage and non-outage tasks proposed by the plant, and the resources required have been compared to budget allocations for those activities so that commitments do not exceed the level of resources available.

- Senior Management recognizes that implementation and completion of effective improvement programs is essential to improve performance. In pursuing that goal, it is recognized that follow-through of existing programs is mandatory. Effective utilization of existing staff is essential, and many of the improvements recommended in the Engineering Improvement Program are directly applicable to that goal. Management is committed to effective follow-through on the recommendations of the Engineering Improvement Program and increased teamwork and proactive involvement in technical and engineering issues.

  The scheduling of all Engineering Improvement Plan activities and their execution has been elevated to an annual performance evaluation criteria for top Engineering management by the Managing Director. Senior Management will conduct quarterly reviews of Engineering Improvement Plan progress beginning January 1989.

D. SAFETY ASSESSMENT/QUALITY VERIFICATION

1. Concerns

The ineffectiveness of quality groups in identifying developing plant problems, slowness and ineffectiveness in implementation of the root cause assessment program, and marginal staffing in various groups.

2. Response

A number of steps have been taken in the Safety Assessment/Quality Verification area to respond to identified areas of concern and to increase the level of involvement by quality oversight groups in plant activities aimed at identifying developing plant problems. The goal of Supply System management is the same as that of the NRC, i.e., to have Supply System staff identify and correct problems. Line management is accountable to provide specific direction to their employees to achieve this improvement. All of the specific commitments discussed in the NRC Management Meetings are being routinely monitored to ensure appropriate follow-up and effectiveness. Significant actions taken to date include:

- Corporate Nuclear Safety Review Board (CNSRB) membership changes have been made to provide this organization with stronger operational and technical capability. Specifically, changes were made to provide more practical experience in the outside membership. The Board is expected to take a more active role in questioning and evaluating areas within its responsibility.

- The Engineering Assurance organization within Licensing and Assurance has been established. This group will provide independent quality oversight of technical areas, thus providing additional resources to improve our ability to identify and correct problems. The efforts of this group, coupled with steps being taken by Engineering are expected to significantly improve the quality of engineering products and provide early identification of potential problems.

- Training sessions were held in August where most of the QA (including auditors and Plant QA) staff members received initial training in performance based inspections. This training was provided by the same contractor that has provided training to NRC inspectors. Initial training for those who were unable to attend the contractor's sessions will be conducted in-house. The application of performance based methods will be stressed by management.

- An independent Root Cause Analysis Group has now been established and is functioning. Training in Root Cause Analysis methods is scheduled to be presented in October and November 1988. Approximately 30 Supply System employees including representatives from Operations, Plant Technical, Operational Assurance and Engineering will participate in this initial training. Additional staff will be trained in future sessions.

  The Supply System is committed to a formal systematic program to enhance the current analysis of plant problems. The intent of the program is to assure that all events are appropriately analyzed, given their relative severity and/or frequency. The overall purpose is to ensure that when a root cause(s) analysis is performed, all causes are identified and corrected. This will result in decreasing the probability of event reccurence.

- The Director of Licensing and Assurance has initiated an evaluation of current staffing levels and capabilities within the Directorate. This evaluation has resulted in the addition of resources in the Engineering Assurance, Root Cause and Licensing functions. The increased Licensing staff and some redirection of other Licensing staff efforts are expected to improve the overall quality of Licensing submittals.

- The primary responsibility for the tracking and statusing of open items is with the individual line organization that is required to complete an action. Thus, the concern is as stated (e.g. ability of the Compliance staff to track and status open items). Several efforts are planned to improve our capability in this area and are listed below:

The Plant Technical Department is adding additional personnel to the staff in FY89. One of the resources will be committed, initially part time, to performing compliance functions.

Efforts are currently planned to update the status of internal and external organization commitments and to provide periodic reports of open items status to plant management (see discussion under Commitment/Corrective Action Follow-Through). A listing of actions which have been closed will periodically be supplied to the QA organization. This list of items will be reviewed and items selected for closeout effectiveness verification by the QA organization. The verification effort was previously being performed by the Compliance staff.

Clerical resources will be adjusted to ensure that engineer level personnel are not burdened with tasks that prohibit them from the monitoring of open item status.

Initiatives discussed in other sections of this response (Operations, Maintenance and Engineering) are expected to reduce Compliance staff workloads due to resultant reductions in LERs and NOVs.

Finally, Plant Technical Department management intends to monitor Compliance staff workloads to ensure that plant organizations, which are responsible for providing input, are supporting LER/NOV response preparation.

Increased management attention is being directed to the areas of Safety Assessment/Quality Verification to assure that the programs which have been initiated are carried to completion and that the desired results are achieved. Corrections or changes will be made as necessary to achieve the desired results. Management involvement in problem resolution and follow-up on commitments is being stressed at all levels as a central part of our improvement programs.

In conclusion, the Supply System is committed to operating WNP-2 in a safe, efficient manner and recognizes the need for more management involvement and improvements in the conduct of plant activities.

Accordingly, the Supply System is committed to aggressively pursue the issues identified in all areas of the SALP Report, and make changes as necessary to provide for such improvements.

It is anticipated that the organizational and programmatic changes described in this letter will bring about the improvements necessary to enhance and expedite the quality of Supply System performance.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

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