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SUBJECT: Advises that SALP rept of insp 50-397/94-09 is acceptable & forwards response SALP re WNP-2.

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TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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June 28, 1994
G02-94-147

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2; OPERATING LICENSE NPF-21**
RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) NRC INSPECTION REPORT 50-397/94-09

The Supply System acknowledges the NRC staff's Systematic Assessment of Licensee Performance (SALP) Report 50-397/94-09, for the period of March 1, 1993, through March 31, 1994. We concur with your finding that the performance of licensed activities at WNP-2 is acceptable and directed toward safe facility operation. We also concur with your assessment that although the overall performance has improved, opportunities for improvement exist.

The attachment to this letter is the Supply System's response to the SALP report. It describes the Supply System actions to improve performance at WNP-2 in all areas. WNP-2's goal is to demonstrate performance which would lead to a SALP Category 1 level rating in all functional areas.

As discussed in our response to the last SALP, one of the Supply System's top priorities has been to hire key personnel experienced in successful nuclear power plant management. We have been successful in that regard. Since the last SALP report we have added experienced personnel with records of successful performance in the capacities of Plant Manager, Manager of Regulatory Programs, and Technical Services Division Manager.

We acknowledge that procedural adherence continues to be an area in which further improvement is needed. As discussed within our SALP response, there are improvement activities underway specific to the Operations and Maintenance areas. From a broader perspective, the Supply System has identified the need to simplify and clarify administrative procedures.

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We previously informed you in our response to Inspection Report 50-397/93-50 of our plan to simplify and clarify administrative procedures. The effort will include the development of site-wide procedures which will combine some of the existing corporate and site administrative procedures. We expect significant reductions in the number and complexity of procedures. A project management team has been formed for this effort having a member with previous successful experience in this area at another plant. The team has visited several other utilities with successful procedure programs to benchmark their programs and help develop alternatives for application at the Supply System. The Supply System expects to issue a plan for this effort in August, 1994. Completion of the overall effort is tentatively planned for September, 1995; however, the completion date is dependent on the content of the approved plan.

We also need to enhance our monitoring tools for evaluating procedural adherence. In that regard, methods of assessing our progress have been recently modified. The performance indicator report has been changed to provide statistical representation of personnel and procedure error information. As plant problem reports are generated, a search of related plant and industry issues is performed to help identify significant trends as soon as possible. Trending techniques for managers and individuals to help improve procedural adherence are being developed and the establishment of numerical goals consistent with the best performing plants is being considered.

The Supply System recognizes that Engineering has been slow in responding to emergent issues. The attached response provides a detailed discussion of the activities Engineering is implementing to resolve the concern regarding the thoroughness, quality and timeliness of resolving technical issues. With regard to the Licensing organization, it has been reorganized with direct reporting to the Senior Nuclear Officer, and a new Manager of Regulatory Programs has been hired. These actions are expected to result in improved performance regarding the quality of Licensing submittals.

The Supply System acknowledges that the existing programs for self-assessment have not been as effective as they must be to demonstrate a SALP 1 level of performance. A separate section within the attached response focuses solely on oversight activities. It discusses planned improvements for the Quality Assurance organization, the oversight review groups and our self-assessment activities.

The Supply System recognizes that the SALP review period has been changed from a 12-month cycle to an 18-month cycle. Consequently, the Supply System is planning on performing an internal SALP review at mid-cycle (approximately 9 months). The primary focus of this mid-cycle review is to determine the effectiveness of the changes implemented and to make modifications as necessary.

Sincerely,

J. V. Parrish, (MD 1023)
Assistant Managing Director, Operations

PST/CGB/kd
Attachment

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927R

ATTACHMENT

Response to the 1994 Systematic Assessment of Licensee Performance (SALP) Report

A. Functional Area: Engineering

The SALP Board indicated that although improvements had been made within the Engineering organizations, additional efforts are necessary to improve engineering timeliness, quality of work, thoroughness, and safety perspective. The Board assigned a Category 3 rating to the Engineering area.

Board Concerns

- Engineering has been slow in correcting a number of long standing deficiencies.
- Several events late in the assessment period illustrated engineering weaknesses in addressing emergent issues.
- Engineering continues to have difficulty ensuring fire protection features are properly installed and maintained.
- Many license amendment submittals were of relatively low quality.

Response

1. Correction of Long-Standing Deficiencies and Engineering Response to Emergent Issues

These two concerns are interrelated. Our success in correcting long-standing problems will directly affect our ability to effectively address emergent issues. We intend to focus our efforts in the following three areas to help improve the response to long-standing and emergent technical issues.

a. System Management Program

The System Management Program includes routine system engineer walkdowns and quarterly team walkdowns. This team includes the system engineer, the cognizant design engineer, and representatives from Maintenance, and Operations. While this program has provided some benefits, it requires refinement.

The quarterly team walkdowns will be enhanced. Additional guidance will be developed and provided to team members to ensure management's expectations for these walkdowns are clearly communicated. Several activities will occur during these walkdowns. The Operations representative will walkdown system-related operational procedures. The design engineer will compare selected portions of the system design basis documents and the Final Safety Analysis Report (FSAR) with the installed configuration. The system engineer will compare the plant drawings with the system configuration, and the Maintenance representative will document and correct minor maintenance items.

This organized cross disciplinary approach will help ensure proper identification of plant problems. Early identification of plant problems by these composite teams are expected to result in prompt resolution. The review of each problem should have the appropriate depth and breadth resulting in a thorough analysis and implementation of the proper corrective actions.

Although the technical issues discussed in the SALP report have been or are being resolved, the Supply System recognizes that increased sensitivity to potential safety significance and a greater degree of urgency in implementing the necessary corrective actions must be instilled within the line organizations and their management. The problem identification and resolution process was recently revised to more thoroughly incorporate the guidance contained in Generic Letter 91-18. Although training on this new process is complete, further operability training will be conducted in August and September, 1994.

Senior Management continues to communicate expectations concerning the need to thoroughly investigate technical issues and to develop and implement timely corrective actions.

These changes to the System Management Program will be implemented by October, 1994.

b. Planning Process

The Technical Services Division will have lead responsibility to further enhance the planning process for prioritizing and scheduling plant system activities such as design changes. We will combine the individual system improvement plans developed by the system engineers into one integrated plan. Plant and engineering priorities will be reflected in this integrated plan. This will ensure that the appropriate priorities are assigned such that the safety significant issues are worked in a more timely fashion. Additionally, through prior planning, an in-depth review of tasks will be

performed to ensure the corrective actions are thorough and performed in a quality manner. This approach will allow the entire organization to become more aware of all the outstanding issues and their priority. We will also assign one individual who will have single point accountability for the implementation of each activity.

This planning process will be implemented by November, 1994.

c. System Engineer Responsibilities and Expectations Document

The Supply System agrees that the System Engineering organization must become more sensitive to issues that might have safety significance. By developing a heightened safety perspective, the System Engineering organization will approach issues with the proper degree of urgency and a need to be thorough such that corrective actions fully resolve the problem.

System engineer priorities and responsibilities are being reconsidered. System engineers, System Engineering management, Operations, Maintenance, and Health Physics personnel are involved with this redefinition of responsibilities. This effort will focus our activities on support of Operations and Maintenance. The establishment of priorities and clear role definition will result in mutual understanding among the system engineers, their supervisors, and their customers. Where appropriate, administrative tasks that can be completed by others will be transferred. The system engineers will remain responsible for some major maintenance efforts associated with their systems; however, all project responsibilities will be reassigned to an established, dedicated projects group. This projects group had previously been assigned all major modifications. This redefinition of responsibilities will be completed by August, 1994 and fully implemented by December, 1994.

2. Fire Protection Program Deficiencies

The Supply System recognizes the need to make improvements in management of the Fire Protection Program.

Near-term activities include:

a. A project team was formed to address the major fire protection technical issues such as the fire barrier penetration seals, Thermo-Lag installation, control of cable tray covers and Appendix R fire hazards, and safe shutdown analyses. This project team is comprised of Supply System employees and experienced consultants.

b. The Quality Assurance (QA) department has conducted a detailed 10 CFR 50, Appendix R audit using recognized industry experts. Issues resulting from this audit are being resolved, as are other similar 10 CFR 50, Appendix R issues. Upon completion of the QA audit, a detailed action plan with scheduled completion dates will be developed.

Long-term activities include:

a. Responsibility for the Fire Protection Program was transferred to the Technical Services Division in April, 1994. Furthermore, the Technical Services Division has been assigned overall responsibility for coordination of the many groups that support the Fire Protection Program. Representatives from each group are defining organizational responsibilities and developing detailed action plans to address all major Fire Protection Program deficiencies. These actions will be completed by August, 1994.

b. To provide the technical assistance required to resolve the Appendix R issues, two certified, professional fire protection engineers were recently hired and the Supply System is seeking a third certified fire protection engineer for permanent employment.

3. Licensing Activities

The Supply System recognizes that prior Licensing activities, particularly license amendment submittals, have been deficient and that changes are required. Important changes to the Licensing organization have been made. These include hiring a new Manager of Regulatory Programs, reorganizing Licensing with direct reporting to the Senior Nuclear Officer and establishing clear performance criteria for Licensing personnel.

The new Manager of Regulatory Programs has had prior nuclear power and NRC experience and was selected to establish a top-performing Licensing organization. The new manager has reorganized the Licensing organization and plans to obtain additional technical support.

Shortly after the new Manager of Regulatory Programs joined the Supply System, the Licensing organization's line of reporting was transferred from Engineering to the Senior Nuclear Officer. This direct reporting relationship will provide Licensing with increased Senior Management focus and input on plant priorities. This is expected to help alleviate the concern with not submitting licensing submittals on a timely basis.

The new Manager of Regulatory Programs is also developing a new set of performance criteria for the Licensing personnel. These criteria will provide clear guidance to each Licensing engineer as to what management expects when developing Licensing documents and what is necessary to get licensing submittals approved prior to submittal.

Licensing is also developing an internal training program to enhance the Licensing engineers' capability in dealing with licensing issues. This training program will also be presented to selected Engineering, Maintenance, Operations, and QA personnel. This is expected to create a better understanding of the role these groups play in providing Licensing with the technical information needed to create a quality document.

Additionally, Licensing and Compliance Engineers will be attending the management Senior Reactor Operator (SRO) Certification classes. This training will enhance the Licensing and Compliance Engineers' knowledge of the plant design and create a better understanding of the regulatory interface with Plant Operations. This training should further enhance WNP-2 development of licensing submittals.

These actions will be developed by November, 1994.

B. Functional Area: Maintenance

The SALP Board assigned a Category 2 rating to the Maintenance area and noted management action has halted a declining performance trend with some improvement noted. However, several areas of concern were identified.

Board concerns

- Procedural adherence needs improvement as indicated by craft errors causing interruption of plant operation and a modification being half-installed prior to Plant Operation Committee (POC) review.

- Weak supervisor oversight not being fully effective in reinforcing management expectations of work practices.

- Planning, control, and coordination of maintenance work require improvement as noted by improper repair of a main steam system valve, repeat overhaul of spent fuel pool cooling pump, and incorrect assembly of seismic restraints.

Response

1. Procedural Adherence

The WNP-2 management team is continuing to pursue improved adherence to procedures. Actions taken to date include an independent root cause analysis on procedural non-compliance at WNP-2, trending of procedural non-compliance events, establishment of a "self-checking" program aimed at minimizing human error, improving the quality of plant procedures, routinely emphasizing the need for procedural adherence at staff meetings and pre-job briefings, and clear establishment and communication of management expectations in the area of procedural adherence.

To ensure clear expectations have been established and communicated to all WNP-2 personnel, written performance expectations regarding procedural adherence have been provided. Performance in this area is periodically reviewed with employees. These reviews provide an opportunity for feedback between employees and supervisors to ensure a mutual understanding exists and to provide routine communication on performance and expectations. This should provide additional, valuable information for identification of procedural adherence problems and an opportunity to take needed action.

Other planned actions to improve adherence to procedures include: increasing the quantity and quality of supervisory oversight for maintenance craft personnel, continuing the ongoing maintenance procedure improvement efforts, improving the quality of maintenance work instructions, and continued evaluation of personnel error caused events and implementation of appropriate corrective action.

2. Supervisor Oversight

We recognize that proper supervisory oversight and direct observation of field activities by first line supervisors is an important element of maintenance activities to ensure management expectations for work performance are met. Efforts to improve supervisory oversight of Maintenance personnel during work performance are focused on improving both the quality and quantity of this oversight and observation.

Increased direct observation time by first line supervision has been achieved in recent months. Written expectations for supervisory field time have been issued in the form of a Maintenance Division instruction. Each Maintenance production shop will establish performance indicators to measure the level of supervisory involvement. These indicators will be included in individual performance expectations.

A primary barrier to supervisory involvement in field activities is the current level of administrative requirements placed on first line supervisors. In order to reduce this barrier, work processes have been modified to allow both craft and administrative personnel to assist in the closure of maintenance work packages. Additional administrative personnel have been permanently assigned to the Maintenance Production Manager to provide direct support to each shop to meet this and other administrative needs.

To improve supervisory skills and to better prepare supervisors for their responsibilities, the Maintenance Division established an "academy" approach to training new and prospective supervisors. This approach combines previously fragmented supervisor training into a six-week course where both supervisory and work process skills are taught. The first course was completed in March, 1994. The next course is scheduled for August, 1994. All permanent, first line Maintenance Production supervisors have been trained to the standards presented in the Supervisor Training Course.

3. Planning, Control, and Coordination of Maintenance Work

While progress has been made in this area through implementation of an electronic work management system and improved scheduling, additional actions are in progress to provide additional improvements in this area. The focus of these actions are to improve work scheduling, work package quality, and coordination of in-progress work.

To improve work scheduling, preventive maintenance and surveillance activities are continuing to be grouped in a manner that supports efficient performance, and evenly distributed over a 12-week period. In addition, personnel involved in work scheduling have been co-located to improve their communication and coordination of work scheduling. Improvements in the content and layout of the schedule are in progress and improved monitoring of schedule effectiveness will be implemented.

To improve work package quality and consistency, an improved work planning guide is being developed. This guide contains management expectations and standards for maintenance work package quality. In addition, training of maintenance work planners to ensure they possess a working knowledge of this improved planning guide will be conducted.

To improve the coordination of in-progress work, management will continue to emphasize the importance of performing work as scheduled and ensure proper accountability of those involved in implementing work activities. Also, the use of dedicated individuals to oversee the progress and coordination of scheduled work will continue as needed.

C. Functional Area: Plant Operations

The SALP Board assigned a Category 2 rating to the Plant Operations area noting plant and human performance during the appraisal period was good as evidenced by the longest continuous power operation period in the plant's history. However, several areas of concern were identified.

Board Concerns

- Even though improvement was noted regarding procedural adherence, there was still a need for further Operations work in this area as indicated by not following procedures in response to alarms and off-normal events. Examples of this were the failure to follow procedures to completion in response to high steam tunnel/reactor building differential temperature and not declaring a channel of reactor vessel level indication inoperable when required by procedures.

- Operations management did not consistently demonstrate the expected sense of ownership and safety perspective. This was evidenced by Operations management not conservatively evaluating or thoroughly questioning identified plant problems such as the leaking pressure isolation valves and control rod drive scram solenoid pilot valve testing.

Response

1. Operator Performance Errors

The Operations Manager has issued a personal letter to plant operators clearly communicating that the number of personnel errors in the department is significant and that immediate improvement is needed. Personnel error PERs are tracked and trended by each crew and the topic of personnel errors is discussed at staff and supervisor meetings.

To promote higher performance standards, Operations will benchmark other utilities for information on development of programs based on performance indicators and incentives. A performance based program, specifically focused on improving human performance, will be developed and implemented. The operating crews will be held accountable for effective implementation of the program.

Operations Instruction OI-9, "Supervisory Oversight," was developed and implemented in January, 1994, requiring increased supervisory oversight of field activities in an effort to further improve performance. Some of the performance criteria observed are procedural compliance, use of self-checking techniques, formal communication practices, thoroughness of turnovers, proper use of annunciator response procedures, and general work practices.

The Operations managers and Operations Training managers will strengthen the use of awareness drills during simulator training and will ensure that self-checking is consistently evaluated and critiqued during simulator training.

1. Response to Annunciators and Off-Normal Events

An individual with prior control room experience will be assigned as the Operations department procedure coordinator on a rotational basis. A plan will be developed to improve the overall content, quality, and correctness of our existing annunciator response procedures (ARPs) and abnormal operating procedures (AOPs).

The Operations Training department is presently developing a training module on "Structured Approach for Problem Solving." This module will be used in training the operating crews during the next training cycle following the completion of the 1994 refueling outage (R9).

WNP-2 operators will continue to be trained and evaluated on annunciator response and abnormal operating procedures. Opportunities will be emphasized for the operating crews to successfully diagnose and respond to abnormal conditions.

The Operations liaison to training, as the lead evaluator, will ensure that operator training's performance relative to management's expectations and these identified weaknesses improves through observation and reporting to the Training Manager and Operations Manager.

3. Operations' Ownership and Involvement in Engineering

An Operations Instruction entitled "Operational Cycle Concerns" has been developed to provide background information on plant issues, effect(s) on plant systems and components, special conditions, contingencies, and identified closure mechanisms. It also ensures that newly identified requirements have been incorporated into appropriate plant procedures. This instruction is provided to the operating crews for training and reference purposes and is updated as necessary.

The Operations and Plant Support Engineering managers met to discuss methods to improve the guidance presently provided to the operating crews from emergent technical issues. Additional consideration will be placed on operational consequences and impacts.

During Cycle 10, Operations management plans to matrix a licensed or previously licensed individual to the Plant Support Engineering group, as soon as resources allow, to inject an increased operations perspective into this functional area. This perspective will improve the Engineering — Operations interface, help ensure operational consequences are fully considered, and ensure that Operations management is involved in problem resolution at an early stage.

A shift manager continues to be dedicated as the Operations representative to the Project Review Group (PRG) which reviews all projects from planning through implementation in the plant.

Operations management are voting members of the Project Review Committee (PRC) which sets priority and final approval, including funding, of all proposed plant modifications.

Operations management representatives will continue to work with Maintenance and the Technical Services Division to further enhance the "system expert" program and ensure more consistent involvement by Operations personnel.

D. Functional Area: Plant Support

The SALP Board assigned a Category 2 rating to the Plant Support area. Areas of good performance were noted along with some Board concerns.

Board Concerns

- The Board indicated that the Supply System's lack of depth at the professional technical staff level in Radiation Protection as a continuing concern.

- The Board noted that within Emergency Planning, problems with the maintenance of inventory records and scheduling of Emergency Preparedness surveillances dealing with emergency equipment existed.

- The Board indicated a concern with the ability of Security to detect slow, long-term deterioration of the Closed Circuit Television (CCTV) image. The Board also noted that certain security surveillance procedures did not have provisions to assure that acceptable random failures did not have a common cause.

Response

1. Radiation Protection

The Supply System agrees that there is a lack of depth in the professional technical staff in Radiation Protection. Consequently, efforts to attract qualified professional staff continue. Radiation Protection management is supporting one of the degreed health physicist's efforts in preparing for the certified health physics exam this year. Additionally, selected Radiation Protection professional staff personnel will attend a Senior Reactor Operator (SRO) certification course over the next year. Also, National

Registry of Radiation Protection Technologists (NRRPT) study, classes, and testing will be offered to the health physics technicians. The use of outside consultants to augment the professional staff will continue as appropriate.

In order to increase the effectiveness of the Radiation Protection oversight function, the Corporate Health Physicist was recently relocated to the plant. This move will allow this individual to have a greater impact on plant activities in support of Radiation Protection's overall program. Also, by working at the plant, the Corporate Health Physicist will help to alleviate the problem with the lack of depth in the professional technical staff in Radiation Protection.

2. Emergency Preparedness

The report identified problems which existed in Emergency Preparedness with inventory records and scheduling of Emergency Preparedness surveillances related to the emergency equipment readiness. These issues have been resolved by assuming responsibility for emergency center maintenance within the Emergency Preparedness department. Periodic assessments of emergency center readiness are performed and a new system for scheduling and documenting inventory status and surveillance completion is in use. This new system was implemented and evaluated for four months to ensure that this corrective action was effective.

Improvements identified in the SALP report continue with the completion of Emergency Operations Facility renovation and the Technical Support Center upgrade completion planned for June, 1994. The five team on-call rotational emergency response organizations were implemented. The training program is now being revised to provide team based training which is expected to result in improved performance. Also, a procedure upgrade project is in progress.

3. Security

In the Security area, steps have been taken to resolve the two issues discussed in the report. In order to detect and correct CCTV image deterioration prior to any loss of function, a video recorder has been purchased and will be used to periodically capture the quality of the CCTV image. Action will be taken to correct identified degradation before component functionality is affected. Corrections to Security surveillance procedures were completed and reviewed by the NRC during the SALP period. These changes resolved this issue.

The Security organization is continuing to look for improvement. The use of self and peer assessments will continue to be used in Security to identify any weaknesses that may exist. The group is also looking for advances in technology to potentially improve efficiency and performance.

E. Functional Area: Supply System Oversight

The Board indicated that, while improvements have occurred, the Supply System's self assessment programs have not been adequately involved in identifying ineffective improvement initiatives. We concur with the Board's evaluation. As this area is integral to all functional areas, we offer the following overall response.

Board Concerns

- Quality Assurance audits were thorough and in-depth in several areas, however, QA did not appear to play a significant role in raising the level of performance, especially in the Engineering and Maintenance areas. Quality involvement in Fire Protection was not evident until after issues were identified by the NRC.

- Oversight organizations and review groups need to be more demanding and critical.

- Self assessments have not been sufficiently involved in identifying where improvement initiatives are not fully effective.

Response

1. Quality Assurance

Quality Assurance acknowledges the need to continue to implement an intrusive, performance based assessment approach. Improvements in our scope and schedule of assessments have been made to ensure that key organizations and activities are assessed at the frequency and depth commensurate with their current performance, industry experience, and safety significance. Recent changes to the assessment schedule have been made which reflect ongoing assessments in 10 CFR 50, Appendix R Fire Protection design control and implementation (through an ongoing Safety System Operational Modification Inspection (SSOMI) type assessment). These are examples of our recognition of the need to assess the Engineering and Maintenance areas more aggressively. In addition, the QA schedules have been revised to assess maintenance activities later this year to assure planned improvements continue.

2. Review Groups

The Supply System has revised and documented the performance expectations for members of the on-site and off-site review committees. We have also provided specific performance plans for the members of the on-site committee and these plans are being reviewed quarterly with the individuals to enhance and improve committee performance. In addition, we have streamlined some administrative processes which support the

committees and this has resulted in more timely and in-depth reviews. We are evaluating changes to the membership of these boards to assure that these committees function as independent reviewers and do not actually manage the issue.

3. Self-Assessments

The Supply System recognizes the need to provide additional self-assessments over and above that provided by the Quality Assurance organization, especially in topical areas where the performance indicators have shown ineffective prior corrective actions. As a recent example, management recognized that improvement efforts had not resulted in the level of performance expected. Management's initial indication as to the cause of this problem was due to the perception and reaction of the middle managers. To assess this issue further, a team of people from the Supply System, INPO, and other plants was established to interview a large sample of our middle managers and that effort is presently underway.

The Supply System has also recently conducted or had others conduct self-assessments in Maintenance, Radiological Protection, Industry Events, and several Engineering areas. Maintenance self-assessments identified the need for additional supervisory training to assure the infield oversight and resolution of worker issues is effective. Radiological Protection staff members have contracted for assessments from industry experts in the areas of dosimetry and waste management. Our Industry Event/Information review process was assessed by a team of outside experts and industry peers. The Supply System will continue such initiatives as well as benchmarking with the industry leaders.June 28, 1994