


# OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004)

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WASHINGTON PUBLIC POWER  
SUPPLY SYSTEM



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## 1 - ORGANIZATION

### 1.1 PURPOSE

This section provides a description of the authorities and responsibilities assigned to Supply System organizational units and individuals involved in establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program during the initial testing (pre-operational and startup testing) and subsequent operations phases of Supply System nuclear power plants.

### 1.2 SUPPLY SYSTEM ORGANIZATION

The Supply System organization responsible for establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program for its nuclear power plants is as depicted in Figures 1-1 and 1-2. Portions of these activities may be delegated to external organizations qualified to the requirements of this Operational QA Program, hereafter referred to as QA Program; however, the responsibility shall remain with the Supply System.

### 1.3 MANAGEMENT RESPONSIBILITIES

1.3.1 The Managing Director is responsible for the establishment of policies and for overall management of Supply System operations. The Managing Director has issued a Management Statement which commits the Supply System to design, construct, and operate its nuclear power plants without jeopardy to the health and safety of the public. The Managing Director is the ultimate Supply System

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authority on matters involving quality. The Managing Director operates through the Vice President, Nuclear Operations; Director, Projects; Director, Information; and the Chief Financial Officer to provide for engineering, construction, procurement, quality assurance/quality control, and operations activities for Supply System nuclear power plants.

1.3.2 The Vice President, Nuclear Operations reports to the Managing Director and is responsible for:

- a. Safe and efficient operation of Supply System nuclear power plants.
- b. Safe and successful completion of initial testing activities for WNP-2 (through the WNP-2 Plant General Manager).
- c. Establishing and monitoring maintenance systems common to operational nuclear power plants.
- d. Training of nuclear plant staff and support personnel.
- e. Development of programs and procedures to ensure uniform application at operational nuclear power plants.
- f. Radiological protection, fire protection, plant security, emergency preparedness, and radioactive waste management.

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- g. Maintaining cognizance of changing regulatory requirements and providing controlled interface between the Supply System and regulatory agencies to assure that commitment documents receive the necessary degree and depth of reviews prior to transmittal.
- h. Providing licensing support functions in such areas as acquisition and maintenance of nuclear power plant construction permits and operating licenses.
- i. Quality Assurance program definition, implementation and effectiveness.
- j. Reviewing in-house and external events for determination of cause and necessary corrective action to minimize potential for recurrence at Supply System nuclear facilities.
- k. Engineering design and analysis support for WNP-2.
- l. Appoint in writing the members to the Corporate Nuclear Safety Review Board (CNSRB) including the Chairman and Alternate Chairman.

To accomplish this role, the Vice President, Nuclear Operations operates through the Plant General Manager; Director, Engineering; Director, Quality; Director, Nuclear Training; Director, Support Services; Manager, Planning and Controls; Director, Regulatory and Industry Affairs; Corporate Chemist; and Corporate Radiological Health Officer.

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1.3.2.1 The Director, Quality reports to the Vice President, Nuclear Operations and is directly responsible for the definition, direction, and effectiveness of the overall Quality Assurance Program during design, construction, and operation phases of all Supply System nuclear power plants. Major functions of the Quality Assurance organization are:


- a. Establishing and maintaining assurance programs, Nuclear Operation Standards, and directorate procedures which incorporate nuclear safety considerations and comply with the Quality Assurance (QA) criteria delineated in Appendix B to 10CFR 50.
- b. Assuring through reviews, surveillances, assessments, inspections, and audits that Supply System and its suppliers' activities are being performed in a safe and legal manner in accordance with written and approved documents which comply with applicable requirements defined by the assurance programs and Nuclear Operation Standards.
- c. Assessing the overall effectiveness of assurance programs' implementation, including evaluation of plant performance and reporting conclusions to the Managing Director.
- d. Stopping unsatisfactory work and controlling further processing, delivery, or installation of nonconforming material.
- e. Establishing and maintaining adequate and qualified assurance staffing levels based on workload analysis.

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- f. Providing trending of deficiencies to identify areas where corrective actions have not minimized recurrence.
- g. Establishing, maintaining, and controlling the Operational QA Program Description (WPPSS-QA-004) and the Supply System Functional Manual for Nuclear Operation.
- h. Certifying Supply System examination personnel for non-destructive examinations (NDE).
- i. Qualifying and certifying Supply System QC inspection and test personnel.
- j. Acquiring and maintaining ASME Certificates of Authorization and/or Owners Certificates.
- k. Ensuring that a written agreement with an Authorized Inspection Agency is obtained to provide for Authorized Nuclear In-Service Inspection Services.
- l. Establishing, managing, and administering the implementation and effectiveness of the Nuclear Safety Issues Program (NSIP).

The Director, Quality has effective communication channels with all Supply System senior management positions and has no duties or responsibilities unrelated to quality assurance. To accomplish the above defined role, the Director, Quality operates through the Manager, Quality Support Services; Manager, Quality Services; Manager, Plant Quality Control; Manager, Supplier Quality; and WNP-1 Quality Assurance staff.



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The qualification requirements for this position are as described in Appendix I, Qualification Requirements.

A representative from the Quality Assurance Organization is a member of the Plant Operating Committee (see Chapter 13 of the FSAR) and has sufficient authority and organizational freedom to identify problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. The representative has no duties or responsibilities unrelated to quality assurance matters and has effective communication channels with all plant supervisory and management personnel.

- 1.3.2.1.1 The Manager, Quality Services and the Manager, Quality Support Services report to the Director, Quality and are directly responsible for performing internal Supply System quality assurance functions that are necessary to verify that the QA Program is being effectively implemented. This includes maintaining a sufficient number of qualified auditors to perform QA audits, as required.

Each Manager has the authority and responsibility to stop unsatisfactory work and control further processing, delivery, or installation of nonconforming material. When the unit is operating, either Manager may recommend that the unit be shut down; the Plant General Manager, however, has the final responsibility for the overall evaluation of all aspects and implications of shutting down the operating unit.

Qualification requirements for these two positions are described in Appendix I, Qualification Requirements. The Managers, Quality Services and Quality Support Services, are specifically responsible for:

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- a. Reviewing and concurring with documents affecting safety, including changes thereto, to assure that applicable quality assurance requirements have been identified and specified therein. Documents subject to review and concurrence by Quality Assurance reviewers include, but are not limited to the following: (i) procedures which address: administrative controls, operations, maintenance, technical specifications, in-service inspection and testing, modifications, calibration, testing, and fuel handling; and nonconformance and corrective action reports.
- b. Reviewing and concurring with programs, procedures, and/or instructions (including changes thereto) of off-site Supply System organizations to assure that they are clear, address applicable quality assurance requirements, and are technically acceptable prior to approval for release.
- c. Verifying internal Supply System activities to assure that they are being conducted in a safe and legal manner in accordance with approved programs, plans, procedures, or instructions. Such verifications will be in the form of audits, technical assessments, or quality assurance surveillances. Included in the scope of these verifications are: (i) control room operations; post modification/major maintenance testing and operational tests; maintenance, modification, repair, and calibration; personnel training; and refueling activities; (ii) activities associated with satisfying technical specifications and in-service inspection and testing; (iii) activities associated with the implementation of security, fire protection, and radiological protection programs; (iv) activities including engineering, maintenance, modifications, operational problem resolution, technical support activities, and operational

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analysis that affect plant nuclear safety and reliability; and (v) activities related to procurement, storage and issuance of parts, materials, and services to assure implementation of QA Program and management requirements.

- d. Performing independent design, functional, and safety evaluations.
- e. Performing quality assurance audits, surveillances, and technical assessments of Supply System organizations and on-site external organizations (e.g., the engineering and maintenance support contractors).
- f. Developing evaluation schedules and selecting qualified personnel to perform the activities of this function.
- g. Certifying Audit Team Leaders.
- h. Qualifying Quality Assurance personnel.
- i. Forwarding evaluation reports to the management positions responsible for the areas assessed and the Chairman of the Corporate Nuclear Safety Review Board for review, assessment, and/or correction of identified deficiencies.
- j. Maintaining QA verification records.
- k. Supply System initiated SSFI reviews and other similar plant safety system operability reviews.

Each Manager will be responsible for performance of the above activities within certain functional areas.



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1.3.2.1.2 The Manager, Plant Quality Control (QC) reports to the Director, Quality and is directly responsible for performance of in-plant QC functions. In accomplishing this role, the Manager, Plant QC is responsible for:

- a. Evaluating procedures and instructions for accomplishing QC activities.
- b. Determining and establishing hold points for inspections, examinations, and/or measurements to be accomplished during maintenance, modification, repair, and testing.
- c. Performing and evaluating the inspections, examinations, and/or measurements established.
- d. Assuring that proper staffing is available to meet plant workloads.

Qualification requirements for this position are described in Appendix I, Qualification Requirements.

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- 1.3.2.1.3 The Manager, Supplier Quality reports to the Director, Quality and is primarily responsible for the definition and implementation of the source surveillance/audit program for verification of activities performed by Supply System vendors (including the Nuclear Steam Supply System vendors). He is further responsible for assuring that items received for WNP-2 meet the required quality standards. The Manager, Supplier Quality is responsible for:
- a. Establishing vendor witness points for inspection and release of material/equipment for shipment.
  - b. QC receipt inspection of materials and equipment received by the Supply System.
  - c. Establishing and maintaining evaluated vendors list.
  - d. Planning, coordinating, and performing source surveillances, source inspections, and external audits to verify implementation of vendors' QA/QC programs.
  - e. Reviewing and approving vendor furnished QA/QC procedures and programs.
  - f. Reviewing for acceptance other utility audits furnished through the Nuclear Procurement Issues Committee (NUPIC) or Nuclear Energy Institute (NEI).

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- 1.3.2.1.4 WNP-1 OA Staff report to the Director, Quality and are primarily concerned with assuring that the records and equipment of the project are maintained such that they may be shown to meet quality standards on restart.
- 1.3.2.2 The Plant General Manager for WNP-2 reports to the Vice President, Nuclear Operations and is directly responsible for safe and efficient operation of the plant in accordance with the requirements of the Operating License, the Plant Technical Specifications, and the Plant Procedures Manual. Some of the specific responsibilities of the Plant General Manager are:
- a. Planning, coordinating, and directing all test, operation, modification, inspection, maintenance, and refueling activities subsequent to the issuance of an Operating License.
  - b. Authorizing all plant modifications subsequent to the issuance of an Operating License.
  - c. Qualifying and training plant staff.
  - d. Initiating and approving purchase requisitions.
  - e. Controlling purchased equipment and materials intended for plant use.
  - f. Ensuring calibrated measuring and test equipment (including installed instruments covered by the Plant Technical Specifications) is utilized at WNP-2.
  - g. Dispositioning of nonconforming items.

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- h. Implementing the in-service testing program.
- i. Developing, maintaining and implementing a fire protection program.
- j. Off-Site Dose Calculation Manual (ODCM).
- k. The Radiological Environmental Monitoring Program and Bioassay Program.
- l. Environmental sciences function which performs nonradiological monitoring and fitness for duty chemical analysis.
- m. The supply, engineering, and efficient in-core management of nuclear fuel.
- n. Transient analysis and licensing issue resolution to support technical specification changes and reload fuel licensing.

The Plant General Manager operates through the Operations Manager, Maintenance Manager, Technical Services Manager, Radiation Protection Manager, Chemistry Manager, and Planning/Scheduling/Outage Manager. The plant organization and functional responsibilities of key plant personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

- 1.3.2.3 The Director, Nuclear Training reports to the Vice President, Nuclear Operations and is responsible for nuclear training policy and implementation, fire prevention and protection training, technical maintenance of the simulator to support operator training and testing, and training records management for nuclear plant operations.

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1.3.2.4 The Director, Support Services reports to the Vice President, Nuclear Operations and is responsible for the development and implementation of policies and programs which support operation of Supply System nuclear power plants in the areas of safeguards and physical security, fitness for duty, emergency preparedness, and administration and records management. To accomplish this role, the Director, Support Services operates through the Manager, Security Programs; Manager, Emergency Preparedness; and Manager, Administration and Records Management.

1.3.2.4.1 The Manager, Security Programs reports to the Director, Support Services and is responsible for overall Supply System security activities. The Manager, Security Programs is specifically responsible for:

- a. Administering a security program which includes preemployment screening, physical security surveys and investigations, loss prevention, and fitness for duty.
- b. Managing the security force by assuring that physical security is consistent with needs and is maintained within individual plant safeguards security plans.
- c. Providing training, administrative, and technical support to the Plant General Manager in the area of plant security.

1.3.2.4.2 The Manager, Emergency Preparedness reports to the Director, Support Services and is responsible for developing and maintaining an emergency response program that includes plans, implementing procedures, training, and drills and exercises.



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1.3.2.4.3 The Manager, Administration and Records Management reports to the Director, Support Services and is responsible for:

- a. Developing and implementation of administrative controls for plant procedures, processes and systems to maintain nuclear plant design, construction, and operating records.
- b. Providing program definition and policy development for Supply System records management activities, which includes processing, retrieval, storage and dispositioning of records.
- c. Providing administrative support functions necessary for the maintenance of manuals and procedures.
- d. Managing an administrative process by which engineering-related activities and commitments are assigned, scheduled, tracked, and dispositioned.

1.3.2.5 The Corporate Chemist reports to the Vice President, Nuclear Operations and is responsible for policy development, oversight, and integration of matters pertaining to chemistry at WNP-2.

1.3.2.6 The Corporate Radiological Health Officer reports to the Vice President, Nuclear Operations and is responsible for the development and oversight of radiation protection policies and programs which support operation of WNP-2. The Corporate Radiological Health Officer provides support to WNP-2 through coordination of radiation protection projects and long range planning, program oversight, audits and evaluation of the Radiation Protection Program.

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1.3.2.7 The Director, Regulatory and Industry Affairs reports to the Vice President, Nuclear Operations and is responsible for:

- a. Acquiring and maintaining operating licenses of Supply System nuclear power plants.
- b. Defining and implementing programs which assure that licensing submittals receive an adequate technical review from cognizant Supply System, NSSS, or AE personnel prior to transmittal.
- c. Tracking licensing commitments and taking action necessary to assure that they are being met in a timely manner.
- d. Providing coordinated development of responses and comments to new laws, regulations, regulatory guides, and other regulatory issuances.
- e. Administering the WNP-2 industry and in-plant operating experience programs.
- f. Providing the Independent Safety Engineering Group (ISEG) functions for assessing programs, processes and activities of various areas and operations that affect plant nuclear safety and reliability.
- g. Administering the nonconforming condition and corrective action processing including assisting the cognizant organization in evaluation and determination of the root cause for plant-related events.

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- h. Reliability and availability analysis to improve plant performance, safety, and maintainability.

The Director, Regulatory and Industry Affairs operates through the Manager, Licensing; Manager, Regulatory Services; Manager, Regulatory Support; and Manager, Special Projects.

1.3.2.8 The Director, Engineering reports to the Vice President, Nuclear Operations and is responsible for providing project engineering and design control, nuclear fuel supply, and maintenance/surveillance engineering support as required for WNP-2. The Director, Engineering is specifically responsible for:

- a. Providing and implementing design control programs and processes by which plant design, and design changes, and modifications are defined, controlled, and verified.
- b. Implementing programs for pre-service inspection, in-service inspection, and nondestructive examinations and materials and welding engineering.
- c. Providing engineering support for technical resolution of nuclear safety and licensing issues.
- d. Maintaining a current engineering data base for WNP-2 including; Master Equipment List (MEL), Safety Related Material (SRM), Class 1 Electrical (C1E), Restricted Use Equipment List (RUEL).
- e. Implementing configuration control by establishing site-specific policy, procedures, and methods that allow control and accountability.

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- f. Management of major plant modifications, maintenance tasks, and contractor support.

The Director, Engineering operates through the Manager, Mechanical Design Engineering; Manager, Electrical/I&C Design Engineering; Manager, WNP-2 Projects; Manager, Engineering Programs; and Manager, Materials and Inspection. The Engineering organization and functional responsibilities of key personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

1.3.3 The Director, Projects reports to the Managing Director and is responsible for providing project management support for Supply System projects. The Director, Projects is specifically responsible for:

- a. Providing project management and engineering for power projects under construction and preservation management and engineering for mothballed power projects.
- b. Providing for site restoration for power project sites which are to be abandoned.
- c. Providing specialized project management for major construction projects which results in off-line completion of major additions to operating plants and support facilities.
- d. Providing specialized project management for major procurement acquisitions for operating power plants.

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The Director, Projects operates through the Manager, WNP-1 Project; Manager, Facilities Services and Construction; and Manager, Administrative Support Services.

1.3.4 The Chief Financial Officer reports to the Managing Director and is responsible for providing procurement and storage control services that are required to support operation and maintenance of Supply System nuclear power plants and for the sale and demolition of Projects WNP-3, WNP-4 and WNP-5. To accomplish this role, the Chief Financial Officer operates through the Manager, Procurement and Materials Management; and Manager WNP-3.

1.3.4.1 The Manager, Procurement and Materials Management reports to the Chief Financial Officer and is responsible for:

- a. Development of Supply System procurement policies and procedures.
- b. Procurement of items and services in response to approved purchase requisitions.
- c. Coding, cataloguing, handling, storage, shipping, and disposal of procured items.
- d. Providing project management for disposition of assets from terminated power projects and disposition of major assets surplus to operating power projects.

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1.3.4.2 The Manager, WNP-3 reports to the Chief Financial Officer and is responsible for:

- a. Site restoration for the terminated project.
- b. Completion and closeout of all construction phase related license and permit commitments.
- c. Site management during restoration and sales activities.



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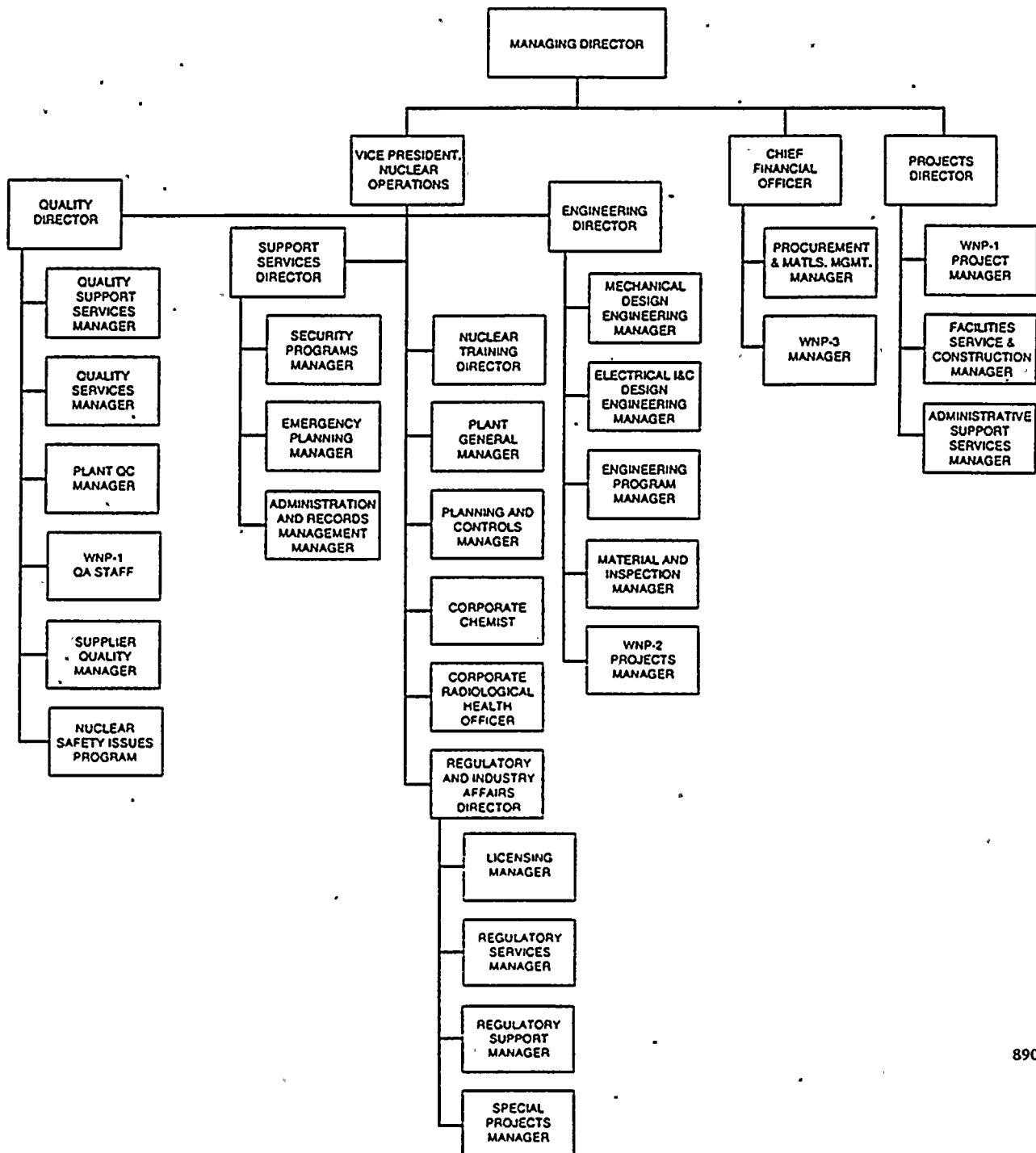
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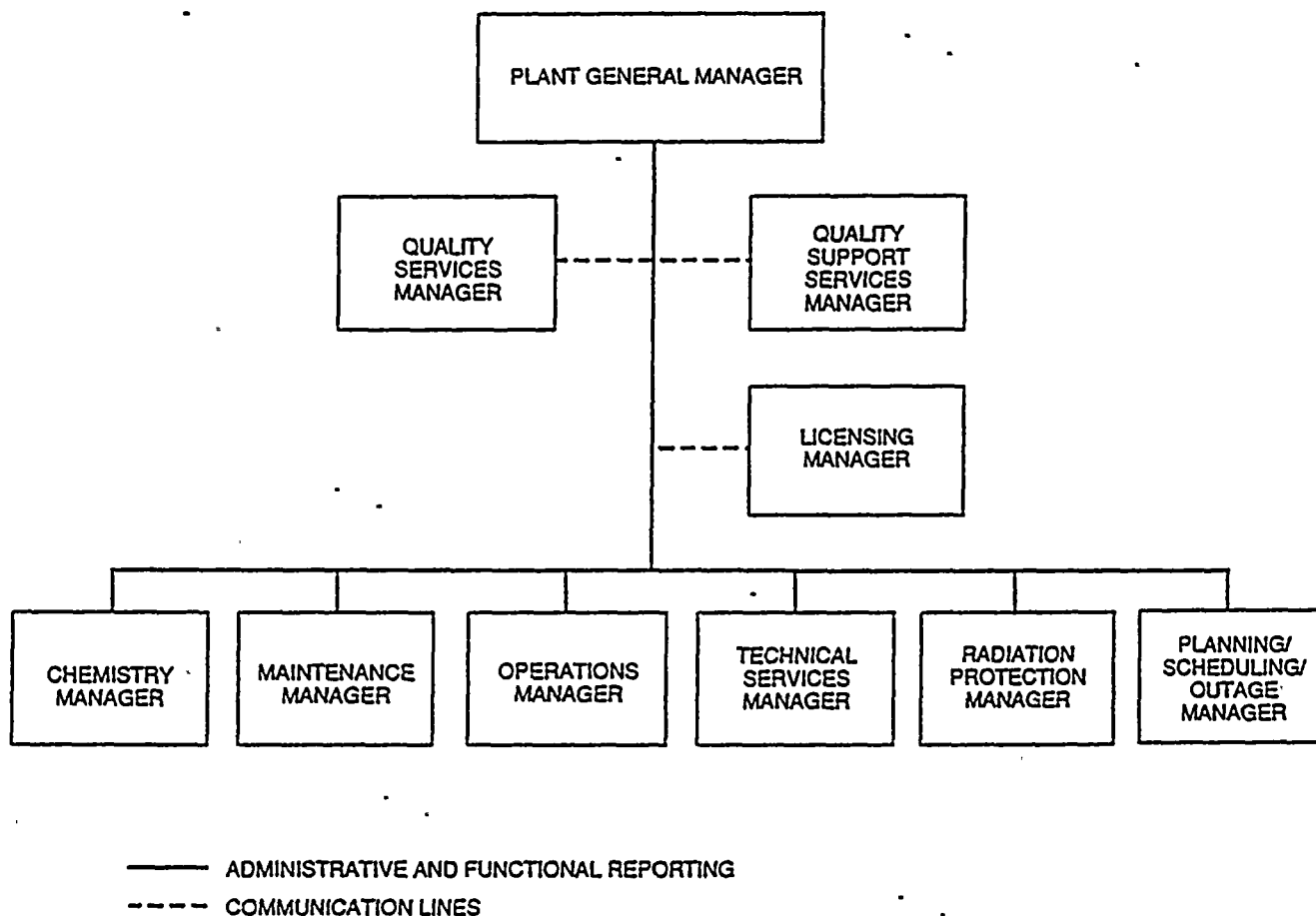
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FIGURE 1-1



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FIGURE 1-2



**Supply System Organization  
Relative To Operational QA**



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2.1 This section provides an overall description of the QA Program that will be applied to initial testing and subsequent operation and maintenance activities throughout the life of Supply System nuclear power plants.

2.2 GENERAL

2.2.1 The QA Program will be implemented through a series of Nuclear Operation Standards (NOSs) contained in the Supply System Functional Manual for Nuclear Operation. In turn, these NOSs will be implemented by Supply System organizational procedures, programs, or plans which prescribe detailed methods for functional accomplishment. The NOSs will address the applicable requirements of Appendix B to 10CFR 50 and Sections 1 through 18 of the QA Program. A matrix of Nuclear Operation Standards cross referenced against each criteria of Appendix B to 10CFR 50 is included in Table 2-1. The NOSs and implementing procedures, programs, or plans will collectively comply with the regulatory positions of QA-related Regulatory Guides as identified and modified in Appendix II, Position Statements.

2.2.2 A list of safety-related items that will be subject to the applicable controls of the QA Program is included in the Final Safety Analysis Report (FSAR) for the applicable Supply System nuclear power plant. Changes to this listing shall be controlled by the Director, Engineering and approved by the Plant General Manager.

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2.2.3 Applicable provisions of the QA Program shall be implemented by the earliest of the following and shall remain in effect for the life of Supply System nuclear power plants:

- a. Prior to inception of the activity.
- b. At the time of temporary/permanent transfer of system/component custody to Test and Startup organization.
- c. Ninety (90) days prior to initial fuel loading.

2.2.4 Revisions to the QA Program will be made by the Quality Assurance organization as follows:

- a. Proposed changes to the QA Program will be evaluated to determine whether or not they would result in a reduction of commitments previously accepted by the Nuclear Regulatory Commission (NRC).
- b. Changes that do not reduce the commitments may be implemented prior to forwarding such changes to the NRC. However, all such changes shall be forwarded to the NRC at least annually.
- c. Changes that reduce commitments will be forwarded to the NRC for their review and acceptance prior to implementation. Such changes shall be regarded as accepted by the NRC upon receipt of a letter from the NRC to this effect or sixty (60) days after submittal to the NRC, whichever occurs first.

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- 2.2.5 Managers of Supply System organizations responsible for implementing the applicable provisions of the QA Program shall assure that activities that affect safety-related functions of plant items are performed by personnel who have been indoctrinated and trained. The scope, objective, and method of implementing the indoctrination and training program shall be documented. Proficiency of personnel performing activities that affect safety-related functions of plant items shall be maintained by retraining, re-examination, and/or recertifying, as applicable. Methods shall be provided for documenting training.
- 2.2.6 The scope, implementation, and effectiveness of the QA Program is routinely audited by the Quality Assurance organization. Copies of audit reports are presented to Supply System management to provide for assessment of the effectiveness of the QA Program. Additionally, at least once per two (2) years, the Supply System management arranges for an independent evaluation of the adequacy of the scope, implementation, and effectiveness of the QA Program. This is accomplished by knowledgeable personnel outside of the Quality Assurance organization to assure achievement of an objective program assessment. Results of these independent evaluations are reported to the Managing Director and Vice-President, Nuclear Operations.

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**TABLE 2-1**

## **OPERATIONAL QA PROGRAM DESCRIPTION IMPLEMENTING NUCLEAR OPERATION STANDARDS (Page 1 of 1)**

Nuclear Operation Standards		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
NOS-1	Organizational Responsibilities/Changes	X																	
NOS-2	Control of the Functional Manual for Nuclear Operation	X				X	X												
NOS-3	Operational QA Program Description Control	X					X												
NOS-4	Plant Operations and Maintenance Control	X		X			X		X	X			X	X	X				
NOS-5	Personnel Training, Qualification and Certification	X	X								X								
NOS-6	Review Committees (CNSRB & POC)	X																	
NOS-8	Nuclear Safety Assurance Assessment Program	X																	
NOS-9	Procedures/Instructions Control	X		X		X	X												
NOS-11	Conduct of Licensing Activities	X					X												
NOS-13	Reporting of Incidents	X		X															
NOS-14	Operating Experience Review	X																	
NOS-19	Plant QC Inspection Program	X								X	X								
NOS-20	Quality Assurance Evaluations	X														X	X		X
NOS-21	ASME Pressure Boundary Work	X		X			X	X	X	X	X	X		X	X				
NOS-22	Q-List Control	X		X															
NOS-23	Plant Modification Control	X		X			X					X							
NOS-24	Control of Records	X																X	
NOS-26	Computer Software QA	X		X			X												
NOS-27	Procurement and Storage Control	X			X		X	X						X					
NOS-30	Control of Nonconformances and Corrective Action	X		X			X								X	X	X		
NOS-32	Configuration Management Program	X		X			X												
NOS-33	Inservice Inspections	X					X			X	X	X							
NOS-34	Inservice Testing of Pumps and Valves	X					X					X							
NOS-35	Nuclear Materials Control	X													X	X			
NOS-36	Chemistry	X													X	X			
NOS-37	Rad. Environmental Mon. Program	X																	
NOS-39	Fire Protection Program	X													X				
NOS-40	Radioactive Waste Management	X																	
NOS-41	QA Program for Radioactive Materials Shipping Packages	X																	
NOS-43	Nuclear Plant Security	X	X	X			X								X	X			
NOS-45	Simulator Certification	X	X	X			X					X			X	X			

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### 7 - CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

#### 7.1 PURPOSE

This section establishes controls to assure that safety-related items and services, whether purchased directly or through contractors and subcontractors, conform to procurement documents.

#### 7.2 GENERAL

7.2.1 Procedures/instructions shall be established and implemented for the control of purchased materials, equipment, and services. These procedures/instructions shall clearly describe the actions to be accomplished and identify those positions or groups responsible for performing those actions.

7.2.2 Material, equipment, services and spare/replacement parts (other than commercial grade items as defined in 10CFR 21) for safety-related structures, systems and components:

- a. Shall have a technical evaluation to assure that requirements for acceptable item(s) are specified in the procurement documents.
- b. Shall be procured from vendors whose quality assurance qualifications have been affirmed, either prior to or after award of the contract, by Supplier Quality, and

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- c. Shall be subject to the quality assurance program controls and to technical requirements at least equal to the original technical requirements or to revised controls that have been properly reviewed and approved.

7.2.3 Material, equipment, services and spare/replacement parts for safety-related structures, systems and components that are commercial grade items as defined in 10CFR 21:

- a. Shall have a technical evaluation to assure that requirements for acceptable item(s) are specified in the procurement documents.
- b. Shall have acceptance methods to provide reasonable assurance the item(s) received is the item(s) which was specified. These may include one or more of the methods of Paragraphs 7.2.4., 7.2.5., or 7.2.6 as specified by the Technical Evaluation.

7.2.4 Evaluation of vendors, including review and concurrence of vendors' QA programs, shall be performed by QA using QA or Engineering personnel competent in determining the ability of vendors to provide acceptable quality products. Source selection will be based on one or more of the following:

- a. The ability of the vendor to comply with those elements of 10CFR 50. Appendix B applicable to the type of material, equipment, or services being procured.
- b. A review of previous record and performance of vendors who have provided similar articles of the type being procured.

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- c. A survey of the vendor's facilities and QA program to determine his capability to supply a product which meets the design, manufacturing, and quality requirements.

7.2.5 Source verification (vendor surveillance, inspection and audit) shall be commensurate with the relative importance, complexity, and quantity of the items or service procured and the vendor's quality performance. In-process and final surveillance requirements of vendor products shall be determined in advance and performed to assure conformance with procurement document requirements. Source verification is not required to be performed where the quality of the item can be verified by review of test reports, inspection upon receipt, or other means. Source verification activities shall include evaluation of vendor furnished Certificates of Conformance and/or vendor's Certification System.

7.2.6 Receiving inspection of vendor furnished items shall be performed to assure that:

- a. The item is properly identified and corresponds to the identification on the procurement document and the receiving documentation.
- b. The item and the acceptance records satisfy the inspection instruction prior to relying upon the item to perform its safety function.
- c. Specified inspection, test, and other records are complete and available at the site prior to relying upon the item to perform its safety function.
- d. Inspection status of accepted items is identified prior to their being released for storage, use or further work.



OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION

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REV.

7

- 7.2.7 Documentary evidence that the vendor furnished items conform to the procurement requirements shall be retained at the site for the life of the items.



 <b>WASHINGTON PUBLIC POWER SUPPLY SYSTEM</b>  <b>OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION</b>	PAGE I-1
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## APPENDIX I

### QUALIFICATION REQUIREMENTS

The minimum qualification requirements for key Quality Assurance personnel that will be met at the time of initial core loading or appointment to the active positions are as follows:

#### I.1 Director, Quality

- a. Education: Bachelor Degree or equivalent\* in Engineering or a related science.
- b. Experience: Ten (10) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a management position or a combination of the two. The requirement that the director have at least two years of experience in the administration of and adherence to the Quality Assurance Program in a significant management role directly involving nuclear power plants is being deleted.

Because the director's duties encompass a much broader range of responsibilities than administration of the QA Program, it is not considered desirable, nor appropriate, to limit the choice of candidates to only those who have had detailed involvement in the administration of the QA Program.

#### I.2 Quality Services and Quality Support Services Managers

- a. Education: Bachelor Degree or equivalent\* in Engineering or a related science.

OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTIONAPPENDIX IQUALIFICATION REQUIREMENTS

- b. Experience: Four (4) years experience in the field of quality assurance; or equivalent number of years of nuclear plant experience in a supervisory position, preferably at an operating nuclear plant, or a combination of the two. At least one (1) of these four (4) years of experience shall be nuclear power plant experience in the implementation of the quality assurance program.

I.3 Plant Quality Control Manager

- a. Education: Bachelor Degree or equivalent\* in Engineering or related science.
- b. Experience: Four (4) year experience in the field of quality assurance and/or quality control, or an equivalent number of years of nuclear plant experience in a supervisory position, preferably at an operating nuclear plant, or a combination of the two. At least one (1) year of this four (4) years experience shall be in the implementation of the quality assurance/control program.

---

\*Equivalency will be determined based upon an evaluation of the following factors:

1. High school diploma or GED.
2. Sixty (60) semester hours of related technical education taught at the college level (900 classroom or instructor conducted hours).
3. Qualified as an NRC senior operator at the assigned plant.
4. Four (4) years of additional experience in his area of responsibility.



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QUALITY ASSURANCE PROGRAM DESCRIPTION

APPENDIX I

QUALIFICATION REQUIREMENTS

5. Four (4) years of supervisory or management experience.
6. Demonstrated ability to communicate clearly (verbally and in writing).
7. Certification of academic ability and knowledge by corporate management.
8. Successful completion of the Engineer-In-Training examination.
9. Professional Engineer License.
10. Associated degree in Engineering or a related science.

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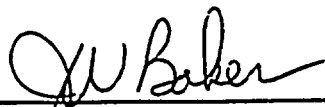
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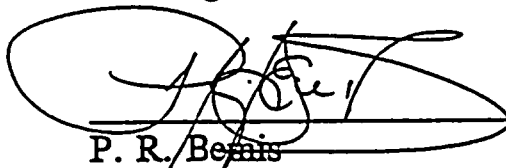
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Recommended for Approval by:



J. W. Baker  
Training Director



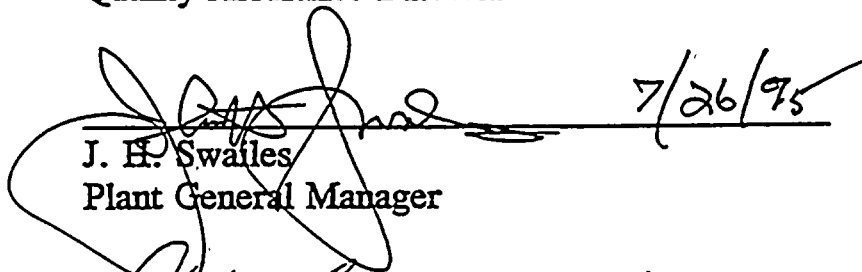
P. R. Bennis  
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J. P. Burn  
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G. O. Smith  
Quality Assurance Director



J. H. Swailes  
Plant General Manager

7/26/95



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7/26/95

Approved by:



J. V. Parrish  
Vice President-Nuclear Operations

## PURPOSE AND SCOPE

The purpose of this document is to identify, track, and trend initiatives that are being developed or implemented which have an affect on the Supply System's objective of achieving and sustaining superior regulatory performance. Combining all such initiatives in one report demonstrates that issues affecting regulatory performance have senior management's attention and will receive appropriate resources to assure effective implementation.

This document includes initiatives from Operations, Maintenance, Engineering, and applicable support organizations. Objectives and initiatives may be revised as appropriate to reflect changing conditions, or as necessary to assure the continued safe, reliable, cost-effective, and environmentally sound operation of WNP-2.



## INTRODUCTION

In early 1995, the Supply System performed a Mid-Cycle SALP Self Assessment (Self Assessment). At the conclusion of this Self Assessment and as a part of its presentation of the results, the Supply System committed to provide the NRC with a document addressing the identified weaknesses within 45 days following the R-10 outage. This document fulfills our commitment.

This document serves as a vehicle by which the Supply System and the NRC may accomplish the following goals:

- Develop a common understanding of the Supply System's weaknesses and strengths.
- Identify plans, programs, and initiatives designed to improve regulatory performance.
- Track and trend corresponding performance over time.

During May through July 1995, a special team under the direction of Regulatory Programs and Industry Affairs worked closely with coordinators assigned by each WNP-2 functional organization to develop and compose this regulatory communication tool. Over the course of this period, functional coordinators were asked to develop objectives and corresponding actions which were either being undertaken or would be undertaken to address weak areas affecting their respective organizations which had been identified within the Self Assessment. In addition, coordinators were asked to identify the results expected from their actions and establish standards by which these results could be measured to determine if they were accomplishing their intended purpose. The initial input from the functional coordinators was also evaluated by an ad-hoc Review Committee. The Review Committee evaluation was to ensure that there were no conflicts between the goals of the various Supply System organizations and to confirm that the Self Assessment identified weaknesses were effectively addressed by the corrective actions.

Although coordinators were instructed to specifically address the weaknesses set forth within the Self Assessment, they were also instructed to document and address additional weaknesses or improvement efforts affecting regulatory performance. This increase in scope was made with the intention of establishing this document as a central repository in which WNP-2 improvement measures related to the Self Assessment can be documented, updated, tracked and trended

in an effort to form a complete look at overall station health and improvement initiatives. The functional coordinators were asked to assure that a demonstrable connection existed between the identified weaknesses and the associated objectives, initiatives, and measurement standards.

For this document to be successful and effectively serve its stated purpose, it must be institutionalized through use of existing Supply System programs and processes. Therefore, this document, as well as issues surfacing from it which transverse functional lines (e.g., human performance errors), will be captured and addressed as initiatives within the Supply System Business Plan. This will ensure that the items receive proper resource allocation and management attention. The status of each item will be provided on a routine basis. In this manner objectives and initiatives will be assigned to a responsible individual and will be tracked, trended and monitored on a periodic basis, but no less than once each quarter. The NRC will be provided updates of this document in a timely manner.

This document is organized along the functional lines contained in the Self Assessment. In addition, three sections were added based upon our review of our performance. The functional areas included are listed below, with the new areas added in bold type:

## **0.0 Core Vice President - Nuclear Operations (VPNO) Objectives**

### 1.0 Licensee Control Systems

### 2.0 Operations

### 3.0 Engineering

### 4.0 Maintenance

### 5.0 Plant Support

### 6.0 Training

### 7.0 Additional Improvement Initiatives

Detailed areas of coverage are graphically represented on a Planning Tree which may be found behind the next tab. As an aid to reviewing this document, each functional area is preceded by a matrix containing a summary of the weakness identified in the Self Assessment and the corresponding objective designed to

address that weakness. Not all issues identified in the Self Assessment continue today as weaknesses. Items no longer requiring attention are identified as "complete" on the functional area matrix. One or two areas are presently being assessed to determine what action, if any, may be required to address the area of weakness. Those items are identified as "evaluating" on the functional area matrix.

This document has strong potential to provide the Supply System and the NRC a common basis of understanding, interpreting, and assessing significant regulatory performance issues facing the Supply System. Fundamentally, however, this document is a management tool. As such, it is expected that refinements and revisions will be necessary from time to time. Its continued use will be based upon assessed needs and benefits internal to the Supply System.

# REGULATORY PERFORMANCE ENHANCEMENT

**Preparation:** May 1995 - July 1995

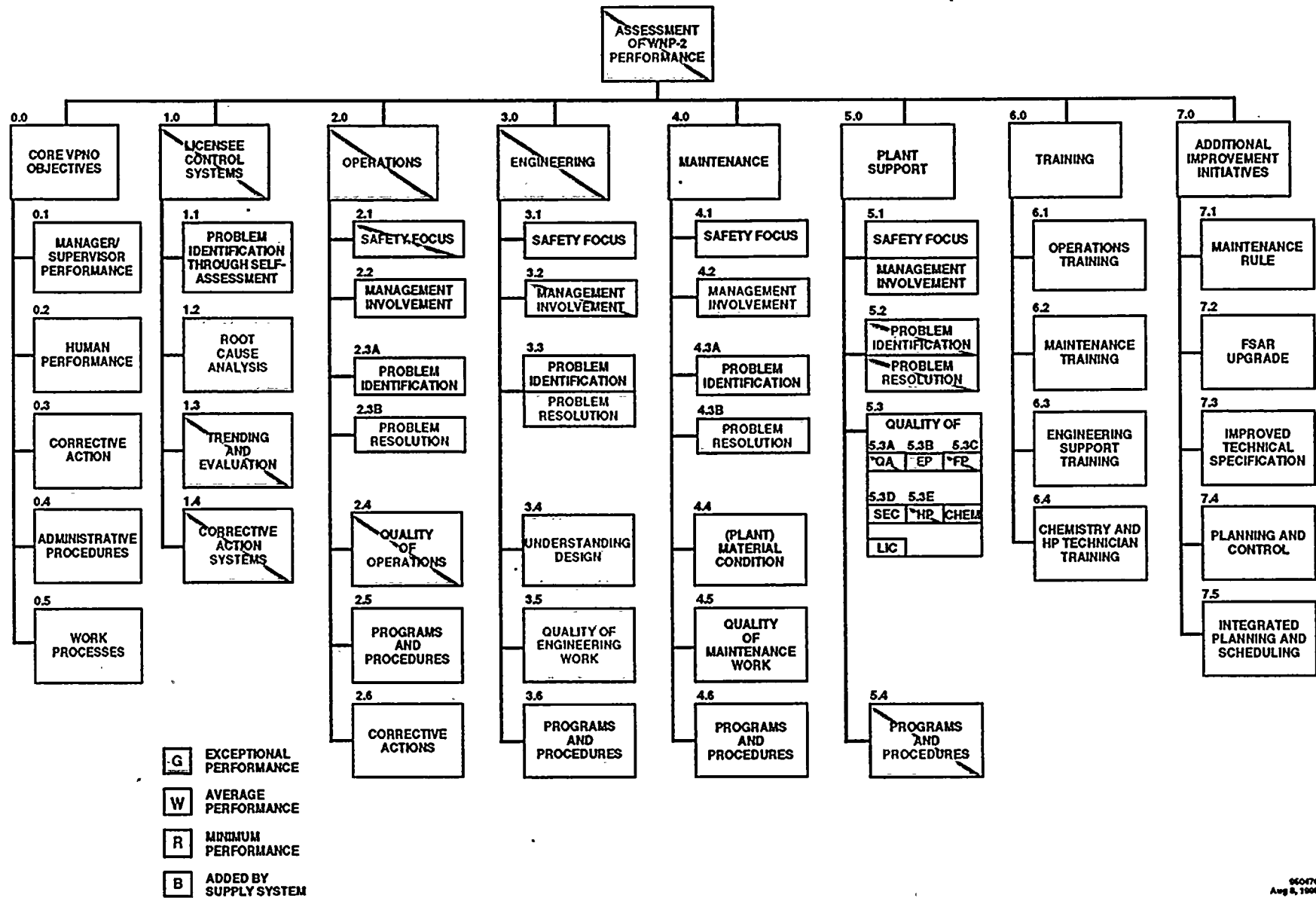
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**Review Committee:** W. Barley, Radiation Protection  
J. Engbarth, Administrative Auditor  
P. Robinson, Outside Legal Counsel  
J. Streeter, Managing Director Staff  
C. Van Hoff, Communications and External Affairs

# WNP-2 FINAL PERFORMANCE ASSESSMENT PLANNING TREE



# PERFORMANCE IMPROVEMENT AREAS CORE VPNO OBJECTIVES

0.0	CORE VPNO OBJECTIVES					
0.1	MANAGER/ SUPERVISOR PERFORMANCE	<table><tr><td></td><td>OBJECTIVE</td></tr><tr><td>• Improve manager supervisor performance.</td><td>0.1.1</td></tr></table>		OBJECTIVE	• Improve manager supervisor performance.	0.1.1
	OBJECTIVE					
• Improve manager supervisor performance.	0.1.1					
0.2	HUMAN PERFORMANCE	<table><tr><td></td><td>OBJECTIVE</td></tr><tr><td>• Improve human performance.</td><td>0.2.1</td></tr></table>		OBJECTIVE	• Improve human performance.	0.2.1
	OBJECTIVE					
• Improve human performance.	0.2.1					
0.3	CORRECTIVE ACTION	<table><tr><td></td><td>OBJECTIVE</td></tr><tr><td>• Improve effectiveness of corrective actions</td><td>0.3.1</td></tr></table>		OBJECTIVE	• Improve effectiveness of corrective actions	0.3.1
	OBJECTIVE					
• Improve effectiveness of corrective actions	0.3.1					
0.4	ADMINISTRATIVE PROCEDURES	<table><tr><td></td><td>OBJECTIVE</td></tr><tr><td>• Simplify administrative procedures.</td><td>0.4.1</td></tr></table>		OBJECTIVE	• Simplify administrative procedures.	0.4.1
	OBJECTIVE					
• Simplify administrative procedures.	0.4.1					
0.5	WORK PROCESSES	<table><tr><td></td><td>OBJECTIVE</td></tr><tr><td>• Simplify management, design change, and procurement work processes.</td><td>0.5.1</td></tr></table>		OBJECTIVE	• Simplify management, design change, and procurement work processes.	0.5.1
	OBJECTIVE					
• Simplify management, design change, and procurement work processes.	0.5.1					



EXCEPTIONAL  
PERFORMANCE



AVERAGE  
PERFORMANCE



MINIMUM  
PERFORMANCE



ADDED BY  
SUPPLY SYSTEM

# ***VICE PRESIDENT - NUCLEAR OPERATIONS OBJECTIVES***

## **0.1 MANAGER/SUPERVISOR PERFORMANCE (Reference Business Plan Management Initiative OP 6)**

**Objective:** 0.1.1 Improve manager/supervisor performance by changing cultural behavior.

**Initiatives:** 0.1.1.A Implement Leadership Expectations--plan, lead, organize and control. Completed.

0.1.1.B Assess manager/supervisor development needs--assessment for key managers. Ongoing.

0.1.1.C Develop initial and continuing supervisor/manager training program. Training Advisory Group (TAG) formed in October 1994; completed training needs assessment in March 1995; conducted the first cycle of continuing training in March 1995. Ongoing.

0.1.1.D Periodically survey the workplace to assess the effectiveness of performance improvement efforts. Ongoing.

0.1.1.E Implement succession planning process. Program evaluation complete with Senior Management approval of the revised process in 2/95. Program is currently in process to identify candidates and their development needs. 12/95.

### ***Expected Results:***

Improvements in the performance and skills of Supply System managers and supervisors, identification and correction of Supply System issues through effective supervision, and improvement in the performance and the consistency of performance of Supply System workers.

### ***Measurement***

**Standard:** Feedback from employees through formal instruments and informal sessions.

## 0.2 HUMAN PERFORMANCE (Reference Business Plan Initiative OP 9)

**Objective:** 0.2.1 Improve human performance at WNP-2.

**Actions:** 0.2.1.A Approve Management Initiative to improve human performance. Completed.

0.2.1.B Establish Human Performance Coordinator position reporting to VPNO. Completed.

0.2.1.C Identify internal and external attitudes regarding human performance. 9/30/95.

0.2.1.D Identify current initiatives to improve human performance. 9/30/95.

0.2.1.E Assess devices being used to monitor human performance. 9/30/95.

0.2.1.F Assess effectiveness of each department's human performance and develop recommendations for enhancements e.g., site wide OI-9 and Gold Card program. 9/30/95.

0.2.1.G Integrate human performance improvement efforts. Ongoing.

### *Expected*

**Result:** Reduced number and significance of human errors.

### *Measurement*

**Standards:** 0.2.1.a Number/rate of PERs caused by human performance.

0.2.1.b Number/rate of significant PERs caused by human performance.



### 0.3 CORRECTIVE ACTION

**Objective:** 0.3.1 Improve the effectiveness of corrective actions in correcting and preventing the recurrence of significant deficiencies.

**Actions:** 0.3.1.A Form and implement a Corrective Action Review Board (CARB). Completed.

0.3.1.B Review significant PERs and other PERs selected by CARB members to assess adequacy of corrective actions. Ongoing.

0.3.1.C Provide CARB feedback to PER dispositioners on CARB lessons-learned. Ongoing.

**Expected**

**Results:** Improved quality of PER dispositions.

Reduced number of recurring significant deficiencies.

**Measurement**

**Standards:** 0.3.1.a Number/rate of recurring PERs.

0.3.1.b Number/rate of recurring significant PERs.

#### 0.4 ADMINISTRATIVE PROCEDURES

**Objective:** 0.4.1 Simplify administrative procedures (Reference Business Plan Management Initiative OP 7).

**Actions:** 0.4.1.A Establish procedure hierarchy. Completed.

0.4.1.B Develop and implement a plan to simplify and clarify administrative procedures. Completed. Implementation in progress.

0.4.1.C Identify procedure requirements and commitments. Completed.

0.4.1.D Develop tracking system for requirements and commitments. Completed.

0.4.1.E Restructure administrative procedures. 12/96.

**Expected**

**Results:** Simple, cost-effective and efficient procedures and improved employee compliance to procedures.

Reduced number of administrative procedures and reduced number/rate of PERs caused by administrative procedure complexity and other shortcomings.

**Measurement**

**Standards:** 0.4.1.a Number of administrative procedures.

0.4.1.b Number/rate of PERs caused by administrative complexity and other shortcomings.

## 0.5 WORK PROCESSES

**Objective:** 0.5.1 Simplify management process, design change process, and procurement process (Reference Business Plan Management Initiative OP 7).

**Actions:** 0.5.1.A Form process improvement teams.

- Work Management - Completed
- Procurement - Completed
- Design Change - 9/11/95

0.5.1.B Evaluate process and identify improvements.

- Work Management - Completed
- Procurement - 10/4/95
- Design Change - 11/13/95

0.5.1.C Develop implementation plan for improvements.

- Work Management - 7/28/95
- Procurement - 11/1/95
- Design Change - 12/29/95

0.5.1.D Implement improvements.

- Work Management - 10/30/95
- Procurement - 1/1/96
- Design Change - 2/5/96

### **Expected**

**Results:** Simple, cost-effective, and efficient processes and improved employee compliance to procedures.

### **Measurement**

**Standards:**

- 0.5.1.a Staffing levels.
- 0.5.1.b Overtime.
- 0.5.1.c Work Order Inventory Age..
- 0.5.1.d PERs related to ineffective controls.

# PERFORMANCE IMPROVEMENT AREAS LICENSEE CONTROL SYSTEMS

1.0

## LICENSEE CONTROL SYSTEMS

• Overall: less than average performance

1.1

### PROBLEM IDENTIFICATION THROUGH SELF- ASSESSMENT

	OBJECTIVE
• Increased self-assessment needed - particularly in areas with long standing problems	1.1.3
• Q.A. reviews have been too narrow	5.3A.1
• POC performance identified as weak	Complete
• OER noted as not timely or acted upon	1.1.1 1.1.2

1.2

### ROOT CAUSE ANALYSIS

	OBJECTIVE
• Quantity of root cause analyses needs improvement.	1.2.1

1.3

### TRENDING & EVALUATION

	OBJECTIVE
• PTL not used to fullest capacity despite significant upgrade to PTL software	1.1.1

1.4

### CORRECTIVE ACTION SYSTEMS

	OBJECTIVE
• Actual or perceived complexity in implementing corrective action process has resulted in limited use of the system	Complete
• Q.A. / Line organization interface requires improvement to assure emerging problems are identified	5.3A.1 5.3A.2

☒ Q EXCEPTIONAL  
 PERFORMANCE

☐ W AVERAGE  
 PERFORMANCE

☐ R MINIMUM  
 PERFORMANCE

# ***LICENSEE CONTROL SYSTEMS***

## **1.1 PROBLEM IDENTIFICATION THROUGH SELF-ASSESSMENT**

**Objective:** 1.1.1 Improve the adequacy, timeliness, and efficiency of reviewing industry experience and applying it to WNP-2.

**Initiatives:** 1.1.1.A Revise PPM 1.10.4 (External Operational Experience Review). Completed.

1.1.1.B Establish line organization commitment to perform reviews of OER, tracking process, and goals. 8/15/95.

1.1.1.C Provide training to line organization staff. 9/15/95.

1.1.1.D Initiate line review of Operating Experience Reviews (OERs). 9/30/95.

1.1.1.E Coach line staff on the adequacy and timeliness of review process. Through 12/31/95.

1.1.1.F Review the process and results for quality and possible adjustments. Ongoing.

### ***Expected***

**Result:** OER information will be reviewed in a thorough and timely manner with appropriate corrective actions resulting.

### ***Measurement***

**Standards:** 1.1.1.a Monitor the monthly report on OER reviews for timeliness and corrective actions implemented.

1.1.1.b Appropriate corrective actions reviewed and taken by line management.

1.1.1.c Screen the PER database on a periodic basis to see if problems contained within OER information have occurred at WNP-2.

\* \* \* \* \*

**Objective:** 1.1.2 Evaluate the adequacy of original OER reviews.

**Initiatives:** 1.1.2.A Establish a program to review selected OERs. 9/30/95.

***Expected  
Result:***

Either confirm that the original review and corrective action implementation process was effective or identify additional corrective actions necessary.

***Measurement***

***Standard:*** Monitor percentage of reviewed OERs that require new corrective actions.

\* \* \* \* \*

***Objective:*** 1.1.3 Improve the line organization's ability to perform self-assessments.

***Initiatives:*** 1.1.3.A Establish guidelines for the self-assessment process. 7/31/95.

1.1.3.B Staff a self-assessment specialist to coach line organization. 9/1/95.

1.1.3.C Begin first self-assessment with line organizations. 10/1/95.

***Expected***

***Result:*** Line organization performance should improve.

***Measurement***

***Standard:*** Monitor line organization performance indicators.

## 1.2 ROOT CAUSE ANALYSIS

**Objective:** 1.2.1 Increase the frequency and quality of root cause analysis.

**Initiatives:** 1.2.1.A Revise PPM 1.3.12A, Processing of Problem Evaluation Requests, to provide definitive guidance on when root cause analyses will be used in the dispositioning of PERs. 8/31/95.

1.2.1.B Significantly increase coaching of PER dispositioners in root cause analysis techniques. Beginning 9/1/95.

1.2.1.C Provide initial and continuing root cause analysis training to selected personnel. Ongoing.

### *Expected*

**Result:** The number of repeat problems should be reduced.

### *Measurement*

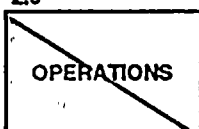
**Standards:** 1.2.1.a Trend the number of repeat problems on a periodic basis, and assess data results at the end of the period.

1.2.1.b Trend the number of repeat problems due to incorrect or inadequate corrective action because a root cause analysis was not performed.

# PERFORMANCE IMPROVEMENT AREAS

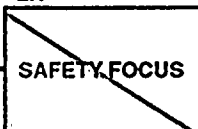
## OPERATIONS

2.0



• Overall: less than average performance

2.1



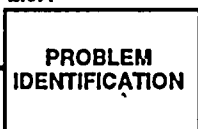
	OBJECTIVE
• Unsatisfactory Operator & Supervisor performance	2.1.1 2.1.2
• Poor questioning attitude	2.1.1 2.1.2
• Conservative decision making still weak	2.1.3
• Inadequate oversight of overall Plant Activities	2.1.1 2.1.2

2.2



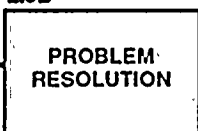
	OBJECTIVE
• Need to Increase management presence & expectations	2.2.1 2.2.2
• Communication of management's expectations is weak	2.2.1 2.2.2

2.3A



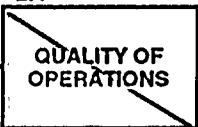
	OBJECTIVE
• Significant PERs mostly self-identified	Evaluating
• Varied perception of when to Initiate PERs	Evaluating

2.3B



	OBJECTIVE
• Poor questioning attitude	2.1.1 2.1.2
• Inadequate oversight of Plant Activities	2.1.1
• Incomplete compliance with Technical Specification Requirements	2.4.1
• Need to reduce personnel errors	2.4.1
• Lack of formal process to evaluate effectiveness of work around fixes	2.4.1

2.4



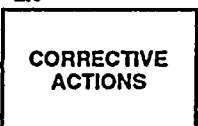
	OBJECTIVE
• Need to eliminate numerous performance errors	2.1.1
• Attention to detail needs emphasized	2.1.1

2.5



	OBJECTIVE
• Procedural adherence remains a challenge	2.5.1
• Need to complete procedure Improvements (remove ambiguity & streamline)	2.5.1
• Crews need to request assistance with subtle issues	2.5.2

2.6



	OBJECTIVE
• Foster operation staff acceptance of Issues.	2.6.1

**G** EXCEPTIONAL PERFORMANCE

**W** AVERAGE PERFORMANCE

**R** MINIMUM PERFORMANCE

**B** ADDED BY SUPPLY SYSTEM



# OPERATIONS

## 2.1 SAFETY FOCUS

- Objective:** 2.1.1 Improve safety culture such that (1) staff members are constantly looking for subtle issues, (2) all staff members are actively bringing safety issues to management's attention, and (3) management deals with the issues effectively such that they are resolved prior to significant affect on reliability.
- Initiatives:**
- 2.1.1.A Implement a revision to the OI-9 Program enabling identified issues to be resolved effectively, including criteria dealing with issue identification and the use of Plant programs (PERs and WRs). 8/1/95.
  - 2.1.1.B Implement the Management Oversight Program in the Control Room. This program places experienced, non-operations managers in the Control Room for the express purpose of identifying positive and negative behaviors and providing immediate feedback to the Operations staff on-shift. This allows human performance to be enhanced. This program was authorized on 4/15/95 as a temporary program to improve department performance. It continues through 8/5/95, at which time it will be evaluated for continuation, revision or cancellation.
  - 2.1.1.C Establish the expectation that either the Operations Manager or the Assistant Operations Manager be involved in Technical Specification interpretations and that Licensing be contacted, as necessary, to develop consistent decisions. Completed.
  - 2.1.1.D Issue guidance on items to consider and criteria necessary for making judgements regarding applicability of Technical Specifications. 9/30/95.
  - 2.1.1.E Initiate changes in crew make-up to infuse new ideas, expectations and attitudes through a mixing of experience and personalities. 10/1/95.
  - 2.1.1.F Develop a program which involves Operations staff in identifying areas for positive and improved implementation of management expectations relating to human performance (similar to Calvert Cliff's Gold Card). Gold Card results will be used in crew discussions to reinforce, clarify and revise management expectations as a regular portion of the Operations Crew Training Cycle. This discussion will occur on a peer-to-peer level using real-life examples to reinforce behaviors in self-identification and assessment. In addition, Gold Card Program results

which indicate a trend of performance issues will be treated as a PER condition. 8/1/95.

2.1.1.G Improve Operations' participation in the Quarterly System Walk-down Program to expose other personnel to Operations' philosophies and problems. This program exposes Operations personnel to the views and problems of support organizations. Ongoing.

2.1.1.H Improve Operations staff participation on the PRG/PRC to help select project activities based upon operational needs. Ongoing.

***Expected Results:***

Improved Safety Culture in which Operations is more able to recognize subtle trends and problems resulting in improved response to equipment and personnel issues prior to their having an affect on Operations. This should be reflected in fewer and shorter forced outages and improved teamwork among WNP-2 organizations.

***Measurement***

***Standards:*** Plant/Corporate Level

2.1.1.a Reduction in unplanned automatic scrams.

2.1.1.b Increase safety system reliability.

2.1.1.c Fewer unplanned safety system actuations.

2.1.1.d Increase emergency generator reliability.

2.1.1.e Increased Net Electrical Generation, Capacity Factor, and Unit Capability Factor.

2.1.1.f Reduced Unplanned Capability Loss Factor.

2.1.1.g Reduce the number of NOVs, LERs, and personnel errors.

Department Level

2.1.1.h OI-9 summaries indicating fewer instances of failure to meet expectations.

2.1.1.i Management Oversight observations indicating improved performance.

2.1.1.j Fewer NOVs and LERs for technical specification violations with zero as a goal.

2.1.1.k Feedback from other WNP-2 organizations (i.e., Maintenance, Plant Support, Health Physics and Quality Assurance) indicating improved Operations performance and better working relationships.

- 2.1.1.1 Increase in PER generation rate as issues are identified, followed by a PER reduction as those issues are corrected and do not recur.

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**Objective:** 2.1.2 Create a Management Oversight presence which (1) leads to identification of issues before they affect reliability, (2) reinforces management expectations, and (3) allows management to make decisions to the greatest extent possible based on fact and not opinion.

**Initiatives:** 2.1.2.A Implement the revised OI-9 Program as discussed in 2.1.1.A. The observations required under this program for Operations management, especially the Operations Manager, Assistant Operations Manager, Day-Shift Manager and Shift Managers, provide an increased oversight presence. 8/1/95.

2.1.2.B Use the Management Oversight Program in the Control Room, as discussed in 2.1.1.B. Ongoing.

2.1.2.C Develop additional trending capability within Operations, which will allow management to address individual and systemic problems quicker. 8/1/95.

2.1.2.D Implement a pilot program that will provide managers and supervisors additional training on managerial techniques such as (1) pinpointing results and behaviors which support organizational goals, (2) developing measurement and feedback systems to communicate progress, and (3) managing and reinforcing desired behaviors and results. Pilot training to be completed by 9/1/95 followed by an implementation period. Improvements in performance will be monitored before additional staff management members receive the training.

**Expected Results:**

Operations management will be more visible and active in reinforcing expectations. This visibility and activity will enable management to recognize problems at an earlier stage. This will result in not only identifying the need to improve behaviors, but also successfully coaching individuals towards desired improvements or making changes in personnel who do not adapt to expectations.

**Measurement**

**Standards:** Plant/Corporate Level

2.1.2.a Same as 2.1.1.a - 2.1.1.g.

Department Level

2.1.2.b Non-shift management time in the Control Room will be increased.

- 2.1.2.c Operations management will rate the quality of the OI-9 observations made by the on-shift management complement (SM and CRS).
- 2.1.2.d The quality of the feedback from Shift Managers and Control Room Supervisors will be judged by individual contributors who have had interface with them each quarter. This will help evaluate the coaching and reinforcement techniques practiced by management personnel.
- 2.1.2.e Management Oversight observations are being reviewed for improved performance.
- 2.1.2.f Industry peer evaluations, e.g., INPO assist visits, will be performed periodically to evaluate the effectiveness of the Management Oversight Program.

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**Objective:** 2.1.3 Foster an environment in which all individuals make conservative decisions when responding to issues.

**Initiatives:** 2.1.3.A Implement revised OI-9 management observations, as discussed in 2.1.1.A. Ongoing.

2.1.3.B Implement revised Management Oversight Program, as discussed in 2.1.1.B. Ongoing.

2.1.3.C Use simulator training scenarios during each training cycle which promote conservative decision-making. These scenarios specifically address implementation of Technical Specifications. Ongoing.

2.1.3.D Continue Boss Talks, which involve example discussions with Operations team members and are used to reinforce expectations for conservative decision-making. Ongoing.

2.1.3.E Implement the Gold Card Program, as discussed in 2.1.1.F. 8/1/95.

**Expected Results:**

Additional training and coaching will result in improvements in conservative decision-making. Response to precursor problems will become more effective and thereby increase overall Plant reliability through fixing problems early, instead of waiting until they become challenges to current performance.

*Measurement*

*Standards:* Plant/Corporate Level

2.1.3.a Same as standards 2.1.1.a, 2.1.1.b, 2.1.1.d, 2.1.1.e, and 2.1.1.f.

Department Level

2.1.3.c Management Oversight observations should indicate improvement.

2.1.3.d NRC observations should indicate improvement.

2.1.3.e Management observations of the Gold Card Program should indicate that conservative decisions are being discussed and reinforced.

2.1.3.f Peer evaluations of performance will be conducted periodically to evaluate this area.

## 2.2 MANAGEMENT INVOLVEMENT

**Objective:** 2.2.1 Create an environment in which Operations staff accepts, implements and reinforces management expectations at all times.

**Initiatives:** 2.2.1.A Hold confirmatory meetings with Operations staff to focus on the acceptance, development, and implementation of management expectations. Beginning in the fourth quarter of 1995.

2.2.1.B Implement the OI-9 Program, as discussed in 2.1.1.A. 8/1/95.

2.2.1.C Continue Boss Talks in Operations, as discussed in 2.1.3.D. Ongoing.

2.2.1.D Implement pilot management training, as discussed in 2.1.2.D. This training will be used in conjunction with the regular performance appraisal program. 9/1/95.

**Expected  
Results:**

Confirmatory meetings will enhance commitment to management expectations. Completing the balance of the initiatives will further reinforce and validate implementation of the expectations. Overall, the expectations should result in more effective personnel performance and increased reliability in Plant operations.

**Measurement**

**Standards:** Plant/Corporate Level

2.2.1.a Same as the standards set forth in 2.1.1.a - 2.1.1.g.

Department Level

2.2.1.b Same as the standards set forth in 2.1.1.h - 2.1.1.m.

2.2.1.c Performance appraisal results will identify, in detail, the implementation of management expectations.

2.2.1.d Same as the standard set forth in 2.1.2.d.

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**Objective:** 2.2.2 Use the Operations quarterly indicators to (1) reinforce management expectations, (2) facilitate identification of areas requiring additional work, and (3) facilitate identification of successes showing improvement from the perspective of the Operations staff and WNP-2 management.

**Initiatives:** 2.2.2.A Select and analyze key Operations processes (e.g., Clearance Order processing) to identify in-process performance indicators which would assist implementers and staff in evaluating the quality of process implementation. Collect and chart data to allow improved performance

of a particular process. After certain process level improvements are made and solidified, select another process for similar review and continue until all Operations processes have been analyzed. Ongoing.

- 2.2.2.B Revise the Operations quarterly indicators to track human performance trends requiring improvement. Assure these indicators have goals or control bands identified to focus management attention when necessary. Beginning 8/1/95.
- 2.2.2.C Periodically review equipment trending data from Technical Staff to ensure Maintenance and Technical Staff personnel are focused on equipment trends which Operations believes require attention. Validate equipment trends with operator workarounds and problem areas. Beginning 10/1/95.

***Expected Results:***

Analyzing processes and tracking in-process performance will allow performers and management to identify process or implementation problems earlier and implement fixes prior to the problem affecting Plant reliability. In addition, establishing performance indicators will reinforce expectations and allow standards to be revised for added efficiencies. At the same time, data gathering will allow a greater degree of management by fact, rather than by assumption. These actions should translate into improved Plant reliability, better problem resolution and clearer expectations.

***Measurement***

***Standards:*** Plant/Corporate Level

- 2.2.2.a Same as the standards set forth in 2.1.1.a - 2.1.1.g.

Department Level

- 2.2.2.b One process per quarter will be tracked, trended and evaluated to ensure demonstrated improvement.
- 2.2.2.c Feedback from operators and shift crews will be monitored to evaluate responsiveness to problems.
- 2.2.2.d Human performance PERs for Operations' errors, related to Operations' processes, will be monitored for reduction.
- 2.2.2.e Management Oversight observations will be monitored for indications of improved performance.

## 2.3A PROBLEM IDENTIFICATION

**Objective:** 2.3A.1 Increase the number of PERs generated as a result of Operations' involvement in Plant activities.

**Initiative:** 2.3A.1.A Coaching by the Operations Manager, via the on-going OI-9 reviews and on-going Management Oversight, has provided additional clarification and expectations. As a result, the current threshold for generating PERs is considered adequate. No further action will be taken regarding this issue at this time.

2.3A.1.B Generate statistical data demonstrating that the current PER level is truly representative of existing problems. 3/96

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**Objective:** 2.3A.2 Develop a common understanding among Operations staff regarding the need to document problems so that they can be properly characterized and fixed.

**Initiative:** 2.3A.2.A Coaching by the Operations Manager, via the ongoing OI-9 evaluations and in-progress Management Oversight observations, has provided additional clarification and improved consistency. The current threshold for PER generation is consistent between shifts and is meeting management expectations. No further action will be taken regarding this issue at this time.



## 2.3B PROBLEM RESOLUTION

**Objective:** 2.3B.1 Improve the system for reviewing chronic problems and operator workarounds to ensure it is based on sound technical facts and judgments. Clearly communicate this system to Operations staff so that misunderstandings about station priorities are avoided.

**Initiatives:** 2.3B.1.A Revise OI-14 Chronic Equipment Problems. OI-14 documents the methods to track status and prioritize chronic equipment problems resulting in operator workarounds. The revision will improve identification of issues for resolution. **Beginning 9/1/95.**

2.3B.1.B Establish goals for reducing the number of workarounds. **9/1/95.**

### **Expected**

**Result:** Improved focus will reduce the total number and duration of Operations workarounds.

### **Measurement**

**Standards:** Plant/Corporate Level

2.3B.1.a Control Room deficiencies will be monitored for improvement.

### Department Level.

2.3B.1.b The number of operator workarounds will be monitored for reduction.

2.3B.1.c The average time a work-around is in place will be monitored for reduction.

2.3B.1.d Observations from Management will be monitored for indications of improved performance.

2.3B.1.e Feedback from the Operations staff will be monitored for indication of an improved ability to operate the Plant as designed.

## 2.4 QUALITY OF OPERATIONS

**Objective:** 2.4.1 Improve the process and common understanding of issues among Operations staff which leads to preventing recurrence of minor events while they are precursors, rather than addressing them only when they become significant events.

**Initiatives:** 2.4.1.A Reinforce management expectations for dealing with issues through the use of the OI-9 Program, as discussed in 2.1.1.A. 8/1/95.

2.4.1.B Monitor issues raised and resolution of those issues through conducting additional operator log reviews and Quality assessments and by assessing feedback from Management Oversight in the Control Room. Oversight began in 5/95, log reviews began in 4/95 and Quality assessments are routine. Ongoing.

2.4.1.C Use the quarterly human performance indicators for Operations (described under 2.2.2.B) to reinforce positive behaviors and correct weak behaviors. This will be done on an individual crew and manager basis. Beginning 8/1/95.

2.4.1.D Use the Gold Card Program to reinforce human performance issue resolution at an early stage. Beginning 8/1/95.

**Expected  
Result:**

Problems will be addressed before they become challenges to Operations. This should result in improved reliability.

**Measurement**

**Standards:** Plant/Corporate Level

2.4.1.a Same as standards set forth in 2.1.1.a - 2.1.1.g.

Department Level

2.4.1.b Feedback from Oversight personnel will be monitored for indications of improved performance.

2.4.1.c Logs will be monitored for indication that issues are consistently being resolved through an established corrective processes.

2.4.1.d Observations of the Gold Card Program implementation will be monitored for indications that Operations staff is being more aggressive in fixing human performance problems early.

2.4.1.e The gross number of PERs will be monitored for an increase, followed by a decrease as problems are corrected and do not recur. PERS are also monitored for recurring trends of problem types or areas.

## 2.5 PROGRAMS AND PROCEDURES

**Objective:** 2.5.1 All staff members must strictly follow procedures unless they have reason to believe they should not, at which time they should secure their work area and seek procedural clarification or modification.

**Initiatives:** 2.5.1.A Implement OI-9 Program, as discussed in 2.1.1.A. 8/1/95.

2.5.1.B Operations staff members express a persistent belief that traps exist in procedures. Survey the staff to determine whether this is an actual concern. If the concern is validated, correct the procedures and revise the training program to ensure that all staff members are made aware of the procedure requirements. This training should be prioritized around the most frequently cited procedures of concern. 8/1/95.

### *Expected*

**Result:** Operations staff will strictly adhere to procedures. Operations will demonstrate recognizable leadership in adherence to this standard.

### *Measurement*

**Standards:** Plant/Corporate Level

2.5.1.a NOV rate, LERs, and personnel errors will be monitored for reduction.

### Department Level

2.5.1.b Procedure compliance PERs will be monitored for reduction.

2.5.1.c Feedback from Management Oversight and the NRC will be monitored for indications of improvement.

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**Objective:** 2.5.2 Ensure Operations management makes decisions regarding the need for procedure deviations in accordance with approved procedures.

**Initiatives:** 2.5.2.A Review of a sample of Operations' procedure deviations will be completed by Quality. 8/1/95.

2.5.2.B If a problem exists with inappropriate procedure deviations, develop appropriate corrective actions. To be assessed once analysis is complete.

### *Expected*

**Result:** Operations staff will lead by example in implementing management's expectations regarding the use of procedure deviations.

### *Measurement*

**Standard:** Procedure deviations processed in accordance with approved procedures.

## 2.6 CORRECTIVE ACTIONS

**Objective:** 2.6.1 Ensure that Operations staff accepts issues brought to them by other station personnel in a manner that does not intimidate or in any way demean the messenger. Operations staff should hold personnel accountable for gathering and reporting facts in this same non-threatening manner.

**Initiatives:** 2.6.1.A Perform a site-wide informational survey to determine whether station personnel elect to ignore issues rather than be subject to challenges associated with reporting them to the Control Room. To be initiated 9/15/95.

2.6.1.B If a concern is validated, develop appropriate responses to the issues identified. To be assessed based upon survey results.

**Expected  
Result:**

A survey of station personnel will identify whether a concern exists in this area and if so, action can be taken to improve Operations staff performance. This should ultimately encourage station personnel to freely identify issues of concern so that they may be properly addressed.

**Measurement**

**Standard:** Subjective measure based on survey results.

## PERFORMANCE IMPROVEMENT AREAS ENGINEERING

3.0

### ENGINEERING

• Overall: performance less than average

3.1

#### SAFETY FOCUS

	OBJECTIVE
• Problem resolution is ineffective	3.1.1
• Safety focus needs further improvement action plans & priorities are lacking in key areas	3.1.1
• Root cause analyses are inadequate	3.1.1

3.2

#### MANAGEMENT INVOLVEMENT

	OBJECTIVE
• Further improvements are needed to management's involvement within engineering organizations	3.2.1
• Management/supervisory skills need improvement	3.4.1
• Inadequate support given to involving supervisors in system management program	3.5.1
• Need to continue emphasis on backlog management	3.2.1

3.3

#### PROBLEM IDENTIFICATION

	OBJECTIVE
• Timely resolution of problems continues to be weak	3.3.1
• Need to further improve effectiveness of multi-disciplined teams conducting system walkdowns	3.3.1
• Follow through on remedial efforts is lacking	3.3.1
• Problems with resolving long-standing issues persist	3.3.1
• Several plant & industry issues not dealt with effectively	3.3.1

3.4

#### UNDERSTANDING DESIGN

	OBJECTIVE
• Understanding of plant design & the design change review process is minimal	3.4.1 3.5.1 6.4.1
• Inattention-to-detail errors & lack of appropriate project oversight problems persist	3.4.1
• Design reviews are lacking in consistency & quality	3.5.1
• Significant number of deficiencies in implementation of design changes are evident	3.5.1 3.2.1

3.5

#### QUALITY OF ENGINEERING WORK

	OBJECTIVE
• Process controls are weak	3.4.1
• System management program lacks adequate support	3.5.1
• Design reviews & their implementation are weak	3.4.1
• Attention to detail lacking	3.4.1
• Poor interdepartment coordination & cooperation	3.5.1 3.3.1
• Poor management involvement & oversight	3.1.1 7.1.1

3.6

#### PROGRAMS & PROCEDURES

	OBJECTIVE
• Implementation of 10CFR50.65 (aka "the Maintenance Rule") lags significantly behind most of the industry	3.1.1
• Quarterly team walkdowns not always adequately supported by other organizations	3.2.1
• Frequency of quarterly team walkdowns is inadequate	3.2.1
• Procedures, instructions, & standards are cumbersome & unwieldy	3.5.1

**[G]** EXCEPTIONAL  
PERFORMANCE

**[W]** AVERAGE  
PERFORMANCE

**[R]** MINIMUM  
PERFORMANCE

# ENGINEERING

## 3.1 SAFETY FOCUS

**Objective:** 3.1.1 Maintain Plant Nuclear Safety within the bounds of the Plant's license and the insights provided by the Probabilistic Safety Assessment.

**Initiatives:** 3.1.1.A Develop and communicate management expectations for conservative decision-making, stressing safe operation, Plant operability, quality, timeliness and thoroughness of work products. **Completed.** Update training to emphasize conservative decision-making by 6/96.

3.1.1.B Continue to prioritize initiatives, programs and projects through the Plant Review Committee process with a focus on maintaining nuclear safety and Plant support consistent with the Plant-wide prioritization process. **Ongoing.**

3.1.1.C Increase and optimize staffing in the System Engineering group to provide better and more timely system support to Operations and Maintenance. 11/30/95.

3.1.1.D Update the Engineering Qualification Guides to provide in-depth qualification training to Engineering staff, which will include the following: 10/31/95.

- Senior Reactor Operator (SRO) level training to system engineers on their WNP-2 assigned systems. To be completed within one year for present staff and within one year of hire date for new staff.
- Integrated systems training based on the SRO systems training program within two years for present staff and one year from hire date for new systems engineers.
- Design and licensing basis training, including the development of the required design basis documents and training materials. To be completed within two years (10/97) for present staff and within two years of hire date for new staff.
- Train Engineering staff on Plant Technical Specifications. To be completed within one year for present staff and within one year of hire date for new staff.
- Provide Engineering staff with annual refresher training on performing operability assessments, specifically addressing GL 91-18.

- Corrective action resolution training on root cause methods and effective corrective actions. To be completed within one year for present staff and within one year of hire date for new staff.
- Probabilistic Safety Assessment applications and awareness training for appropriate staff personnel, emphasizing safety significance rankings of systems. To be completed within one year for present staff and within one year of hire date for new staff.
- Continuing training program that focuses on refresher training, lessons learned and special topics (e.g., industry events). Ongoing.

***Expected  
Results:***

Minimization of errors associated with misunderstanding Plant interactions when implementing Plant design changes or performing post modification or maintenance testing or special test procedures.

Enhanced engineering safety perspective through a better understanding of how changes in Plant conditions and systems can affect Plant accident response.

Improved quality of operability assessments performed on degraded Plant systems, components and structures.

Improved interface between Engineering and Operations. With broader systems knowledge, the engineer will better understand the effect of degraded equipment on the ability of the operators to control the Plant during normal and off-normal conditions.

Improved quality and timely completion of safety significant issues through better regulatory and risk-based Plant understanding.

Better and more timely support to Plant Operations and Maintenance on those initiatives, programs and projects of greatest impact to reliable and cost effective Plant operations.

Increased system engineering understanding and involvement with Plant systems to allow refocus of system engineering problem resolution performance to become proactive rather than reactive.

***Measurement  
Standards:***

- 3.1.1.a Use of Maintenance Rule criteria to monitor safety system availability and reliability.
- 3.1.1.b Number of LER/NOVs issued against safety systems.
- 3.1.1.c WO backlog on safety systems.

3.1.1.d Timeliness of closure of corrective actions on significant PERs.

3.1.1.e Monitor schedule effectiveness in focusing work activities on risk significant systems and issues.



## 3.2 MANAGEMENT INVOLVEMENT

**Objective:** 3.2.1 Focus Engineering on an end product that ensures safe, reliable and cost-effective operation of WNP-2.

**Initiatives:** 3.2.1.A Define Engineering support in terms of Plant performance indicators related to safe, reliable and cost-effective system operation. Adopt a definition of "success" that meets the following criteria:

- End result oriented (i.e., fixed problem, enhanced Plant operation, reduced barriers, more effective maintenance).
- Not based solely on definition of an Engineering product (i.e., do not use a criteria based solely on the engineering quality of the design package). 10/31/95.

3.2.1.B Continue to eliminate low priority discretionary issues from work scope through application of the Project Review Committee processes including PSA/PRA. Items that do not meet the corporate goals of safe Plant Operation improved reliability, cost effectiveness and will be eliminated. Ongoing.

3.2.1.C Establish alignment between Engineering, Operations and Maintenance to identify process interfaces and define role, responsibility and accountability of each in the following activities: 12/29/95.

- System walk-downs
- Design change implementation and testing.
- Scope reduction control

3.2.1.D Consolidate all technical resources under a single director. 7/31/95.

***Expected  
Results:***

Improved quality and thoroughness of all Engineering products with a focus on customer satisfaction--measured in ability to implement, amount of rework and cost-effectiveness.

Enhanced ability to finalize design packages (error free).

Decrease in long-standing/open issues.

Improvement in teamwork.

Better alignment between organizations with corporate expectations and goals provides focus for prioritizing work.

Engineering focus changes from internally defined measures of success to measures that are directly measured in improved Plant performance, more effective maintenance and better Operations staff support.

Reduced maintenance costs and reduced operator burden.

Establishment and tracking of performance indicators will enhance directorate knowledge and ability to communicate performance level.

***Measurement***

- Standards:***
- 3.2.1.a Reduction in work inventory age.
  - 3.2.1.b Timeliness of engineering responses - turnaround time.
  - 3.2.1.c Total design project costs defined in terms of engineering labor, implementation labor and capital costs within estimates.
  - 3.2.1.d Planning and schedule effectiveness (i.e., completing work on schedule).
  - 3.2.1.e Individual system performance - monitor total Plant costs, Plant efficiency, and total megawatts produced.
  - 3.2.1.f Number of operator workarounds.
  - 3.2.1.g Number of Control Room deficiencies.
  - 3.2.1.h Total maintenance manhours expended on system maintenance.
  - 3.2.1.i Total dose received.

### 3.3 PROBLEM IDENTIFICATION AND RESOLUTION

**Objective:** 3.3.1 Identify and resolve operationally significant issues in a timely manner consistent with the corporate goals of continued safe Plant operation, improved reliability, and cost effectiveness.

**Initiatives:** 3.3.1.A Increase and optimize staffing - See 3.1.1.C.

3.3.1.B Provide in-depth training to Engineering staff - see 3.1.1.D.

3.3.1.C Prioritize work and eliminate low priority discretionary items - see 3.1.1.B and 3.2.1.B.

3.3.1.D Strengthen management expectations for System Engineers to appropriately identify and categorize system weaknesses for resolution. The following information sources will be used to aid the System Engineers in identifying weaknesses: 9/15/95.

- PER Generation
- Operating Event Reports
- Work Orders utilization
- Work History File utilization
- Risk significant component identification
- Operations and Maintenance (customer) feedback

3.3.1.E Develop and implement system report card assessing key system reliability characteristics. 12/30/95.

3.3.1.F Reassess process for ensuring industry experience is reflected in system reliability, availability, and operability decisions - See section 1.1.2.

3.3.1.H Establish management expectations among Operations, Maintenance and Engineering that defines the System Engineer as the focal point for system problem resolution. Include emphasis on immediate notification of System Engineers on any significant issues associated with their systems. 12/31/95.

**Expected Results:** Decrease in long-standing/open issues.

Improved quality and timely completion of safety significant issues.

Better and more timely support to Plant operations and maintenance.

Improved cost-effectiveness and reliability of systems as measured by objective criteria.

Establishment of a proactive approach to ensure industry experience is factored into maintaining safe, reliable, and cost effective system operations.

***Measurement***

- Standards:***
- 3.3.1.a Timeliness of closure of corrective actions on significant PERs.
  - 3.3.1.b Reduce work order inventory age.
  - 3.3.1.c System report card - reflects key indicators on a system by system basis (e.g., Maintenance Rule criteria (risk significant actions), work order inventory age, PERs, overdue PTL items, failed tests, operator work-around, component performance).
  - 3.3.1.d Results obtained from OER selective re-review effort (i.e., assessment of quality of reviews performed).
  - 3.3.1.e System availability.
  - 3.3.1.f Equivalent system availability.

### 3.4 & 3.5 UNDERSTANDING DESIGN AND QUALITY OF ENGINEERING WORK

**Objective:** 3.4.1 Maintain an Engineering organization that has the appropriate qualifications, education, training and tools to successfully meet the corporate goals of safe, reliable and cost-effective Plant operation.

**Initiatives:** 3.4.1.A Optimize and staff the System Engineering group with highly qualified engineering personnel - see 3.1.1.C.

3.4.1.B Provide in-depth training to Engineering staff - see 3.1.1.D.

3.4.1.C Re-engineer design change process to simplify procedures, making the cognizant Engineer accountable for a larger scope of the design inter-relationships (i.e., minimize special reviews performed by experts).  
2/5/96.

3.4.1.D Improve interorganizational process interfaces by establishing clearly defined roles and responsibilities - see 3.2.1.C.

**Expected  
Results:**

Minimize errors associated with misunderstanding Plant interactions when implementing Plant design changes or performing post-modification or -maintenance testing or special test procedures.

Enhance engineering safety perspective through a better understanding of how changes in Plant conditions and systems can affect Plant accident response.

Improve the quality of operability assessments performed on degraded Plant systems, components and structures.

**Measurement**

**Standard:** Number of PER/LER/NOVs issued against system-related design implementation, post-maintenance testing and special test activities.

### 3.6 PROGRAMS AND PROCEDURES

**Objectives:** 3.5.1 Ensure that Engineering programs are closely coupled with the System Engineer group such that the System Engineer is provided with the necessary tools and data to properly assess the health of the Plant systems.

Maintain Engineering processes that provide high quality, efficient and responsive design products to maintain system health and support Plant operational needs.

**Initiatives:** 3.5.1.A Review current program charters and realign, if necessary, to ensure that direct communication links are established with the System Engineers for data related to their system. 1/31/96.

3.5.1.B Revise and streamline the design change process - see 3.4.1.C.

3.5.1.C Complete development of Maintenance Rule Program - see 7.1.1.F.

**Expected Results:** Better use of programs to support System Engineers in maintaining their systems in a safe, reliable and cost-effective manner.

Improved support and timeliness of Engineering products required to support Plant operations.

Better Engineering versatility in addressing problems.

#### **Measurement**

**Standards:** 3.5.1.a Performance indicators as defined on system report cards.

3.5.1.b Timeliness of Engineering designs and implementation in the Plant.

# PERFORMANCE IMPROVEMENT AREAS MAINTENANCE

4.0	MAINTENANCE	• Overall: performance is average	
4.1	SAFETY FOCUS	<ul style="list-style-type: none"> <li>Continual personnel errors indicate safety focus is weak</li> </ul>	<b>OBJECTIVE</b> 4.1.1 4.1.2 6.2.1
4.2	MANAGEMENT INVOLVEMENT	<ul style="list-style-type: none"> <li>Increased supervisory field presence has been ineffectual in reducing personnel errors</li> <li>Supervisory performance level needs improvement</li> <li>Need continued management emphasis on procedural compliance &amp; need to perform error-free work</li> </ul>	<b>OBJECTIVE</b> 4.2.1 4.2.1 7.1.1 4.2.1 6.2.1
4.3A	PROBLEM IDENTIFICATION	<ul style="list-style-type: none"> <li>Problem identification is untimely and weak</li> </ul>	<b>OBJECTIVE</b> 4.3A.1
4.3B	PROBLEM RESOLUTION	<ul style="list-style-type: none"> <li>Corrective actions have not been effective in eliminating procedural noncompliance &amp; personnel errors</li> </ul>	<b>OBJECTIVE</b> 4.3B.1
4.4	(PLANT) MATERIAL CONDITION	<ul style="list-style-type: none"> <li>Management's goals for the age of work orders, number of backlogged work orders &amp; timely completion of PM's have not been met</li> <li>Post-maintenance testing is weak</li> <li>Procedural non-compliance has not been eliminated</li> </ul>	<b>OBJECTIVE</b> 4.4.1 4.4.1 4.2.1
4.5	QUALITY OF MAINTENANCE WORK	<ul style="list-style-type: none"> <li>Personnel errors &amp; procedural non-compliance continue to occur</li> <li>Foreign material exclusion in both drywell &amp; wetwell is weak</li> </ul>	<b>OBJECTIVE</b> 4.2.1 4.5.1 6.2.1 4.5.1
4.6	PROGRAMS & PROCEDURES	<ul style="list-style-type: none"> <li>Procedure upgrade effort slow to complete</li> <li>Work orders have been revised without Q.C. review</li> <li>Review of backlogged work requests has been untimely</li> </ul>	<b>OBJECTIVE</b> 4.6.1 4.2.1 4.4.1

**Q.** EXCEPTIONAL PERFORMANCE

**W** AVERAGE PERFORMANCE

**R** MINIMUM PERFORMANCE

# MAINTENANCE

## 4.1 SAFETY FOCUS

**Objective:** 4.1.1 Improve the industrial safety consciousness and industrial safety performance of personnel involved in performing Maintenance activities.

**Initiatives:** 4.1.1.A Continue monthly trending and evaluation of lost time and recordable accidents for Maintenance personnel by maintenance management. **Ongoing.**

4.1.1.B Continue conducting routine safety meetings aimed at dealing with industrial safety issues for Maintenance personnel. **Ongoing.**

4.1.1.C Continue monthly trending of errors by Maintenance personnel for management evaluation and action. Current trending shows continued improvement in both the number and significance of errors by Maintenance personnel. **Ongoing.**

4.1.1.D Evaluate the need for additional management actions (such as training, procedure revisions, establishing new management expectations, etc.) and implement them as needed based on performance. **10/15/95.**

### **Expected**

**Result:** A sustained reduction in the number of lost time and recordable accidents.

### **Measurement**

**Standard:** Representation of lost time and recordable accident trends and personnel error trends for Maintenance personnel.

\* \* \* \* \*

**Objective:** 4.1.2 Ensure decisions regarding the prioritization, scheduling, and implementation of maintenance activities (including the removal of Plant systems from service) are conservative from a nuclear safety perspective.

**Initiatives:** 4.1.2.A Continue SRO review and involvement in the assignment of priorities for corrective maintenance activities. **Ongoing.**



- 4.1.2.B. Continue evaluating the removal of safety systems from service using a probabilistic safety assessment and tracking of safety system out-of-service times to ensure conservatism regarding safety system availability. Ongoing.

***Expected***

***Result:*** Conservatively maintaining safety system availability and reliability consistent with the probabilistic safety assessment.

***Measurement***

***Standard:*** Routine tracking and evaluation of safety system availability and reliability.

## 4.2 MANAGEMENT INVOLVEMENT

**Objective:** 4.2.1 Maintain a low personnel error rate (including cases of procedure non-compliance) by Maintenance personnel.

**Initiatives:** 4.2.1.A Increase the Maintenance management perspective of craft supervisors by including craft supervisors in periodic meetings. This should be aimed at systematically communicating Maintenance management expectations and perspective in the areas of procedure compliance and craft supervisor performance expectations. These meetings will begin no later than 9/15/95 and continue for as long as needed to accomplish their purpose. Ongoing.

4.2.1.B Review current Maintenance management practices (including the Maintenance Observation Program) for evaluating and improving the effectiveness of Maintenance craft supervisors and implement corrective actions as needed. 10/1/95.

4.2.1.C Continue monthly trending of Maintenance personnel error rate and the number of Maintenance personnel errors per month for Maintenance management evaluation and action. Ongoing.

### **Expected Results:**

Improved understanding and embracing of Maintenance management expectations regarding craft supervisor performance expectations by craft supervisors.

A sustained reduction in the number and significance of human performance errors and procedure non-compliances for Maintenance personnel.

### **Measurement**

**Standard:** Monthly trending of human performance errors (inclusive of procedure non-compliance events) for Maintenance personnel.

### 4.3A PROBLEM IDENTIFICATION

**Objective:** 4.3A.1 Continued proactive problem identification by personnel involved in maintenance activities.

**Initiative:** 4.3A.1.A Review with Maintenance staff and supervisory personnel Maintenance manager's expectations regarding identification and implementation of corrective actions. 9/15/95.

4.3A.1.B Further enhance the monthly maintenance performance indicators by implementing a maintenance performance indicator for trending "rework" as a quality measure. 9/15/95.

4.3A.1.C Corrective actions associated with LER 94-019-00, Gasket Missing From Main Control Room Air Handle WMA-AH-51B Preclude Associated Emergency Fan WMA-FN-54B From Sufficiently Pressurizing The Control Room, have been implemented to deal with the issue of inadequate problem identification surrounding the Control Room HVAC system. Completed.

**Expected  
Results:**

Timely and accurate identification of problems associated with maintenance activities and Plant equipment.

A sustained decrease in the number of repeat events/recurring problems associated with Plant equipment and performance of the Maintenance organization.

**Measurement**

**Standard:** System reliability, number of operator workarounds, unplanned reactor trips, management observation.

### 4.3B PROBLEM RESOLUTION

**Objective:** 4.3B.1 Strengthen Maintenance management's effectiveness in monitoring for and evaluating opportunities to improve the effectiveness of corrective actions and equipment repairs.

**Initiative:** 4.3B.1.A Continue monthly trending of maintenance performance indicators such as trouble/breakdown work order inventory, work order inventory age, the number of Control Room deficiencies, the number of late preventive maintenance tasks and technical specification surveillance tests, personnel errors, schedule effectiveness, and personnel safety performance for management evaluation and action. **Ongoing.**

4.3B.1.B Further enhance the monthly maintenance performance indicators by implementing a maintenance performance indicator for trending "rework" as a quality measure. 9/15/95.

4.3B.1.C Continue monthly trending and management review of late corrective actions associated with PERs and regulatory commitments. **Ongoing.**

4.3B.1.D Review Maintenance manager's expectations regarding identification and implementation of corrective actions with Maintenance staff and supervisory personnel. 9/15/95.

4.3B.1.E Continued participation by the Maintenance Manager in the PER Review Meetings. **Ongoing.**

#### **Expected**

**Result:** A sustained decrease in the number of repeat events/recurring problems associated with Plant equipment and performance of the Maintenance organization.

#### **Measurement**

**Standard:** Track key word search "hits" that identify newly written PERs as repeat events.

#### 4.4 PLANT MATERIAL CONDITION

**Objective:** 4.4.1 Sustain a material condition for Plant components and systems which results in high levels of system availability and reliability and a low Plant heat rate.

**Initiatives:** 4.4.1.A Continue monthly trending of performance indicators associated with Plant material condition relative to established goals such as work order inventory, work order inventory age, the number of Control Room deficiencies, and the number of late preventive maintenance tasks for management evaluation and action. Current trending shows an overall positive improvement for these indicators. **Ongoing.**

4.4.1.B Institute system engineer reviews of corrective maintenance work orders for safety-related, quality class 1 equipment to verify the adequacy of testing activities intended to ensure the equipment is operable prior to its return to service. **9/30/95.**

**Expected**

**Result:** Sustained high levels of system availability and reliability, a continued low Plant heat rate, and meeting goals associated with Plant material conditions.

**Measurement**

**Standard:** Graphical trends of system availability and reliability, Plant heat rate, and material condition performance indicators.

## 4.5 QUALITY OF MAINTENANCE WORK

**Objective:** 4.5.1 Sustain a high level of performance regarding the quality of maintenance work performed.

**Initiatives:** 4.5.1.A Further enhance the monthly maintenance performance indicators by implementing a maintenance performance indicator for trending "rework" as a quality measure. 9/15/95.

4.5.1.B Continue monthly trending of maintenance performance in the areas of preventive maintenance and technical specification surveillance testing for Maintenance management evaluation and action. **Ongoing.**

4.5.1.C Continue monthly trending of errors by Maintenance personnel for management evaluation and action. Current trending shows improvement in both the number and significance of errors by Maintenance personnel. **Ongoing.**

4.5.1.D Train appropriate personnel on the requirements and implementation activities associated with foreign material exclusion requirements. 1/15/96.

4.5.1.E Continue scheduled, routine training of Maintenance personnel. **Ongoing.**

**Expected  
Result:**

Continued improved performance regarding the quality of maintenance work performed, continued reduction in the error rate by Maintenance personnel, and a minimization in the number of events involving inadequate foreign material controls.

**Measurement**

**Standard:** Graphical representation of maintenance rework, Maintenance personnel error rate, preventive maintenance, performance, and a reduction in the number of events involving inadequate foreign material exclusion, using a PER measure.

#### 4.6 PROGRAMS AND PROCEDURES

**Objective:** 4.6.1 Provide technically accurate and usable maintenance procedures that can be used, as written, by Maintenance personnel in the field.

**Initiatives:** 4.6.1.A Continue monthly progress trending of the maintenance procedure upgrade effort for management evaluation and action. **Ongoing.**

4.6.1.B Complete a re-evaluation of the current time table and scope of the maintenance procedure upgrade effort from a value added, cost-effectiveness and regulatory commitment standpoint. **10/15/95.**

**Expected**

**Result:** Based on the re-evaluation, either continue the current or revised maintenance procedures upgrade effort on the existing or revised schedule, or discontinue the maintenance procedure upgrade effort.

**Measurement**

**Standard:** Graphical, monthly trending of maintenance procedure upgrade completions.

# **PERFORMANCE IMPROVEMENT AREAS** **PLANT SUPPORT**

5.0

## **PLANT SUPPORT**

• Overall: performance is average

5.1

### **SAFETY FOCUS**

### **MANAGEMENT INVOLVEMENT**

• Quality assurance area needs increased management involvement

### **OBJECTIVE**

5.3A.1  
5.3A.2

5.2

### **PROBLEM IDENTIFICATION**

0

### **PROBLEM RESOLUTION**

• PER process is cumbersome & inconsistently used  
• PER trending program lacks meaning to management

### **OBJECTIVE**

1.2.1

5.3A

### **QUALITY OF QUALITY ASSURANCE**

• Problem resolution needs improvement

### **OBJECTIVE**

5.3A.1

• Use of stop work order authority has been underutilized

5.3A.2

• Need to be more critical & aggressive w/ emphasis on problem resolution

5.3A.1  
5.3A.2

5.3B

### **QUALITY OF EMERGENCY PREPAREDNESS**

### **OBJECTIVE**

5.3C

### **QUALITY OF FIRE PROTECTION**

• Technical Fire Issues, thermolag and fire barrier seal installation exists

### **OBJECTIVE**

7.5.1

• Fire Extinguisher Inspections and untreated wood in protected area were noted as problem areas.

Complete

5.3D

### **QUALITY OF SECURITY**

• Performance has been weak

### **OBJECTIVE**

5.3D.1  
5.3D.4

• Need to eliminate sense of complacency to stop decline in performance

5.3D.1  
5.3D.4

5.3E

### **QUALITY OF HEALTH PHYSICS**

• Radiation exposure for both routine & outage activities too high

### **OBJECTIVE**

5.3E.1

• Source term reduction efforts lag behind industry average

5.3E.1

• Personnel violations are excessive

5.3E.2  
6.4.1

• Apparent negative trend of personal contamination events

5.3E.3

5.4

### **PROGRAMS & PROCEDURES**

• Procedural adherence continues as a significant problem

### **OBJECTIVE**

5.3A.3  
5.3B.3  
5.3E.2

**Q** EXCEPTIONAL PERFORMANCE

**W** AVERAGE PERFORMANCE

**R** MINIMUM PERFORMANCE



## PERFORMANCE IMPROVEMENT AREAS

### PLANT SUPPORT

5.0

PLANT  
SUPPORT

- Overall: performance is average

5.3A

QUALITY OF  
QUALITY  
ASSURANCE

	OBJECTIVE
• Problem resolution needs improvement	5.3A.1
• Use of stop work order authority has been underutilized	5.3A.2
• Need to be more critical & aggressive w/ emphasis on problem resolution	5.3A.1 5.3A.2

# QUALITY ASSURANCE

## 5.3A QUALITY ASSURANCE

**Objective:** 5.3A.1 Attain a higher level of quality involvement and line management buy-in on issue resolution, human performance, procedural adherence, and the effectiveness of corrective action programs.

**Initiatives:** 5.3A.1.A On 6/20/95 the Quality Directorate began a 100% review of all PERS at the disposition and closure phase. This review focuses on the adequacy and completion of the corrective actions. Inadequate corrective actions are communicated to the appropriate line organization both verbally and in writing. This initiative will continue for a six-month period at which time it will be reevaluated. **Ongoing.**

5.3A.1.B Quarterly, Functional Area Engineers will meet with line management to determine the needs of the line organization as well as obtain an assessment of the performance of the Quality organization in supporting those needs. **Ongoing.**

5.3A.1.C Each Quality Directorate Manager will rotate two individuals from the Quality Directorate per fiscal year. This applies to both inter- and intra-organizational rotations. Rotations for Operations personnel into the Quality Directorate to commence by October 1995. **Ongoing.**

5.3A.1.D The Line organization will participate as Audit Team Members in 50 percent of FY96 Quality audits. **Ongoing.**

5.3A.1.E Outside utilities' personnel will participate as Audit Team Members in 50 percent of FY96 Quality audits. **Ongoing.**

5.3A.1.F Functional Area Engineers will use Quality Control inspectors in a "Coordinated Approach" to Plant walk-downs. **Ongoing.**

5.3A.1.G Development and implementation of a training program for the Quality Directorate. The focus of this program will be on auditor performance and licensing basis requirements. **Ongoing.**

5.3A.1.H Implement a shop-peer inspection program. This will involve a reduction in QC hold points and training of craft personnel on how to perform peer inspections. **Ongoing.**

***Expected  
Results:***

Effective communication between the line organization and the Quality staff should improve. An additional benefit is the expected alignment of goals for Quality and the line organizations.

A thorough review of all PERs at disposition and closure should foster a consistent and improved standard on the quality and effectiveness of the corrective action process.

Through rotation of personnel, Quality staff will gain an appreciation for the performance requirements of the line organization and line organizations will gain an increased awareness for the license-based requirements of their activities.

Increased awareness of the Quality staff on the problems, issues, workarounds, and failures in the Plant. The resource of Quality Control has not been fully utilized for its unique perspective. This endeavor should transfer Plant awareness to all organizations.

Improve Craft personnel responsibility for delivering a quality product through involvement and exposure to PEER inspection.

***Measurement  
Standards:***

- 5.3A.1.a The Quality Directorate will track and report on the number and the specifics of returned PERS as a result of the Corrective Action Review Board and Quality Directorate review efforts.
- 5.3A.1.b Every quarter, the frequency of the Functional Area Engineer's meeting with the line organization will be reviewed and reported in the Quality Directorate Quarterly Report.
- 5.3A.1.c Organizational rotations will be reviewed and in the Directorate Quarterly Report.
- 5.3A.1.d Line organization participation on audit teams will be reviewed and reported in the Quality Directorate Quarterly Report. on this goal.
- 5.3A.1.e Report frequency and value achieved using the Quality/QC coordinated approach will be reviewed and the administrative staff will track and generate a quarterly report for the Director's review.

\* \* \* \* \*

- Objective:*** 5.3A.2 The Quality Organization will focus their resources on timely and effective intervention dealing with issues having an impact on human performance, station safety and a reduction in repeat problems.

- Initiatives:**
- 5.3A.2.A Quality Directorate Audits and Surveillances will have reports generated within seven working days of the exit. **Ongoing.**
  - 5.3A.2.B Quarterly, Functional Area Engineers will meet with the line management to determine the needs of the organization as well as the performance of the Quality organization in supporting those needs. **Ongoing.**
  - 5.3A.2.C Use the Critical Attribute Database to ensure a thorough and comprehensive coverage of the Functional Areas. Focusing on the fundamental aspects of the department's scope. **Ongoing.**
  - 5.3A.2.D Track the use of the "Stop Work" order by the Quality Directorate. This applies to both the formal and the consensus "Stop Work" order. **Ongoing.**
  - 5.3A.2.E Functional Area Engineers will use Quality Control inspectors in a "Coordinated Approach" to Plant walk-downs. **Ongoing.**

**Expected  
Results:**

With Audit and Surveillance Reports in the customer's hands within seven (7) working days of the exit, the value and applicability of the information to line management should be enhanced.

Effective communication between the customer organization and the Quality staff should improve. The additional benefit is providing a clear focus for both organizations on the areas requiring improvement.

Aggressive and appropriate use of the "Stop Work" tool should increase the effectiveness of the Quality Directorate in raising the standard of human performance and procedural compliance.

The focus of the line organizations and Quality Directorate should be on the same issues--to identify potential and repetitive problems to management.

Increased awareness of the Quality staff of the problems, issues, workarounds, and failures in the Plant. The resource of Quality Control has not been fully utilized for its unique perspective. This endeavor should transfer the unique perspective Quality Control has on Plant activities to all organizations via Quality Directorate products.

**Measurement**

- Standards:**
- 5.3A.2.a The achievement of timely reports will be reviewed. The Quality Directorate will track this parameter.
  - 5.3A.2.b Information from the Functional Areas Engineers meeting with the respective departments will be reported in the Quarterly Quality Directorate report.

5.3A.2.c Every six months, the scheduled due dates for the Critical Attributes Database will be queried to establish the percent completed.

5.3A.2.d The number and value added for the Stop Work Order will be reviewed. A log will be maintained by the directorate secretary and reported in the Quarterly Quality Directorate Report.

## PERFORMANCE IMPROVEMENT AREAS

### PLANT SUPPORT

5.0

PLANT  
SUPPORT

• Overall: performance is average

5.3B

QUALITY OF  
EMERGENCY  
PREPAREDNESS

	OBJECTIVE

# EMERGENCY PREPAREDNESS

## 5.3B EMERGENCY PLAN AND IMPLEMENTING PROCEDURES

**Objective:** 5.3B.1 Maintain and verify the current level of the Emergency Plan and Implementing Procedures.

**Initiatives:** 5.3B.1.A Train Emergency Response Organization to the new plan and procedures. Completed.

5.3B.1.B Develop training for NUMARC Emergency Action Levels. Completed.

5.3B.1.C Complete WNP-2 Accountability Drill. Completed.

5.3B.1.D Complete Preparedness Drill for 10/95 Exercise. 9/95.

5.3B.1.E Conduct 10/95 Exercise. 10/95.

5.3B.1.F Develop procedures and training for severe accident management. 1/97.

### *Expected*

**Result:** Successful evaluations during 8/95 NRC Inspection and 10/95 Exercise.

### *Measurement*

**Standard:** No major areas of concern revealed during 8/95 NRC Inspection and 10/95 Exercise.

\* \* \* \* \*

**Objective:** 5.3B.2 Maintain Emergency Response Facilities and Equipment.

**Initiatives:** 5.3B.2.A Develop Emergency Response Facilities and Equipment Checklist. Completed.

5.3B.2.B Develop Emergency Planning Position Papers. 12/95.

### *Expected*

**Result:** All emergency response centers and equipment maintained in a constant state of readiness.

**Measurement**

**Standard:** No identified areas of concern noted during weekly walkdown of emergency response centers.

\* \* \* \* \*

**Objective:** 5.3B.3 Develop Departmental Guidelines and Policies by 12/31/95 that clearly identify functions of Emergency Planning Organization.

**Initiatives:** 5.3B.3.A Develop instructional manual for drills and exercises. Completed.

5.3B.3.B Develop reference materials for various Emergency Planning roles and responsibilities. 12/95.

5.3B.3.C Develop six-year planning schedule. 8/95.

**Expected**

**Result:** Enhance the department's ability to maintain a high quality, effective Emergency Response Organization.

**Measurement**

**Standard:** Reduce the number of findings from Quality audits, NRC Inspections and FEMA Reviews.

\* \* \* \* \*

**Objective:** 5.3B.4 Develop a Program Improvement Plan with State, Counties, and EFSEC by June 1996 to achieve program efficiencies.

**Initiatives:** 5.3B.4.A Conduct benchmarking with selected counties, states, and utilities. Completed.

5.3B.4.B Use information obtained from benchmarking to identify work efficiencies. 12/95.

5.3B.4.C Implement work efficiencies to achieve reduction in program costs without affecting quality. 6/96.

**Expected**

**Result:** Achieve off-site cost savings.

**Measurement**

**Standard:** Reduced expenditure for off-site emergency preparedness.



## PERFORMANCE IMPROVEMENT AREAS

### PLANT SUPPORT

5.0

#### PLANT SUPPORT

- Overall: performance is average

5.3C

#### QUALITY OF FIRE PROTECTION

	OBJECTIVE
• Technical Fire Issues, thermolag and fire barrier seal Installation exists	7.5.1
• Fire Extinguisher Inspections and untreated wood in protected area were noted as problem areas.	Complete

# ***FIRE PROTECTION***

## **5.3C FIRE PROTECTION**

**Objective:** 5.3C.1 Complete fire protection projects relating to thermo-lag, fire-rated penetration seals, and safe shutdown (Appendix -R) procedures.

**Initiatives:** 5.3C.1.A Establish projects to address fire protection issues. **Complete.**

5.3C.1.B Complete plant modifications necessary to resolve safe shutdown fire barrier issues without reliance on thermo-lag. **Spring 1999.**

5.3C.1.C Complete walkdown of essential fire penetration seals. **12/97.**

5.3C.1.D Revise safe shutdown analysis to incorporate necessary changes. **Completed.**

***Expected***

**Result:** Resolve fire protection deficiencies.

***Measurement***

**Standard:** Completion of initiatives in accordance with established schedules.

## PERFORMANCE IMPROVEMENT AREAS

### PLANT SUPPORT

5.0

#### PLANT SUPPORT

- Overall: performance is average

5.3D

#### QUALITY OF SECURITY

	OBJECTIVE
• Some examples of poor performance identified.	5.3D.1 5.3D.4
• Need to implement programs to remove complacency and improve performance	5.3D.1 5.3D.4

# SECURITY

## 5.3D SECURITY

**Objective:** 5.3D.1 Eliminate complacency and improve human performance.

**Initiatives:** 5.3D.1.A Ensure Security Procedure compliance through the following initiatives:

- Develop and implement in-house compliance audits using representatives from all Security departments. Development completed 2/95; Implementation Ongoing.
- Gain Security Officer feedback on procedure reviews, concerns, and suggestions. 12/1/95.
- Consolidate the number of Security procedures. Ongoing.
- Continue to communicate management expectations for procedural compliance. Ongoing.

5.3D.1.B Relieve boredom which contributes to complacency by adding duties relating to proper housekeeping and safety focus to ensure officers remain in a higher state of readiness. Ongoing.

### **Expected**

**Result:** Continuation of improvement in performance which has been observed since completion of Mid-Cycle Assessment.

### **Measurement**

**Standard:** Graphical representation of human performance errors against an established goal.

\* \* \* \* \*

**Objective:** 5.3D.2 Optimize Security performance by using state-of-the-art equipment.

**Initiatives:** 5.3D.2.A Install Hand Geometry at protected area entry turnstiles to allow employees to gain efficiencies. 11/95.

5.3D.2.B Relocate the EOFCC and related equipment to the Alternate Access Point Badge Issue Station as part of the equipment upgrade. 11/95.

***Expected***

***Result:*** Reduction in badging errors.

***Measurement***

***Standard:*** Badging error rate.

\* \* \* \* \*

***Objective:*** 5.3D.3 Increase availability and reliability of Security equipment.

***Initiatives:*** 5.3D.3.A Increase assessment of Alarm Station Operator (ASO) performance and increase operator assessment ability of Security equipment. Implemented 4/5/95.

- Repair or replace 17" alarm monitors to improve picture resolution. Completed.
- Train CAS operators on method to use the camera "template" for assessment purposes and methods for adjusting monitors. 9/1/95.

5.3D.3.B Reduce excessive alarm rates on vital area doors. 12/19/95.

- Implementation of multiple employee entries through card-reader doors. Ongoing.
- Issue informational articles to Plant employees stating expectations for door closures. Ongoing.
- Continue to develop and trend door alarm rates, gathering more detail data for an in-depth analysis to determine if there is a maintenance or human error problem. 12/95.

***Expected***

***Result:*** Reduction in Security Systems' equipment failures.

***Measurement***

***Standard:*** Graphical representation of equipment failures against an established goal.

\* \* \* \* \*

***Objective:*** 5.3D.4 Strengthen the FFD & CBO programs.

***Initiatives:*** 5.3D.4.A Maintain existing quality of work, pride, and skill of FFD staff. Upgrade equipment, incorporate DOT FFD program. Streamline FFD outage processing. Ongoing.

5.3D.4.B Increase employee awareness and understanding of the Supply System's Continued Behavioral Observation Program. Ongoing.

***Expected***

***Result:*** Maintain a drug-free and professional work force.

***Measurement***

***Standard:*** Graphical representation of FFD testing results.

\* \* \* \* \*

***Objective:*** 5.3D.5 Maintain high level of readiness.

***Initiatives:*** 5.3D.5.A Benchmark other Security training and Security Force organizations.  
Ongoing.

5.3D.5.B Participate in peer self-assessments of the FFD/CBO and Security  
Programs. Ongoing.

5.3D.5.C Prepare for Operational Safeguards Response Evaluation (OSRE).  
Scheduled by NRC.

***Expected***

***Result:*** An acceptable and working OSRE plan and increased Security Force efficiency.

***Measurement***

***Standard:*** List of on-going/planned activities.

## PERFORMANCE IMPROVEMENT AREAS PLANT SUPPORT

5.0

PLANT  
SUPPORT

- Overall: performance is average

5.3E

QUALITY OF  
HEALTH  
PHYSICS

	OBJECTIVE
• Radiation exposure for both routine & outage activities too high	5.3E.1
• Source term reduction efforts lag behind industry average	5.3E.1
• Personnel violations are excessive	5.3E.2 6.4.1
• Apparent negative trend of personnel contamination events	5.3E.3

# HEALTH PHYSICS

## 5.3E HEALTH PHYSICS

**Objective:** 5.3E.1 Reduce personnel radiation exposure to a level consistent with comparable Boiling Water Reactors.

**Initiatives:** 5.3E.1.A Implement WNP-2 Business Plan (SOT2) concerning reduction of occupational and collective personnel radiation exposure. **Ongoing.**

5.3E.1.B Improve and continue the plan for flushing high radiation dose rate components to remove contaminants causing increased dose rates. **Ongoing.**

5.3E.1.C Identify high radiation dose rate contributors (e.g., turbine blades), evaluate for modification or removal and develop plans for implementation of modification in order to achieve lower dose rates. Identification - by 9/96; Evaluation and Development - **Ongoing.** (Piping, which was causing elevated dose rates in the Reactor Water Cleanup Holdup Pump Room, was removed in July 1995.)

5.3E.1.D Continue the plan for shielding components as evaluations deem appropriate. **Ongoing.**

5.3E.1.E Continue the publication of the status of departmental dose accumulation and dose budget comparisons in the Plant newsletter. **Ongoing.**

5.3E.1.F Implement an incentive compensation plan based upon an ALARA goal. **Completed.**

**Expected Result:** Reduction of collective and occupational personnel radiation exposure.

### **Measurement**

**Standards:** 5.3E.1.a Annual dose accumulation and ranking on INPO quartiles.

5.3E.1.b Departments assessed based on monthly, outage and annual dose accumulation.

5.3E.1.c Results from standardized radiation survey points.

\* \* \* \* \*

**Objective:** 5.3E.2 Continue to foster an environment which encourages adherence to radiological requirements.



- Initiatives:**
- 5.3E.2.A Develop Advance Radiation Worker Training including practical exercise using the maintenance training skid and concurrent training of craft workers and health physics technicians. 1/96.
  - 5.3E.2.B Add industry events to include personnel violations of radiological requirements at WNP-2 to General Employee Training. Ongoing.
  - 5.3E.2.C Develop and communicate management expectations for worker accountability in radiological environments including work group supervisor accountability on all shifts. 10/95.
  - 5.3E.2.D Enhance the RWP/ALARA planning process to improve exposure controls and provide improved information to workers. 9/95.

**Expected**

**Result:** Reduction in personnel violations of radiological requirements.

**Measurement**

**Standard:** The measurement standard will be a reduction in personnel violations of radiological requirements which result in PERs as compared to the total number of PERs written.

\* \* \* \* \*

**Objective:** 5.3E.3 Ensure proper emphasis on personnel contamination events.

- Initiatives:**
- 5.3E.3.A Develop criteria which indicates a significant personnel contamination event. 11/95.
  - 5.3E.3.B Implement trending program using criteria for significant personnel contamination event. 1/96.
  - 5.3E.3.C Use information from trending program to develop baseline and inform management. Ongoing.

**Expected**

**Result:** Reduction in personnel contamination events trended and investigated.

**Measurement**

**Standard:** The measurement standard will be determined as part of the development of the personnel contamination event program.

# PERFORMANCE IMPROVEMENT AREAS

## TRAINING

6.0

### TRAINING

--

6.1

### OPERATIONS TRAINING

	OBJECTIVE
• Continue training that improves and enhances operator performance.	6.1.1
• Enhance knowledge of plant operations and impact on operator performance	6.1.2

6.2

### MAINTENANCE TRAINING

	OBJECTIVE
• Foster training environment emphasizing proper safety focus	6.2.1

6.3

### ENGINEERING SUPPORT TRAINING

	OBJECTIVE
• Ensure understanding of Plant Systems and Operations	6.3.1

6.4

### CHEMISTRY AND HP TECHNICIAN TRAINING

	OBJECTIVE
• Enhance and improve chemistry and health technician performance.	6.4.1



EXCEPTIONAL PERFORMANCE



AVERAGE PERFORMANCE



MINIMUM PERFORMANCE



ADDED BY SUPPLY SYSTEM

# TRAINING

## 6.1 OPERATIONS TRAINING

**Objective:** 6.1.1 Continue to provide quality training that is specifically designed to enhance and improve operator performance in the Plant.

**Initiatives:** 6.1.1.A Continue development and integration of the following performance issues and attributes into licensed and non-licensed operator training materials and simulator scenarios: **Ongoing.**

- Attention to detail
- Conservative decision-making
- Problem resolution and a questioning attitude
- Self-checking
- Component tagging practices
- Technical specification case studies
- Pre-evolution or pre-job briefs
- Understanding design bases
- Line management expectations
- Procedural adherence
- Three-way communication

6.1.1.B Continue implementation of these performance attributes in classroom and simulator training sessions. As an example, in the present training cycle (95-4), Operations Training is re-emphasizing conservative decision-making and problem resolution during simulator scenarios which are based on Abnormal Operations. Self-checking is being evaluated by instructors and Operations Managers/Supervisors using Job Performance Measures (JPM) training in the simulator and the formal communications policy is being reviewed in the classroom as well as in the Plant simulator. **Ongoing.**

- 6.1.1.C Continuously evaluate ways to further enhance operator training programs, maintaining a "focus" on improved Plant and operator performance. Use Training Advisory Group (TAG) meetings to ensure Training alignment with Operations line management expectations and needs. Ongoing.

**Expected  
Result:**

Increased emphasis on good performance attributes and management expectations in operator training will result in improved operator performance and reduced error rate.

**Measurement  
Standard:**

Operations Training will use the Operations line management measurement standards as indicators of success.

\* \* \* \* \*

**Objective:**

- 6.1.2 Enhance knowledge of Supply System managers, supervisors, and key staff to enable them to have a better operational understanding of how the discharge of their responsibilities impact Plant operations and operator performance.

**Initiatives:**

- 6.1.2.A Continue presentation of the 13-week Management Certification training course into the foreseeable future to ensure that critical managers and supervisors receive this important training. Ongoing.
- 6.1.2.B Involve Plant personnel from Operations, Maintenance, Technical Services and Engineering into this program as augmentation for the instructional staff in future management certification classes. 9/30/95.
- 6.1.2.C Evaluate increasing the student population of this class to effectively train and certify more people per unit of time. 10/1/95.

**Expected  
Result:**

Providing SRO level training to managers, supervisors, and key staff will enable them to have a better operational understanding of the impact of their responsibilities on safe and efficient Plant operations.

**Measurement  
Standard:**

Operations Training will use the Operations line management measurement standards as indicators of success.

## 6.2 MAINTENANCE TRAINING

**Objective:** 6.2.1 Foster a training environment that emphasizes proper safety focus.

**Initiative:** 6.2.1.A Reinforce management expectations when conducting training and evaluating performance by targeting the following attributes: **Ongoing.**

- Procedural adherence
- Stop, Think, Act, Review (STAR)
- Work practices (e.g., attention to detail and conservative decision-making)
- Industrial/Radiological safety

All Maintenance personnel have been through one cycle of this training. A second cycle with emphasis on these attributes will be completed by 4/96.

**Expected Result:** Reduction in performance errors.

### **Measurement**

**Standard:** Maintenance Training will use the Maintenance line management measurement standards as indicators of success.

### 6.3 ENGINEERING SUPPORT TRAINING

**Objective:** 6.3.1 Ensure technical and engineering professionals possess a broad scope understanding of Plant systems and operations.

**Initiatives:** 6.3.1.A Augment the Engineering Support Staff Training (ESST) Program participant population. This initiative is presently in progress and will be completed by 6/96.

6.3.1.B Institute training within the ESST Program to enhance the technical capabilities of the technical and engineering professionals on staff. This program will be in place by 1/97.

**Expected**

**Results:** Reduction in occurrences attributable to lack of understanding of the potential impact of engineering activities on Plant operations.

Compliance with regulatory and procedural guidance.

**Measurement**

**Standards:** 6.3.1.a ESST training will use the Engineering line organization measurement standards as indicators of success.

6.3.1.b Fewer issues surfacing in POC reviews of change documents.

6.3.1.c Reduction in PERs related to engineering activities.

6.3.1.d Fewer inadequate Corrective Actions involving engineering activities.

#### 6.4 CHEMISTRY TECHNICIAN AND HEALTH PHYSICS TECHNICIAN TRAINING

**Objective:** 6.4.1 Continue to provide quality training that is specifically designed to enhance and improve chemistry technician and health physics technician performance in the Plant.

**Initiatives:** 6.4.1.A Continue to provide continuing training based on identified needs such as PERs, LERs, in-house operating events and industry events. Ongoing.

6.4.1.B Continue to stress self-checking, procedure adherence, communications, questioning attitudes and conservative decision-making in all phases of training. Ongoing.

6.4.1.C Continue to use line management as subject matter experts (SME) during training to reinforce management's expectations for performance. Ongoing.

**Expected Result:** Improved job performance.

**Measurement Standard:** Chemistry and Health Physics Training Group will use the line organizations measurement standards as indicators of success.

# **PERFORMANCE IMPROVEMENT AREAS** **ADDITIONAL IMPROVEMENT INITIATIVES**

7.0	ADDITIONAL IMPROVEMENT INITIATIVES		
7.1	MAINTENANCE RULE		OBJECTIVE
		• Implement Maintenance Rule.	7.1.1
7.2	FSAR UPGRADE		OBJECTIVE
		• Improve the FSAR.	7.2.1
7.3	IMPROVED TECHNICAL SPECIFICATIONS		OBJECTIVE
		• Improve the Technical Specifications	7.3.1
7.4	PLANNING AND CONTROL		OBJECTIVE
		• Develop business plan initiatives supporting NRC Communication Document Implementation	7.4.1
		• Develop progress reporting for business plan initiatives	7.4.2
7.5	INTEGRATED PLANNING AND SCHEDULING		OBJECTIVE
		• Improve overall integrated planning and scheduling of work.	7.5.1

**G** EXCEPTIONAL PERFORMANCE    
 **W** AVERAGE PERFORMANCE    
 **R** MINIMUM PERFORMANCE    
 **B** ADDED BY SUPPLY SYSTEM



# ***ADDITIONAL IMPROVEMENT INITIATIVES INDEX***

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# ***MAINTENANCE RULE***

## **7.1 MAINTENANCE RULE**

**Objective:** 7.1.1 Implement the Maintenance Rule.

**Actions:** 7.1.1.A Scope SSCs within the Maintenance Rule. **Completed.**

7.1.1.B Determine SSC risk significance. **Completed.**

7.1.1.C Complete data collection. **Completed.**

7.1.1.D Draft performance criteria. **Completed.**

7.1.1.E Complete identification of all "a(1)" SSCs. **Completed.**

7.1.1.F Complete draft Program Plan. **Completed.**

7.1.1.G Draft goals for "a(1)" SSCs. **Completed.**

7.1.1.H Performance criteria review by Expert Panel. **8/31/95.**

7.1.1.I Begin trial implementation of Maintenance Rule. **Ongoing.**

7.1.1.J Draft Annual Report--Program Review. **10/95.**

### ***Expected***

**Result:** Implementation of Maintenance Rule will bring the Supply System in line with industry practices and NRC requirements.

### ***Measurement***

**Standard:** Meet milestones on all Action Items.

# ***FINAL SAFETY ANALYSIS REPORT (FSAR) UPGRADE***

## **7.2 FINAL SAFETY ANALYSIS REPORT (FSAR) UPGRADE**

**Objective:** 7.2.1 Rewrite the FSAR to ensure the following:

- It contains the minimum information required by Regulatory Guide 1.70.
- It accurately reflects existing design and operating procedures.
- It can be relied upon for 10 CFR 50.59 safety evaluations.

**Actions:**

7.2.1.A Establish project scope and develop upgrade plan. **Completed.**

7.2.1.B Present upgrade plan to Project Review Committee (PRC). **Completed.**

7.2.1.C Prepare bid documents for upgrade project. **Completed.**

7.2.1.D Receive and evaluate upgrade project bids. **8/20/95.**

7.2.1.E Begin upgrade project. **9/15/95.**

7.2.1.F Complete upgrade project. **6/97.**

7.2.1.G Submit FSAR upgrade to the NRC. **8/97.**

**Expected  
Result:**

An upgraded FSAR will accurately reflect existing WNP-2 design, reflect all information required by Regulatory Guide 1.70, and consolidate current redundant data. This upgrade process will also allow for the development of an FSAR change process by which the future integrity of the document will be protected.

**Measurement**

**Standard:** Meet milestones on all Action Items.

# ● **IMPROVED TECHNICAL SPECIFICATIONS**

## **7.3 IMPROVED TECHNICAL SPECIFICATIONS**

**Objective:** 7.3.1 Convert the existing Supply System Technical Specifications to the Improved Technical Specifications in a manner similar to that described in NUREGs 1433 and 1434.

**Actions:** 7.3.1.A Submit Improved Technical Specifications to NRC. In the 4th quarter of 1995.

7.3.1.B Obtain NRC approval. Scheduled by NRC.

7.3.1.C Implement Improved Technical Specifications. In the 4th quarter of 1996.

### ***Expected***

**Result:** Implementation of Improved Technical Specifications will result in improved operational safety, clearer understanding of the Technical Specification requirements, decreased administrative burden, and a six-month reduction in surveillance frequency "R" (18 to 24 months).

### ***Measurement***

**Standard:** Meet milestones on all Action Items.

# PLANNING AND CONTROL

## 7.4 BUSINESS PLAN ALIGNMENT AND MONTHLY PROGRESS REPORTING

### BUSINESS PLAN ALIGNMENT

**Objective:** 7.4.1 Develop business plan initiative(s) to support key issues identified for performance enhancement (Reference Business Plan Initiative Form Attachment A).

**Initiatives:** 7.4.1.A Develop global business plan initiatives addressing the purpose, objective, expected results and major action items required to successfully develop, implement and monitor activities in support of performance enhancement. 8/15/95.

7.4.1.B Review performance enhancement objectives and identify common issues across organizations which would warrant the development of business plan initiatives (e.g., creating an environment that encourages a proper safety focus). 8/15/95.

7.4.1.C Draft Business Plan Initiatives as identified in Initiative 2 above. 8/31/95.

#### **Expected**

**Result:** Alignment of performance enhancement objectives and initiatives and the Business Plan.

#### **Measurement**

**Standard:** Complete actions on schedule.

\* \* \* \* \*

### MONTHLY PROGRESS REPORTING

**Objective:** 7.4.2 Develop and implement monthly progress reporting for related business plan initiatives and other key actions.

**Initiatives:** 7.4.2.A All business plan related initiatives' status will be reported on a monthly basis (reference Management Initiative Progress Report Attachment B).  
**Note:** Only performance enhancement objectives and related business plan initiatives require monthly status reports. All other initiatives will continue to be reported quarterly. 8/31/95.

7.4.2.B All other key actions identified as performance enhancement objectives will require monthly status reports. 8/31/95.

***Expected  
Result:***

Provide monthly status reporting for management review of progress and assessment of corrective actions.

***Measurement***

***Standard:*** Complete actions on schedule.

# **INTEGRATED PLANNING AND SCHEDULING**

## **7.5 INTEGRATED PLANNING AND SCHEDULING**

**Objective:** 7.5.1 Improve overall integrated planning and scheduling of work (see 0.5.1).

**Initiatives:** 7.5.1.A Implement a electronic work process. **Completed.**

7.5.1.B Reorganize Planning and Scheduling organizations to combine similar functions. **Completed.**

7.5.1.C Implement improved integrated daily scheduling process. **Completed.**

7.5.1.D Create Fix-It-Now (FIN) process. 9/11/95.

7.5.1.E Create Work Teams. 10/13/95.

7.5.1.F Implement Work Teams. 10/30/95.

### **Expected**

**Result:** Improved daily integrated schedule coordination, adherence, accountability, and efficiency within involved departments. .

### **Measurement**

**Standard:** Meet milestone schedule.