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November 27, 1995
GO2-95-251

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21
RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE
PERFORMANCE (SALP) - NRC INSPECTION REPORT 50-397/95-99**

The Supply System acknowledges the NRC staff's Systematic Assessment of Licensee Performance (SALP) Report 50-397/95-99, for the period of April 1, 1994, through September 2, 1995. We concur with your finding that the performance of licensed activities at WNP-2 is acceptable and directed toward safe facility operation.

Attachment A to this letter is the Supply System's response to the SALP report. It summarizes the actions to improve performance at WNP-2 in the Radiation Protection area and within the functional areas of Operations and Engineering. The Supply System's intent is to establish a performance level which would lead to achieving our goal of superior performance.

In an effort to realize our goal of superior performance and to address the more generic performance aspects related to the issues identified in the SALP report and past Supply System performance, the Supply System has implemented an extensive performance improvement program identified as the Performance Enhancement Strategy (PES). The PES implements comprehensive improvement initiatives designed to improve performance in all SALP functional areas. These initiatives address the underlying causes of the problems identified in the SALP report which are preventing the Supply System from achieving our excellence goal. The PES program was formally docketed and on several occasions has been reviewed with members of the NRC staff and the NRC WNP-2 Oversight Panel.

As you are aware the PES Program is a multi-faceted program directed at changing the culture within the Supply System. The improvement initiatives are directed at building a teamwork environment where each member of the Supply System team can contribute and is responsible for their actions. This team concept must and will be achieved, allowing us to reach and maintain our goal of superior performance.

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**SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
RESPONSE - NRC INSPECTION REPORT 50-397/95-99**

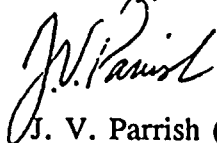
The attached response identifies and briefly describes the PES initiatives in place to address the underlying issues identified in the SALP report. The PES index is included as Attachment B to facilitate review. As you are aware, the status of the PES initiatives will be reviewed on a periodic basis with the NRC WNP-2 Oversight Panel. It is our intent to build on the successes of the past year, making adjustments as necessary, to effectively implement long-term performance improvements.

Measures have been established by which we can determine whether the planned initiatives have been effective in improving performance. This ongoing performance monitoring program consists of quantitative goals, periodic evaluation of performance in meeting the goals, and identification and implementation of revised initiatives where appropriate.

Responses to the specific technical examples cited in the SALP were, in almost all cases, previously docketed. The PES initiatives address resolution of the underlying problems that provided an environment in which the specific problems could occur.

If you have any questions or desire additional information regarding this matter please contact me or D. A. Swank at (509) 377-4563.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

JMP
Attachments

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A. Functional Area: Plant Operations

The SALP Board assigned a Category 3 rating to the Plant Operations area noting performance was adequate, with poorer performance observed during the later portion of the SALP period. Several areas of concern were identified in the SALP report. These areas of concern and the Supply System response are outlined below:

- Management's inability to correct long-standing operator performance problems.

The correction of long-standing performance problems in Operations is being addressed by the objectives associated with sections 2.0, 3.3, and 6.1 of the PES. The initiatives issued to meet these objectives are far-reaching and meant to change the culture within the Operations organization. These objectives involve the use of a peer review program and a comprehensive management observation program to ensure management performance objectives are implemented. These programs provide for immediate feedback to the individual regarding performance. The objectives will foster both a conservative decision-making environment and questioning attitude among the Operation's staff when dealing with day-to-day operations.

- Administrative control procedures provided confusing guidance.

The Supply System has implemented a site-wide program to simplify and clarify administrative procedures. Within the Operations area PES objectives identified in section 2.5 are directed at improving the use and adherence to plant procedures along with the correction of procedure problems.

- Management was unable to implement effective corrective actions to prevent recurrence of problems.

Effective corrective actions are the result of a quality root cause analysis. PES section 1.2 identifies initiatives to improve the root cause analyses being performed for identified problems. A quality root cause analysis will result in the identification and implementation of effective corrective actions to prevent problem recurrence.

- Operations was not a demanding customer and seemed reluctant to assert its leadership role in challenging other plant organizations for support.

One of the primary intentions of initiatives associated with PES section 2.2 is to ensure management's expectations are being properly communicated and implemented in the field. One of these expectations deals with Operations taking more of a leadership role and demanding better performance from support organizations.

The Operations Manager is presently the Operations representative to the Project Review Committee (PRC) and an experienced Senior Reactor Operator is assigned as a member of the Project Review Group (PRG). The PRG reviews all projects from planning through implementation in the plant, while the PRC approves and sets the priority for proposed plant modifications.

Operations personnel perform walkdowns and periodic reviews for targeted plant systems with the Engineering and Maintenance organizations. These walkdowns and reviews continue to bring to the attention of other organizations concerns and desired changes in system performance that must be addressed.

Due to the recent licensing of a significant number of Senior Reactor Operators and reorganization of the operating crews, Operations has placed formerly licensed operators in positions with other departments. The assignment of licensed operators to organizations that interface with Operations will assist in improving interdepartmental communications as well as providing a mutual understanding of organizational needs and expectations.

The combination of the items described above and PES initiatives outlined in sections 2.0, 3.1, 3.2, 3.3, 3.4, 4.1, and 6.1 will improve interdepartmental communications and provide Operations with the information necessary to assume more of a leadership role regarding daily plant operations. These initiatives encourage the development of a team effort among organizations which will provide for more consistent plant operations.

- Practices and formality observed in the simulator were not successfully transferred to the control room.

Implementation of initiatives associated with sections 2.0 and 6.1 of the PES will ensure that control room operations meet management's expectations for formality and professionalism. These initiatives are aimed at changing the overall culture through supervisory oversight of, and feedback to, control room operators while in the control room and in the simulator. The internalization of management's expectations regarding operator performance will result in improved work practices, communications, and overall professionalism within the control room and Operations organization.

- Weaknesses were still apparent with operator knowledge of Technical Specification requirements and there were instances of poor equipment operator performance, indicative of deficiencies in training.

PES section 6.1 deals with training specifically designed to strengthen and improve both licensed and non-licensed operator performance. Components of this training

include, but are not limited to, conservative decision-making, management expectations, Technical Specification case studies, self-checking, and component tagging. The continued reinforcing of the training issues identified in PES section 6.1 through the operator training programs will continue to upgrade operator knowledge levels.

B: Functional Area: Engineering

The SALP Board assigned a Category 3 rating to Engineering noting performance in this area continues to be adequate. The board identified that a number of concerns remain from the previous SALP periods. Areas of concern identified in the SALP report and the Supply System responses are outlined below:

- Lack of technical depth and breadth of root cause determinations and corrective actions.

PES sections 1.2 and 3.1 implement initiatives directed at improving the quality of root cause analyses and the resulting corrective actions. These efforts involve formal training of root cause analysis techniques and coaching of those individuals involved with performing root cause analysis. It continues to be management's expectation to thoroughly investigate issues and to develop and implement timely effective corrective actions.

- The need for NRC stimulus to pursue problems.

Sections 3.1, 3.2, 3.3, and 3.4 of the PES implement initiatives which enhance the knowledge of Engineering personnel regarding plant system requirements. At the same time these initiatives assist in promoting a teamwork environment where problems can be identified and addressed without regulatory prompting. The improved system knowledge along with the implementation of the system report card concept provides greater involvement by Engineering with plant systems. This allows for early detection of problems and refocusing of engineering efforts in a proactive mode rather than a reactive mode for problem resolution.

- Lack of teamwork and communication between organizations.

As stated in the cover letter, one of the overall goals of the PES is to build a work environment within the Supply System which promotes the teamwork concept. PES initiatives outlined in sections 2.0, 3.1, 3.2, 3.3, and 3.4 enhance communications between Engineering and other organizations. These initiatives encourage the development of a team effort among organizations resulting in more consistent plant operations.

- Technical problems were identified with design modification packages along with weaknesses in control of design analyses.

Initiatives within sections 3.1, 3.2, 3.4, and 3.5 of the PES are directed at improving the quality of design modification packages and design analyses. One of the major initiatives in this area includes the re-engineering of the design change process.

- Operability evaluations of degraded equipment were often untimely and narrowly focused and did not always provide sound technical basis for the resultant conclusions.

Implementation of initiatives associated with sections 3.1, 3.3, and 3.4 of the PES establish activities to improve the depth and quality of operability assessments. These activities comprise an extensive training program for the Engineering staff and increased management oversight of engineering activities. The training activities deal with integrated system knowledge training, design and licensing basis training, plant Technical Specifications training, and training involving the application of NRC Generic Letter 91-18 for operability assessments.

- System engineer problem identification and resolution, procedure quality, and addressing of technical issues on their systems appears lacking.

As stated in the responses above many of the PES Engineering initiatives deal with improving the overall knowledge of Engineering personnel, improving interdepartmental communications, providing for increased management oversight, and placing Engineering in more of a proactive roll for problem resolution. These initiatives provide the System Engineer the expertise to better identify and resolve problems, improve procedural quality, and comprehensively address technical issues.

- Some PERs were not generated in a timely manner and the Engineering staff did not always generate PERs for issues that were identified by the Engineering staff.

The Supply System has recently conducted training dealing with the timeliness of PER preparation and processing. The training involved a review of management's expectations regarding PER issuance and lessons learned from past instances where PERs were not issued in a timely manner. Additional training was provided to Supply System managers and supervisors regarding lessons learned from the PER review processes.

C. Functional Area: Plant Support - Radiation Protection

The SALP Board assigned an overall Category 2 rating to the Plant Support area, but identified that strong performance in this functional area was offset by performance in the implementation of the Radiation Protection program. The areas of concern dealing with the Radiation Protection program were:

- Management has not been effective in assuring that established programs were properly implemented and that timely, effective corrective actions for identified problems were taken.

Initiatives executed in connection with section 5.3E.2 of the PES establish activities to enhance the implementation of established Radiation Protection program requirements plant wide. These activities include hands-on training activities for both craft and Health Physics Technicians, reviews in the continuing training program of lessons learned from past problems, and the communication of management's expectations for worker accountability in radiological environments. Within the Radiation Protection organization a program is being implemented which will provide greater management oversight and feedback to workers regarding radiation protection activities. This program will use a combination of peer reviews and comprehensive management observation to ensure management's expectations are properly implemented, while providing for immediate feedback to the individual regarding performance. The program will foster both a conservative decision-making environment and questioning attitude regarding the implementation of Radiation Protection programs.

As stated above in response to concerns in the Operations and Engineering area, PES section 1.2 implements initiatives directed at improving the quality of root cause analyses and implementing effective corrective action. This effort involves formal training of root cause analysis techniques and coaching of those individuals involved with performing root cause analysis. Training has been provided to many PER dispositioners regarding PER preparation, processing, and lessons learned. This training involved a review of management's expectations for PERs and problems identified with PERs and corrective actions. Additional training was provided to Supply System managers and supervisors regarding the same topics. Management's expectations are that problems will be thoroughly evaluated and appropriate corrective actions implemented in a timely manner.

- Instructions given to radiation workers in specific pre-job briefings were sometimes inadequate to address radiological safety issues.

The Supply System is in the process of developing ALARA pre-job briefing (additional exposure controls) training for selected Supply System personnel. This training will increase the involvement of work group supervision in the pre-job briefing process and improve each workers understanding of the radiological requirements before a job is performed.

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