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NRC-94-0042

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

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) NRC Letter, SALP 14 Report
Inspection Report No. 50-341/94001

Subject: SALP 14 Response

Detroit Edison has reviewed the SALP 14 Report and the comments made by the NRC during the SALP meeting on June 1, 1994. We concur with your overall assessment that the conduct of nuclear activities at Fermi 2 was acceptable during this SALP period. We also agree with the individual ratings assigned to each of the four SALP functional areas. We are pleased with the recognition of our Plant Support Function as Category 1 (excellent), and are equally disappointed that we were unable to sustain the improved performance in Operations that was noted during the previous SALP period. We see this decline in Operations to a Category 3 (adequate) as significant. We are not satisfied with this level of performance and have been implementing improvements to reverse this negative trend.

Our review of the report did not identify any discrepancies which require resolution or change. In general, our views are in agreement with those expressed in the SALP 14 Report. As discussed at the meeting, we are taking steps to identify and alter the factors which have led to the decline in our performance in the Operations area. We will continue to assess our performance and will modify, delete or augment these actions to be responsive to changing performance and conditions. We intend to return Fermi 2 to a path of improving performance.

You noted in the report that certain negative factors were common to multiple SALP functional areas including inadequate work controls, failure to adequately communicate management expectations to workers, perceived schedule pressures and inadequate corrective actions. We are addressing each of these factors in a comprehensive manner as discussed below.

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In order to strengthen the work control process, we have bolstered the operating experience level by increasing the number of SRO and RO licensed or certified personnel in this area. An independent assessment of our work control and tagging processes has been performed and the results are being incorporated into the two programs by an in-house review team made up of Operations, Maintenance, Modifications, Planning, Scheduling, Radiation Protection and Quality Assurance personnel. In addition to these personnel and programmatic changes, Tagging and Protective Barrier System training was given during the last requalification cycle to licensed and non-licensed operators.

Communication of management expectations requires not only direct, up front communication of expectations, but also continued oversight and consistent feedback to maintain focus on these expectations. In order to improve communications, daily meetings are being held between the Assistant Vice President and Manager, Operations, the Assistant Vice President and Manager, Technical, the Plant Manager, the Nuclear Assurance Manager, the Director of Nuclear Quality Assurance and the Director of Nuclear Licensing to discuss the broad issues affecting the plant and to determine how best to support the activities resulting from these issues. Similarly, the Superintendents of Operations, Maintenance, Technical Engineering and Work Control are meeting weekly to focus on key plant problems and their solutions. These meetings promote teamwork and communication. Management expectations are communicated to the workers in several forms, including direct verbal and written communication; periodic site wide information meetings, such as the outage information meetings; newsletters such as PLANTALK and the periodic maintenance newsletter; electronic signs and bulletin boards; and videos, such as the one on schedule adherence versus schedule pressure. Oversight and feedback are being accomplished, in part, through increased management involvement in training. Management now routinely observes all phases of training to ensure that the training is consistent with and reinforces expectations. In addition to these enhancements, both internal and external evaluations have been performed to determine whether management expectations are being effectively communicated. The results to date are encouraging. Realizing that effective communications are crucial to the success of our mission, we are consciously seeking opportunities to improve the communication of management expectations.

The issue with perceived schedule pressures is a cultural problem which can lead to totally unexpected and unwanted results. Effective communication of management expectations along with proper planning and scheduling of work are the keys to ensuring that schedule pressures do not lead to improper or unsafe work practices. We are taking specific actions in both of these areas, as described above, to ensure that perceived schedule pressures do not override common sense and good work practice habits. Specific efforts have been aimed at ensuring that all Fermi 2 personnel recognize that safety is management's highest priority, and a recent communications evaluation has concluded that employees do recognize that safety is a clear priority of senior management.

The fourth concern, inadequate corrective actions, is being addressed through the Corrective Action Program Improvement Plan. Management involvement and oversight in our corrective action efforts has been significantly increased. Organizational Unit Heads are now required to personally review and approve the evaluation results of all Deviation Event Reports (DERs) assigned to their respective organizations. The Manager - Nuclear Assurance and the Supervisor - Safety Engineering reviewed management's expectations for the Corrective Action Program Improvement Plan with Unit Heads and their personnel in a series of meetings when this effort began. To improve quality and consistency, the number of DER evaluators has been reduced to a core group of approximately 150 individuals who receive training in root cause analysis techniques. A priority system is being refined to assist in properly allocating resources for DER evaluations. A DER quality measure has been developed to monitor the quality trend of DERs. This quality measure shows improved performance from the time that expectations were first explained and the measure publicized.

The corrective action procedure has been streamlined so that the requirements for identifying and correcting conditions adverse to quality are clearly stated. The guidance for identifying problems which constitute significant conditions adverse to quality has also been improved. These changes are intended to result in more thorough evaluations for significant conditions adverse to quality, which in turn should lead to more comprehensive and effective corrective actions for the significant problems.

Validation of corrective actions for selected DERs is being performed to ensure that corrective actions are being properly completed and effectiveness reviews are being performed on selected DERs to determine whether the corrective actions have been effective in preventing recurrence. A third party review of DERs is also being performed on a sample basis to monitor the program's effectiveness. Additionally, a Quality Assurance Program change has been submitted to the NRC for approval which will help focus attention on the most significant problems.

In addition to the four concerns discussed above, the report noted that personnel errors also contributed to the decline in operating performance during this period. Several initiatives have been taken to reduce the number of personnel errors and to heighten awareness of the consequences of personnel errors. Training in self checking practices has been provided to all employees and will continue to be emphasized in site requalification training. A Personnel Performance Council has been established to review significant personnel errors. By evaluating personnel errors in the aggregate, it is anticipated that the Council will be able to develop corrective actions which reach beyond those taken for the individual events to reduce or eliminate the precursors, and thus the number and the significance of personnel errors at Fermi 2. The Council also develops activities to heighten awareness and promote proper personnel performance.

Communication of management expectations is another method being used to reduce the personnel error rate at Fermi 2. In addition to the communication initiatives discussed earlier, specific discussions regarding the awareness and avoidance of personnel errors are included regularly at the daily plant meeting, in the printed site periodicals, PLANTALK and MODERATOR, and on the electronic bulletin boards and the site closed circuit television, FISSION VISION. We realize the importance of reducing the personnel error rate and its impact on overall plant performance and safety and are therefore focusing significant management attention on personnel error reduction efforts, with positive results achieved to date.

In examining the strengths of our strong performing areas, several characteristics are evident including teamwork, focus, self-assessment/critiquing and management support. Personnel changes and additions made recently are intended to foster teamwork within the organization and to improve our focus and management support of Operations and related areas. Two new Assistant Vice President positions have been added: Assistant Vice President and Manager, Operations and Assistant Vice President and Manager, Technical. A new Plant Manager has been appointed and a new Director of Nuclear Quality Assurance has been hired. In addition to these management changes, the Nuclear Organization is implementing a critical self assessment initiative in the Operations and Maintenance functional area to assist management in strengthening these key areas. The objective is to perform critical evaluations of programs, processes and activities to confirm that management expectations are being achieved. The self-assessment activity is first focusing on the work control process since it is a key process involving both functional areas and crossing departmental boundaries. Self assessment has already been used successfully in the areas of Security, Radiation Protection and Chemistry.

Detroit Edison recognizes that good Engineering support is also critical to the successful operation and maintenance of the plant. Initiatives underway in the Engineering arena include a Balance of Plant Improvement Plan correcting many long standing balance of plant equipment performance and design problems this outage; the establishment of a Motor Operated Valve (MOV) Integrated Task Team to ensure that the safety-related MOVs function properly and reliably following the 1994 outage; formation of the Design Engineering Error Reduction Task Group to ensure that design packages are consistent and accurate; and System Engineering program upgrades to allocate resources and functions within System Engineering to better meet the requirements of the Operations and Maintenance organizations. These efforts are intended to reduce operational burdens experienced in the past and to increase the involvement of Engineering in preventing and correcting operational problems in the future.

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We also recognize the importance of a strong Quality Assurance organization in achieving our goal of best in class performance. The Nuclear Quality Assurance Department is taking a number of steps to improve our abilities to identify and follow-up on problems. Since the SALP meeting on June 1, 1994, the entire Nuclear Quality Assurance Department has met to discuss initiatives for better identification of problems, communication of problems and follow up to ensure that corrective actions are timely and appropriate. This effort has the support of senior management. Nuclear Quality Assurance is also exploring methods for taking a more pro-active role on site, including frequent peer meetings with line organization supervisors for the purposes of mutual feedback and early identification of potential problem areas for follow-up by Nuclear Quality Assurance or the affected line organization. Quality Assurance management personnel are increasing their field presence in order to facilitate communication and the identification and resolution of problems.

As indicated above, we are not satisfied with the adequate rating we earned in Operations this period and we intend to improve performance in this area significantly. By strengthening the personnel, the processes, the equipment and the communications discussed above and by providing the necessary management support and resources, we intend to improve our Operations function to a best in class performance, not only as demonstrated recently in dealing with significant events, but also during our routine evolutions. We also intend to continue improvements in Maintenance and Engineering so we can achieve the same excellent level of performance exhibited by our Plant Support function during this SALP period.

Sincerely,

BNZ

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
K. R. Riemer
Region III