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USNRC

UNITED STATES OF AMERICA  
BEFORE THE  
NUCLEAR REGULATORY COMMISSION

'94 NOV -8 P2:59

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
GULF STATES UTILITIES	)	Docket No. 50-458-0LA
COMPANY, <u>et al.</u>	)	
	)	ASLBP No. 93-680
River Bend Station, Unit 1	)	

CAJUN ELECTRIC POWER COOPERATIVE, INC.'S  
MOTION TO COMPEL RESPONSES TO FOLLOW-UP DISCOVERY REQUESTS  
AND ANSWER TO MOTION FOR PROTECTIVE ORDER

Cajun Electric Power Cooperative, Inc. ("Cajun"),  
pursuant to 10 C.F.R. § 2.740(f) (1994), hereby files this Motion  
to Compel Gulf States Utilities Company ("GSU") to respond to  
follow-up discovery requests to Cajun Interrogatory 2-6 and  
Answer to GSU's Motion for a Protective Order, and states as  
follows:

I. BACKGROUND

On September 8, 1994, Cajun requested that GSU and its  
affiliated companies, including Entergy Corporation and Entergy  
Operations, Inc. ("EOI"), respond to certain interrogatories, in  
accordance with Section 2.740b of the Commission's Regulations.  
Cajun Interrogatory 2-6 stated as follows:

Identify employees of GSU, its agents or  
consultants who met with Entergy, its  
employees, EOI, EOI employees, their  
contractors, or any tier of subcontractor,  
with regard to any safety matter, stating the  
place and date of the meeting, the names of  
all individuals present, a detailed  
description of the specific safety matters  
discussed, the resolution of such safety  
matters, the contribution of Cajun to the  
discussion or resolution of such safety

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matters, and any follow-up by GSU with regard to such safety matters. Identify all documents prepared by GSU associated with such issues.

On September 22, 1994, Cajun received GSU/EOI's response to Cajun's second set of interrogatories. GSU/EOI's response, in its entirety, was as follows:

Since EOI has operated River Bend, the Respondents are not aware of any such meetings.

Cajun filed a motion to compel a response to this discovery request, since it is inconceivable that an entity (EOI) that had never operated a particular licensed nuclear facility could undertake such operation without meeting with the current operator (GSU) to discuss matters related to safe operation of the facility. On October 4, 1994, a prehearing conference was convened to resolve discovery disputes and related scheduling matters.

At that prehearing conference, counsel for Cajun stated in relation to Cajun Interrogatory No. 2-6 that:

We are looking for a discussion of how safety matters are identified at the plant between the long-term employees, the GSU employees who know the equipment and know where the problems are and how they interface with the new owners, to identify safety concerns and safety matters.

Transcript of October 4, 1994 Prehearing Conference ("Tr.") at 36, lines 3-8. Further:

The [interrogatory] was intended to ask for an identification of meetings between old or new GSU employees and the new EOI employees.

\* \* \* \* \*



I mean, they have to talk about safety matters at some point. I am asking for an identification of who was at the meetings and what was talked about.

Tr. 37, lines 6-8, 12-15.

Cajun's motion was granted for the period from September 1, 1993 through December 31, 1993. Tr. 34. Cajun's motion was also granted for the period from January 1, 1994 to the present. Tr. 37-38. However, counsel for EOI represented that there were "no meetings" between old GSU and EOI employees related to safety matters between January 1, 1994 and the September 1994 scam. Tr. 38.<sup>1/</sup>

Under cover of a letter dated October 14, 1994,<sup>2/</sup> GSU/EOI responded to Cajun Interrogatory No. 2-6 by stating that there were some discussions as described in the "River Bend Near-Term Performance Improvement Plan," dated December 23, 1993 ("NTPIP"), and the "River Bend Long-Term Performance Improvement Plan," Revision 2, dated September 15, 1994 ("LTPIP"). (GSU's Supplemental Response of October 14 is attached as Attachment A). The NTPIP and LTPIP were not "provided" with Cajun's copy of the response, as stated in the text of the response to Cajun

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<sup>1/</sup> Judge Cotter: There have been no meetings.  
Mr. McGeehee: That is correct. None that we know of.  
(Tr. 38. lines 6-8.)

<sup>2/</sup> The October 14, 1994 response was mailed to Cajun from Jackson, Mississippi and not received at Cajun's counsel's office until October 19, 1994.

Interrogatory No. 2-6, and the NTPIP and LTPIP were not obtained by Cajun until October 21, 1994, after a specific request.<sup>3/</sup>

Nonetheless, Cajun propounded follow-up discovery requests on October 24, 1994, as provided in the procedural schedule. (Cajun's October 24, 1994 Follow-up Discovery Requests are attached as Attachment B). Additional discovery requests were propounded by Cajun on October 28, 1994, within ten days of receipt of GSU/EOI's response to Interrogatory 2-6. (Cajun's October 28 Follow-up Discovery Requests are attached as Attachment C). Cajun also sent GSU a letter attempting, in part, to resolve this discovery dispute, which attempt was rejected. (Cajun's October 26, 1994 letter is attached as Attachment D).

On October 28, 1994, GSU submitted a second supplemental response related to the September 1994 scam at River Bend. (GSU's Second Supplemental Response is attached as Attachment E). GSU/EOI filed objections to each of Cajun's October 24th follow-up discovery requests and requested the issuance of a protective order. By letter dated November 3, 1994, GSU/EOI extended those objections to the Cajun's October 28th follow-up requests. (GSU's Objections are attached as Attachment F).

This Motion to Compel and Answer to Motion for Protective Order timely follows the receipt of GSU's objections to Cajun's follow-up discovery requests.

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<sup>3/</sup> Because of the importance of the NTPIP and LTPIP to resolving this discovery dispute, Cajun has attached the NTPIP and portions of the LTPIP to this motion as Attachments G and H, respectively.

## II. MOTION TO COMPEL

### A. CAJUN'S FOLLOW-UP DISCOVERY REQUESTS ARE DIRECTED AT SAFETY ISSUES AND ARE PROPERLY WITHIN THE SCOPE OF THIS PROCEEDING AND THE BOARD'S ORDER OF OCTOBER 4, 1994

In response to the Board's Order of October 4, 1994, compelling GSU to answer Cajun Interrogatory 2-6, GSU/EOI's first supplemental response stated in pertinent part:

During the period between September 1, 1993 and December 31, 1993, there were meetings on a daily basis, which included people from both [GSU] and [EOI], to discuss the issues or problems at River Bend, their underlying causes and long-term corrective action. The issues, their causes, and the proposed corrective action are set forth in the [NTPIP] and the [LTPIP]....

GSU's Supplemental Responses, dated October 14, 1994, at 2. Therefore, since the NTPIP and the LTPIP are represented by GSU/EOI to provide relevant information necessary to respond to the Board's October 4 Order, Cajun reviewed the NTPIP and the LTPIP in the very short time permitted between October 21 and October 24, and propounded further interrogatories aimed at discovering "the issues or problems at River Bend, their underlying causes, and the proposed corrective action" (to use GSU's words).

Although Cajun propounded follow-up discovery requests on the very documents produced by GSU/EOI, GSU now objects that the follow-up requests are beyond the scope of the proceeding. At bottom, GSU's grounds are simply that the Board's October 4 Order concerned only the "general subject matter of [safety-related] meetings [ ] required to be identified." GSU October 28

Objections, at 4. But the Board's order clearly provided for follow-up discovery by Cajun, nothing could be more appropriate follow-up than specific requests directed at the general safety-related subject matter identified, albeit grudgingly, by GSU/EOI.

Cajun's follow-up discovery requests of October 21 and October 28 are directed specifically at the safety issues or problems at River Bend, their underlying causes, the corrective actions proposed by EOI, and the cost of those corrective actions. The purpose of the NTPIP and the LTPIP is to direct the actions necessary to improve the performance at River Bend and to develop performance attributes for the long-run.<sup>4/</sup> For example, the "strategic goals" of the NTPIP are stated as:

1. SAFETY - High regulatory performance as measured by SALP scores.
2. PLANT PERFORMANCE - High operating performance as measured by capacity factor.
3. COST CONTROL - Low production cost performance as measured by mills/kWhr.

NTPIP at 3 (Document Page # 036393). Thus, the NTPIP and LTPIP are, as GSU/EOI admits, directly relevant to safety concerns. A review of Cajun's follow-up requests shows that Cajun is not requesting information about production costs, capacity factors, or other "operational" aspects of River Bend, as GSU implies.

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4/ The NTPIP describes "five recurring performance issues. These are planning and management effectiveness, human resource effectiveness, work effectiveness and efficiency, design information and engineering support, and organizational norms." NTPIP at 1 (Document Page # 036391).

Instead, Cajun's follow-up discovery is aimed at the corrective actions to improve safety performance at River Bend, including the cost of improving that performance. Despite River Bend's high O&M costs, River Bend SALP scores historically are low. Its most recent SALP scores are mostly "2s" and "3s" including a "3" in Maintenance.

GSU's claim that River Bend's safety levels are at "already acceptable levels" (GSU Objections at 6), is contradicted by the existence of the NTPIP and LTPIP. As EOI's counsel stated on October 4:

As the company got closer to the merger, and River Bend started experiencing some operating problems, I think [GSU] was somewhat concerned that the operation of the facility could jeopardize the merger. At that point, Entergy became more involved in the day-to-day operation of the plant.

Tr. 28, lines 11-16. The "operating problems" referenced led to GSU's stop work directive in August 1993 for all activities in maintenance, operations, engineering because of "human performance" problems. These are the problems, or sorts of problems, that the NTPIP and LTPIP are aimed at correcting.

Cajun's follow-up discovery requests are directed at safety matters and are properly within the scope of this proceeding.

**B. CAJUN'S FOLLOW-UP DISCOVERY REQUESTS ARE REASONABLY CALCULATED TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE AND CAJUN MUST HAVE ACCESS TO THE RELEVANT DOCUMENTS**

GSU also objected to Cajun's follow-up discovery requests on the grounds that they were not reasonably calculated to lead to the discovery of admissible evidence. GSU Objections,

at 5-6. To the contrary, as demonstrated above, Cajun's follow-up requests go directly to safety matters and the cost or funding of corrective actions for identified problems.

GSU cites Follow-up Request 2-6.30 as the lone example of a request not likely to lead to the discovery of admissible evidence, because it concerns "general operations information."

Id. However, Follow-up 2-6.30 addresses the backlog of Procedure Change Notices. As the NTPIP states:

River Bend has recently experienced a number of significant personnel errors attributable to human performance effectiveness.

NTPIP at 37 (Document Page # 036427). Indeed, the August 1993 plant stand down order referenced above was directly caused by personnel performance errors.

The NTPIP states that one program goal, to address these performance errors, is to:

Reduce the backlog of plant procedure changes and improve the change notice process.

Id. The item specifically referenced by Follow-up 2.6.30 states:

Reduce the Change Notice backlog and report and track status of identified procedure weaknesses.

NTPIP at 39, § 6.4.3 (Document Page # 036429). Clearly, Cajun Follow-up 2-6.30 is narrowly tailored to produce evidence admissible on the future safety matters related to the merger.

More generally, GSU/EOI claims it is being requested "to produce thousands of documents." GSU Objections at 6. GSU/EOI conveniently ignores the fact that the vast majority of the Follow-up Requests ask GSU to "identify and describe" relevant documents. Rather than force GSU/EOI to produce



"thousands" of documents, Cajun is narrowly tailoring its requests so that performance reports and other documents which may be accessible to Cajun will be identified and described, so that Cajun will know what is considered significant to the performance improvement plans at River Bend.

GSU's Supplemental Response stated that:

Neither [GSU] or [EOI] is aware of a record of the various meetings that took place, the people who attended such meetings, or the issues that were discussed, other than the issues set forth in the [NTPIP] and the [LTPIP] or in other plant documents such as condition reports or NRC inspection reports, which are available to Cajun for inspection at the River Bend plant site.

GSU October 14 Supplemental Response at 2 (emphasis supplied). Cajun understands this to mean that relevant documents will be made available at the River Bend facility. However, GSU's Objections apparently state that the documents are not accessible after all (or at least not without "undue" burden on GSU), contrary to what the Supplemental Response states.

This Motion to Compel is necessary not only to ensure that GSU/EOI "identifies and describes" the relevant documents, but also to ensure that the relevant documents are available and accessible to Cajun at River Bend, as stated in GSU's Supplemental Response.

### III. ANSWER TO MOTION FOR PROTECTIVE ORDER

GSU requests a protective order allegedly to protect it from burdensome and irrelevant discovery. Cajun opposes GSU's motion and states that GSU has not shown good cause, under applicable Commission precedent, demonstrating the need for a

protective order in this case. See Metropolitan Edison Co., CLI-79-8, 10 NRC 141, 147-48 (1979); Texas Utilities Electric Co., LBP-85-41, 22 NRC 765, 768 ((1985). Cajun has narrowly tailored its follow-up discovery requests to address the contention set for hearing in this proceeding, and it would be unfair to Cajun to limit Cajun's timely discovery.

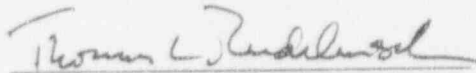
Moreover, GSU/EOI cannot be heard to claim that discovery is overly broad where it has rejected out-of-hand offers to sit down and attempt to resolve this discovery dispute. Cajun's October 26, 1994 letter made just such an offer and it was rejected. GSU's obvious strategy in this entire proceeding, visible once again, is to stonewall Cajun's every effort to litigate this proceeding.

#### IV. CONCLUSION

Based on the foregoing, Cajun Electric Power Cooperative, Inc., respectfully requests that the Atomic Safety and Licensing Board issue an order against GSU/EOI compelling responses to Cajun's follow-up discovery responses, and denying GSU's motion for a protective order.

Dated: November 7, 1994

Respectfully submitted,



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Attorneys for Cajun Electric Power  
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ATTACHMENT A

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
Gulf States Utilities Co., et al. )  
(River Bend Station, Unit 1) )

Docket No. 50-458-OLA  
ASLBP No. 93-680

GULF STATES UTILITIES COMPANY'S SUPPLEMENTAL RESPONSES  
TO CAJUN ELECTRIC POWER COOPERATIVE, INC.'S SECOND  
SET OF INTERROGATORIES DATED SEPTEMBER 8, 1994

The Respondents, Gulf States Utilities Company ("Gulf States") and Entergy Operations, Inc. ("Entergy Operations") supplement their responses to the Second Set of Interrogatories propounded by Cajun Electric Power Cooperative, Inc. ("Cajun") as follows. Pursuant to General Instruction "E", the names of the individuals responsible for providing the responses follow each response.

- 2-6. Identify employees of GSU, its agents or consultants who met with Entergy, its employees, EOI, EOI employees, their contractors, or any tier of subcontractor, with regard to any safety matter, stating the place and date of the meeting, the names of all individuals present, a detailed description of the specific safety matters discussed, the resolution of such safety matters, the contribution of Cajun to the discussion or resolution of such safety matters, and any follow-up by GSU with regard to such safety matters. Identify all documents prepared by GSU associated with such issues.

RESPONSE:

Beginning in September 1993, in contemplation of the Gulf States/Entergy merger, certain employees of Entergy Operations were transferred to River Bend. Two of these employees became officers of Gulf States, and others remained employees of Entergy

Operations. Please see Attachment A for a list of the Entergy Operations employees who were transferred to River Bend between September 1, 1993 and December 31, 1993, the date the merger was consummated. Also during this period, other Entergy employees periodically visited River Bend in an advisory role or to assist plant management with specific tasks.

During the period between September 1, 1993 and December 31, 1993, there were meetings on a daily basis, which included people from both Gulf States and Entergy Operations, to discuss the issues or problems at River Bend, their underlying causes and long-term corrective action. These issues, their causes, and the proposed corrective action are set forth in the River Bend Near Term Performance Improvement Plan and the Long Term Performance Improvement Plan, copies of which are provided with this response. Neither Gulf States nor Entergy Operations is aware of a record of the various meetings that took place, the people who attended such meetings, or the issues that were discussed, other than the issues set forth in the Near Term Performance Improvement Plan and the Long Term Performance Improvement Plan or in other plant documents such as condition reports or NRC inspection reports, which are available to Cajun for inspection at the River Bend plant site.

The Gulf States/Entergy merger was consummated on December 31, 1993. At that time, all employees of Gulf States and Entergy Operations at the site who were associated with the operation of River Bend became employees of Entergy Operations. There are no Gulf States employees assigned to the River Bend

site. Since December 31, 1993, operational issues at River Bend have been discussed between Entergy Operations and Gulf States senior management in periodic meetings, by telephone, and in Board of Directors meetings. The type of operational issues discussed and their resolution are set forth in the provided Long Term Performance Improvement Plan or in plant documents such as condition reports, outage reports or NRC inspections or correspondence which are available to Cajun for inspection at the River Bend plant site. No documents were found that were prepared by Gulf States which discuss the specifics of such issues.

H. W. Keiser

2-15. Identify the Institute for Nuclear Power Operation ("INPO") meetings GSU is presently permitted to attend and identify the INPO documents to which GSU presently has access.

RESPONSE:

The type of INPO meetings include the following:

- 1) A number of meetings are held at the plant site in connection with the formal INPO Evaluation.
  - i) The formal exit meeting with the utility executives.
  - ii) Informal working level meeting between INPO representatives and plant personnel. The primary purpose of these meetings is to ensure that the preliminary observations of the INPO Team are factually accurate. The meetings are designed to encourage open discussions and exchange of information, and for this reason, INPO limits attendance both in terms of the level of management



involved and the number of people in attendance. Typical only those people with functional responsibility for an issue are in attendance. The Plant Manager's Debrief is an example of this type of working level meeting.

- 2) Meetings in connection with INPO assist visits - INPO assist visits may or may not have a meeting associated with them. If an exit meeting is held by INPO, it is usually with the plant department head who requested the meeting.

Gulf States may attend the formal INPO Evaluation exit meeting. Interim, working level meetings between INPO and certain plant employees in connection with the INPO evaluation process and INPO assist visit exit meetings would not be attend by Gulf States unless its attendance was important to the purpose of the meeting.

The following types of technical documents are generated by INPO with the purpose of providing information or guidance to its member utilities and participants.

- (1) **Criteria** - documents that contain generally accepted performance objectives appropriate to the safe and reliable operation of a nuclear station, with a number of supporting criteria for each objective. The performance objectives are broad in scope and generally cover a single, well-defined management or technical area. The supporting criteria are more narrow in scope and generally describe a

specific activity (or activities) that support a performance objective.

- (2) **Guidelines** - documents containing INPO recommendations covering selected areas of nuclear plant management and operation. Guidelines are categorized into management and technical areas as appropriate. A guideline may be the result of a study of a given area or may be principally a compilation of good practices identified through evaluations or through other INPO activities.
- (3) **Good Practices** - documents developed from programs of member utilities and/or from INPO's collective experience. It is recognized that other programs and methods may be as good or better. Accordingly, good practices describe programs and methods intended to be helpful in meeting applicable INPO performance objectives and are offered as assistance to member utilities that feel their programs or methods could be improved by using all or part of a good practice.
- (4) **Reports** - documents pertaining to a generic study, reporting the results of INPO activities or INPO sponsored activities, including Significant Operating Experience Reports (SOERs). The SOER is used to transmit INPO recommendations to the industry on a significant problem area. The SOER normally will describe several events that highlight the subject concern.
- (5) **Conference Proceedings** - produced for the Chief Executive Officers Conferences.

ATTACHMENT B

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October 24, 1994

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† ADMITTED IN WASHINGTON ONLY

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Re: Gulf States Utilities Company, (River Bend  
Station), NRC Docket No. 50-458-OLA

Dear Mr. Wetterhahn:

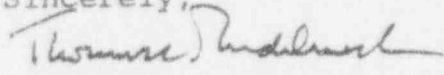
In accordance with the Licensing Board's order issued at the October 4, 1994 prehearing conference, enclosed please find Cajun Electric Power Cooperative, Inc.'s Follow-up Discovery Requests on Item 2-6.

As you are aware, we did not receive GSU/EOI's supplemental response to Item 2-6 on October 14, as provided for in the order and, in fact, we did not receive it until Wednesday, October 19. More importantly, we did not receive the purportedly "attached" documents to the response until Friday, October 21st.

In light of this delay, I requested from Mr. Levanway an additional twenty-four hours to propound discovery requests, which request was denied. Nonetheless, Cajun reserves the right to submit additional follow-up discovery requests in the next several days.

Please call if you have any questions.

Sincerely,

  
Thomas L. Rudebusch

cc: Honorable B. Paul Cotter, Jr. (by mail)  
Honorable Peter S. Lam ( " " )  
Honorable Richard F. Cole ( " " )  
Ann P. Hodgdon, Esq. ( " " )  
Robert B. McGehee, Esq. ( " " )  
John Schwab, Esq. ( " " )

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
GULF STATES UTILITIES COMPANY, et al. ) Docket No. 50-458-OLA  
 )  
River Bend Station, Unit 1 )  
 )

FOLLOW-UP DISCOVERY REQUESTS OF  
CAJUN ELECTRIC POWER COOPERATIVE, INC.,  
TO GULF STATES UTILITIES COMPANY,  
ENTERGY OPERATIONS, INC., AND ALL AFFILIATED COMPANIES

The general instructions and definitions from Cajun's first request continue to apply to all discovery requests set forth herein.

The following discovery requests are based on the RIVER BEND NUCLEAR STATION NEAR-TERM PERFORMANCE IMPROVEMENT PLAN:

2-6.1 MATERIAL CONDITION - Page 6, Item 1.1.3

- (a) Provide a current list of MWOs which are not "CLOSED" with a priority of 1 and 2. Provide the date when each MWO problem on the current priority 1 and 2 list was identified.
- (b) Provide information regarding the maintenance backlog. Specifically, identify and describe the maintenance backlog for each priority category of MWO and how that backlog has varied each month during the last 3 years. Provide information regarding the typical weekly workoff rate of MWOs during the last 3 years.

2-6.2 MATERIAL CONDITION - Page 6, Item 1.2.

Identify and describe the current prioritized list of long standing and recurrent equipment problems. Provide the list of problems to be resolved in the near term based on the 10/23/93 list and the current status of these problems. Provide the list of problems to be resolved since the RF5 outage based on the 10/23/93 list and the status of these problems if RF5 has been completed.

2-6.3 MATERIAL CONDITION - Page 7, Item 1.3.

Identify and describe the plant labeling standard. Provide information regarding the completion of painting and labelling in the HPCS Diesel Generator Room, EHC skid, and Auxiliary Building Crescent Area.

2-6.4 MANAGEMENT PROCESSES - Page 9, Item 2.1.2.

- (a) Identify and describe the procedures which assign material condition responsibilities, identify general inspection criteria, and specify inspection frequency. (Item 2.1.2.2) Identify and describe all reports which list the deficiencies identified during these inspections, corrective actions taken, and the workoff rate of the deficiencies identified.
- (b) Identify and describe the plant observation program and documents generated as a result of management oversight of selected plant activities and material condition. (Item 2.1.5.)

2-6.5 MANAGEMENT PROCESSES - Page 10, Item 2.1.3.

Indicate the percentage of the total number of individuals in the organization and number of supervisors and employees in each functional organization that have participated in the management development training focusing on the coaching and leadership program. (Item 2.1.3.1) Identify and describe the training material used to deliver the program.

2-6.6 MANAGEMENT PROCESSES - Page 15, Item 2.2.2.

Provide the INPO Work Management assist visit report including any recommendations identified in the report. (Item 2.2.2.2)

Provide the UESC maintenance evaluation report including any recommendations identified in the report. (Item 2.2.2.3.)

2-6.7 MANAGEMENT PROCESSES - Page 16, Item 2.2.3.

- (a) Identify and describe the written guidelines and conditions for classifying each priority level of MWO. (Item 2.2.3.3.)
- (b) For each weekly report to management since 12/1/93, detailing schedule deviations from the previous week, identify and describe i) the items that were scheduled and not started, and ii) the items that were scheduled and started but not completed. Identify the priority of the items identified on these reports. (Item 2.2.3.4.)

2-6.8 MANAGEMENT PROCESSES - Page 17, Item 2.2.4.

Identify and describe any documents generated by the steering council to review workloads and prioritize



problem solutions in the area of spare parts. (Item 2.2.4.1.d)

2-6.9 IMPROVING THE PLANT MODIFICATION PROCESS - Page 19, Item 2.3.2.

Describe the prioritized minor modification request (MR) list and provide a detailed descriptions of and justifications for the modifications listed based on the list published on 11/10/93. (Item 2.3.2.5) Provide the current status of the modifications listed on the list identified in Item 2.3.2.5).

2-6.10 STRATEGIC PLANNING - Page 20, Description of Program

Identify and describe the documentation generated by the conduct of any independent assessment and validation of plan actions and root causes of performance issues discussed in the Program Description paragraph under 3.0 - Strategic Planning.

2-6.11 STRATEGIC PLANNING - Page 21, Item 3.1.5

Provide the Performance Measure Report for the Near-Term Performance Improvement Plan (Item 3.1.5). Identify and describe each periodic report that provides information on the performance measures identified in the report.

2-6.12 STRATEGIC PLANNING - Page 21, Item 3.2

Identify and describe any documents generated by the systematic assessment identified in Item 3.2.4. shown as complete on 10/1/93.

2-6.13 STRATEGIC PLANNING - Page 22, Item 3.3.

- (a) Provide the Master Issues List - Issue 1993-Cycle 5/RF-5 MIL Approved Project List. (Item 3.3.4)
- (b) Identify and describe the contents of each monthly progress report of the MIL identified in Item 3.3.7.
- (c) Identify and describe the Issue Management Process for emerging issues identified in Item 3.3.9.
- (d) Provide any documents generated by the Strategic Planning Committee quarterly review of the MIL as noted in Item 3.3.10.

2-6.14 STRATEGIC PLANNING - Page 23, Item 3.4.

- (a) Identify and describe the Planning and Budget Assumptions (Environmental Assessment) identified in Item 3.4.2

- (b) Identify and describe the Strategy and Objectives, Critical Success Factors, Plan Objectives, Strategies, and Performance Indicators developed as a result of the Management Workshops completed by 11/8/93 as indicated in Item 3.4.3. Provide any revisions to these documents and the periodic information generated to track the performance indicators.

2-6.15 WORK PRACTICES - Page 25, Item 4.1

- (a) Provide information regarding the increase of time supervision spends in direct observation of work activities. What methods were established to increase supervision observation time of direct work activities? How is the time spent by each supervisor in direct observation of the work measured, reported and tracked? Identify and describe any documentation and data that indicates how much time each supervisor spends in direct observation of the work prior to and after the methods established in Item 4.1.2 were implemented. Provide the data that shows that the gains (if any) resulting from this initiative are continuing.
- (b) Identify and describe the ACAD-90-10 Maintenance Supervisor Training Program as it existed prior to the update and describe how it changed as a result of the review by the Assistant Plant Manager as identified in Item 4.1.4. Identify and describe all revisions of the documents since the re-issue following the review by the Assistant Plant Manager.
- (c) Identify and describe the Program developed for Chemistry and Radiation Protection which is similar to Mechanical Maintenance, for Supervisor Training identified in Item 4.1.5.

2-6.16 WORK PRACTICES - Page 26, Item 4.2

- (a) Item 4.2.1 indicates that briefings were completed in small group meetings with all maintenance workers and supervisors to stress procedural compliance as well as other issues. Describe how the level of procedural compliance is measured and tracked to determine the success of these briefings. What performance indicators have been developed, data gathered, tracked and reported to management on this issue. Identify and describe any performance indicators developed and all information which would indicate the success or failure of these briefings to increase procedural compliance.
- (b) Item 4.2.2 commits to an improved Observation program which will provide oversight and in-the-field coaching

on items such as procedural adherence. Describe the details of this program and the guidance given to individuals assigned to the coaching and observation activities. Identify the individuals assigned as coaches and their qualifications for this assignment. Provide all documentation associated with the implementation of this program and produced as a result of the coaching and observation activities. What performance indicators were established to measure the success of this coaching and observation program? Provide the performance indicators developed and all information which would indicate the success or failure of these briefings to increase procedural adherence.

- (c) Item 4.2.3.a indicates that the worker feedback process will be improved by including a feedback form in selected MWOs. Since the process was enhanced (12/15/93), how many feedback forms were issued in MWOs? How many forms were returned? How many of the returned forms contained comments that were accepted and improvements implemented? How many of the returned form's comments were rejected? Identify and describe all returned feedback forms.
- (d) Item 4.2.3.b indicates critiques will be performed of major jobs with planners and craft in attendance. Identify and describe critiques performed to date.
- (e) Item 4.2.4 indicates that workers will be assigned to the Planning Department on a rotating basis. Since 12/1/93 how many individuals have been rotated into and out of the Planning Department. What selection criteria was used to select the workers and what special training was provided to workers rotating into the Planning Department?

2-6.17 WORK PRACTICES - Page 27, Item 4.3

- (a) Provide information regarding the "Red Sheet " program as it existed before and after the revision identified in 4.3.2.
- (b) Identify and describe all critiques of high risk activities and lessons learned as a result of these critiques as indicated in Item 4.3.4.

2-6.18 WORK PRACTICES - Page 27, Item 4.4

Identify and describe the additional training provided to the operators as identified in Item 4.4.3. Describe in detail the training material developed to support this training. How many operators have received this training? What are the job responsibilities of the operators that

received this training? Has this additional training been incorporated into the Accredited Operator Training Program?

2-6.19 WORK PRACTICES - Page 28, Item 4.5

- (a) Identify and describe the TSP-0033 which existed prior to the revision identified in 4.5.1.2 and all revisions which occurred after the revision identified in 4.5.1.2.
- (b) Item 4.5.1.3. identifies a list of supervisors and workers to be briefed regarding the roles and responsibilities when working with system engineers. As of this date (10/24/94) how many workers and supervisors in each group have completed the briefings?

2-6.20 WORK PRACTICES - Page 29 & 30, Item 4.6

- (a) Identify and describe the assessment report generated by the Entergy Corporate Health Physics as indicated in Item 4.6.1.
- (b) Identify and describe the rad worker handbook as it existed prior to the simplification identified in Item 4.6.2 and all subsequent revisions.
- (c) Identify and describe all revisions of the rad worker supervisor handbook identified in 4.6.3.
- (d) Provide information on the number of individuals in each functional organization that took part in the review of Policy Statement/Management Directive pertaining to Radiation Protection Violations in the tool box type sessions (PS/MD-044). Identify and describe documents used to prepare for and conduct these sessions. (Item 4.6.4) What special training was provided to the individuals that lead these sessions. What were the qualifications of individuals assigned to conduct these sessions.
- (e) Provide information on the number of individuals in each functional organization that took part in the review of Standard and Expectations pertaining to radiation worker work practices, number 2. in the tool box type sessions. Identify and describe documents used to prepare for and conduct these sessions. (Item 4.6.5) What special training was provided to the individuals that lead these sessions. What were the qualifications of individuals assigned to conduct these sessions.

- (f) Provide information on the number of individuals in each functional organization that took part in the review of Standard and Expectations pertaining to the ALARA Program in the tool box type sessions. Identify and describe documents used to prepare for and conduct these sessions. (Item 4.6.6) What special training was provided to the individuals that conducted these sessions. What were the qualifications of individuals assigned to conduct these sessions.

2-6.21 EFFECTIVE CORRECTIVE ACTION - Page 31, Item 5.1

- (a) Provide the priority list of documents (significant corrective actions) meeting the criteria for selection of significant conditions adverse to quality. Identify and describe the documents identified on the list. Provide the criteria used to select the documents placed on the list. What, if any, actions were required based on the review of these documents to verify operability requirements? (Item 5.1.2)
- (b) Provide the goal and schedule for the reduction of priority list significant corrective actions established in Item 5.1.3. Provide information and data to show how the number and individual significant corrective actions have changed since the list was first established.

2-6.22 EFFECTIVE CORRECTIVE ACTION - Page 32, Item 5.2

- (a) Identify and describe RBNP-030 as it existed prior to the change indicated in Item 5.2.1 and all subsequent changes of the document.
- (b) Describe the policy identified in the letter from J. R. McGaha regarding policy for identification of problems/concerns (Item 5.2.2.).
- (c) Identify and describe the procedure used by the operating experience group to evaluate the corrective action database both for identifying trends and confirming corrective action effectiveness. Provide data generated to trend corrective actions and confirmation of corrective action effectiveness as required by the procedure.
- (d) Identify and describe the River Bend Station trending program identified in Item 5.2.5. Provide data generated to support the trending programs and documents which show status of the activities, documents, or indicators trended by this program.



5.3.1 EFFECTIVE CORRECTIVE ACTION - Page 33, Item 5.3

Identify and describe the interim process established for addressing CR's for significant conditions adverse to public health that will require a root cause analysis (Item 5.3.1.1).

5.3.2 EFFECTIVE CORRECTIVE ACTION - Page 34, Item 5.4

(a) Identify and describe the initial recommendations of the Risk Process Management Team (RPMT) for Corrective Action Root Cause Analysis for an Ideal Process (Item 5.3.2.1).

(b) Identify and describe the RSP-019 that reflects the changes recommended by the RPMT (Item 5.3.2.2).

5.3.3 EFFECTIVE CORRECTIVE ACTION - Page 35, Item 5.5

Identify and describe the matrix which describes and defines expectations of independent management functions, roles and responsibilities. (Item 5.3.3.1) Provide the schedule and description of the all planned, scheduled or required assessments or evaluations for River Bend, include a brief portion of the River Bend Assessment or evaluation programs including those performed by Quality Assurance, Independent Safety Engineering Group, and all self-assessments. Identify and describe all assessments performed at River Bend since January 1, 2000.

5.3.4 EFFECTIVE CORRECTIVE ACTION - Page 36, Item 5.6

(a) Identify and describe all corrective action programs, quality assurance, independent management functions, roles and responsibilities, corrective action, management, and the Quality Assurance, Independent Safety Engineering Group, and all self-assessments.

(b) Identify and describe the results of the corrective action programs, quality assurance, independent management functions, roles and responsibilities, corrective action, management, and the Quality Assurance, Independent Safety Engineering Group, and all self-assessments.

5.3.5 EFFECTIVE CORRECTIVE ACTION - Page 37, Item 5.7

Identify and describe the results of the corrective action programs, quality assurance, independent management functions, roles and responsibilities, corrective action, management, and the Quality Assurance, Independent Safety Engineering Group, and all self-assessments.

5.3.6 EFFECTIVE CORRECTIVE ACTION - Page 38, Item 5.8

Identify and describe the results of the corrective action programs, quality assurance, independent management functions, roles and responsibilities, corrective action, management, and the Quality Assurance, Independent Safety Engineering Group, and all self-assessments.



2-6.23 EFFECTIVE CORRECTIVE ACTION - Page 33, Item 5.3

Identify and describe the interim process established for screening CR's for significant conditions adverse to quality that will require a root cause analysis (Item 5.3.1).

2-6.24 EFFECTIVE CORRECTIVE ACTION - Page 34, Item 5.4

(a) Identify and describe the initial recommendations of the Key Process Management Team (KPMT) for Corrective Action/Root Cause Analysis for an Ideal Process (Item 5.4.1).

(b) Identify and describe the RBNP-030 that reflects the changes recommended by the KPMT (Item 5.4.2).

2-6.25 EFFECTIVE CORRECTIVE ACTION - Page 35, Item 5.5

Identify and describe the matrix which describes and defines expectations of independent assessment functions, roles and responsibilities. (Item 5.5.1) Provide the schedule and description of the all planned, schedules, or required assessments or evaluations for River Bend. Provide a description of the River Bend Assessment or Evaluation programs including those performed by Quality Assurance, Independent Safety Engineering Group, NRB, and any self-assessments. Identify and describe all assessments performed at River Bend since January 1, 1993.

2-6.26 EFFECTIVE CORRECTIVE ACTION - Page 35, Item 5.6

(a) Identify and describe all documents generated by the Quality Assurance organization associated with audits, surveillances, corrective actions, training of personnel in the Quality Assurance, and procedures and schedules for performance of audits.

(b) Identify and describe the results of the combined Utility, Audit Group/Joint Utility Audit Group Audit completed by 3/1/94 as indicated in 5.6.4.

2-6.27 HUMAN PERFORMANCE EFFECTIVENESS - Page 37, Issue Description

Please identify and describe all events that were caused by significant personnel errors attributable to human performance effectiveness.

2-6.28 HUMAN PERFORMANCE EFFECTIVENESS - Page 38, Item 6.1

(a) Provide a detailed description and the results of the 30 day observation program identified in 6.1.3. How was the effectiveness of this program determined?

Identify and describe all documentation and training that was used to prepare the observers for assignment as observers.

- (b) Item 6.1.4 indicates that human performance is to be verified that it is at a level commensurate with safe and reliable power operation. What criteria has been established and performance indicators developed to determine when human performance is commensurate with safe and reliable power operation? Explain the basis for the criteria and performance indicators in this area. Provide the data that is being collected and trended to verify safe and reliable power operation.

2-6.29 HUMAN PERFORMANCE EFFECTIVENESS - Page 39, Item 6.2

Identify and describe all documentation associated with the conduct of the formal evaluation of the STAR training program. Provide all information generated as the result of the evaluation.

2-6.30 HUMAN PERFORMANCE EFFECTIVENESS - Page 39, Item 6.3

Identify and describe all Procedure Change Notices. Identify and describe how the backlog of Procedure Change Notices has changed over the last three years. Identify and describe all documents which identify procedure weaknesses. (Item 6.3.4)

2-6.31 ENGINEERING SUPPORT - Page 39 and 40, Item 7.1

Provide a list of high priority drawings that require upgrade as determined by Operations and Maintenance as identified in Item 7.1.4. Provide the title of each drawing on the list and the nature of the changes required to be made to each drawing. Provide the schedule for completing drawing changes as identified in Item 7.1.3. Provide the present status of the drawings that indicates if the scheduled changes have been completed in accordance with the original schedule. Please provide data used by EOI to monitor performance regarding timely revision of all drawings. Include criteria for determining update/revision priority and targets for completing the revisions on each type/priority of drawing. Provide EOIs method of monitoring performance in this area and the data generated by the program.

2-6.32 ENGINEERING SUPPORT - Page 41 and 42, Item 7.2

Provide the list of high priority vendor manuals that require upgrade as determined by the plant staff as identified in Item 7.2.4. Provide the title of each vendor manual on the list and the nature of the changes required to be made to each manual. Provide the schedule

for completing the vendor manual changes as identified in Item 7.2.4. Provide the present status of the vendor manuals that indicates if the scheduled changes have been completed in accordance with the original schedule. Please provide data used by EOI to monitor performance regarding timely revision of all vendor manuals. Include criteria for determining update/revision priority and targets for completing the revisions on each type/priority of vendor manual change. Provide EOIs method of monitoring performance in this area and the data generated by the program.

2-6.33 ENGINEERING SUPPORT - Page 42 and 43, Item 7.3.1

- (a) Identify and describe any performance indicators which show the effectiveness of the timely processing of Parts Verification Requests. Provide the procedure and program methods to accomplish this activity. Provide the criteria, data and periodic reports used by EOI to verify acceptable performance in this area. (Item 7.3.1.1) Provide information which shows the trends from January 1, 1993 to the present in the number of unprocessed requests and the mean time for completing requests.
- (b) Identify and describe performance indicators which show the effectiveness of the timely processing of Vendor Information Requests. Provide the procedure and program methods to accomplish this activity. Provide the criteria, data and periodic reports used by EOI to verify acceptable performance in this area. (Item 7.3.1.2) Provide information which shows the trends from January 1, 1993 to the present in the number of unprocessed requests and the mean time for completing requests.
- (c) Identify and describe the method developed for prioritization, tracking and timely disposition of emergent PVR's. (Item 7.3.1.3) Provide all data generated by the method developed and reports issued to date.
- (d) Identify and describe the method developed for prioritization, tracking and timely disposition of emergent VIR's. (Item 7.3.1.4) Provide all data generated by the method developed and reports issued to date.

2-6.34 ENGINEERING SUPPORT - Page 43, Item 7.3.2

Provide a list of all high priority Condition Reports assigned to engineering as identified in Item 7.3.2.1. Provide the information regarding each condition report on the list and the nature of the conditions that require

Engineering Action. Provide the schedule for completing CR actions as identified in Item 7.3.2.2. Provide the present status of the CR's requiring engineering action which indicates if the scheduled CR's have been completed in accordance with the original schedule. Identify and describe how EOI monitors performance regarding timely completion of engineering actions associated with CR's. Include criteria for determining engineering action priority and targets for completing these actions. Provide EOI's method of monitoring performance in this area and the data/reports which show this performance.

2-6.35 ENGINEERING SUPPORT - Page 43, Item 7.3.3.

Provide a priority list of uncompleted Modification Requests and a description of the nature of and reason for each modification requested. Describe EOI's method and criteria for monitoring acceptable performance of engineering in supporting plant modification requests. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.36 ENGINEERING SUPPORT - Page 43, Item 7.3.4.

Please provide information regarding the nature of the NSSS drawing problems identified in 7.3.4 and the safety significance of this problem.

2-6.37 ENGINEERING SUPPORT - Page 44, Item 7.3.5.

Provide a priority list of uncompleted Procurement Requisitions and a description of the nature of and reason for each requisition. Provide EOI's method and criteria for monitoring acceptable performance of engineering in supporting procurement requisitions. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.38 ENGINEERING SUPPORT - Page 44, Item 7.4.1.

Provide a priority list of requested Vendor Skids Upgrade P&ID's and a description of the nature of and reason for each requested upgrade. Provide EOI's method and criteria for monitoring acceptable performance of engineering in supporting P&ID upgrade for Vendor Skids. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.39 ENGINEERING SUPPORT - Page 44, Item 7.4.2.

Provide the near term list of Bill of Materials requested by Maintenance in Item 7.4.2.1 as of 9/30.93. Provide the current a status of the requested Bill of Materials. What is the backlog of the requests of Bill of Materials.

Provide EOI's method and criteria for monitoring acceptable performance of engineering in supporting the generation of Bill of Materials. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.40 ENGINEERING SUPPORT - Page 45, Item 7.4.3.

Provide a description of Engineering' Operability Tracking System. Provide the program description or procedure used to implement the system. Provide a list and description of each item being tracked in the system. Indicate the operability issues associated with each item tracked. Provide EOI's method and criteria for monitoring acceptable performance of engineering's use of and tracking of issues on the Operability Tracking System. Please provide information which shows the performance trends and the issues that were placed on and removed from the tracking system from January 1, 1993 to the present.

2-6.41 ENGINEERING SUPPORT - Page 45, Item 7.4.4.

Describe the priority list of Loop Calibration Reports (LCRs) established by Maintenance in Item 7.4.4.1. as of 10/31/93. Provide the current status of the requested LCR's. What is the backlog of LCR requests. Provide EOI's method and criteria for monitoring acceptable performance of engineering in completing the LCRs. Please provide information which shows the performance trends from January 1, 1993 to the present.

2-6.42 ENGINEERING SUPPORT - Page 46, Item 7.5.1.

Provide a list of modifications required to implement recommendations of the Safe Shutdown Analysis discussed in Item 7.5.1.5. Describe the nature and approximate cost of these modifications. Provide the schedule for installing these modifications. Indicate how the installation, testing, and operation of these modifications is being tracked to ensure timely completion.

2-6.43 ENGINEERING SUPPORT - Page 46 and 47, Item 7.5.2.

Describe the rework of structural steel fire proofing in areas identified by the evaluation discussed in 7.5.2.2.

2-6.44 ENGINEERING SUPPORT - Page 47, Item 7.5.3.

Describe the rework of penetration seals as dispositioned on the Condition Reports discussed in 7.5.3.2.

2-6.45 ENGINEERING SUPPORT - Page 47, Item 7.6.



Describe the elevated drywell temperatures identified in 7.6.4 and the safety significance of this problem. Identify the potential modifications required to resolve this problem and the estimated cost of these modifications.

2-6.46 ENGINEERING SUPPORT - Page 48, Item 7.8.

Identify and describe all SSFI's on River Bend. Include all deficiencies identified by the SSFI. Do not limit your response to drawing deficiencies.

2-6.47 ENGINEERING SUPPORT - Page 49, Item 7.9.

Identify and describe all documentation generated by the Engineering Review Committee including the feedback forms discussed in 7.9.2. Provide data and trend information used to evaluate program performance as discussed in 7.9.4.

The following discovery requests are based on the RIVER BEND STATION LONG PERFORMANCE IMPROVEMENT PLAN (LTPIP), Rev 2 dated September 15, 1994:

2-6.48 CLOSURE - Page 7

The LTPIP provides for the use of a LTPIP Closure Form with attached documentation to demonstrate completion of LTPIP activities. Please identify and describe all instances where Closure Forms and attached documentation have been generated to date. Provide copies of additional Closure Forms as they are completed.

2-6.49 REVISIONS - Page 8

The LTPIP provides for the use of a LTPIP Revision Form with attached justification to document and describe a change to an activity in the LTPIP. Please identify and describe all Revision Forms and attached documentation/justification generated to date. Provide copies of additional Revision Forms as they are completed.

2-6.50 PERFORMANCE MEASURES - Page 8

- (a) The LTPIP includes quantitative performance measures to track and determine the effectiveness of the LTPIP. Periodic management reports are to be developed to show performance against these performance indicators. Please identify and describe all management reports generated to date and provide future reports as they are issued.

- (b) The performance measures set forth in each program plan generally provide the goals established by each program plan. The LTPIP does not however, indicate the specific data to be obtained, the source of this data, and how the data is to be tracked, reported and monitored to determine satisfactory performance. Please describe the details associated with these performance measures including specific data elements to be used in the tracking and reporting on each program progress and effectiveness. If all these data elements have not yet been determined, provide those that are available at this time and transmit the remainder as they are developed. Provide an explanation regarding how the selected performance measures data elements relate to the goals established in the program plan. Also, please identify and describe all reports on the program plan performance measures issued to date and provide future reports as they are issued.
- (c) In addition to monitoring performance of the program plans within the LTPIP, plant management may have established other performance measures dealing with activities not associated with the LTPIP. Managements reports and review of this type of information is common in the nuclear industry and is encouraged by INPO and the NRC. Please provide a comprehensive list of all Performance Indicators that have been established to monitor performance at River Bend that are routinely reported to departmental management, site management, NRB, INPO, or the NRC. Provide copies of the performance indicator reports and the established goals to be achieved for each indicator. Identify and describe all management reports which address plant and organizational performance generated since January 1, 1993. Provide all future reports of this type as they are issued for review by management.

## 2-6.51 STRATEGIES AND PROGRAMS

The LTPIP Rev 2 indicates that many program plan activities are behind schedule. Please provide the remedial plans established to recover progress on all program plan activities that are shown behind schedule in Rev. 2 of the LTPIP. Provide an analysis regarding the impact to the success of the LTPIP if these program plan activities are not completed as scheduled.

## 20-6.52

Please provide all future revisions of the LTPIP as they are issued.



ATTACHMENT C

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October 28, 1994

BY HAND DELIVERY

Mark J. Wetterhahn, Esq.  
Winston & Strawn  
1400 L Street, N.W.  
Washington, DC 20005

Re: Gulf States Utilities Company, (River Bend  
Station), NRC Docket No. 50-458-OLA

Dear Mr. Wetterhahn:

Enclosed please find additional discovery requests on  
the Long-Term Performance Improvement Plan (LTPIP), as referenced  
in my letter of October 26, 1994.

Please call if you have any questions.

Sincerely,

*Tom Rudebusch*

Thomas L. Rudebusch

cc: Honorable B. Paul Cotter, Jr. (by mail)  
Honorable Peter S. Lam ( " " )  
Honorable Richard F. Cole ( " " )  
Marian L. Zobler, Esq. ( " " )  
Robert B. McGehee, Esq. ( " " )

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
GULF STATES UTILITIES COMPANY, et al. ) Docket No. 50-458-OLA  
 )  
River Bend Station, Unit 1 )  
 )

FOLLOW-UP DISCOVERY REQUESTS OF  
CAJUN ELECTRIC POWER COOPERATIVE, INC.,  
TO GULF STATES UTILITIES COMPANY,  
ENTERGY OPERATIONS, INC., AND ALL AFFILIATED COMPANIES

The general instructions and definitions from Cajun's first request continue to apply to all discovery requests set forth herein.

The following discovery requests relate to the River Bend Station Long-Term Performance Improvement Plan (LTPIP), Rev 2 dated September 15, 1994.

2-6.53 Process development - Item 2.2.5, Page 23

Item 2.2.5 of the Process Development portion of this strategy discusses a project closeout critique and closeout critique form to be used by project managers to provide feedback to River Bend management. The schedule indicates this activity is 50% complete. Please identify and describe the Critique Forms and information generated to date.

2-6.54 Develop self-assessment capability - Item 8.1.2, Page 62

Item 8.1.2 establishes a methodology to determine where to focus internal and external assessment resources and develops an assessment schedule. This activity is shown as complete in the 1st quarter of 1994. Please identify, describe and provide the methodology established as well as the schedule for assessments. Also, identify and describe any documents related to assessments completed to date based on the schedule developed.

2-6.55 Develop effective oversight processes for problem solving systems - Item 8.2.1.4 and 8.2.1.5, Page 62

Items 8.2.1.4 and 8.2.1.5 discuss the revision of the Performance Monitoring Management Report to provide more effective trend information for executive decision making and action plan development and provide analysis results to senior management. The schedule shows these activities

as complete in the third quarter of 1994. Please identify and describe the changes made to the Performance Monitoring Report as a result of this activity. Please provide the analysis results provided to senior management (shown as 9/3/94).

2-6.56 Improve the Supervisory Effectiveness to Minimize Rule/Knowledge - Based Errors - Item 9.5.1.1, Page 69

The referenced item indicates Field Surveillance (Plant Observations) will be conducted to improve performance in this area. Please identify and describe the data and observations generated by this activity to date. Please indicate the number of tours made to date, the average time spent on these tours and as follow-up to these tours, and the level of management and functional areas of responsibility of the individuals involved in these tours.

2-6.57 PERFORMANCE MEASURES - Page 76

The performance measures identified on page 76 for work control provides performance goals. Please identify, describe, and provide data to indicate monthly performance in each of these areas from January 1993 to the present. Please provide additional information regarding performance in meeting these goals on a monthly basis as the program implementation proceeds.

2-6.58 Improve Preventive and Predictive Maintenance Performance - Item 10.4.4, Page 80

Item 10.4.4 indicates periodic assessments of the PM program effectiveness in accordance with the Maintenance Rule requirements are scheduled to be conducted starting early in the 3rd Quarter of 1994. How many assessments of the PM program have been completed to date? Please identify and describe all documentation generated by this activity to date. Please provide copies of assessment reports associated with this activity as they are completed.

2-6.59 PERFORMANCE MEASURES - Page 84

The performance measures identified on page 84 for materials management specify a performance goal of 50 or less priority 1, 2, or 3, MWO's awaiting parts. Please identify, describe, and provide data to indicate monthly performance in this area from January 1, 1993 to the present. Please provide additional information regarding performance in meeting this goal on a monthly basis as the program implementation proceeds.

2-6.60 PERFORMANCE MEASURES - Page 91

The performance measures identified on page 91 for modifications provides performance goals. Please identify, describe, and provide data to indicate monthly performance in each of these areas from January 1, 1993 to the present. Please provide additional information regarding performance in meeting these goals on a monthly basis as the program implementation proceeds.

2-6.61 PERFORMANCE MEASURES - Page 96

The performance measures identified on page 96 for procedures provides performance goals. Please identify, describe, and provide data to indicate monthly performance in each of these areas from January 1, 1993 to the present. Please provide additional information regarding performance in meeting these goals on a monthly basis as the program implementation proceeds.

2-6.62 Complete the actions of the NTPIP - Pages 105 & 106

- (a) Drawing upgrade project - NTPIP Item 7.1.4 indicates a target date of 3/31/94 for completion of this activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (b) Vendor technical manuals - NTPIP Items 7.2.6 and 7.2.7 indicate a target date of 4/30/94 and 3/31/94 for completion of these activities. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by any delay in completing these activities.

2-6.63 Backlog of plant support open items - the NTPIP scope was to process the following numbers of high priority open items through engineering:

- (a) 43 Maintenance Work Orders - NTPIP Item 7.3.1.2 indicates a target date of 3/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (b) 30 Condition Reports - NTPIP Item 7.3.2.4 indicates a target date of 4/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or

impact on the quality of maintenance caused by the delay in completing these activities.

- (c) 30 Field Worked Modification Requests - Please identify and describe the work and Modifiacton Requets and explain why they are not found in Rev. 1 of NTPIP.
- (d) 150 Procurement Engineering Requisitions - NTPIP Item 7.3.5.3 indicate a target date of 4/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (e) NSSS drawing problems - NTPIP Item 7.3.4.1 indicates an actual completion date of 10/20/93 for this or a similar activity. Please explain why this activity is in the LTPIP if it was reported as completed in Rev. 1 of the NTPIP. If not complete, identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.64 Improve usability and accuracy of design documents:

- (a) Upgrade seventeen high priority vendor skid P&IDs requiring additional mark numbers - NTPIP Item 7.4.1.3 indicates a target date of 3/31/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (c) Update on-line Bill of Materials database with approximately 500 items - Please explain why this matter is not found in Rev. 1 of NTPIP.
- (d) Update approximately 400 high priority Loop Calibration Reports - NTPIP Item 7.4.4.4 indicates a target date of 4/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.65 Update fire safe shutdown analysis - NTPIP Item 7.5.1.3 indicates an actual completion date of 11/30/93 for this or a similar activity. Why is this activity in the LTPIP if it was reported as completed in Rev. 1 of the NTPIP? If not complete, identify and explain the safety significance, challenge to the plant operators, or impact



significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing this activity.

2-6.66 Evaluate the configuration management issues to ensure the design drawings accurately reflect the updated physical plant - NTPIP Item 7.8.1 indicates a target date of 2/15/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.67 Establish an Engineering Review Committee - NTPIP Item 7.9.1 indicates an actual completion date of 12/1/93 target date for this or a similar activity. Why is this activity in the LTPIP if it was reported as completed in Rev. 1 of the NTPIP? If not complete, identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.68 Item 14.2.2.7, Page 108

This activity involves the review of the backlog of approximately 5,000 LCR's awaiting engineering update, and revise as appropriate. This activity was scheduled from 2/1/94 through 9/15/96. However, the September 15, 1994 issue of the LTPIP, Rev. 2 indicates that this activity is complete. If this activity is completed, please indicate if any reportable events were identified as a result of this review. Were any calibration changes identified as a result of this review? Identify and explain any reportable events or significant calibration changes caused by this review.

2-6.69 Item 14.2.7.1.1, Page 113

This activity involves the performance of an INPO assist in Engineering Support to focus on Systems Engineering. This assist visit is shown as complete on the schedule. Please identify and explain the findings and recommendations made by INPO as a result of this visit.

2-6.70 Item 14.2.7.1.2, Page 113

This activity involves the performance of an SSFI-type assessment to evaluate the need to enhance aspects of the design basis/configuration management process. The schedule shows that this assessment is in progress. Please identify and explain any reportable events

resulting from this SSFI and the findings and recommendations identified by this assessment when it is completed.

ATTACHMENT D

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October 26, 1994

BY TELECOPY

Mark J. Wetterhahn, Esq.  
Winston & Strawn  
1400 L Street, N.W.  
Washington, DC 20005

Re: Gulf States Utilities Company, (River Bend  
Station), NRC Docket No. 50-458-OLA

Dear Mr. Wetterhahn:

In accordance with the Licensing Board's order issued at the October 4, 1994 prehearing conference, GSU/EOI was to supplement its response to Cajun Request No. 2-6 by identifying meetings between GSU and Entergy employees and identifying safety-related matters discussed at such meetings (including any meetings concerning the SCRAM that occurred at River Bend on or about September 9, 1994).

However, neither the responses provided to Cajun on Wednesday, October 19th (under cover of Mr. Levanway's letter dated October 14, 1994), nor the related documents which we received on October 21, respond fully to the Licensing Board's order on these crucial issues.

GSU/EOI did provide two relevant documents on October 21, the Near-Term Performance Improvement Plan (NTPIP) and the Long-Term Performance Improvement Plan (LTPIP), and Cajun propounded follow-up discovery requests based on those documents, particularly the NTPIP, on October 24, 1994. Cajun has reserved the right to conduct additional follow-up discovery, as was our right if the documents had been timely submitted on October 14.

Yesterday you telephoned and stated that GSU objected to Cajun's follow-up discovery conducted to date on the grounds that the requests were not likely to lead to the production of admissible evidence, and you indicated you would attempt to institute a telephone conference with the Licensing Board to discuss this matter. I indicated we are not opposed to a

telephone conference, in principle, although such a conference may be premature and unnecessary at this time.

To avoid the need for additional rulings from the Licensing Board on GSU's compliance with the October 4 ruling, I would suggest the following procedures: (i) GSU would complete its discovery responses, with Cajun having 10 days to propound follow-up requests; (ii) Cajun will complete its follow-ups on the LTPIP by October 28th (which is within 10 days of the 21st); and (iii) GSU will formally state its objection to any request.

At that point, which I envision to be next week [with the possible exception of any follow-ups related to (i)], I suggest that we sit down and discuss between ourselves how and which responses by GSU/EOI would be acceptable to both Cajun and GSU before we utilize the resources of the Licensing Board. If we cannot reach agreement on all issues, then I suggest we go to the Board with any remaining disputes.

I will telephone you later today to discuss this proposal.

Sincerely,

COPY

Thomas L. Rudebusch

cc: Honorable B. Paul Cotter, Jr. (by telecopy)  
Honorable Peter S. Lam ( " " )  
Honorable Richard F. Cole ( " " )  
Marian L. Zobler, Esq. ( " " )  
Robert B. McGehee, Esq. ( " " )

ATTACHMENT E



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
Gulf States Utilities Co., et al. )  
(River Bend Station, Unit 1) )

Docket No. 50-458-OLA  
ASLBP No. 93-680

GULF STATES UTILITIES COMPANY'S SECOND SUPPLEMENTAL RESPONSE  
TO CAJUN ELECTRIC POWER COOPERATIVE, INC.'S SECOND  
SET OF INTERROGATORIES DATED SEPTEMBER 8, 1994

The Respondents, Gulf States Utilities Company ("Gulf States") and Entergy Operations, Inc. ("Entergy Operations") supplement their response to Interrogatory No. 2-6 propounded by Cajun Electric Power Cooperative, Inc. ("Cajun") as follows. Pursuant to General Instruction "E", the name of the individual responsible for providing the response follows the response.

- 2-6. Identify employees of GSU, its agents or consultants who met with Entergy, its employees, EOI, EOI employees, their contractors, or any tier of subcontractor, with regard to any safety matter, stating the place and date of the meeting, the names of all individuals present, a detailed description of the specific safety matters discussed, the resolution of such safety matters, the contribution of Cajun to the discussion or resolution of such safety matters, and any follow-up by GSU with regard to such safety matters. Identify all documents prepared by GSU associated with such issues.

RESPONSE:

There was a meeting of the Board of Directors of Entergy Corporation on September 19, 1994 in Washington, D.C., at which several officers of Gulf States were present at various times

during the meeting. These officers included Frank Gallaher, J. D. Jackson and G. D. McInvale. The September 9, 1994 SCRAM was one of the issues discussed at this meeting. The Gulf States officers may or may not have been present at the time of this discussion.

On October 27, 1994 a meeting was held in Beaumont, Texas in which the September 9 SCRAM was discussed. Present at the meeting were Randy Douet, the Director of Plant Projects and Support at River Bend for Entergy Operations, Inc., Frank Gallaher, President of Gulf States, and five (5) members of the Gulf States' Advisory Board. The Advisory Board members present were Frank Harrison, Bill Klausing, Bookman Peters, Sam Segnar, and Jim Taussig. Other persons who were present at the meeting and who may have been present when the issue of the September 9 SCRAM was discussed were Jack Herrington, Bud Storey, Karen Johnson, Andy Dryer, Mike Barnhill, Jim Brown, Jim Moss, Kim McMurray, and Ken Sanburg.

There are no documents prepared by GSU associated with these meetings other than the minutes of the Board of Directors of Entergy Corporation for the September 19, 1994 meeting. These minutes do not contain a reference to the discussion regarding the September 9, 1994 SCRAM.

H. W. Keiser

ATTACHMENT F

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
GULF STATES UTILITIES COMPANY	)	Docket No. 50-458-OLA
	)	ASLBP No. 93-680
(River Bend Station, Unit 1)	)	

GULF STATES UTILITIES COMPANY'S OBJECTIONS TO  
CAJUN ELECTRIC POWER COOPERATIVE, INC. FOLLOW-UP  
DISCOVERY REQUESTS DATED OCTOBER 24, 1994 AND  
MOTION FOR A PROTECTIVE ORDER

I. INTRODUCTION

Gulf States Utilities Company ("GSU") hereby objects to "Follow-up Discovery Requests Of Cajun Electric Power Cooperative, Inc., to Gulf States Utilities Company, Entergy Operations, Inc., and All Affiliated Companies" dated October 24, 1994, and moves for a protective order pursuant to 10 C.F.R. § 2.740(c) that such discovery not be had. Cajun Electric Power Cooperative Inc.'s ("Cajun") discovery requests relate to matters outside the proper scope of follow-up discovery, outside the scope of the one admitted contention, and are not reasonably calculated to lead to admissible evidence. Furthermore, Cajun's requests are overbroad, unduly burdensome and oppressive. Cajun is not only engaging in a fishing expedition, it is attempting to "drain the pond and collect the fish from the bottom."<sup>1</sup>

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<sup>1</sup> See Amcast Industrial Corp. v. Detrex Corp., 138 F.R.D. 115, 121 (N.D. Ind. 1991), infra at 5.

## II. ARGUMENT

On October 24, 1994, Cajun sent GSU 52 multi-part follow-up discovery requests asking for detailed additional information concerning the "River Bend Nuclear Station Near-Term Performance Improvement Plan" and the "River Bend Nuclear Station Long-Term Performance Improvement Plan," which GSU had produced in response to a previous discovery request from Cajun. Specifically, Cajun's October 24, 1994 requests seek data regarding plant procedures, corrective action plans, self-assessments, personnel matters, root cause analyses, performance measure reports, and many other items considered in the performance improvement plans. These requests are extremely broad in scope, encompassing a vast quantity of documentation covering virtually every aspect of River Bend operation, with no demonstrated nexus to Cajun's single admitted contention. For the reasons discussed below, the Atomic Safety and Licensing Board ("Licensing Board" or "Board") should uphold GSU's objection to Cajun's follow-up discovery requests and grant a protective order pursuant to 10 C.F.R. § 2.740(c) that the discovery not be had.<sup>2/</sup>

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<sup>2/</sup> Counsel for GSU and Cajun have discussed various ways to resolve the discovery dispute, but have not been able to reach agreement. Inasmuch as counsel for Cajun indicated his intention to submit additional discovery related to the performance improvement plans, this pleading is being submitted to expedite disposition of the issue.

A. Cajun's Discovery Request Is Beyond The Proper Scope Of Follow-up Discovery In This Proceeding

Discovery in this proceeding concluded on September 22, 1994. See Board Memorandum and Order dated March 24, 1994 at 2. At the prehearing conference in this matter, the Board required GSU to supplement Cajun Interrogatory 2-6. That interrogatory related to meetings between employees of GSU and those of Entergy and Entergy Operations, Inc. ("EOI") regarding safety matters. The Board stated in its ruling on the record:

The ruling is that GSU is to give Cajun in response to their interrogatory 2.6 the names and current affiliation of all Entergy, EOI, and EOI [sic] employees who attended meetings during the period September 1993 through December 31, 1993, and to describe the general subject matter of those meetings.

Prehearing Conference Transcript at 34-35 (October 4, 1994) (hereinafter cited as "Tr.").<sup>3/</sup>

On October 14, 1994, GSU provided its supplemental response to, inter alia, Interrogatory 2-6.<sup>4/</sup> Therein, GSU described the general subject matter of meetings between representatives of GSU and EOI and produced the near-term and long-term performance improvement plans for River Bend. Cajun pounced on the opportunity presented by the submission of these documents

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<sup>3/</sup> The ruling was slightly modified later in the prehearing conference to account for later events, but the scope of follow-up discovery remained the same. Tr. at 38.

<sup>4/</sup> "Gulf States Utilities Company's Supplemental Responses To Cajun Electric Cooperative, Inc.'s Second Set of Interrogatories," dated October 14, 1994.



discovery of any data relating to how a postulated change in funding or operation by EOI will affect future safety at River Bend.

The River Bend performance improvement plans were developed to increase operational performance beyond current levels.<sup>7</sup> Thus, in violation of 10 C.F.R. § 2.740(b)(1), Cajun's discovery requests regarding GSU's plans to improve performance even further are not reasonably calculated to lead to the discovery of admissible evidence concerning whether alleged underfunding of River Bend resulting from the merger will reduce the margin of safety from present, already acceptable levels.

C. The Board Should Issue A Protective Order That Discovery Not Be Had Because Cajun's Requests Are Overbroad, Oppressive And Unduly Burdensome

Pursuant to 10 C.F.R. § 2.740(c), the Board may issue a protective order that discovery not be had to protect a party from "oppression or undue burden and expense." With regard to Cajun's October 24, 1994 follow-up discovery requests, such a protective order is appropriate. Cajun's requests concerning the performance improvement plans would require GSU, at great expense in time and money, to produce thousands of documents related to plant procedures, self-assessments, corrective actions, root cause analyses, personnel matters, and dozens of other issues. Thus, the discovery requests would divert the resources of the very

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<sup>7</sup> See "River Bend Nuclear Station Near-Term Performance Improvement Plan," at 1, and "River Bend Nuclear Station Long-Term Performance Improvement Plan," at 1.

individuals charged with operation of the facility and require such individuals to research minutiae irrelevant to this proceeding. Cajun has not attempted in any way to tailor its requests more narrowly to produce responses relevant to the impacts of the merger on the margin of safety at River Bend. Rather, Cajun's inquiries merely attempt to dissect the performance improvement plans and to probe every area possible, regardless of relevance. The response to this inquiry is required to be performed in a manner which can only be characterized as the most onerous for GSU and EOI. As noted previously, the NRC has reviewed these performance plans, and Cajun, as co-owner of the facility, had access to these documents long before it filed its voluminous requests on the last day of the extended discovery period designated by the Board. There is no justification for Cajun to subject GSU to such wide-ranging, oppressive discovery this late in the discovery process.

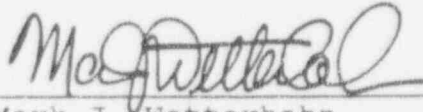
Under Rule 26 of the Federal Rules of Civil Procedure, responses sought by discovery requests "must comport with the traditional notions of relevancy and must not impose an undue burden on the responding party." Robbins v. Camden City Bd. Of Education, 105 F.R.D. 49, 55 (D.N.J. 1985). This principle is equally applicable to NRC proceedings because Federal Court constructions of Rule 26 of the Federal Rules provide appropriate guidelines for interpreting the discovery standards set forth in the NRC's rules. See Boston Edison Company (Pilgrim Nuclear Generating Station, Unit 2), LBP-75-30, 1 NRC 579, 581 (1975).

Contrary to the above principle, Cajun is not only engaging in a fishing expedition, Cajun is attempting to "drain the pond and collect the fish from the bottom." Amcast Industrial Corp. v. Detrex Corp., 138 F.R.D. 115, 121 (N.D. Ind. 1991), citing In re IBM Peripheral Devices Anti-Trust Litigation, 77 F.R.D. 39, 41-42 (N.D. Cal. 1977). Such an exercise "goes beyond the bounds set by the discovery rules." In re IBM Peripheral Devices Anti-Trust Litigation, 77 F.R.D. at 42. Thus, the Board should grant a protective order that discovery on Cajun's irrelevant follow-up requests not be had.

### III. CONCLUSION

For the foregoing reasons, GSU respectfully requests that the Board uphold GSU's objections to Cajun's October 24, 1994 follow-up discovery requests and grant a protective order that discovery on those requests, or other similar requests, not be had.

Respectfully submitted,



Mark J. Wetterhahn

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Washington, D.C. 20005  
(202) 371-5700

Attorneys for Gulf States  
Utilities Company

Dated at Washington, D.C.  
this 28th day of October, 1994

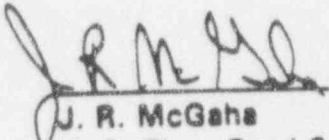
ATTACHMENT G

**RIVER BEND**

**NUCLEAR STATION**

**NEAR-TERM PERFORMANCE**

**IMPROVEMENT PLAN**

  
J. R. McGaha  
V. P. River Bend Station  
Revision 1  
December 23, 1993

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## RIVER BEND NUCLEAR STATION

### NEAR-TERM PERFORMANCE IMPROVEMENT PLAN

#### BACKGROUND

River Bend Station management has undertaken the development of a Near-Term Performance Improvement Plan (the Plan) to address the underlying causes of certain significant performance issues at the station and to put in place immediate actions to achieve performance improvements. The planned performance improvements are characterized as near-term in that they are intended to be implemented over the next six months while the station Long Term Performance Improvement Plan is being developed. The Long Term Performance Improvement Plan will address a broader range of issues over the longer term, which will help ensure that the root causes of River Bend's performance problems are corrected and the unit achieves a sustained level of excellent performance.

River Bend management has identified certain performance attributes that it wants to achieve for the River Bend Station. These performance attributes, which are listed below, embody management's expectations for improving the performance of the River Bend Station in the near term. Identification of these attributes was based on an analysis of the root causes of previous performance issues and the experience of the River Bend management team.

1. Establishment and reinforcement of high performance standards and expectations.
2. Establishing, reinforcing, and clarifying responsibility and accountability for personal performance at all levels of the organization.
3. Self assessment, corrective action processes, and root-cause techniques that contribute directly to effective identification, correction, and prevention of plant problems.
4. Increased management involvement and improved processes in support of leadership, oversight, resources, and direction to achieve sustained, good performance.
5. Excellence in human performance as measured by a reduction in personnel error.
6. Efficient work processes.
7. Emphasis on a high state of material readiness.
8. Improved processes, procedures, and procedural compliance.

Based on internal and external assessments of River Bend's recent performance, management identified five recurring performance issues. These are planning and management effectiveness, human resource effectiveness, work effectiveness and efficiency, design information and engineering support, and organizational norms (problem solving). These performance issues were validated by an independent

assessment of River Bend's recent performance and capabilities which was undertaken in September 1993. The independent assessment helped River Bend management verify the significant performance issues needed to be addressed in the Plan.

The independent assessment and validation also assisted River Bend management in the characterization of performance issues into four root causes. These are (1) management skills have not kept pace with the level of change required, (2) planning, goal setting, performance monitoring, and management feedback have not been effective, (3) problem identification and problem solving methods have not been consistently applied to improve performance, and (4) critical station work processes are inefficient and have allowed backlogs of work to occur. The Near-Term Performance Improvement Plan addresses these root causes.

### PURPOSE OF THE PLAN

The purpose of the River Bend Near-Term Performance Improvement Plan is to direct the actions necessary to improve station performance and begin a transition to more comprehensive, performance-based initiatives to be included in the Long Term Performance Improvement Plan and future Business Plans. The Plan contains program initiatives and objectives intended to measurably improve the station's performance in the near term (next six months) as determined by associated performance measures.

To achieve these results, the River Bend organization must develop the performance attributes identified by management. The short-term strategies for developing these performance attributes are contained in the program initiatives. The Long Term Performance Improvement Plan will focus on the development of these attributes over the long term.

The plan serves three purposes:

1. Addresses near-term challenges to achievement of station objectives.
2. Captures current improvement initiatives that are critical to near-term improvement and assures they are prioritized and integrated properly, appropriate resources are allocated, and accountability for performance results is assigned.
3. Serves as an input to the Long Term Performance Improvement Plan.

### STRATEGIC GOALS

This Plan is consistent with the long-term station strategic goals that will be more fully defined in the Long Term Performance Improvement Plan. The achievement of near-term performance results contained in this Plan will measurably assist in achieving the long term goals of:

1. **SAFETY** - High regulatory performance as measured by SALP scores.
2. **PLANT PERFORMANCE** - High operating performance as measured by capacity factor.
3. **COST CONTROL** - Low production cost performance as measured by mills/kWhr.

## METHODOLOGY

River Bend management developed this Plan by evaluating past assessments performed at River Bend including independent and line-management assessments, INPO evaluations, and NRC inspections. The findings, observations, and issues correlate to seven broad performance areas:

1. Material Condition
2. Management Processes
  - 2.1 Establishment of management expectations, ownership, and teamwork
  - 2.2 Work Control
  - 2.3 Plant modifications
3. Strategic Planning
4. Work Practices
5. Corrective Action
6. Human Performance Effectiveness
7. Engineering Support

Additionally, and separate from the inputs to this Plan, River Bend management initiated an independent validation of these performance areas.

For each performance area, objectives were established, and initiatives and action plans were developed. In addition each of the program initiatives of this Plan has been assigned to an executive sponsor who is responsible and accountable for Plan results. Each of the action plans has an associated schedule with responsibilities assigned to specific station managers. The action plans have been prioritized and resource-loaded and appropriate resources have been committed.

## MONITORING PLAN IMPLEMENTATION

River Bend management will monitor the Plan implementation through routine management reporting. In addition, the River Bend Vice President will receive monthly or more frequent reports from responsible managers during plant performance review meetings. Any deviations from Plan commitments will be approved by the Vice President.

The following sections delineate the breakdown of each performance area into program initiatives, objectives, performance measures, and action plans for the River Bend Near-Term Performance Improvement Plan. The performance measures that will be used by management to monitor the overall effectiveness of the implementation of the Near-Term Performance Improvement Plan and separately provided. These measures are tied to the root causes of performance problems at the station and will be used by management to assure correction of underlying problems.

<b>1.0 Title of Program:</b>	Material Condition
<b>Executive Sponsor:</b>	M. Sellman
<b>River Bend Goal Supported:</b>	High Operating Performance

---

## 1.0 MATERIAL CONDITION

### Issue Description

River Bend management is dedicated to providing plant personnel with a quality plant to operate by ensuring that plant systems and components are in conformance with design, are maintained in good working condition, and are readily and safely accessible by plant personnel. To this end, identification, prioritization, scheduling, and implementation of corrective maintenance and modifications for long-standing problems and operator workarounds will be improved. The Maintenance Work Order backlog will be reduced. In addition, the current plans to improve housekeeping and plant and equipment painting will be assessed with enhancements made, as necessary, including the establishment of expectations and assignment of responsibility for completion of the actions.

### Description of Program:

Implement near-term initiatives to measurably improve the material condition of River Bend. These initiatives will address high-priority actions for preservation, housekeeping, equipment identification, and correction of equipment problems.

### Program Objectives:

This program contains three objectives to improve material condition at River Bend. These are:

1. Prioritize, schedule, and assign resources, as necessary, to complete the high-priority MWO backlog in the near term.
2. Identify, prioritize, schedule, and resolve recurrent or long-standing material condition problems that can affect safety and plant reliability, and hold people accountable to schedules.
3. Establish and implement near-term initiatives to ensure that plant preservation, housekeeping, and equipment identification meet the standards established by plant management.

Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
1.1 Reduce the High-Priority MWO Backlog	E. Ewing	
1. Prepare a list of high-priority Maintenance Work Orders (MWOs) required by Operations for performance improvement.	J. Venable	10/5/93A
2. Establish an achievable schedule with Operations, Maintenance, System Engineering, Design Engineering and Procurement.	E. Ewing	11/5/93A
3. Complete the scheduled work on the near-term list of MWOs and develop a program to ensure that all high priority 1 and 2 MWOs greater than 14 days old are worked and maintain a backlog of zero.	E. Ewing	1/31/94
1.2 Long-standing and Recurrent Equipment Problems	E. Ewing	
1. Utilize Operations input and system performance data to assure the list of long-standing and recurrent equipment problems is complete.	J. Schippert	10/15/93A
2. Prioritize long-standing and recurrent equipment problems by impact on plant operations and safety, and prepare a list of problems to be resolved in the near term and during RF5.	J. Venable	10/22/93A
3. Establish an achievable schedule with input from Operations, Maintenance, Design Engineering, System Engineering, Outage	E. Ewing	11/5/93A



Management, and Procurement etc.

- |     |   |            |             |
|-----|---|------------|-------------|
| 4.  | Complete the work on the near-term list of equipment problems   | E. Ewing   | End of RF-5 |
| 1.3 | Housekeeping, Preservation, Labeling  | J. Venable |             |
| 1.  | Verify adequacy of schedule and resources for painting, preservation and insulation improvements to satisfy management expectations.                                  | J. Venable | 10/15/93A   |
| 2.  | Upgrade and proceduralize the plant labeling standard.  | J. Venable | 10/30/93A   |
| 3.  | Implement the schedule for painting, cleaning, insulation, and or preservation in the improvement areas.  | L. Ballard | 12/31/93    |
| 4.  | Complete all labeling in the following improvement areas when painting is complete:<br>HPCS Diesel Generator Room,<br>EHC skid, and Auxiliary Building Crescent area. | P. Barker  | 12/31/93    |

## 2.0 Management Processes

### 2.1 Title of Program:

Improving Management Expectations, Ownership, and Teamwork

### Executive Sponsor:

K. Suhrke

### River Bend Goal Supported:

All

---

## 2.1 Improving Management Expectations, Ownership, and Teamwork

### Issue Description

To be successful in improving plant performance, River Bend management must establish effective processes for communicating expectations to the station staff. In addition, management must continually foster ownership of plant problems and their solutions within the staff and promote teamwork to assure the station performs effectively.

### Description of Program:

This program establishes the routine processes that allow management to:

- establish, communicate, and monitor performance expectations through a communications plan and monthly plant review meetings,
- foster ownership results by improving the plant walkdown program,
- instill teamwork among station organizations and
- support interactions with the NRC through an effective regulatory communications plan.

### Program Objectives:

1. Conduct monthly plant review meetings with senior management and functional-area managers to clarify expectations, review performance and hold managers accountable.
2. Expand and improve the program for plant walkdowns by station management to improve plant material condition as defined by operations, and strengthen the self-assessment process by observing selected plant activities, e.g., maintenance, operations evolutions, surveillance testing, and training.
3. Conduct management coaching and teambuilding activities to improve supervisory capabilities and the ability of departments to work together.
4. Develop and implement a communications plan to reinforce management expectations, employee ownership, and teamwork.
5. Establish an effective regulatory communications plan to enhance interactions with the NRC by assuring that communications are accurate, complete, and responsive and occur within the required time frame.

Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
<b>2.1.1 Establish Plant Review Meetings</b>	<b>K. E. Suhrke</b>	
1. Establish an objective statement and guidelines for meeting topics, format, presenters.	K.E. Suhrke	10/20/93A
2. Conduct first monthly meeting, establish calendar/plan for future meetings.	K.E. Suhrke	11/1/93A
3. Incorporate lessons learned from first meeting into objective statement.	K.E. Suhrke	11/15/93A
<b>2.1.2 Expand and Improve Station Walkdown Program</b>	<b>J. Venable</b>	
1. Divide plant into inspection zones and develop inspection guidelines for monitoring material condition and selected activities.	J. Venable	10/30/93A
2. Issue a procedure that assigns material condition responsibilities, identifies general inspection criteria, and specifies inspection frequency.	J. Venable	11/30/93A
3. Assemble inspection teams consisting of multi-discipline, supervisory personnel and conduct two zone inspections.	J. Venable	11/30/93A
4. Review inspection team comments/results and modify inspection criteria as necessary.	J. Venable	12/15/93A

5. Modify plant observation program, J. Venable 12/15/93A  
to continue management oversight  
of selected plant activities and  
material condition.
- 2.1.3 Conduct Management Coaching and W. Beck  
Teambuilding
  1. Conduct management development  
training focusing on coaching  
and Leadership.
    - a. Develop a coaching program S. Brawner 8/31/93A
    - b. Implement program with S. Brawner 11/15/93A  
first line supervisors in  
Operations, Maintenance,  
System Engineering  
and Radiation Protection.
    - c. Implement program with S. Brawner 12/31/93  
remainder of Operations,  
Maintenance, System  
Engineering and Radiation  
Protection personnel  
(see 6.2.2 for remainder  
of plant staff supervisors).
    - d. Implement program to S. Brawner 3/30/94  
remainder of site personnel
  2. Conduct management development  
training focusing on team building
    - a. Develop a program that enables K. Suhrke 11/15/93A  
senior management to  
facilitate team  
building seminars

- b. Conduct team building seminars with managers and direct reports

(1) V.P. Staff	J. McGaha	12/17/93A
(2) Plant Staff	M. Sellman	1/14/94A
(3) SA & QV	J. Fisicaro	2/11/94
(4) Site Support	K. Suhrke	2/11/94
(5) Engineering	T. Leonard	2/11/94

- c. Evaluate senior management team building seminars

N. Spitzfaden 2/15/94

- d. Develop a program for supervisor/foreman team building seminars

N. Spitzfaden 1/21/94

- e. Complete team building program for supervisors/foreman

N. Spitzfaden 3/31/94

#### 2.1.4 Implement the following communications plan

T. Dickson

- 1. Communicate initial management changes.

T. Dickson 9/24/93A

- a. External News Releases
- b. Internal announcements via newsletters and electronic bulletins
- c. Face-to-Face employee meetings at the site

- 2. Communicate status of ongoing merger process.

T. Dickson 12/31/93A

- a. Publish information on employee/human resources issues
- b. Assist site management direct communications efforts (letters to employees Compliments/Concerns meetings)

- |    |  |            |           |
|----|--|------------|-----------|
| 3. | Establish regular internal communications activities.  | T. Dickson | 11/1/93A  |
| a. | Publish "Performance Notes" newsletter at least weekly   |            |           |
| b. | Establish executive luncheon meetings with departments featuring briefings on plant systems by the engineering staff and major activities such as MOV Test Program and Outage Preparations |            |           |
| c. | Establish site VP/Plant Manager luncheon meetings with first-line supervisors  |            |           |
| d. | Conduct Supervisor Communications Training for site Supervisors as a model of the supervisor training course.  |            | 2/28/94   |
| e. | Conduct employee meetings with Entergy Operations CEO  |            | 10/22/93A |

- |    |  |            |          |
|----|--|------------|----------|
| 4. | Establish regular external communications.                           | T. Dickson | 11/1/93A |
| a. | Coordinate media relations with plant management/GSU media spokesmen |            |          |
| b. | Establish news bulletin process                                      |            |          |
| c. | Continue community relations, tours and public affairs activities    |            |          |

#### 2.1.5 Regulatory Communications Plan

- |    |   |             |           |
|----|---|-------------|-----------|
|    |   | J. Fisicaro |           |
| 1. | Develop policy guidance for the staff on expectations for communications with the NRC.  | J. Fisicaro | 11/15/93A |
| 2. | Develop guidance for routine communications with the NRC including expected subjects, periodicity, and expected level of interaction. | D. Lorfing  | 11/30/93A |
|    | •Resident   |             |           |
|    | •NRR  |             |           |
|    | •Region IV  |             |           |



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|----|--|-------------|----------|
| 3. | Review and improve communications vehicles to assure that external and internal commitment due dates are high-lighted to management to assure commitment dates are met.  | D. Lorfing  | 12 30 93 |
| 4. | Establish an effective technical and management review process for licensing submittals to assure that each document is reviewed for technical quality, is complete, accurate and appropriately addresses and resolves the issue, and accurately reflects management's position. | J. Fisicaro | 12/31/93 |
| 5. | Evaluate the LER process to provide more timely and quality submittals. (This item will be accomplished in conjunction with Section 5.3 on root cause and item 4 of Section 2.1.5).  | O. Bulich   | 2/1/94   |
| 6. | Review licensing procedures to ensure that the items identified in Section 2.1.5 are implemented.  | O. Bulich   | 3/1/94   |

2.2 Title of Program: Improving the Work-Control Process  
Executive Sponsor: M. Sellman  
River Bend Goal Supported: High Operating Performance

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## 2.2 Improving The Work-Control Process

### Issue Description

One of the principal measures of the station's performance is the material condition of the facility, as measured by maintenance backlogs, high priority Maintenance Work Orders, and operator work-arounds. These indicators are affected by the ability to complete maintenance work, which will be improved through improving the work control process. The station work-control process should be improved and streamlined to improve the productivity of maintenance work and allow more timely completion of work.

### Description of Program:

Improve the work-control process at River Bend by centralizing responsibility for controlling plant work under a Work Management Center, completing near-term improvements to streamline the Maintenance Work Order (MWO) process, and improving the usability of and adherence to the maintenance priority system and plant schedules.

### Program Objectives:

1. Assign responsibility and accountability for controlling plant work to Operations to ensure that required work is properly prioritized, planned, scheduled, and completed to support improvement in plant material condition.
2. Improve the MWO process to allow more efficient use of resources.
3. Develop and use plant integrated schedules to drive plant maintenance, testing, and support activities to assure that the required work gets done.

### Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
2.2.1 Work Management Center	J. Venable	
1. Establish a Work Management Center (WMC) outside the main control room.	J. Venable	9/15/93A

- |                                     |  |            |           |
|-------------------------------------|--|------------|-----------|
| 2.                                  | Designate personnel from plant staff organizations (Operations, Maintenance, Engineering, etc.) to staff the WMC.  | J. Venable | 9/30/93A  |
| 3.                                  | Gain consensus among affected departments and publish written guidelines that document the scope and intent of the Work Management Center and Assign responsibilities regarding management of work activities within the center. | J. Venable | 11/15/93A |
| 4.                                  | Conduct performance analysis to assess effectiveness of the work management center during initial operation.   | J. Venable | 12/15/93A |
| 5.                                  | Incorporate lessons learned from performance analysis and other work control evaluations into written guidelines.  | J. Venable | 1/15/94   |
| <b>2.2.2 Streamline MWO Process</b> |  | E. Ewing   |           |
| 1.                                  | Modify existing procedures to allow selective, corrective maintenance during PM activities.  | J. Simpson | 11/15/93A |
| 2.                                  | Implement selected short-term recommendations from INPO Work Management Assist visit.  | E. Ewing   | 12/15/93A |
| 3.                                  | Implement selected short-term recommendations from UESC maintenance evaluation.  | E. Ewing   | 12/15/93A |
| 4.                                  | Complete the Quality Action Team for Work Control and implement near-term changes.   | J. Simpson | 1/31/94   |

### 2.2.3 Simplify Priority System and Integrate Scheduling

E. Ewing

- |    |  |              |           |
|----|--|--------------|-----------|
| 1. | Establish Maintenance Work Order Review (MWOR) Group to prioritize those MWOs not already designated Priority 1 by Operations Department.  | J. Venable   | 9/27/93A  |
| 2. | Fully implement the Integrated Management Schedule based on a 12-week rolling system schedule (RSS) concept using the surveillance test and preventive maintenance schedules as the basis. Incorporate corrective (non-routine) maintenance, post-maintenance tests, and modifications into pre-defined maintenance windows. | S. Radebaugh | 9/30/93A  |
| 3. | Simplify the MWO tracking and prioritization systems by establishing written guidelines and conditions for classifying each priority level of MWO.   | T. Fredieu   | 11/30/93A |
| 4. | Initiate weekly reports to management detailing schedule deviations from previous week and explain why:<br><br>a. Items that were scheduled but not started<br><br>b. Items that were scheduled and started but not completed  | T. Fredieu   | 11/30/93A |
| 5. | Implement a rolling 3-day schedule (POD) and a 7-day schedule, controlled by the rolling system schedule.  | T. Fredieu   | 12/1/93A  |

2.2.4 Improve Parts Support To  
Maintenance

R. Frayer

1. Help Desk/Problem Trending

R. Frayer

a. Establish a Material Help Desk  
near Maintenance Department

R. Frayer

9/20/93A

b. Establish a method to trend  
parts problems and root causes  
and delivery due dates to  
support MWOs

R. Frayer

9/20/93A

c. Temporarily reorganize the  
department to focus on parts  
problems and root causes

R. Frayer

9/23/93A

d. Establish a steering council to  
review workloads and prioritize  
problem solutions

R. Frayer

9/23/93A

2. Reduce Part Issuance Delays by  
developing a method to prove  
parts as part of the staging/  
pledging process (Ref 7.4.2).

R. Hebert

3/1/94

3. Material Quality Action Team

a. Complete the QAT for Material  
Configuration Control and  
submit changes for  
manager review/approval

J. Hill

12/5/93A

b. Implement near-term changes  
from the QAT

J. Hill

2/14/94

c. Develop a plan for implementation  
of long-term recommendations  
from the "should map" process  
of the QAT

J. Hill

2/28/94

**2.3 Title of Program:**

Improving the Plant Modification Process

**Executive Sponsor:**

T. Leonard

**River Bend Goal Supported:**

High Operating Performance

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**2.3 Improving The Plant Modification Process**

**Issue Description**

One of the principal measures of the station's performance is the material condition of the facility. To support a high state of material condition and plant reliability, engineering processes must be in place to resolve design and engineering issues effectively and efficiently. The plant modification process should be improved and streamlined to allow more timely completion of engineering and design work to reduce operations and maintenance work-arounds and to enhance equipment reliability.

The plant modification process is one of three specific processes that need near-term improvement: the maintenance work-control process to increase maintenance productivity and effectiveness; the modification process to assure that plant operations and maintenance are supported through elimination of work-arounds and impediments; and routine management processes that address expectations, ownership, and teamwork.

**Description of Program:**

Improve the plant modification program to support improvement in plant material condition, eliminate operations and maintenance work-arounds, and eliminate unnecessary administrative burdens to operations, maintenance, and engineering.

**Program Objectives**

1. Implement the short-term recommendations of the Design Change Quality Action Team.
2. Implement an effective minor modification process.
3. Work off near-term minor modifications, as prioritized, to support plant operations.



Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
2.3.1 Modification Control QAT, Short-Term Recommendations:	M. Stein	
1. Improve the use of full size drawings and adjust the process as appropriate.	M. Stein	10/26/93A
2. Streamline the minor modification process. Issue new procedure or revisions as appropriate to implement changes.	M. Stein	3/18/94
2.3.2 Complete the Highest Priority Minor Modifications	C. Miller	
1. Develop a list of modification needs through ongoing solicitation of plant staff organizations.	C. Miller	9/5/93A
2. Have the Assistant Plant Manager of Maintenance evaluate and prioritize list.	S. Radebaugh	9/10/93A
3. Obtain System Engineering and Operations approval of requested modifications.	J. Schippert/ J. Venable	10/15/93A
4. Assign five Engineering personnel to Minor Modification Requests (MR) Project for Design Applications	M. Stein	10/27/93A
5. Publish prioritized minor MR list to responsible personnel	C. Miller	11/10/93A
6. Monitor progress of assigned Engineering tasks.	C. Miller	Ongoing
7. Incorporate planned minor modifications into the 12 week maintenance schedule	C. Miller	12/10/93A

3.0 Title of Program: Strategic Planning  
Executive Sponsor: K. Suhrke  
River Bend Goal Supported: All

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### 3.0 Strategic Planning

#### Issue Description

For the past several years, various lists and methods have been used to identify and focus efforts on long-range issues critical to achieve overall success. The station is currently developing a Master Issues List Program to approve, schedule and fund important station projects. However, the use of these strategic planning tools throughout the organization, as well as the discipline required to follow through and implement the defined actions, was not always effectively achieved. The need to develop the Long Term Performance Improvement Plan and have that plan become the planning and monitoring tool for the future is a near-term, critical performance issue.

#### Description of Program:

Develop a Near-Term Performance Improvement Plan; conduct an independent assessment and validation of plan actions and root causes of performance issues; expand and improve the Master Issues List (MIL) Program; and integrate these activities to develop the River Bend Long Term Performance Improvement Plan.

#### Program Objectives:

1. Develop a Near-Term Performance Improvement Plan to improve station performance and provide a transition to the station Long Term Performance Improvement Plan.
2. Validate plan actions and root causes of performance issues through parallel, independent assessment.
3. Improve the process for developing and complying with an integrated, strategic approach to station business planning.
4. Prepare Long Term Performance Improvement Plan. Provide a comprehensive framework for management and staff to achieve station performance objectives and ensure proper tools are used to establish station performance objectives and plans. Assure that the station staff is sufficiently involved in the development of the Long Term Plan to promote a high level of ownership and accountability.

Action Plan:

<u>Actions/Major Activities/Deliverables</u>		<u>Responsibility</u>	<u>Projected Date Complete</u>
3.1	Near-Term Performance Improvement Plan	D. Derbonne	
1.	Identify near-term performance areas	J. Curless	8/1/93 A
2.	Draft Plan Objectives, Strategies and Performance Measures	J. Curless	9/8/93 A
3.	Issue Draft Performance Improvement	J. Curless	9/15/93 A
4.	Prepare, Revise and Issue Action Plans	Sponsors	10/1/93A
5.	Establish Performance Measure Report for Near-Term Performance Improvement Plan	D. Derbonne	10/31/93A
6.	Revise Improvement Plan per Validation Process, if necessary	D. Derbonne	10/31/93A
7.	Brief Senior Management on Near-Term Performance Improvement Plan	J. McGaha	11/30/93A
8.	Manage Completion of Action Plans	D. Derbonne	As Stated in Action Plans
3.2	Issue Validation	D. Derbonne	
1.	Project Initiation	J. Curless	8/30/93A
2.	Complete Document Reviews	J. Curless	9/20/93A
3.	Complete Station Interviews	J. Curless	9/24/93A
4.	Complete Systematic Assessment	J. Curless	10/1/93A
5.	Integrate results with Near-Term Performance Improvement Plan	J. Curless	10/8/93A

6.	Input to Long Term Plan	T. Murphy	12/15/93A
3.3	Improve Master Issues List (MIL)	D. Derbonne	
1.	Hold High Performance Team meeting to identify processes & process owners	T. Murphy	6/1/93A
2.	Initial consolidated list of projects	P. Freehill	7/93A
3.	Issue Strategic Planning Procedure including Prioritization Process	D. Andrews	8/20/93A
4.	Issue 1993-Cycle 5/RF-5 MIL Approved Project List	P. Freehill	10/1/93A
5.	Incorporate Resource Loaded NTPIP into MIL	P. Freehill	11/10/93A
6.	Budget Submittal uses MIL as basis	P. Holt	10/15/93A
7.	Begin monthly progress reporting of MIL	D. Derbonne	10/31/93A
8.	Integrate MIL work items into applicable Level II Schedules (eg. Quarterly Maintenance Schedule)	P. Freehill	11/30/93A
9.	Develop an Issue Management process for emerging issues	D. Derbonne	2/15/94
10.	Initial Quarterly review of MIL by Strategic Planning Committee	S. Radebaugh	2/15/94
3.4	Long Term Performance Improvement Plan Integration	T. Murphy	
1.	Review the Entergy Business Plan Methodology	T. Murphy	9/30/93A

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|----|---|-------------|----------|--|
| 2. | Develop Planning and Budget Assumptions (Environmental Assessment)  | T. Murphy   | 11/3/93A |  |
| 3. | Conduct Management Workshops to:<br>- Develop Strategy and Objectives<br>- Agree on Critical Success Factors<br>- Develop Plan Objectives, Strategies, Performance Indicators | T. Murphy   | 11/8/93A |  |
| 4. | Develop Long Term Action Plans  | J. Fisicaro | 2/15/94  |  |
| 5. | Submit Long Term Plan for final review and approval   | J. Fisicaro | 2/15/94  |  |
| 6. | Communicate Long Term Plan to site Personnel  | J. Fisicaro | 2/28/94  |  |

*4.0 Title of Program:* Improve Station Work Practices  
*Executive Sponsor:* M. Sellman  
*River Bend Goal Supported:* High Regulatory Performance

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#### 4.0 Work Practices

##### Issue Description

Work practices refer to employee effectiveness in controlling plant configuration and evolutions, as well as maintenance and other support activities, troubleshooting, and testing under the general cognizance of the Operations, Maintenance and Modification and Construction Departments. This issue involves enhancing the station work practices and control of work to assure that work is performed in accordance with established plans, schedules and procedures that are technically correct, easily understood, and are consistently used. Teamwork in the completion of operations and maintenance activities has not always been effective. Further improvement is needed from workers in providing feedback on improving procedures, work packages, and techniques.

##### Description of Program:

This program enhances the station work practices and control of work to assure that work is performed in accordance with established plans, schedules, and procedures that are technically correct, easily understood, and consistently used. Initiatives include setting management expectations for supervisors, improving work package and procedure compliance, enhancing management of high-risk activities, improving plant chemistry and radiological controls, and clarifying the roles of design and system engineers with respect to maintenance and operations.

##### Program Objectives:

This program initiative reinforces management expectations that work is properly planned, training is adequate to the task, support from interfacing groups is provided, supervisors are involved in monitoring and coaching workers to pre-defined levels of performance requirements; jobs, tasks, and evolutions are completed correctly the first time. Objectives include:

1. Establish supervisory expectations for plant workers.
2. Reinforce expectations for work package and procedure compliance and promote continuous improvement in the work documentation.
3. Improve the management of high-risk activities to minimize the potential for plant transients during maintenance and testing activities.
4. Improve communications of management expectations for plant chemistry control.



5. Clarify the roles of design and system engineers with respect to maintenance and operations.
6. Reinforce radiological expectations to minimize radiological control problems

Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
4.1 Expectations and Management Leadership, Coaching	J. McGaha	
1. Hold communications meetings with RBS personnel to reinforce management expectations.	J. McGaha	9/24/93A
2. Establish methods for supervision to increase their time in direct observation of work activities.	G. Kimmell	11/15/93A
3. Update, gain Plant Manager Approval, and issue a revised training program for all supervisory personnel to ensure that management expectations regarding leadership, coaching, accountability and setting the proper example to the worker are consistently applied and understood.	S. Brawner	2/15/94
4. Review the ACAD-90-010 Maintenance Supervisor Training Program with the Assistant Plant Manager of Maintenance, update and issue a revised program if required.	R. Findish	12/31/93
5. Develop a program, similar to Mechanical Maintenance, for Supervisor Training using ACAD 90-010, "Guidelines for Maintenance Supervisor Selection and Development for (Chemistry and Radiation Protection).	P. Le Fort	3/30/94

#### 4.2 Reinforce Procedure and Work Package Adherence

E. Ewing

1. Conduct small group meetings with all maintenance workers and supervisors to stress procedure compliance, management expectations concerning job plans, procedures and work practices. Periodic meetings will be held to reemphasize these Standards and Expectations. S. Radebaugh Briefing CompleteA
2. Implement Near Term Performance Improvement Observation program which will provide oversight and in the field coaching on items such as procedure adherence. D. Clymer 9/20/93A
3. The worker feedback process to the Planner will be enhanced by including a feedback form in selected MWO's with a signoff step requiring completion and returning the form to Planning.
  - a. The feedback form will be revised to include disposition of comments back to the workers. J. Simpson 12/15/93A
  - b. Critiques will be performed of major jobs with Planners and craft in attendance. J. Simpson 12/15/93A
4. Increased feedback to Planning will be provided by assigning workers to the Planning Department on a rotating basis. E. Ewing 12/1/93A

#### 4.3 Improve Management of High Risk Work Activities

E. Ewing

1. Brief all maintenance workers on the need for a questioning attitude and attention to detail during high-risk activities. Periodic reinforcement with maintenance craft will be undertaken via toolbox meetings.

S. Radebaugh

BriefingsA  
Completed

2. Revise "Red Sheet" program to ensure an effective review for high risk categories.

T. Fredieu

11/15/93A

3. Clarify the roles and responsibilities of Maintenance, Operations, Modification and Construction, and System Engineering personnel, with respect to high risk activities.

E. Ewing

11/15/93A

4. Implement a program to critique high risk activities for lessons learned.

E. Ewing

11/15/93A

#### 4.4 Improve Plant Chemistry Control

B. Burke

1. Chemistry will implement the chemistry monitoring program and keep plant operations informed of system chemistry transients and abnormal chemistry trends.

B. Burke

10/15/93A

2. Develop with chemistry input, procedure which provides operations personnel appropriate guidance to comply with the EPRI Normal Water Chemistry guidelines.

J. Venable

12/31/93

3. Develop and conduct additional training for licensed operations personnel which will sensitize them to the impact of abnormal

L. Woods

4/15/94

chemistry on plant systems.

#### 4.5 Clarify Design and System Engineering Responsibilities and Expectations

##### 4.5.1 Clarify System Engineering Responsibilities and Expectations J. Schippert

- |    |  |              |           |
|----|--|--------------|-----------|
| 1. | Establish a high performance team to define the role of the System Engineer.                                       | J. Schippert | 11/15/93A |
| 2. | Revise TSP-0033.   | J. Schippert | 12/31/93  |
| 3. | Conduct briefings on roles and responsibilities when working with System Engineers (revised TSP-0033) and vendors. |              |           |
|    | a. Maintenance workers and foreman   | E. Ewing     | 1/31/94   |
|    | b. Operations workers and Supervisors  | J. Venable   | 1/31/94   |
|    | c. Chemistry workers and Supervisors   | B. Burke     | 1/31/94   |
|    | d. Design Engineering workers and Supervisors  | J. Hamilton  | 1/31/94   |
|    | e. Modification and Construction workers and Supervisors   | S. Radebaugh | 1/31/94   |
| 4. | Conduct briefings with System Engineering on their roles and responsibilities per TSP-0033.                        | J. Schippert | 1/31/94   |

4.5.2 Clarify Design Engineering Responsibilities and Expectations

J. Hamilton

1. Establish a high performance team composed of System and Design Engineering, Maintenance and Operations to review the role and interfaces of Design Engineering.

J. Hamilton

11/15/93A

2. Revise Design Engineering standards and expectations.

J. Hamilton

2/15/94

3. Revise RBNP-02.

J. Hamilton

2/28/94

4. Conduct briefings with Design Engineers and customers on roles and responsibilities of Design Engineering.

M. Stein/  
J. Miller

2/28/94

4.6 Reinforce Radiological Expectations of Plant Personnel

W. Odell

1. Perform an Alara Program assessment using Entergy corporate Health Physics.

W. Odell

11/20/93A

2. Review and simplify rad worker handbook.

W. Odell

2/28/94

3. Develop rad worker supervisor handbook.

W. Odell

2/28/94

4. Review Policy Statement/Management Directive pertaining to Radiation Protection Violations in a tool box type session (PS/MD-044).

W. Odell

3/31/94

5. Review Standard and Expectations pertaining to radiation worker work practices, number 2. (\*To be completed by first line supervisors

W. Odell

3/31/94

in a tool box type session).

6. Review Standard and Expectation  
pertaining to ALARA Program.  
(\*To be completed by  
first line supervisors in a tool  
box type session).

W. Odell

3.31.94



**5.0 Title of Program:** Effective Corrective Action  
**Executive Sponsor:** J. Fisicaro  
**River Bend Goal Supported:** High Regulatory Performance

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## 5.0 Effective Corrective Action

### Issue Description

An effective corrective action process is needed to identify problems, determine problem significance, determine root cause, determine corrective action to prevent recurrence, and assure proper action is taken to track and effect closure of corrective actions.

### Description of Program:

This program contains the River Bend corrective action processes for identifying and prioritizing currently open corrective actions for completion, improving the identification process for plant problems, upgrading the quality and effectiveness of the root-cause analysis process, streamlining the Condition Report (CR) process, clarification of independent assessment functions, and enhancing the audit and surveillance program.

### Program Objectives:

The program objectives associated with improving the timeliness and effectiveness of the corrective action process including the following:

1. Identify, prioritize, and complete the most significant open corrective actions to reduce the current backlog.
2. Clarify and improve the methods for identification of plant problems to assure that significant problems are determined and resolved in a timely manner.
3. Enhance the root-cause analysis process to focus resources on the most significant problems and prevent problem recurrence.
4. Streamline the CR process to reduce administrative burden.
5. Clarify the roles and responsibilities of the station organizations responsible for independent assessment to assure that problems are correctly identified, management is appropriately notified, and timely and appropriate actions are taken to improve station performance.
6. Enhance the effectiveness of the station audit/surveillance program to provide more performance based audits/surveillance and problem identification.
7. Evaluate the station "50.59 Process" for effective implementation.

# Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
<b>5.1 Focus Resources on Significant Corrective Actions</b>	<b>J. Leavines</b>	
1. Develop a consolidated list of outstanding corrective action documents.	J. Leavines Post 1991 Pre 1991	10/30/93A 3/31/94
2. Set criteria for selection of significant conditions adverse to quality and apply to consolidated list. Prioritize those documents meeting the criteria.	J. Leavines Post 1991 Pre 1991	10/31/93A 4/30/94
a. For significant issues adverse to quality, verify operability requirements are adequate.	J. Leavines Post 1991 Pre 1991	11/15/93A 3/31/94
3. Establish a schedule and assign responsibility for working on root cause and corrective action for the priority list and gain consensus among affected departments. Also establish a goal for reduction of the priority list, and monitor progress.	J. Leavines Post 1991 Pre 1991	10/31/93A 4/30/93
4. Review the balance of the original list for further work or cancellation.	J. Leavines Post 1991 Pre 1991	11/30/93A 5/30/94
<b>5.2 Improve Problem Identification</b>	<b>J. Leavines</b>	
1. Issue change notice to RBNP-030 to assure nonconformances and significant adverse conditions are identified	J. Leavines	10/22/93A
2. VP letter from J. R. McGaha regarding policy for identification of problems/concerns.	J. Fisicaro	1/31/94

- |   |   |             |           |
|---|---|-------------|-----------|
| 3.  | Develop a procedure for the operating experience group to evaluate the corrective action database both for identifying trends and confirming corrective action effectiveness.           | D. Wells    | 12/31/93  |
| 4.  | Conduct a review of the Corrective Action Process previously employed to assure the NTPIP addresses all weaknesses.   | J. Fisicaro | 12/31/93A |
| 5.  | Conduct a review of River Bend Station databases containing corrective action information (CR, HPES, etc.) Evaluate date for incorporation into the corrective action trending program. | D. Wells    | 3/31/94   |
| 6.  | Conduct a review of nuclear safety concerns program.  | J. Fisicaro | 2/28/94   |
| 5.3 Improve Accuracy of Root-Cause Determinations |   | J. Leavines |           |
| 1.  | Establish an interim process for screening CR's for significant conditions adverse to quality that will require a root cause.   | J. Leavines | 10/6/93A  |
| 2.  | Establish a core group of personnel familiar with current industry standards/philosophy who perform or lead a team performing root-cause analysis for significant problems.             | J. Leavines | 10/6/93A  |
| 3.  | Establish an interim process for management review and approval of root causes and associated corrective action and the schedule for completion of the corrective action.               | J. Leavines | 10/6/93A  |

- |  |  |             |           |
|--|--|-------------|-----------|
| 4.   | Revise appropriate procedures include the above actions and address expectations to assure proper problem identification and incorporate into a final corrective action process. | J. Fisicaro | 12/31/93  |
| 5.   | Evaluate current root cause training to determine if techniques cover human performance & component failure analysis techniques.   | J. Leavines | 12/31/93A |
| 5.4. Streamline the Condition Report Process |  | J. Leavines |           |
| 1.   | Implement the initial recommendations of the Key Process Management Team (KPMT) for Corrective Action/Root Cause Analysis for an ideal process.                                  | J. Leavines | 10/6/93A  |
|  | a. Establish interim screening process as approved by the KPMT.  | J. Leavines | 10/6/93A  |
|  | b. Establish core group to lead personnel in root cause determination for significant problems.  | J. Leavines | 10/6/93A  |
|  | c. Establish management review process to approve proposed corrective action and schedule.   | J. Leavines | 10/6/93A  |
| 2.   | Revise RBNP-030 to reflect the changes and submit to affected organizations for review.  | J. Leavines | 12/31/93  |
| 3.   | Participate in the check and adjust process by submitting process measures to the KPMT as required and adjusting the process in conjunction with the KPMT.                       | J. Leavines | 12/31/93A |
| 5.5  | Clarify Independent Assessment Roles and Responsibilities  | C. Maxson   |           |

- |     |  |               |           |
|-----|--|---------------|-----------|
| 1.  | Prepare a matrix description and define expectations of independent assessment functions, roles, and responsibilities.   | C. Maxson     | 11/15/93A |
| 2.  | Conduct an analysis to determine the improvements needed to assure that assessment results are effectively translated into corrective actions.   | C. Maxson     | 11/30/93A |
| 3.  | Prepare the necessary administrative changes to clarify the expectations for the independent assessment functions.   | C. Maxson     | 2/28/94   |
| 5.6 | Enhance the Audit and Surveillance Program   | K. Giadrosich |           |
| 1.  | Coordinate the Quality Assurance Audit/Surveillance Schedule to provide more performance based audits/surveillances and problem identification.  | K. Giadrosich | 11/31/93A |
| 2.  | Review the Audit/Surveillance Program for potential improvement areas. Assure a focus on performance based objectives and production of effective reports which are "Customer" oriented. | K. Giadrosich | 12/10/93A |
| 3.  | Schedule and conduct Performance Base Training for Audit and Surveillance Engineers.   | B. Biggs      | 3/30/94   |
| 4.  | Two Auditors to conduct Combined Utility, Audit Group/ Joint Utility Audit Group (CUAG/JUAG) Audits.   | B. Biggs      | 3/1/94A   |
| 5.7 | Evaluate the River Bend Station 50.59 Process  |               |           |
| 1.  | Evaluate the 50.59 process to  | L. Dietrich   | 1/31/94   |

ensure program ownership and  
proper implementation.



6.0 Title of Program: Human Performance Effectiveness  
Executive Sponsor: M. Sellman  
River Bend Goal Supported: All

---

## 6.0 Human Performance Effectiveness

### Issue Description

River Bend has recently experienced a number of significant personnel errors attributable to human performance effectiveness. Human performance effectiveness is a function of personal accountability, proper supervision, training, and procedures in the working environment. People must have all necessary information to perform their tasks correctly.

Information can be provided through a balance of direct supervision, training, and procedures. People need to be trained, not only in the processes and technology they are to apply in their work, but also in the fundamentals of safety, performance expectations, attention to detail, day to day excellence, and effective use of resources in their work and in problem solving.

The organization needs to be equipped to accept change as a way of improving performance and as a way of becoming customer-and results-oriented. Line managers must be actively involved in the identification, analyses, and correction of the root causes of human performance errors. Management must establish standards and expectations, become active listeners, encourage feedback from all employees, and coach first-line supervisors to adopt a monitoring and coaching role with their people.

### Description of Program:

These initiatives have been established to improve the effectiveness of the performance of station personnel. The initiatives systematically address personnel errors; enhance supervision, training, and procedure effectiveness; and establish expectations and monitor human performance.

### Program Objectives:

The human performance effectiveness initiatives will reduce the incidence of personnel-error related events through the following program objectives:

1. Address short-term human performance needs and implement an observation program.
2. Improve coaching and the use of the STAR program.
3. Reduce the backlog of plant procedure changes and improve the change notice process.

4. Provide clear management expectations for human performance

Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
<b>6.1 Management Support and Involvement</b>	J. Schippert	
1. Implement stand-down to emphasize management's standard and expectation for human performance	P. Graham	8/14/93A
2. Develop and implement interim work control plan to reduce human errors	J. Schippert	8/17/93A
3. Develop and implement 30 day observation program	J. Schippert	8/16/93A
4. Verify that current observed human performance is at a level commensurate with safe and reliable power operation	J. Schippert	8/24/93A
5. Develop and implement near term performance improvement observation plan to transition to final observation plan in the CBP (See program 4.0)	J. Schippert	9/20/93A
6. Implement improvements in root cause analysis (see 5.3)	J. Fisicaro	12/31/93
<b>6.2 Supervision and Training to Achieve Performance Results</b>	W. Beck	
1. Review STAR program with Plant Staff	J. Schippert	8/20/93A
2. Implement coaching training and complete instruction for all plant staff first line supervisors who report directly to the plant manager (see 2.1.3.1C).	S. Brawner	12/31/93

- |    |  |           |          |
|----|--|-----------|----------|
| 3. | Conduct formal evaluation of the STAR training program | C. Maxson | 12/31/93 |
|----|--|-----------|----------|

### 6.3 Procedure Change Action Plan

T. Murphy

- |    |   |                                  |           |
|----|---|----------------------------------|-----------|
| 1. | Establish departmental QATs for procedure improvement.  | K. Suhrke                        | 10/21/93A |
| 2. | Establish and communicate standards for level of detail in procedure content.                     | T. Murphy                        | 4/15/94   |
| 3. | Improve the effectiveness of new procedure and procedure change reviews by user department.       | T. Murphy                        | 3/1/94    |
| 4. | Reduce the Change Notice backlog and report and track status of identified procedure weaknesses.  | Department Managers<br>T. Murphy | 4/30/94   |
| 5. | Implement procedure improvements in Records Management Process.                                   | T. Murphy                        | 3/30/94   |
| 6. | Revise or change procedures with correct responsibility titles (as organization appears 12/1/93). | T. Murphy                        | 1/31/94   |

### 6.4 Establish Clear Goals and Expectations on Human Performance

J. Schippert

- |    |   |              |           |
|----|---|--------------|-----------|
| 1. | Conduct meetings to communicate the standard for error free performance with plant staff. | J. Schippert | 8/16/93A  |
| 2. | Identify key human performance standards and expectations.                                | J. Schippert | 10/29/93A |
| 3. | Provide briefings on the application of key human performance standards and expectations. | J. Schippert | 12/31/93  |

7.0 Title of Program: Engineering Support  
Executive Sponsor: T. Leonard  
River Bend Goal Supported: All

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## 7.0 Engineering Support

### Issue Description

River Bend is committed to providing engineering support to the station in a timely and cost-effective manner. This includes responses to station requests as well as maintaining the station engineering documentation and databases current. Improvements are required in the near term to address the backlog of engineering documentation updates, engineering support requests, and engineering deficiency and condition reports.

The Engineering Support initiative focuses on near-term strategies to achieve progress in reducing the backlogs and to determine the longer-term process improvements required to continue to manage the workload successfully.

### Description of Program:

This program includes the following initiatives:

1. Consolidate, prioritize, and complete high-priority engineering backlog items to improve plant performance by minimizing operator and maintenance work-arounds.
2. Improve the availability and quality of documentation to perform work and to improve plant operations support.
3. Enhance the management systems for the control of engineering workload to assure backlogs remain at acceptable levels.

### Program Objectives:

The objectives of this effort include the following:

1. Drawing upgrade project: incorporate near-term, high priority drawing changes.
2. Vendor technical manuals: incorporate near-term, high priority changes to vendor manuals.
3. Plant support open items: reduce the open items in the following areas to improve plant support:
  - a. Maintenance Work Order information

- b. Condition Reports
- c. Close-out of Field-Work MR's
- d. Unprocessed NSSS drawings
- e. Procurement requisitions
- 4. Design document usability and accuracy: improve the following design documentation-
  - a. Vendor Skid Equipment
  - b. Engineering bill of materials
  - c. Engineering Operability memorandum
  - d. Loop Calibration Reports
- 5. Fire Protection open items: resolve open items associated with fire hazards analysis, structural steel fireproofing, and the penetration seals.
- 6. Engineering work management.

**Action Plan:**

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
<b>7.1 Drawing Upgrade Project</b>	<b>T. Crouse</b>	
1. Establish organization and appoint Project Manager and Lead Review Engineer.	T. Crouse	10/1/93A
2. Resources fully mobilized to support drawing changes.	C. Jones	11/15/93A
3. Issue schedules of near-term, high priority drawing changes based on input from engineering, operations, and maintenance.	C. Jones	11/15/93A
4. Complete the near-term, high priority drawings as determined by Operations and Maintenance.	C. Jones	3/31/94
<b>7.2 Vendor Technical Manuals</b>	<b>T. Crouse</b>	
1. Establish Organization.	T. Crouse	6/93A
2. Resources fully mobilized to support Vendor Manual changes.	T. Crouse	8/93A
3. Issue project procedures.	A. Soni	10/1/93A



- |    |   |                        |           |
|----|---|------------------------|-----------|
| 4. | Issue a schedule of near-term, high priority upgraded vendor manuals based on input from plant staff. | A. Soni/<br>J. Simpson | 11/30/93A |
| 5. | Review prototype vendor manual product to ensure that it meets the need of the end user.              | J. Simpson             | 12/15/93A |
| 6. | Complete the near-term, high priority vendor manuals as determined by Plant Staff.                    | B. Schoemer            | 4/30/94   |
| 7. | Establish Vendor Manual Maintenance Program.  | C. Mermigas            | 3/31/94   |

### 7.3 Reduce Engineering Backlog

#### 7.3.1 Maintenance Work Orders

- |    |  |                           |               |
|----|--|---------------------------|---------------|
| 1. | Reduce the number of open MWOs by expediting the processing of Parts Verification Requests (PVRs) generated to complete a MWO and update the 5 X K screen in PMS to reflect the PVR response. This activity will eliminate current backlog (eight items as of 10/6/93) of PVR's. | A. Soni<br><br>C. Beaudet | <br>11/20/93A |
| 2. | Reduce the number of open MWOs by expediting the processing of Vendor Information Requests (VIRs) generated to complete a MWO. This activity will eliminate current backlog of VIRs (35 items as of 10/21/93).   | B. Schoemer               | 3/30/94       |
| 3. | Establish a method for prioritization, tracking and timely disposition of emergent PVR's that affect material condition. This will ensure backlogs of PVR's are minimized.   | C. Beaudet                | 11/30/93A     |



4. Establish a method for prioritization, tracking and timely disposition of emergent VIR's that affect material condition. This will ensure backlogs of VIR's are minimized.

B. Schoemer

12 30 93

#### 7.3.2 Condition Reports

R. Stakenborghs

1. Resources mobilized for identification and prioritization of open CRs.

R. Stakenborghs

11/30/93A

2. Issue a schedule of near-term high-priority CR's based on input from plant staff

R. Stakenborghs

12/15/93A

3. Establish a periodic review process including an aging criteria that outstanding CR's do not adversely offset plant operability issues.

R. Stakenborghs

1/31/94

4. Complete the Near Term high priority CRs based on input from plant staff

R. Stakenborghs

4/30/94

#### 7.3.3 Close out of Field-Work MRs

G. Javaherian

1. Issue Production schedule for closeout of selected outstanding Modification Requests (MRs) based on plant staff prioritization.

G. Javaherian

11/15/93A

2. Mobilize Resources.

G. Javaherian

11/25/93A

3. Close out the highest priority field work MR's based on plant staff prioritization

G. Javaherian

3/31/94

#### 7.3.4 Unprocessed NSSS Drawings

C. Mermigas

1. Provide plan for resolution for NSSS drawing problems.

C. Mermigas

10/20/93A

### 7.3.5 Procurement Engineering Requisitions

- |  |                                     |           |
|--|-------------------------------------|-----------|
|  | A. Soni                             |           |
| 1. Identify near-term, high priority procurement requisitions.                                     | R. Hebert                           | 11/20/93A |
| 2. Mobilize resources.   | A. Soni                             | 12/1/93A  |
| 3. Complete procurement requisitions given highest priority by Procurement Services and Materials. | A. Soni                             | 4/30/94   |
| 4. Perform Root Cause for backlog and establish action plan to prevent recurrence.                 | R. Ludwig<br>R. Hebert<br>T. Bagbey | 3/30/94   |

### 7.4 Improve the Usability and Accuracy of Design Documents

#### 7.4.1 Upgrade P&IDs for Vendor Skids

- |   |             |           |
|---|-------------|-----------|
|   | A. Soni     |           |
| 1. Establish with Engineering, Maintenance, and Operations, the near-term, high priority P&IDs requiring additional mark numbers. | A. Soni     | 10/15/93A |
| 2. Resources Mobilized to upgrade vendor skid P&ID's.   | B. Schoemer | 10/29/93A |
| 3. Complete near-term, highest priority vendor skid P&IDs.  | A. Soni     | 3/31/94   |

#### 7.4.2 Engineering Bill of Materials

- |  |         |           |
|--|---------|-----------|
|  | A. Soni |           |
| 1. Determine near-term maintenance needs and issue schedule. | A. Soni | 9/30/93A  |
| 2. Mobilize resources  | A. Soni | 11/30/93A |

- |   |   |             |           |
|---|---|-------------|-----------|
| 3.  | Software upgrade to improve efficiency of Engineering Bill of Materials.  | B. Beck     | 3/20/94   |
| 4.  | Deliver per schedule near-term maintenance needs.   | R. Ludwig   | 3/31/94   |
| 7.4.3. Revalidate Engineering Operability Memos |   | C. Mermigas |           |
| 1.  | Conducted a review of engineering correspondence to determine if any correspondence identified operability evaluations for plant systems or components. | C. Mermigas | 6/93A     |
| 2.  | Of those reviewed, 12 memoranda were converted to Engineering's Operability Tracking System (SDRD appendices).  | C. Mermigas | 8/93A     |
| 7.4.4 Loop Calibration Reports (LCRs)           |   | L. Brescher |           |
| 1.  | Establish LCR priorities with Maintenance.  | L. Brescher | 10/31/93A |
| 2.  | Resources mobilized.  | L. Brescher | 11/30/93A |
| 3.  | Provide schedule of completion  | L. Brescher | 12/15/93A |
| 4.  | Complete the near-term, high priority LCRs as determined by maintenance prioritization.   | L. Brescher | 4/30/94   |
| 5.  | Establish a method for prioritization, tracking and timely incorporation of outstanding changes to the LCRs.  | L. Brescher | 2/15/94   |

## 7.5 Upgrade Fire Protection Design Document

### 7.5.1 Update Fire Hazard Analysis

R. Kerar

- |    |  |              |           |
|----|--|--------------|-----------|
| 1. | Identify corrective action for Fire Hazards Analysis (FHA) deficiencies.             | R. Kerar     | 7/1/93A   |
| 2. | Provide reformatted Safe Shutdown Analysis (SSA) with related databases.             | R. Kerar     | 10/8/93A  |
| 3. | Issue SSA and associated documents.  | R. Kerar     | 11/30/93A |
| 4. | Issue USAR Licensing Change Notice.  | R. Kerar     | 11/30/93A |
| 5. | Identify and schedule modification required to implement recommendations of the SSA. | M. Stein     | 11/30/93A |
| 6. | Develop criteria for aiming emergency lighting                                       | J. Schippert | 1/31/94   |

### 7.5.2 Structural Steel Fireproofing

B. Lenox

- |    |  |          |           |
|----|--|----------|-----------|
| 1. | Provide Engineering direction and support for Structural steel fireproofing drawing revisions.         | B. Lenox | 10/28/93A |
| 2. | Provide evaluation of Structural steel fireproofing.   | B. Lenox | 10/29/93A |
| 3. | Provide safety evaluation (50.59) for structural steel survivability for structural steel fireproofing | B. Lenox | 12/30/93  |
| 4. | Verify and validate combustion loading calculations.   | B. Lenox | 12/23/93  |

- |    |   |              |         |
|----|---|--------------|---------|
| 5. | Rework structural steel fireproofing in areas identified by the evaluation. NRC Commitment. | S. Radebaugh | 4/15/94 |
|----|---|--------------|---------|

### 7.5.3 Penetration Fire Seals

B. Lenox

- |    |  |              |            |
|----|--|--------------|------------|
| 1. | Perform fire test at details not previously tested.                      | H. Woodruff  | 10/29/93   |
| 2. | Complete Engineering disposition of Fire Seal Condition Reports (CRs).   | B. Lenox     | 12/31/93   |
| 3. | Process Licensing Change Notice (LCN) for seal test acceptance criteria. | B. Lenox     | 12/31/93   |
| 4. | Rework penetration seals as dispositioned on CR's.                       | S. Radebaugh | End of RF5 |
| 5. | Update Penetration Seal Database.  | B. Lenox     | 3/31/94    |

### 7.6 Drywell Temperatures

- |    |   |          |           |
|----|---|----------|-----------|
| 1. | Complete the independent analysis for elevated drywell temperatures | M. Stein | 11/30/93A |
|----|---|----------|-----------|

### 7.7 Improve Process for Engineering Work Planning and Control

R. Jones

- |    |   |          |           |
|----|---|----------|-----------|
| 1. | Establish periodic supervisory scheduling meetings to discuss task commitments, resource requirements, and project schedules. | R. Jones | 9/15/93A  |
| 2. | Finalize Engineering Department RF-5 work-load based on the ILSP.   | R. Jones | 10/19/93A |
| 3. | Establish RF-5 resource loading requirements based on the ILSP.   | R. Jones | 10/29/93A |
| 4. | Schedule approved RF-5 Modification Requests  | R. Jones | 11/1/93A  |

based on the ILSP.

Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
7.8 Evaluate Configuration Control Issues With Operations Critical Drawings		
1. Review CRs against operations critical drawing for the past two years to identify and catalog types of drawing deficiencies identified.	T.Crouse	2/15/94
2. Review DCNs for the past two years for non-design related changes to identify and catalog drawing deficiencies that indicate configuration control problems.	T.Crouse	2/15/94
3. Review and catalog any drawing deficiencies identified during the performance of SSFIs.	T. Crouse	3/1/94
4. Perform a root-cause analysis of the types of deficiencies identified and establish a systematic corrective action program to address any configuration control issues.	T. Crouse	4/1/94
5. Verify that the current drawing upgrade initiatives would identify and correct the types of deficiencies identified.	T. Crouse	4/1/94



Action Plan:

<u>Actions/Major Activities/Deliverables</u>	<u>Responsibility</u>	<u>Projected Date Complete</u>
<b>7.9 Improve the Quality and Depth of Engineering Evaluations</b>		
1. Establish an Engineering Review Committee to provide oversight for 10 CFR 50.59 evaluations, FCNs, selected design work activities, CRs for operability evaluations and the modification backlog to set and reinforce high technical standards.	M. Stein	12/1/93A
2. Establish an appropriate feedback form the ERC to responsible groups on the quality of engineering products.	M. Stein	12/1/93A
3. Evaluate and modify the 50.59 process to be consistent with the Entergy plants' process and/or the EPRI SARA Program.	M. Stein	4/15/94
4. Trend 50.59 evaluation results to determine program effectiveness.	M. Stein	4/15/94

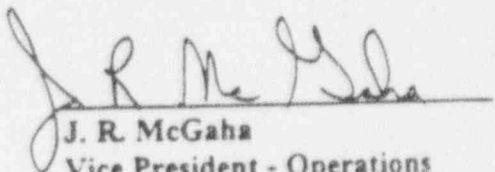
ATTACHMENT H

RIVER BEND

NUCLEAR STATION

LONG-TERM PERFORMANCE

IMPROVEMENT PLAN



J. R. McGaha  
Vice President - Operations  
River Bend Station  
Revision 2  
September 15, 1994

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# RIVER BEND STATION

## LONG-TERM PERFORMANCE IMPROVEMENT PLAN

9/15/94

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## 1 INTRODUCTION

A number of internal and external assessments have addressed River Bend Station's recent performance. An analysis of these assessments indicated that River Bend's performance issues can be traced to four root causes

- Planning, goal setting, performance monitoring and management feedback have not been effective
- Management and leadership skills have not kept pace with the level of change required
- Problem identification and problem solving methods have not been consistently applied to improve performance
- Critical station work processes are inefficient and have allowed backlogs of work to occur

River Bend management has developed two plans for improving station performance: the *Near-Term Performance Improvement Plan* (NTPIP) and the *Long-Term Performance Improvement Plan* (LTPIP). Both plans include specific work activities that can be tracked and reported, assigned responsibilities for plan implementation and a broad set of quantitative performance indicators.

The NTPIP defined required actions to effect immediate performance improvements at River Bend. The NTPIP guided management's initial (near-term) actions to improve overall station performance. A copy of the NTPIP was provided to the Nuclear Regulatory Commission (NRC). The final NTPIP actions were successfully completed during Refuel Outage - 5. (Due to its completion, the NTPIP is not provided as an attachment to this revision of the LTPIP)

This document is the River Bend LTPIP. It defines River Bend's activities and priorities over a three year planning horizon. The LTPIP continues the planning process established for the NTPIP and provides for long-term solutions.

The LTPIP will guide River Bend toward the industry's top quartile of performance. It focuses on issues that must be resolved in order to achieve significant, permanent performance improvements at River Bend.

There are four *key strategies* in this plan. they were developed to address the root causes of performance issues. Within the four strategies, specific activities required for long-term performance improvement are delineated as *strategic programs*. In addition to resolving the root causes, these strategies and programs will improve plant and organizational performance, respond to regulatory concerns, and support River Bend in accomplishing its mission and achieving its strategic goals.

## 2 MISSION AND STRATEGIC GOALS

The River Bend *mission* mirrors the mission of Entergy Operations, Inc.

- To achieve and advance world class standards of safety and operating performance in the global nuclear community
- To produce electrical energy in the most effective and cost-efficient manner
- To sustain and strengthen the assets entrusted to Energy Supply Nuclear as responsible stewards for Entergy Corporation
- To be knowledgeable professionals dedicated to excellence as exemplified by innovation, motivation and teamwork
- To be a socially responsible corporate citizen of the community and of the industry, working in a spirit of partnership and shared values.

River Bend's *strategic goals* are to achieve top quartile performance in the areas of Safety/Regulatory, Operating Performance and Cost.

- |                                |   |
|--------------------------------|---|
| • <b>Safety/Regulatory</b>     | High regulatory performance as measured by SALP scores    |
| • <b>Operating Performance</b> | High operating performance as measured by capacity factor |
| • <b>Cost Control</b>          | Low production cost performance as measured by mills/KWHr |

RIVER BEND STATION  
1994-1996 PERFORMANCE IMPROVEMENT PLAN

River Bend's 1994-1996 strategic goals in each category are shown below. These are "target" three-year average values as included in the River Bend 1994-1996 Business Plan.

Three-Year Average			
Performance Category	1994	1995	1996
SALP (average rating) <sup>1</sup>	2.50	2.125	N/A
Capacity Factor (%)	55.6	69.4	78.1
Production Cost (Mills/KWhr)	41.7	30.9	26.6

### 3 DEVELOPMENT PROCESS

Several different assessments have been conducted of River Bend activities including independent and internal management assessments, NRC inspections and Institute of Nuclear Power Operations (INPO) evaluations. Management analysis of all of these assessments indicated the same root causes of unsatisfactory performance and consistent courses of corrective action. Immediate corrective actions were defined in the NTPIP.

In parallel with NTPIP development, River Bend conducted a comprehensive review to ensure previously identified problems had been captured and their root causes identified. A planning conference (attended by site and GSU managers and Entergy personnel) was held to review the earlier assessments and formulate longer-term actions. The key strategies contained in this plan were defined and developed during the conference. Subsequently, River Bend employee teams drafted the strategic programs necessary to implement each strategy effectively. A series of meetings with site senior management was used to review the plans in detail, to insure the focus of the plans is consistent with management direction, and to confirm the commitment of program managers to the plans.

<sup>1</sup> The 1994 SALP goal is for the period ending Jan-94; the 1995 goal is for the period ending Jul-95; the next SALP period will end in 1997.

### Key Strategies and Programs

Each of the key strategies addresses a root cause of performance problems and focuses on one important performance area. They require inter-disciplinary approaches that cut across multiple departments at River Bend. The key strategy areas and the titles of the implementing strategic programs (and, in parenthesis, a designation code used for reference) are identified below

- **Planning and Performance Management (PPM)**
  - Site Planning and Resource Allocation (SP)
  - Fundamental Project Management (PM)
  - Outage Management (OM)
- **Leadership (LDR)**
  - Leadership and Management (LM)
  - Change Management (CM)
- **Problem Identification and Problem Solving (PID)**
  - Problem Identification and Root Cause Evaluation (RC)
  - Closure of Problems (PC)
  - Oversight of Problem Solving Systems (PS)
  - Human Performance Effectiveness (HP)
- **Work Process Efficiency (WPE)**
  - Work Control (WC)
  - Materials Management (MM)
  - Modifications (MO)
  - Procedures (PR)

In addition to the key strategies and strategic programs, plant support requires ongoing attention if River Bend is to achieve permanent performance improvements. Seven additional programs have been developed in order to support the focus on safe plant operation and maintenance:

- **Support for Safe Plant Operation (SPO)**
  - Engineering Support (ES)
  - Radiological Protection (RP)
  - Plant Chemistry (CH)
  - Licensing and Regulatory Affairs (LC)
  - Security (SS)
  - Training (TT)
  - Quality Assurance (QA)

Engineering support is particularly significant among these programs for its impact on performance due to its major effect on plant material condition and the nature and extent of the needs identified in various assessments

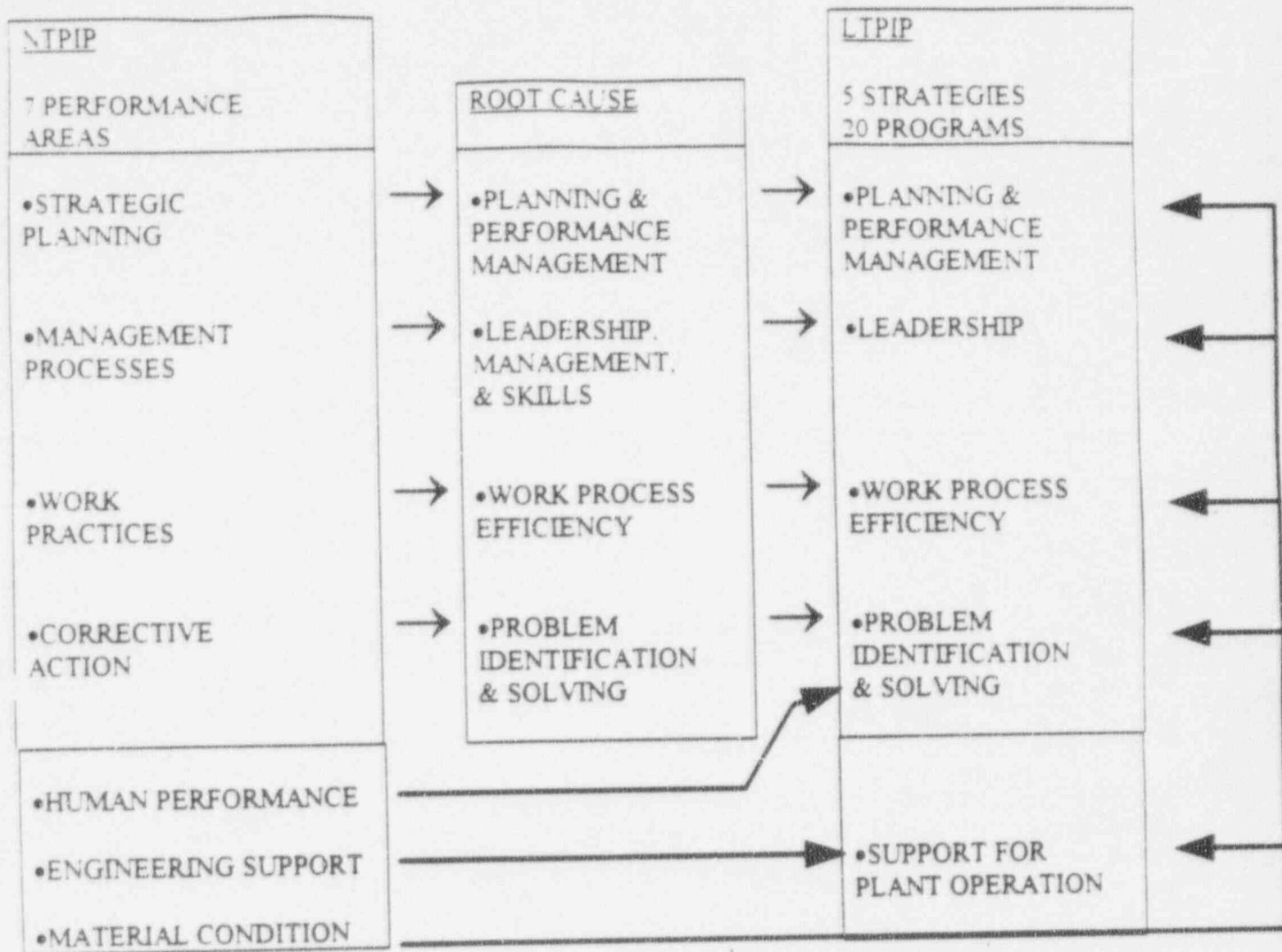
#### **Program Plans**

Program plans have been prepared in each of the 20 program areas. Each plan covers program activities, priorities, responsibilities and resources. The River Bend management team is responsible for ensuring that these programs achieve their objectives and function efficiently. Complete program descriptions, including specific implementing activities, responsibilities, performance measures and the relation of the program to the strategic goals, are provided in Section 12 - Strategies and Programs.

#### **Relationship between the Near-Term and Long-Term Performance Improvement Plan**

The figure shows the relationship between the two plans. The underlying root causes for unsatisfactory performance, identified through various assessments and subsequently validated, provide the basis for four of the performance areas in the NTPIP and the four major strategies (and 13 of 20 programs) in the LTPIP. In addition, engineering support and human performance effectiveness were common areas identified as requiring focus in both plans. Activities addressing material condition deficiencies are present in both plans: in the NTPIP the focus was on addressing specific and immediate material condition remedies; in the LTPIP, material condition remedies are addressed through process, management, and problem resolution strategies and programs. The additional six programs in the LTPIP that address improvement in support for safe plant operation and maintenance were included in order to make the LTPIP more comprehensive.





#### 4 MANAGEMENT ACCOUNTABILITY

LTPIP success depends on clear assignment of implementation responsibilities and strict accountability for performance. The following responsibilities have been assigned for the LTPIP

- The Vice President Operations - River Bend Station has overall responsibility for LTPIP coordination, tracking and successful implementation.
- The Director - Nuclear Safety has responsibility for oversight and verifying the effective completion of the plan.



- A Management Sponsor has been named for each Key Strategy. The sponsor is responsible for ensuring that the strategy is effective and coordinating the activities of the program managers.
- A Program Manager has been named for each Strategic Program. The program manager is responsible for ensuring resources are available for the program, milestones are met, and program activities have their intended positive impact on plant and organizational performance.
- Accountable individuals have been assigned for each activity identified in every plan.
- The River Bend management team will monitor overall plan implementation. The team will regularly assess progress toward correcting root causes of performance problems, ensure performance expectations are met and initiate corrective actions when necessary.

Each individual has direct, personal responsibility and accountability for achieving results in his or her assigned area. Sponsors and program managers are also responsible for providing accurate and complete monthly status reports covering progress, problems and issues in their assigned areas.

## 5 CLOSURE

The programs in the LTPIP have been planned such that most actions (the exception being actions in the NTPIP that effect specific changes in, for example, material condition) taken will result in permanent continuing changes in station capability, activity, and performance results. In cases where, for example a study results in following activity, it will be incorporated in the LTPIP using the revision process described below. In addition, steps will be taken to insure that subsequent activities, such as changes to procedures or management direction, do not reverse the effect of the change.

- **LTPIP Closure Form**  
This form documents the completion and closure of a LTPIP activity. A closure form is completed by the originator (usually the accountable individual for the activity). Documentation as required, will be attached to demonstrate completion of the activity. Closure approvals for an activity are required by the program manager, program sponsor, and Director - Plant Projects and Support.

In order to verify completion of activities and the effectiveness of the proposed plans, assessments will be completed. These assessments will be initiated when the status of related program activities are completed and sufficient time has elapsed to effect change. A plan for these assessments will be developed as a part of the Oversight of Problem Solving Systems Program. The assessment approach will incorporate both significant self assessment and independent elements.

## 6 REVISIONS

The LTPIP will be controlled in accordance with an administrative procedure which is summarized below. Changes to the LTPIP will be controlled using the LTPIP Revision Form and will require appropriate management approvals.

- **LTPIP Revision Form**

This form documents and describes a change to an activity in the LTPIP. The LTPIP Revision form is filled out by the originator (usually the accountable individual for the activity). The originator must provide justification for the change then signs the form and sends it to the program manager who signs as approved and forwards it to the strategy sponsor. The sponsor signifies his approval by signing the memo and forwarding it to the Director, Plant Projects & Support for approval. Final approval by the Vice President Operations, River Bend Station, will be required for all revisions to the LTPIP.

## 7 PERFORMANCE MEASURES

Quantitative performance measures have been developed to track and determine the effectiveness of the LTPIP. Periodic management reports will be developed to show performance against these performance indicators. Appropriate performance measures have been set forth in each program plan.

## 8 TIMELESS PRINCIPLES

The strategies and strategic programs address how performance improvements will be achieved. These initiatives reflect the cultural changes that are required to align River Bend activities with the strategic goals. The Plant Manager has established certain "Timeless Principles" that are the cornerstone for cultural changes. These principles must be embedded in the River Bend management environment and they are the underlying theme of all program plans:

- **Practice Ownership for Work Throughout the Site** - Achieved through personal accountability by all, knocking down barriers to performance, refusing to accept less than excellent results, changing procedures and processes that do not work, cleaning up work spaces before leaving, taking initiative, accepting responsibility and empowering our people.

- **Improve Staff Competence** - Achieved through hiring practices, supervisory selection, holding people accountable, error free performance, making supervisors leaders, outplacing non-performers and encouraging effective training.
- **Correct Equipment Problems** - Achieved through repair practices, improving work management processes, maintaining low corrective maintenance backlog, a high PM/CM ratio, and low out of service frequency for safety related equipment, effective use of capital resources and making sure installed equipment is consistent with design bases
- **Complete Outages in a Timely, Effective Manner** - Achieved through expecting breaker to breaker runs, fixing equipment accordingly, effective closeout of outage work, prioritizing the work and minimizing outage duration.
- **Adhere to Technically Accurate Human-Factored Procedures** - Achieved through aptly written Writers' Guides, validating procedure steps and promptly acting on required procedure revisions.
- **Operate Conservatively** - Achieved by intelligent decision making, avoiding work-around situations, putting personnel and equipment safety first and responding to Operations' priorities.
- **Practice Self-Critical Behavior** - Achieved by self-checking, Stop-Think-Act-Review (STAR), correct root cause determinations, collegial reviews, identifying our own problems, consistently exhibiting a questioning attitude, rising performance standards and the drive to do it right the first time.

## 9 STRENGTHENING OF THE RIVER BEND ORGANIZATION

Achieving the LTPIP results will require new or enhanced organizational capabilities. Several initiatives are underway to enhance the site organization's capability to fulfill its mission and satisfy expressed regulatory concerns. Changes that have been made to date include the assignment of experienced Entergy personnel to River Bend, new personnel assignments, new reporting relationships, and redefined areas of authority and responsibility for some managers

## 10 PLANT MATERIAL CONDITION

The strategic and support programs discussed in section 3 do not reflect all of the activities that will be completed during the next three years in order to improve performance.

A significant number of projects that focus on improving the material condition of plant equipment are planned. Some of these are

- Zebra Mussel Control
- Plant Painting
- System Labeling
- Backlog Reduction
- Long Standing Equipment Problems

Another set of projects will contribute to improved plant operation, safety and reliability. These include

- Emergency Response Information System Upgrade
- Boiling Water Reactor Stability Program
- Reactor Water Reference Leg
- Separate Instrument Air System Installation

These projects and others will help River Bend achieve its strategic goals for 1994-1996

## 11 FACILITIES

The condition of station facilities and working conditions have a significant impact on staff productivity, morale and professionalism. For this reason it is important to highlight those projects that will improve facilities. The most significant project planned for the site is the construction of a new Generation Support Building in close proximity to the plant. The building will house approximately 550 employees and will include dining services, an auditorium, document storage, libraries and laboratories. Another project addresses site restoration - removal of construction facilities and regrading and seeding. The plan also includes a project to complete the painting of plant areas that were not painted during construction. A Site Master Plan will be developed to guide station facility improvements.

## 12 STRATEGIES AND PROGRAMS

The strategies and program plans in this section focus on issues that must be resolved in order to achieve significant, permanent performance improvements at River Bend. Some of these issues were originally addressed in the Near Term Performance Improvement Plan (NTPIP) but require ongoing or long-term attention in order to be fully resolved.

The programs support strategies which, in turn, affect fundamental site management processes. As they are implemented, the programs will result in permanent, systematic changes in River Bend's business approach and methods. Progress in implementing programs will be tracked and periodically reported to site management. Periodic reviews will be conducted to ensure the completion of activities results in ultimate resolution of the root causes. Improvement in performance will be continually monitored.

The programs are presented under each of the key strategies.

Each program includes the following elements:

- Title
- Program Manager
- Description
- Root Causes Addressed by This Program
- Objectives
- Performance Measures
- Activities
- Schedule, including accountable individuals for each activity

- The respective LTPIP strategies and supporting programs are described on the next five pages and are followed by the respective LTPIP program descriptions.

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*STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT*

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**Planning and Performance Management**

This strategy is focused at improving performance and addressing problem root causes in the areas of planning, goal setting, performance monitoring, and work management. These performance improvements will be achieved through the site wide implementation of three interrelated programs. They are

- Site Planning and Resource Allocation (SP)
- Fundamental Project Management (PM)
- Outage Management (OM)

Each program is designed to support efficient and successful selection and completion of work activities at River Bend Station. Additionally, performance measures have been designed not only to provide feedback to management, but to provide a path for continuous improvement of all critical work management processes.

Sponsors: Site Planning & Resource Allocation, Fundamental Project Management:  
J R. Douet, Director - Plant Projects & Support

Outage Management: M. Sellman, General Manager - Plant Operations



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*STRATEGY: LEADERSHIP*

**Leadership**

This strategy focuses on improving performance through improvements in leadership and management. Specific root causes addressed are related to strategic processes, managers' experience levels, change management, planning, organizational roles and responsibilities, and improved team work.

The strategy will be implemented through two programs:

- Leadership and Management (LM) and
- Change Management (CM)

Leadership and Management focuses on strengthening basic leadership and management skills through training and implementation of basic management programs. Change Management adds activities aimed at increasing the receptivity for change by site employees and providing clear evidence of the commitment and progress toward rapid changes in the capabilities of the RBS organization and, as a direct result, performance.

Sponsor: M. Sellman, General Manager - Plant Operations

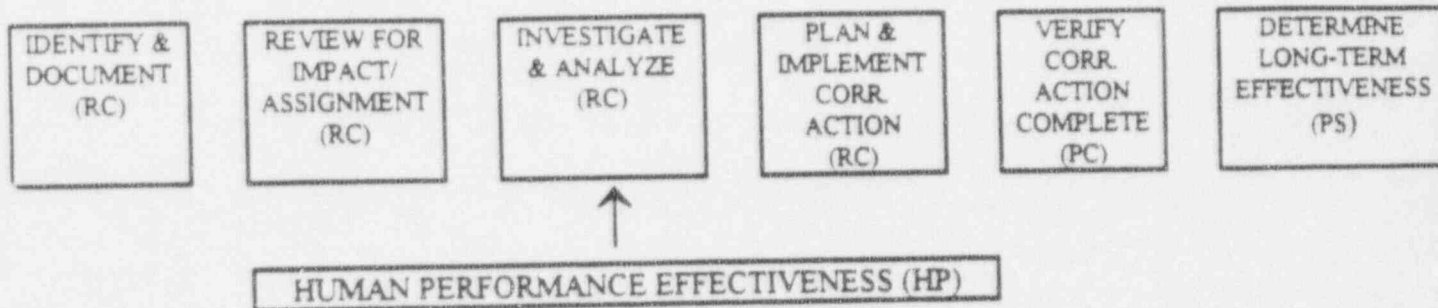
*STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING*

**Problem Identification and Problem Solving**

The Problem Identification and Problem Solving Strategy addresses the root causes associated with problem solving deficiencies at River Bend, in particular, deficiencies relating to problem solving methodology, root cause analysis capability, human performance and corrective action validation. The strategy consists of four separate, but interrelated programs. These programs are

- Problem Identification and Root Cause Evaluation (RC)
- Closure of Problems (PC)
- Oversight of Problem Solving Systems (PS)
- Human Performance Effectiveness (HP)

The following diagram demonstrates the interrelation of the four programs:



The HP Program supports the other three problem identification and resolution programs and is directed toward reducing human error by focusing on assuring that work is performed correctly the first time and on addressing the root causes of human performance errors.

Together, the programs are designed to solve and eliminate problems at River Bend. This is done through improved problem identification and root cause evaluation processes at River Bend, the Corrective Action Programs with emphasis on accountability for problem solving and timely closure, and the processes by which management's expectations for problem identification and correction are effectively communicated and the completeness and effectiveness of corrective actions are verified. The programs are expected to achieve long-term, sustained improvements in the problem solving processes at River Bend.

Sponsor: J. Fisicaro, Director - Nuclear Safety

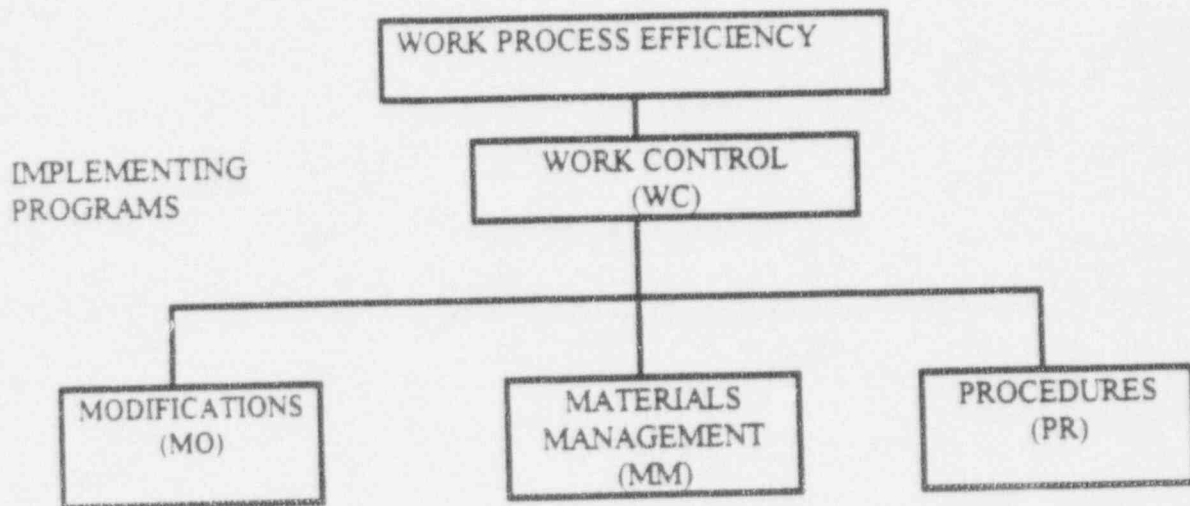
STRATEGY: WORK PROCESS EFFICIENCY

Work Process Efficiency

This strategy addresses the fundamental root cause of work process inefficiencies contributing to unsatisfactory performance. Specifically, it addresses the problems created because critical work station processes are inefficient and have allowed backlogs of work to occur. Key areas of concern were responsibility and accountability for work control to Operations, integration of scheduling with plant daily work, the plant procedure control process, engineering support to Operations and Maintenance, and the plant modification process. Implementation of this strategy includes focusing on each of these areas with a specific program designed to turn it into a strength as shown below. The four programs are:

- Work Control (WC)
- Materials Management (MM)
- Modifications (MO)
- Procedures (PR)

STRATEGY



Sponsor: E. Ewing, Manager - Maintenance

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*

**Support for Safe Plant Operation**

The principal strategies developed for the LTPIP were based on addressing the four performance root causes. The RBS management team also decided that seven additional improvement programs were needed to address specific functions important to support safe plant operation and maintenance. They are:

- Engineering Support (ES)
- Radiological Protection (RP)
- Plant Chemistry (CH)
- Licensing and Regulatory Affairs (LC)
- Security (SS)
- Training (TT)
- Quality Assurance (QA)

Among these Engineering Support is particularly significant for its impact on performance.

Sponsors:     Engineering Support: T. Leonard, Director - Engineering

                 Radiological Protection, Plant Chemistry, and Security: M. Sellman, General  
                 Manager - Plant Operations

                 Licensing and Regulatory Affairs, and Quality Assurance: J. Fisicaro, Director -  
                 Nuclear Safety

                 Training: G. Lewis, Manager - Nuclear Training

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: SITE PLANNING AND RESOURCE ALLOCATION**

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**PROGRAM TITLE**

Site Planning and Resource Allocation

**PROGRAM MANAGER**

Bob Alexander, Manager - Project Management

**DESCRIPTION**

Establish processes that provide for management involvement and control in the selection and implementation of plant projects and programs that are directly related to improving plant performance. These processes will ensure that plant safety and reliability are improved by working the right projects within a defined schedule.

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Planning, goal setting, performance monitoring and management feedback have not been effective.

- Master Issues List (MIL) flexibility and usability including resource planning and schedule integration.
- Effective management information systems.

Management and leadership skills have not kept pace with the level of change required:

- Planning and prioritizing systems.
- Organizational roles and improved teamwork.

**OBJECTIVES**

- Schedule and allocate resources for modifications designed to resolve recurring and long standing equipment problems as well as other major issues to improve plant operation.
- Implement a systematic approach for activity scoping and scheduling.
- Implement a management review process for activity selection and prioritization.
- Establish a process for defining adequate resource allocation to the work load.

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: SITE PLANNING AND RESOURCE ALLOCATION**

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**PERFORMANCE MEASURES**

- Establish a management review process which will select, prioritize, and schedule modifications and other projects on a long-term basis. The review process will be established by 6/30/94.
- Change Review Board to disposition and schedule all items on the Long Standing Equipment Problem list by 12/31/95.
- Review the unscheduled Modification Requests (MR's) backlog to screen and prioritize based on safety and reliability considerations by 12/30/94.
- All open Modification Requests will be scheduled or otherwise dispositioned on the three year Master Issues List by 9/30/95.

**ACTIVITIES**

**1.1 Organizational Commitment**

- 1.1.1 Identify the initial list of primary and alternate personnel that will serve as members of the Change Review Board (CRB) and subcommittee. The list is to be completed and periodically updated by the Manager, Project Management.
- 1.1.2 Establish Project Management Department which will be the owner of the Modification process and responsible for planning, scheduling, and installing modifications. The Project Management department will also be responsible for providing consistent project cost estimates for the Master Issues List and Change Review Board.
- 1.1.3 Establish a communications plan to inform personnel of the CRB, its purpose and decision making process, as well as the successes and the effectiveness of the process. The communications plan will also inform personnel of the inter-relationships between the Business Plan, Master Issues List, and budget. The communications plan will provide for initial communications to inform all personnel how the process works, as well as periodic information concerning successes and the effectiveness of the process.
- 1.1.4 The CRB will review all backlogged unscheduled MR's for safety and reliability issues by 12/30/94.

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: SITE PLANNING AND RESOURCE ALLOCATION**

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- 1.1.5 The entire backlog of unscheduled MR's will be eliminated by 9/30/95 by the CRB dispositioning and scheduling the MR's on the Master Issues List.
- 1.2 **Create a management review process for project selection, prioritization, scoping, and scheduling. The decision making process will include the following:**
  - 1.2.1 An outline of the process with specific accountabilities and responsibilities for individuals and departments.
  - 1.2.2 Detailed requirements that the budget process and the Master Issues List be tied together such that all scheduled and active projects fit within budget.
  - 1.2.3 How to capture in the Master Issues List, projects that must be done, but are beyond the three year window of the current projection.
  - 1.2.4 The process for approving high priority (i.e. safety, reliability) and minor MRs that show the effect on overall budget and schedule.
  - 1.2.5 The method of documenting business decisions made as part of the process.
  - 1.2.6 Provisions for scheduling, estimating, and performing cost/benefit analysis on all projects to be added to the Master Issues List.
  - 1.2.7 Provisions for long-term planning which will include scheduling major projects for the life of the plant.
- 1.3 **Tools**
  - 1.3.1 Fully implement the use of the Project Evaluation Program (PEP) to perform more comprehensive cost/benefit analyses and analyses of alternatives.
  - 1.3.2 Perform a cost benefit evaluation on developing a program that will measure Activity Based Costs (ABC) at the lowest possible threshold to aid determining the base level of effort breakdown. The current cost tracking systems do not monitor to the level of detail required to determine what is the base level of effort.

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT  
PROGRAM: FUNDAMENTAL PROJECT MANAGEMENT**

**PROGRAM TITLE**

Fundamental Project Management

**PROGRAM MANAGER**

Bob Alexander, Manager - Project Management

**DESCRIPTION**

Improve the process and tools that are used to manage activities and projects, with the focus on optimization of resources and completion of assigned activities.

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Planning, goal setting, performance monitoring, and management feedback have not been effective.

- Master Issues List (MIL) flexibility and usability including resource planning and schedule integration.
- Meaningful and useable performance measures.
- Human performance and accountability to reduce human errors.
- Effective management information systems.

Management and leadership skills have not kept pace with the level of change required:

- Organizational roles and improved teamwork.

Critical station work processes are inefficient and have allowed backlogs of work to occur

- Responsibility and accountability for work control.

**OBJECTIVES**

Improve organization ability to manage projects to completion.

- Strengthen and promote management commitment to fundamental project management

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: FUNDAMENTAL PROJECT MANAGEMENT**

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- Identify and procure necessary project management tools
- Provide personnel training in the use of project management procedures and tools
- Establish personal/organizational accountability and review process.

**PERFORMANCE MEASUREMENTS**

The project performance indicators of cost and schedule will be monitored. During 1994 no performance measurements will be made since this is a critical year for setup of the processes and tools to be employed. For 1995 and 1996, the following goals are set for Master Issues List projects:

- All Master Issues List projects and Performance Improvement Plan Programs assigned a Project Manager, and started and completed.
  - Will be completed within  $\pm 10\%$  of the approved budget and schedule during 1995 for individual projects without sacrifice to safety.
  - Will be completed within  $\pm 8\%$  of the approved budget and schedule during 1996 for individual projects without sacrifice to safety.
  - By 12/31/95, 75% of designated personnel will attend Project Management training.
  - Positive trends associated with closeout critiques for Project Management.

**ACTIVITIES**

**2.1 Organizational Commitment**

- 2.1.1 Complete the creation and initial staffing of a Project Management Department for project management of major Master Issues List projects.
- 2.1.2 Review current contract "boilerplate" for contracted work to ensure consistency in application of practices and principles of project management.
- 2.1.3 Benchmark three facilities for successful application of project management to improve project management processes at River Bend

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*STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT*  
*PROGRAM: FUNDAMENTAL PROJECT MANAGEMENT*

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- 2.1.4 Establish a communications plan to demonstrate successes and communicate effectiveness.

**2.2 Process Development**

- 2.2.1 Ensure that critical elements such as early project manager selection, buy-in, accountability and enforcement (risk/reward) are proceduralized (i.e. create a single procedure or modify existing ones).
- 2.2.2 Ensure that procedure(s) address how project management elements apply to non-hardware Master Issues List Projects such as studies, design work, etc.
- 2.2.3 Make adequate time available to project managers for front end scoping and resource allocation, and commitment to allocated resources for the duration of the project. This will be proceduralized to allow project managers to perform their duties and provide early identification of ownership and accountability.
- 2.2.4 Proceduralize the roles of the project manager, the individual project team members with definition of work elements and how they get accomplished, and specific departments with their support roles relative to the project management team which ensures project managers receive adequate support for successful completion of their projects.
- 2.2.5 Develop a closeout critique of tools, procedures, training, teamwork, etc. to document results and provide feedback to River Bend management. The closeout critique forms will be incorporated into the River Bend procedure for Project Management. The closeout critique for projects will be conducted by the project manager with input from the project team, customers, and management. Collective results from the closeout critiques will be reviewed for procedure update on a semi annual basis for continuous improvement.

**2.3 Work Management System**

- 2.3.1 Establish project team to implement a site-wide work management system for planning, scheduling and cost tracking that addresses the total work load (Master Issues List and level of effort).
- 2.3.2 Conduct customer survey with River Bend management and personnel to ensure major requirements for work management practices are incorporated and process owner is established.

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: FUNDAMENTAL PROJECT MANAGEMENT**

- 2.3.3 Evaluate relational database software packages and hardware requirements for the work management system.
- 2.3.4 Procure scheduling software package and transfer all scheduling information.

**NOTE**

*The scope of activities 2.3.5 and 2.3.6 are anticipated to continue beyond the bounds of this plan. The LTPIP end date is 12/31/96. Any remaining scope of work for these activities will be incorporated into normal departmental work plans after 12/31/96.*

- 2.3.5 Procure relational database software, provide resources and implement a task tracking system for level of effort tasks.
  - 2.3.6 Establish required staffing to administer the River Bend work management system.
- 2.4 Personnel Qualifications**
- 2.4.1 Evaluate the accessibility of established project training at other EOI sites or the industry in general.
  - 2.4.2 Implement a project management training program for River Bend employees that is complete with prerequisites for personnel to increase knowledge of fundamental project management. Evaluate the merit of a complementary certification program.
  - 2.4.3 Establish a selection criteria for project managers and evaluate the immediate and future recruitment and/or training of project management personnel (i.e. periodically review the Master Issues List, etc.) to ensure an adequate number of project manager resources are available at River Bend.



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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: OUTAGE MANAGEMENT**

**PROGRAM TITLE**

Outage Management

**PROGRAM MANAGER**

Tom Hildebrandt, Manager - Outage Management

**DESCRIPTION**

Define and implement effective scheduling, goal setting, work control and cost control activities related to a plant outage. Primary focus will be on resource allocation and teamwork, and continuous improvement of key parameters from one outage to the next.

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Planning, goal setting, performance monitoring, and management feedback have not been effective:

- Outage Management
- Master Issues List flexibility and usability including resource planning and schedule integration.
- Meaningful and useable performance measures
- Human performance and accountability to reduce human errors.

Management and leadership skills have not kept pace with the level of change required:

- Planning and prioritizing systems
- Organizational roles and improved teamwork.

Problem identification and problem solving methods have not been consistently applied to improve performance:

- Improved problem solving.

Critical station work processes are inefficient and have allowed backlogs of work to occur.

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*STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT  
PROGRAM: OUTAGE MANAGEMENT*

- Responsibility and accountability for work control.

**OBJECTIVES**

- Shorten the time required for outages
- Minimize outage costs.
- Operate at high capacity levels between outages.
- Establish a high performance level in nuclear and industrial safety, and ALARA.

**PERFORMANCE MEASURES**

- Maintain the time required for outages at:
    - Actual vs. scheduled duration limited to +10%
    - 50 days or less for RF5 (Spring 1994)
    - 43 days or less for RF6 (Fall 1995)
  - Zero lost time outage injuries
  - Post outage continuous operation for 60 days.
  - Maintain outage O&M costs at less than or equal to budgeted amounts,
    - \$30 million for RF5
    - \$28 million for RF6
  - Zero loss of shutdown cooling events
  - Operate at an average of 82% or greater capacity factor during the period 1994-1996
- Annual goals as follows:
- 76% in 1994
  - 79% in 1995
  - 90% in 1996

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: OUTAGE MANAGEMENT**

**ACTIVITIES**

**3.1 Establish Outage Goals and Incentive Programs**

- 3.1.1 Identify milestone variance goals.
- 3.1.2 Identify safety goals.
- 3.1.3 Identify radiation protection goals to meet three year INPO goal in 1996.
- 3.1.4 Identify incentives for continued outage improvement.

**3.2 Effective Scope Identification and Control Program.**

- 3.2.1 Establish and freeze modification scope no later than 60 days after the end of the refueling outage.
  - 3.2.1.1 Revise the long range planning programs as necessary.
  - 3.2.1.2 Schedule the scope identification and freeze tasks on the outage preparation schedule.
- 3.2.2 Issue modification designs six months prior to the outage.
  - 3.2.2.1 Schedule the issue of final designs on the outage preparation schedule.
  - 3.2.2.2 Monitor design progress from scope freeze to design issue.
- 3.2.3 Establish effective work identification freeze date six months prior to outage.
  - 3.2.3.1 Improve the reliability of the Maintenance Work Order (MWO) and Preventive Maintenance (PM) identification process.
  - 3.2.3.2 Schedule MWO and PM identification on the outage preparation schedule.

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*STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT*  
*PROGRAM: OUTAGE MANAGEMENT*

- 3.2.4 Submit licensing submittals to the NRC no later than six months prior to outage
  - 3.2.4.1 Schedule the license change identification process on the outage preparation schedule
  - 3.2.4.2 Identify outage related license changes.
  - 3.2.4.3 Prepare license submittals.
  - 3.2.4.4 Submit license changes to NRC.
- 3.2.5 Establish effective emergent work control program for all corrective maintenance, preventive maintenance, modifications, and all other activities.
  - 3.2.5.1 Develop a policy for approval criteria for emergent work.
  - 3.2.5.2 Prepare a process for implementing the policy.
  - 3.2.5.3 Implement the emergent work control process
- 3.2.6 Establish a program to perform only outage work during outages and all other work during the operating cycle consistent with an acceptable backlog at the end of the outage. This will be accomplished by an effective and accountable scope identification prior to the outage and by establishment of a means to reduce the MWO backlog both before and after the outage.

**3.3 Scheduling Improvements**

- 3.3.1 Implement P.C. based scheduling system.
- 3.3.2 Implement Outage Risk Assessment Management Technical Integration Program (ORAM TIP) process for evaluation of RF-5 L-II schedule and subsequent logic revisions.
- 3.3.3 Ensure that all forced outage work plans, tagouts, RWP and materials are requested and prepared/staged within 30 days of task identification.
  - 3.3.3.1 Establish operations ownership of the forced outage contingency work list.

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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: OUTAGE MANAGEMENT**

- 3 3 3 2 Establish a program plan, request materials, RWP and tagouts for each forced outage task within 30 days of its identification by operations.

**3.4 Improve Outage Work Control**

- 3 4 1 Provide means to separate retest documentation from the parent MWO document when the retest cannot be immediately performed to provide better quality retests and more timely system restorations.
  - 3 4 1 1 Review other Entergy plant procedures to identify best practices.
  - 3 4 1 2 Incorporate these practices into station procedures.
  - 3 4 1 3 Train personnel on revised work control retest procedure.
- 3 4 2 implement Operations, Maintenance and Outage Management training and develop proficiency on the work document cross reference system to improve outage milestone completions.
  - 3 4 2 1 Complete design and installation of the Work Document Cross Reference (WDCR) System.
  - 3 4 2 2 Operations train on the LCO and tagout programs.
  - 3 4 2 3 Maintenance train on the MWO and tagout programs.
  - 3 4 2 4 Outage Management train on the WDCR program.
- 3 4 3 Improve refueling outage tagout preparation and implementation to support outage schedules.
- 3 4 4 Establish operations ownership and develop proficiency in the closeout of paperwork to meet outage milestones.

**3.5 Administrative Management**

- 3 5 1 Establish and implement a policy that all River Bend employees are expected to participate in refueling outages.
- 3 5 2 Establish a program for appointing project manager/coordinators for all major tasks.



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**STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT**  
**PROGRAM: OUTAGE MANAGEMENT**

- 3.5.3 Establish accountability to perform assigned tasks per the approved LII and LIII schedules

**3.6 Reduce Outage Cost and Duration**

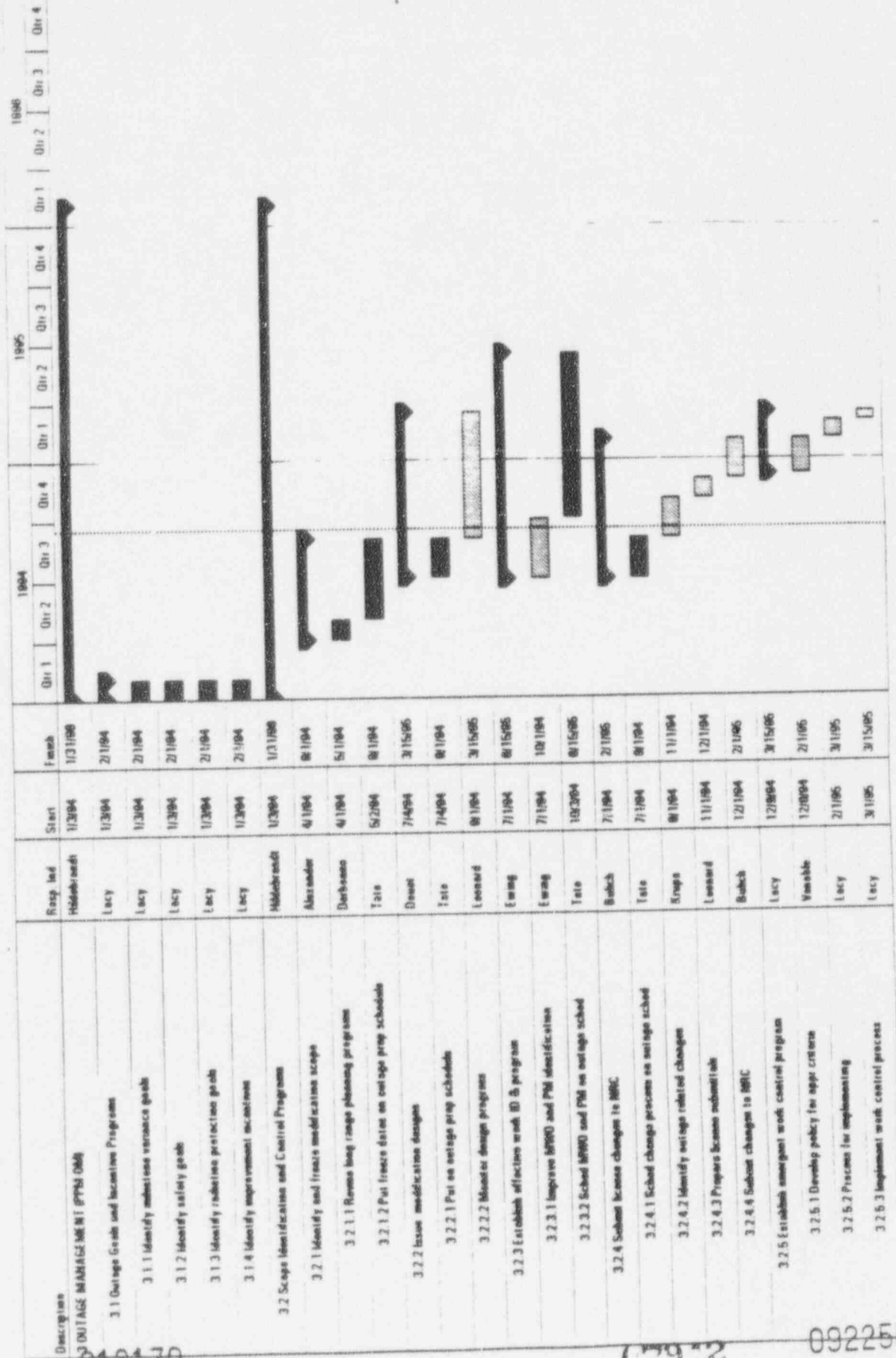
- 3.6.1 Evaluate staff augmentation policies.
  - 3.6.1.1 Research past practices and Entergy practices to determine optimum use of permanent site resources.
  - 3.6.1.2 Adjust use of refueling staff augmentation as indicated.
  - 3.6.1.3 Evaluate/control augmentation mobilization/demobilization rates.
- 3.6.2 Evaluate scope of contracted tasks.
  - 3.6.2.1 Evaluate refueling, diesel generator inspection and turbine inspection contracts practices including consolidation of RBS and Grand Gulf contracts.
  - 3.6.2.2 Adjust contracting practices as indicated.
  - 3.6.2.3 Increase RBS implementation and management of currently contracted tasks.
- 3.6.3 Evaluate and provide, as appropriate, for preoutage IFTS testing.
  - 3.6.3.1 Submit proposed project request for long range planning.
  - 3.6.3.2 Evaluate for long term planning.
  - 3.6.3.3 Implement as evaluated per the Master Issues List process.
- 3.6.4 Evaluate and reduce MOV signature and Local Leak Rate testing as appropriate.
  - 3.6.4.1 Submit proposed project request for long range planning using techniques such as risk assessments/PRA, manual valve conversion and license changes.
  - 3.6.4.2 Evaluate for long-term planning.
  - 3.6.4.3 Implement as evaluated per the Master Issues List process.

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*STRATEGY: PLANNING AND PERFORMANCE MANAGEMENT  
PROGRAM: OUTAGE MANAGEMENT*

- 3 6 5      Develop techniques to perform all non-reactor outage tasks within the critical path.
- 3 6 6      Evaluate and provide, as appropriate, for on line diesel generator maintenance.
  - 3 6 6 1      Submit proposed project request for long range planning
  - 3 6 6 2      Evaluate for long-term planning
  - 3 6 6 3      Implement as evaluated per the Master Issues List process
- 3 6 7      Evaluate and provide, as appropriate, for simultaneous RHR outages via alternate decay heat removal or other methods.
  - 3 6 7 1      Submit proposed project request for long range planning.
  - 3 6 7 2      Evaluate for long-term planning.
  - 3 6 7 3      Implement as evaluated per the Master Issues List process
- 3 6 8      Provide for secondary containment in Mode 5 for fuel movement.  
Provide a truck lock for containment material transfers in Mode 5.
  - 3 6 8.1      Submit proposed project request for long range planning.
  - 3 6 8.2      Evaluate for long-term planning.
  - 3 6 8.3      Implement as evaluated per the Master Issues List process.
- 3 6 9      Implement QAT contractor in-processing recommendations.

**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: OUTAGE MANAGEMENT**

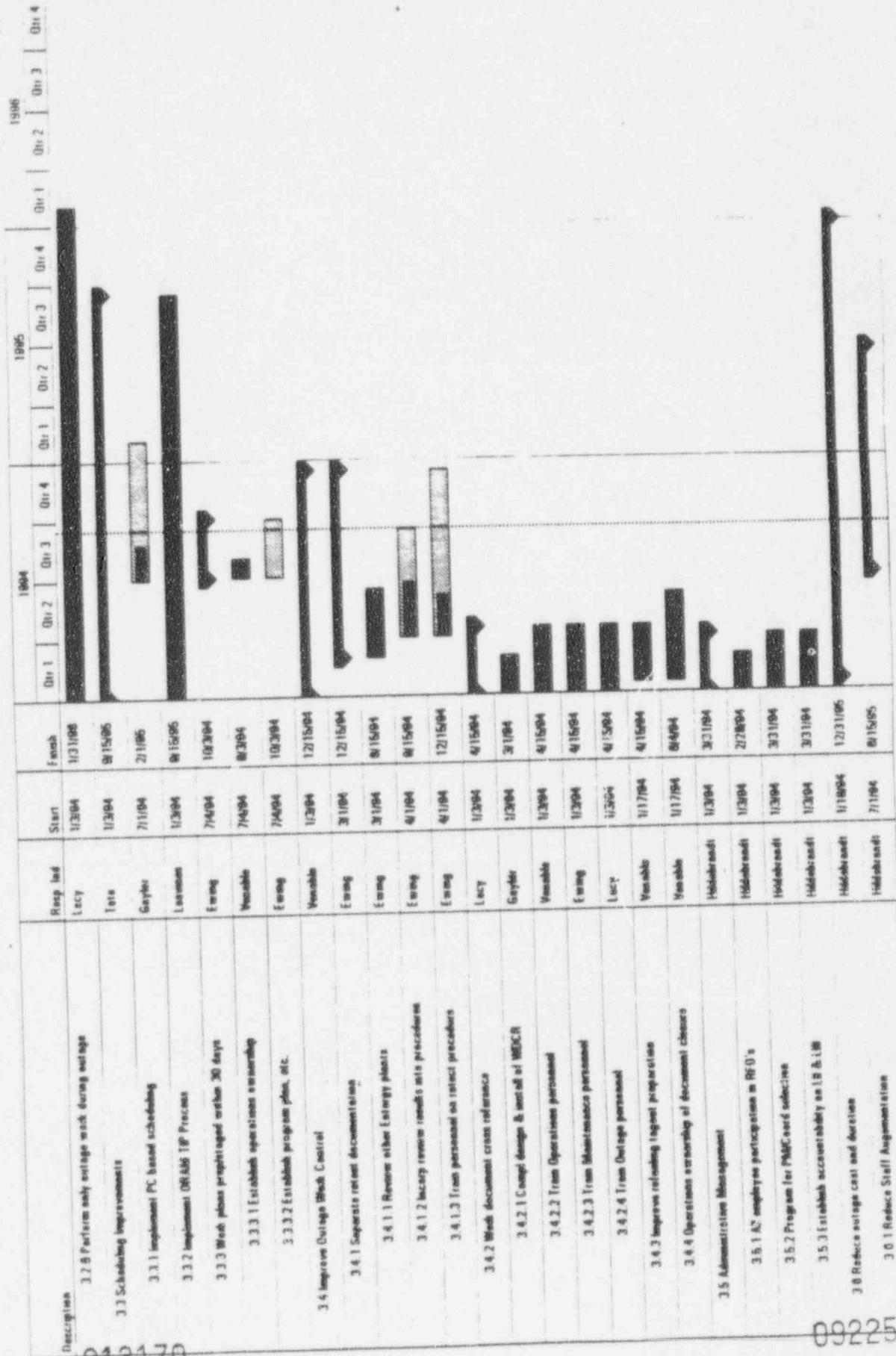


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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: OUTAGE MANAGEMENT**



SCHEDULE ATTACHMENT

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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: OUTAGE MANAGEMENT**

Description	Resp. led	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
3.8.8.1 Submit proposed project request	Lacy	10/3/94	1/1/95												
3.8.8.2 Evaluate for long term planning	Leonard	1/2/95	3/1/95												
3.8.8.3 Schedule per the MRL program	Leonard/Held	3/1/95	12/31/95												
3.8.8 Implement in program OAT	Durkin	1/18/94	7/1/94												

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*STRATEGY: LEADERSHIP*  
*PROGRAM: LEADERSHIP AND MANAGEMENT*

**PROGRAM TITLE**

Leadership and Management

**PROGRAM MANAGER**

Newton Spitzfaden, Manager - Human Resources

**DESCRIPTION**

Identify and implement the steps necessary to enhance leadership and management skills at River Bend. Identify and implement the appropriate management systems from Entergy and benchmark other nuclear and non-nuclear companies to improve leadership and management skills at River Bend

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

The Leadership and Management Systems program addresses the following root causes:

- Planning, goal setting, performance monitoring and management feedback have not been effective
  - Meaningful and useable performance measures
  - Human performance and accountability to reduce human errors
- Management and leadership skills have not kept pace with the level of change required
  - Managers' experience levels
  - Planning and prioritizing systems

**OBJECTIVE**

Develop and use our human resources more effectively and improve the leadership and management capabilities of River Bend personnel by implementing programs that strengthen the following areas.

- Supervisor development and leadership training
- Management training

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*STRATEGY: LEADERSHIP*  
*PROGRAM: LEADERSHIP AND MANAGEMENT*

- Supervisor performance
- Planning and accountability
- Supervisor selection

**PERFORMANCE MEASURES**

- Employee opinion survey rankings in the areas of management, work organization, working relationships, communications and job satisfaction result in the following.
  - 3 of the 5 areas should be above the norm in 1994
  - 4 of the 5 areas should be above the norm in 1995
  - 5 of the 5 areas should be above the norm in 1996
- Supervisory employee participation in the Assessment Program is as follows.
  - 100% of first level supervisors will be assessed by 3/31/95.
  - 100% of all supervisors and above will be assessed by year end 1995.
  - 100% of all first line supervisors hired or promoted will be assessed prior to being put into a position.
- Attendance in Total Quality Management training is as follows.
  - 100% of supervisors and above attend Introduction to Total Quality by 12/31/94
  - 65% of workforce attend Quality Principles and Practices by 12/31/94
  - 100% of workforce attend Quality Principles and Practices by 6/30/95
  - 10% of workforce attend Quality Action Team Leader training by 12/31/94
- Attendance in Professional Supervisors Training is as follows.
  - 50% of supervisors and above attend Professional Supervisor training by 12/31/94

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*STRATEGY: LEADERSHIP  
PROGRAM: LEADERSHIP AND MANAGEMENT*

- 100% of supervisors and above attend Professional Supervisors Training by 12/31/95
- 100% of work groups implement the use of annual work plans by 12/31/94

**ACTIVITIES**

**4.1 Supervisor Development and Leadership Training for Incumbents**

- 4.1.1 Establish an assessment program to determine leadership and management strengths and weaknesses of personnel currently assigned a position with leadership responsibility.
- 4.1.2 Identify and assess those supervisors requiring a performance development program.
- 4.1.3 Develop assessed individual's leadership and management skills based on assessment results using:
  - Training Programs
  - Workshops
  - Mentor Assignments
  - Rotational or Temporary Work Assignments
- 4.1.4 Supervisors and above attend Entergy's Professional Supervisor's Training.
- 4.1.5 Supervisors and above attend communications skills training.
- 4.1.6 Conduct annual surveys to track and trend the results of implemented programs.

**4.2 Management Training**

- 4.2.1 Train personnel in the following Total Quality Improvement programs.
  - 4.2.1.1 Introduction to Total Quality
  - 4.2.1.2 Quality Principles and Practices

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*STRATEGY: LEADERSHIP*  
*PROGRAM: LEADERSHIP AND MANAGEMENT*

4.2.1.3 Quality Action Team Leader

4.2.2 Identify and interview customers of leadership and management training and identify any additional training programs needed

**4.3 Supervisor Performance**

4.3.1 Implement Entergy's Performance Planning and Review System

4.3.2 Implement Entergy's Shining Through Program.

4.3.3 Implement Entergy's compensation program.

4.3.4 Evaluate management development programs at several top performing companies. (Evaluate personnel rotation).

4.3.5 Implement management development to improve resource development and utilization. (Implement personnel rotation).

4.3.6 Implement Total Quality Improvement.

4.3.7 Conduct annual surveys to ensure that enhanced leadership, management, and training programs have resulted in improved performance.

**4.4 Planning and Accountability**

4.4.1 Implement an annual work plan program.

4.4.2 Evaluate performance planning and personal accountability programs at top performance companies.

**4.5 Supervisor Candidate Selection**

4.5.1 Use an assessment program to identify potential candidates for positions of responsibility. (Applies to first line supervisor candidates who were pre-merger GSU employees).

4.5.2 Provide leadership and management skills training to prospective candidates to prepare them for positions of responsibility.

4.5.3 Review the selection process for supervisors above first line and implement changes as needed.

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*STRATEGY: LEADERSHIP*  
*PROGRAM: LEADERSHIP AND MANAGEMENT*

- 4 5 4 Review hiring qualifications for all supervisory positions. Revise or develop standards in accordance with EOI or Site Management approval. First line supervisors complete by July 1 and all other above first line by December 31, 1994.
- 4 5 5 Institute Behavioral Interviewing to River Bend site. Qualification for first class to be held prior to July 1, 1994. 25% of all supervisors will be trained by December 31, 1994. 100% of all River Bend supervisors will be trained by December 31, 1995 study.
- 4 5 6 Evaluate GGNS panel interview process for management hires and make a recommendation regarding it at River Bend by January 1, 1995.

## RIVER BEND STATION

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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: LEADERSHIP AND MANAGEMENT**

Description	Resp. Ind	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
4.5 Supervisor Candidate Selection	Spitzfaden	1/24/94	12/31/96												
4.5.1 Use assessment prog to identify candidates	Lacour	1/24/94	12/31/95												
4.5.2 Provide ldrship and management skill training	Arceneaux	1/24/94	12/31/96												
4.5.3 Review selection process	Spitzfaden	4/1/94	8/30/94												
4.5.4 Review hiring qualifications	Lacour	2/17/94	12/31/94												
4.5.5 Behavioral interviews	Palmer	2/17/94	12/31/95												
4.5.6 GGNS Panel interviews	Lacour	2/17/94	1/1/95												

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*STRATEGY: LEADERSHIP  
PROGRAM: CHANGE MANAGEMENT*

**PROGRAM TITLE**

Change Management

**PROGRAM MANAGER**

Holly Moore, Senior Lead Facilitator - Total Quality

**DESCRIPTION**

The Change Management Program is designed to establish a change philosophy at River Bend to enable personnel and organizations to implement the changes needed to become a top quartile performer. This philosophy will encourage creative thinking, empowerment, taking appropriate risk, ownership, accountability and reward. The types of changes expected are eliminating unnecessary work, improving processes, training personnel for new skills, developing questioning, self-critical attitudes, etc.

Entergy incorporates at its other facilities many of the principles to cause this philosophy change in its management processes and training programs. The management processes address such necessary issues as:

- Pay for performance - performance evaluations and compensation.
- Special reward programs - individual monetary award, such as Shining Through, and
- Group awards for meeting goals (Team Sharing).

The change oriented training programs are continuous improvement oriented under Entergy's Total Quality Improvement program and are:

- Quality Through Empowerment (QTE) - for Supervisors to empower and involve all employees in improving the way work gets done
- Quality Principles and Practices (QP&P) - for all employees to teach the specific skills to make significant improvements in their work.
- Process Management - on demand for teams addressing significant process issues.

STRATEGY: LEADERSHIP  
PROGRAM: CHANGE MANAGEMENT

The Change Management Program will put these processes in place as an evolutionary basis for the change philosophy. It will also advocate specific changes as a revolutionary process to show personnel through results that change is achievable and desirable during the cultural establishment of this new philosophy.

### ROOT CAUSES ADDRESSED BY THIS PROGRAM

This program will result in performance improvement in the following areas:

Management and leadership skills have not kept pace with the level of change required.

Problem identification and problem solving methods have not been consistently applied to improve performance.

### OBJECTIVES

Establish a plant-wide individual philosophy that supports continuous change.

This will be accomplished by:

- 1) Increased results oriented accountability (Goal setting, revised performance evaluations and reward systems to increase accountability of management to create a change philosophy and employees to change), thereby encouraging ownership for work throughout the site and improved staff competence.
- 2) Improved staff competence through Training (QTE & QP&P).
- 3) Advocacy (soliciting and obtaining sponsorship of specific changes, frequent communication of change efforts and results), while the philosophy is established in line management thereby encouraging ownership for work throughout the site.
- 4) Increased usage of team problem solving Quality Action Teams (QATs) or Natural Work Teams (NWTs) to encourage ownership for work throughout the site.
- 5) Ensuring change management is integrated into our Problem Identification and Root Cause Evaluation program and Change Approval Program, to encourage ownership for work throughout the site and practice self critical and questioning attitudes and behaviors.

Objectives 1 and 2 will be implemented through the Leadership and Management Program and will not be covered any further in this program.

Objectives 3, 4 and 5 will be implemented through this program.

*STRATEGY: LEADERSHIP  
PROGRAM: CHANGE MANAGEMENT*

**PERFORMANCE MEASURES**

**EMPLOYEE ATTITUDE** - Bring results of Total Quality section of annual employee survey to the lowest score of the other EOI Nuclear Plants in 1995. average of the other EOI plants scores in 1996

**TEAM PROBLEM SOLVING** - Total Quality Implementation

- River Bend personnel will be represented on all company Key Process Management Teams
- By the end of 1994, 20% of identified Natural Work Teams will complete one process analysis (Plan-Do-Check-Adjust or PDCA)
- By the end of 1995, 50% of identified Natural Work Teams will complete one process analysis (PDCA)
- By the end of 1996, 100% of identified Natural Work Teams will complete one process analysis (PDCA)

**PROCESS INTEGRATION**

Problem Solving - Integration of Change Management in process by 7/94

Change Approval - Integration of Change Management in process by 7/94

**ACTIVITIES**

As mentioned earlier, Objectives 1 and 2 are implemented elsewhere in the Performance Improvement Plan, so no activities will be covered here.

**5.1 Advocacy** - Deleted by approved program revision.

**5.2 Implement the Entergy Total Quality Improvement Implementation Plan**

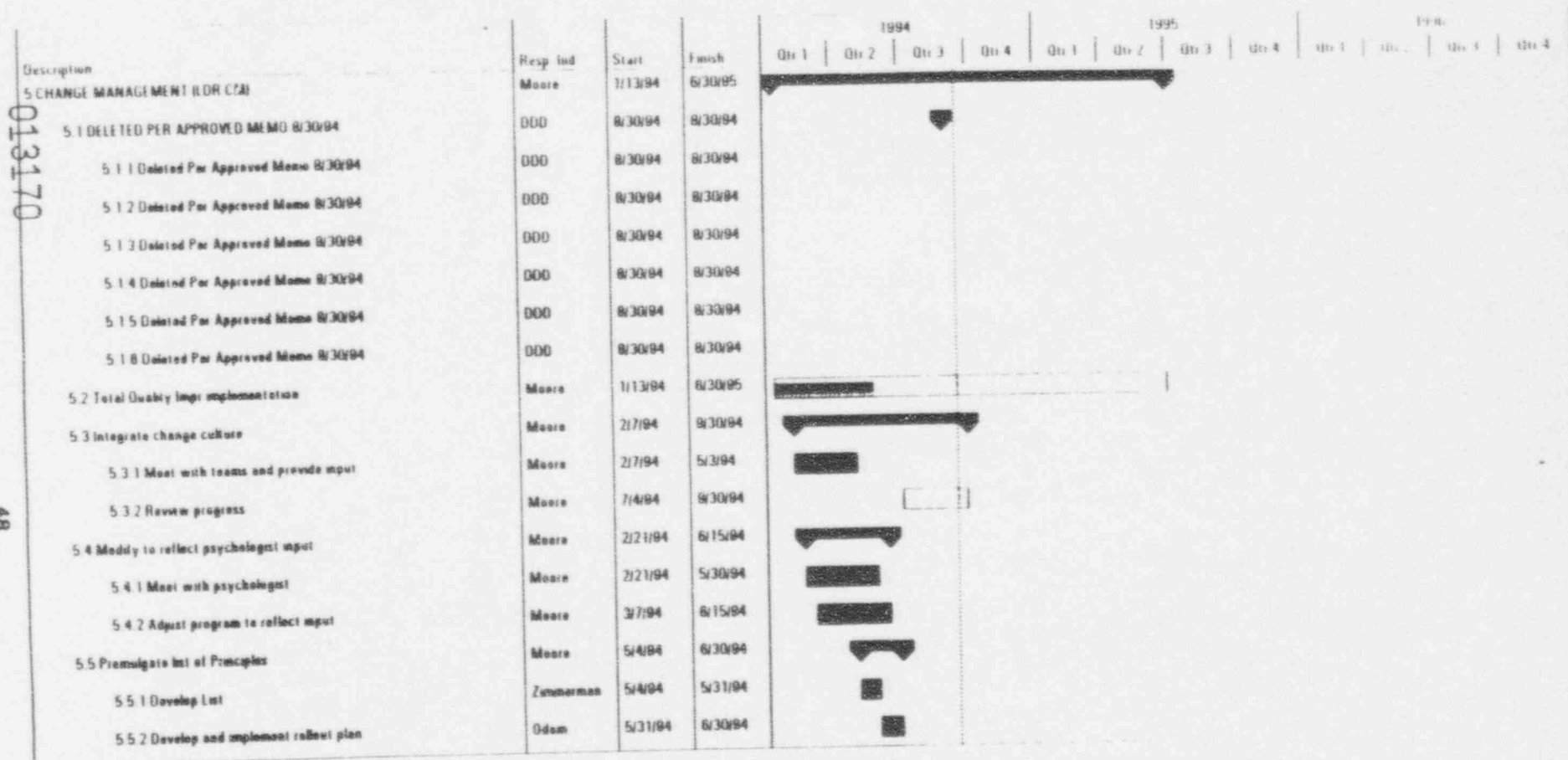
**5.2.1** The River Bend Total Quality Improvement Plan describes in detail the many activities necessary to implement Total Quality at River Bend. This is an essential program element and will provide to employees powerful tools for managing change.

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*STRATEGY: LEADERSHIP  
PROGRAM: CHANGE MANAGEMENT*

- 5.3 **Integrate change philosophy elements into the Site Planning and Resource Allocation Program and Problem Identification and Root Cause Evaluation Program**
  - 5.3.1 Meet with and provide input to those program teams to encourage greater receptivity to major changes in dealing with site issues
  - 5.3.2 Periodically review progress of those teams to provide additional "checks and adjustment"
- 5.4 **Modify the Change Management Program to reflect input from the RBS industrial psychologist**
  - 5.4.1 Meet with the industrial psychologist and obtain ideas and input for furthering enhancing the change philosophy
  - 5.4.2 Adjust program to reflect input
- 5.5 **Promulgate a list of Principles to replace existing Standards and Expectations.**
  - 5.5.1 Develop list of principles.
  - 5.5.2 Develop and implement rollout plan.

# RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: CHANGE MANAGEMENT



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SCHEDULE ATTACHMENT



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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: PROBLEM IDENTIFICATION AND ROOT CAUSE EVALUATION**

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**PROGRAM TITLE**

Problem Identification and Root Cause Evaluation

**PROGRAM MANAGER**

Joe Leavines, Manager - Nuclear Safety Assessment

**DESCRIPTION**

This program is designed to improve the problem identification and root cause evaluation process at River Bend. As a result of this program, improvements in regulatory performance, plant safety and reliability, and cost will be realized through more effective problem identification and root cause evaluation resulting in a reduction in the number of repetitive problems.

This program is an ongoing one with continual improvement, but for purposes of this plan it will be completed when the Corrective Action/Root Cause Analysis Key Process Management Team (KPMT) benchmarking has been completed, the Natural Work Teams (NWT) have incorporated the results into the process, and site wide training has been conducted. This coincides with completion of the review of the backlog present at the beginning of the improvement process. This date is 12/31/95.

**ROOT CAUSE ADDRESSED BY THIS PROGRAM**

Problem identification and problem solving methods have not been consistently applied to improve performance.

- Condition Report Initiation Control
- Root Cause Analysis Capability
- Improved Problem Solving Methodology-Total Quality Program

**OBJECTIVES**

- Clarify and improve the method for identifying plant problems, and establish a threshold to ensure that significant problems are identified and addressed in a timely manner.
- Establish an improved method for screening plant problems to assure significant problems are highlighted and are evaluated for root cause in a timely manner.

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*STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: PROBLEM IDENTIFICATION AND ROOT CAUSE EVALUATION*

- Develop an improved technical, quality, and administrative control process for the overall Problem Identification and Root Cause Evaluation process that will support timely development of corrective actions.
- Create an environment that ensures that problems are evaluated with the appropriate level of detail so that corrective actions identified as a result of these evaluations actually correct the problem and prevent recurrence.
- Define clear accountability for work throughout the site through appropriate planning and implementation of corrective actions.

**PERFORMANCE MEASURES**

The Entergy Key Process Management Team for Corrective Action and Root Cause Analysis is referenced throughout the remainder of this plan. Entergy employs Key Process Teams to evaluate the effectiveness of major processes essential to the mission of the company, and cause continual improvement in those processes. Corrective Action and Root Cause Analysis is one of the processes essential to the success of Entergy. The KPMT for this process has been active for nearly a year and is entering the benchmarking phase in it's pursuit of the best process. This plan is directly linked to that KPMT by design, and the continual improvement of the Corrective Action and Root Cause Analysis process beyond the bounds of the activities of this plan is assured through continuing participation of RBS in the KPMT.

- Establish a baseline and set goals for reduction of repeat failures. Use Entergy Key Process Management Team Output Measure-2 (KPMT OM-2) for Corrective Action Root Cause Analysis.
- Reduce the number of NRC violations which indicate a deficiency in the areas of effective corrective action to a level equivalent to that of top quartile performance by 1996. This is KPMT OM-5.
- Trend technical quality of root cause and corrective action as part of the KPMT, using process measures (PM) developed for that purpose by the KPMT (PM-1 and PM-2)
- Trend the percentage of documents found to be significant as required by KPMT OM 1
- Trend the timeliness of corrective action using KPMT OM-3 and OM-4.

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*STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING*  
*PROGRAM: PROBLEM IDENTIFICATION AND ROOT CAUSE EVALUATION*

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ACTIVITIES

- 6.1 Continue improving the process for problem identification through the use of the KPMT benchmarking of top quartile nuclear utilities and other industries. As part of this improvement, determine if all of the necessary inputs to the process, such as CR, QCR, MWO, and RDR, are present. The resulting improvement will promote the practice of self-critical behavior.
  - 6.1.1 Participate in the KPMT Benchmarking process if it is conducted. If it is not conducted, this portion of the item will be closed. Evaluate any recommendations made by the KPMT threshold sub-committee.
  - 6.1.2 Revise the problem identification processes at River Bend Station based on the KPMT benchmarking or threshold subcommittee recommendations.
- 6.2 Continue upgrading the Condition Reporting procedure (RBNP-0030) to include recommendations of the Entergy KPMT. The emphasis will be on the continuing development of a user-friendly procedure that promotes use. This includes screening for significance, operability and repeatability as well as a tracking process. Timely feedback to the initiator of a Condition Report is emphasized in order to provide positive motivation toward identifying problems.
  - 6.2.1 Modify the CR process based on site surveys and evaluate any recommendations made if KPMT benchmarking is performed.
  - 6.2.2 Conduct training on revised CR process.
- 6.3 Communicate the RBS management commitment for problem identification, performance of root cause evaluations and development of sound corrective actions.
  - 6.3.1 Communicate management expectations for problem identification and performance of root cause evaluation.
  - 6.3.2 Follow-up with group meetings on management expectations.

**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: PROBLEM IDENTIFICATION AND ROOT CAUSE EVALUATION**

- 6.4 Upgrade the root cause analysis capability at River Bend Station by active participation in the KPMT effort for improving root cause analysis at Entergy sites. The KPMT recommendations for improving root cause analysis will be implemented. Additionally Kepner - Treoge training will be provided to the Nuclear Safety & Assessment personnel who assist the plant personnel in root cause analysis.
  - 6.4.1 Participate in the NWT to support KPMT efforts for improving root cause analysis program at Entergy nuclear sites.
  - 6.4.2 Train the core group of root cause evaluators in the KPMT recommended root cause analysis program.
- 6.5 Improve site-wide root cause analysis based on the KPMT recommendations for root cause analysis training. Current root cause analysis program will be revised and the plant personnel trained to accomplish this.
  - 6.5.1 Revise site-wide root cause analysis training program in accordance with the KPMT recommendations. Incorporate other good practices in the program as seen fit.
  - 6.5.2 Train select line group personnel from each site group in the revised root cause analysis training program.
- 6.6 Evaluate effectiveness of the KPMT recommended processes and make necessary adjustments to further improve the root cause analysis program.
  - 6.6.1 Evaluate the quality of root cause determination to date at RBS.
  - 6.6.2 Evaluate effectiveness of the KPMT recommended process and provide feedback to the KPMT via NWTs.
  - 6.6.3 Make changes necessary to improve the program as needed.
- 6.7 Evaluate backlog of significant Condition Reports with open or incomplete items and perform required root cause evaluations, and develop proposed corrective actions.
  - 6.7.1 Establish the priorities and goals for conducting root cause evaluations of the significant CR backlog.

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: PROBLEM IDENTIFICATION AND ROOT CAUSE EVALUATION**

- 6.7.2 Conduct the evaluations of the backlog by having the Condition Review Group (CRG) validate the significant CR designations and the assigned organizations complete the root causes. The root causes will be evaluated using the Corrective Action Review Board (CARB) process. The CARB is a board of senior managers which evaluates root cause and corrective action determinations for CR's which document significant conditions adverse to quality.
- 6.8 Develop a process to ensure that the department assigned responsibility by CARB establishes a corrective action plan and provides timely implementation of the corrective action plan.
- 6.9 Check and adjust the process to make sure use of timely implementation.



## RIVER BEND STATION

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RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: PROBLEM IDENTIFICATION AND ROOT CAUSE EVALUATION

Description	Resp. lead	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
8.8 Check and adjust implementation	Leaves	1/2/95	12/31/96												

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: CLOSURE OF PROBLEMS**

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**PROGRAM TITLE**

Closure of Problems

**PROGRAM MANAGER**

Joe Leavines, Manager - Nuclear Safety Assessment

**DESCRIPTION**

Improve the problem closure process by procedural and process changes that better prioritize and categorize identified problems and emphasize personnel accountability for problem resolution, with the result that the problem solving methodology is improved in terms of effectiveness, completeness and timeliness.

This program is an ongoing one with continual improvement, but for purposes of this plan it will be completed when the Key Process Management Team (KPMT) benchmarking has been completed, the Natural Work Teams have incorporated the results into the process, and site wide training has been conducted. Revision of RBNP-047 will be completed by 12/31/94 & staff training will be completed by 6/30/95.

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Problem identification and problem solving methods have not been consistently applied to improve performance.

- Improved Problem Solving Methodology
- Total Quality Program Integration of Issue resolution with enhanced Planning Processes

**OBJECTIVES**

- Clarify and improve problem closure and facilitate accountability.

**PERFORMANCE MEASURES**

Reduce median time from problem identification to problem closure for each responsible department. This is in keeping with KPMT output measures 3 and 4.

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: CLOSURE OF PROBLEMS**

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**ACTIVITIES**

- 7.1 Improve problem closure process removing barriers to performance, changing procedures that do not work.**
- 7.1.1 Apply graded approach based on significance to closure review to streamline the process without reducing quality
- 7.1.2 Change problem identification and tracking processes to ensure problems are not removed from the tracking system until associated corrective actions have been completed.
- 7.1.3 Develop problem identification/ closure matrix categorizing problems by generic types and cross reference to correct problem reporting document (i.e. - CR, QCR, MWO, or RDR). This will help ensure that identified problems are correctly categorized for more effective and timely resolution. This method will focus attention on significant problems and emphasize prompt closure of minor non-significant problems without burdening the system with unnecessary administrative tasks.
- 7.1.4 Revise RBNP-047 "Corrective Action Program" and implementing procedures to reflect changes.
- 7.1.5 Prepare lesson plan and conduct training for site personnel on revised procedure RBNP-047.
- 7.2 Develop methodology to compile desirable problem report attributes which would enable measurement of results and holding people accountable.**
- 7.2.1 Review existing problem reporting systems to determine if the following information exists for each identified problem to facilitate accountability and tracking:
- Type of Corrective Action document
  - Significant or non-significant problem
  - Responsible Department Director/Manager/Supervisor by name
  - Scheduled Corrective Action completion due date
  - Actual Corrective Action completion date (closure)

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*STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING*  
*PROGRAM: CLOSURE OF PROBLEMS*

7.2.2 Correct systems which do not capture this information.

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# THE NATIONAL ANTHROPOLOGICAL ARCHIVES

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: OVERSIGHT OF PROBLEM SOLVING SYSTEMS**

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**PROGRAM TITLE**

Oversight of Problem Solving Systems

**PROGRAM MANAGER**

Joe Leavines, Manager - Nuclear Safety Assessment

**DESCRIPTION**

Develop long-term processes to monitor the progress and effectiveness of problem identification and problem solving systems. This will be accomplished through self-critical assessments, oversight, and monitoring of critical process parameters. The results will provide assurance that problems are being identified as well as being timely and effectively resolved. The scope of this program includes trending of failures and repeat events, self-assessment and management oversight of the corrective action process.

Many of the action items implemented in this program will be ongoing; however, for purposes of this program, full implementation of the processes will be completed by 10/17/94.

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Problem Identification and Problem Solving methods have not been consistently applied to improve performance

- Corrective action validation process
- Improved problem solving methodology-total quality process
- Integration of issue resolution with enhanced planning processes

**OBJECTIVES**

- Develop an effective self-assessment capability that will focus on identifying process and performance weaknesses
- Develop a method to monitor the effectiveness of corrective actions through the use of trending, and alert management on variations of performance with regard to identifying and solving problems.



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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: OVERSIGHT OF PROBLEM SOLVING SYSTEMS**

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- Define expectations and develop a process to determine where assessment resources can best be applied
- Develop an effective precursor trending program that will provide proactive identification of potential problems

**PERFORMANCE MEASURES**

Performance measures identified in the Long-Term Performance Program "Problem Identification and Root Cause Evaluation " are the same as those developed by the Entergy Key Process Management Team for Root Cause and Corrective Action. Those process measures are applicable for this program as well.

- Establish a baseline and set goals for reduction of repeat failures. Use Entergy Key Process Management Team Output Measure-2 (KPMT OM-2) for Corrective Action Root Cause Analysis.
- Reduce the number of NRC violations which indicate a deficiency in the areas of effective corrective action to a level equivalent to that of top quartile performance by 1996. This is KPMT OM-5.
- Trend technical quality of root cause and corrective action as part of the KPMT, using process measures (PM) developed for that purpose by the KPMT (PM-1 and PM-2).
- Trend the percentage of documents found to be significant as required by KPMT OM-1.
- Trend the timeliness of corrective action using KPMT OM-3 and OM-4.

**ACTIVITIES**

**8.1 Develop self-assessment capability.**

**8.1.1 Establish an effective Self-Assessment Program.**

- 8.1.1.1 Visit other Entergy sites to perform an in-depth review of their self-assessment program.
- 8.1.1.2 Determine River Bend program requirements and develop guidelines.
- 8.1.1.3 Communicate guidelines and management expectations to departments involved with performing self-assessments.

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: OVERSIGHT OF PROBLEM SOLVING SYSTEMS**

- 8 1 1 4 Departments begin performing new self-assessment process
- 8 1 1 5 Compile self-assessment results and issue to management
- 8 1 2 Establish methodology to determine where to focus internal and external assessment resources and develop assessment schedule.
- 8.2 Develop effective oversight processes for problem solving systems.**
  - 8 2 1 Determine trends which provide an effective overview of problem solving capability.
    - 8 2.1.1 Evaluate ANO's Plant Review Group (PRG) process for use at RBS.
    - 8 2.1.2 Establish program expectations and program implementation guidelines (in conjunction with Operating Review Group initiatives).
    - 8 2.1.3 Review departmental and global trends for use in focusing attention on problem solving system strengths and weaknesses. Revise the existing Performance Monitoring Program Management Report to incorporate a review of departmental and global trends.
    - 8 2.1.4 Revise the Performance Monitoring Management Report to provide more effective trend information for executive decision making and action plan development.
    - 8 2.1.5 Provide analysis results to senior management.
  - 8 2.2 Develop precursor trending program based on performance.
    - 8 2.2.1 Evaluate the Precursor Trending program at Waterford.
    - 8 2.2.2 Develop program and write guidelines.
    - 8 2.2.3 Promote program to site personnel.
    - 8 2.2.4 Implement program.

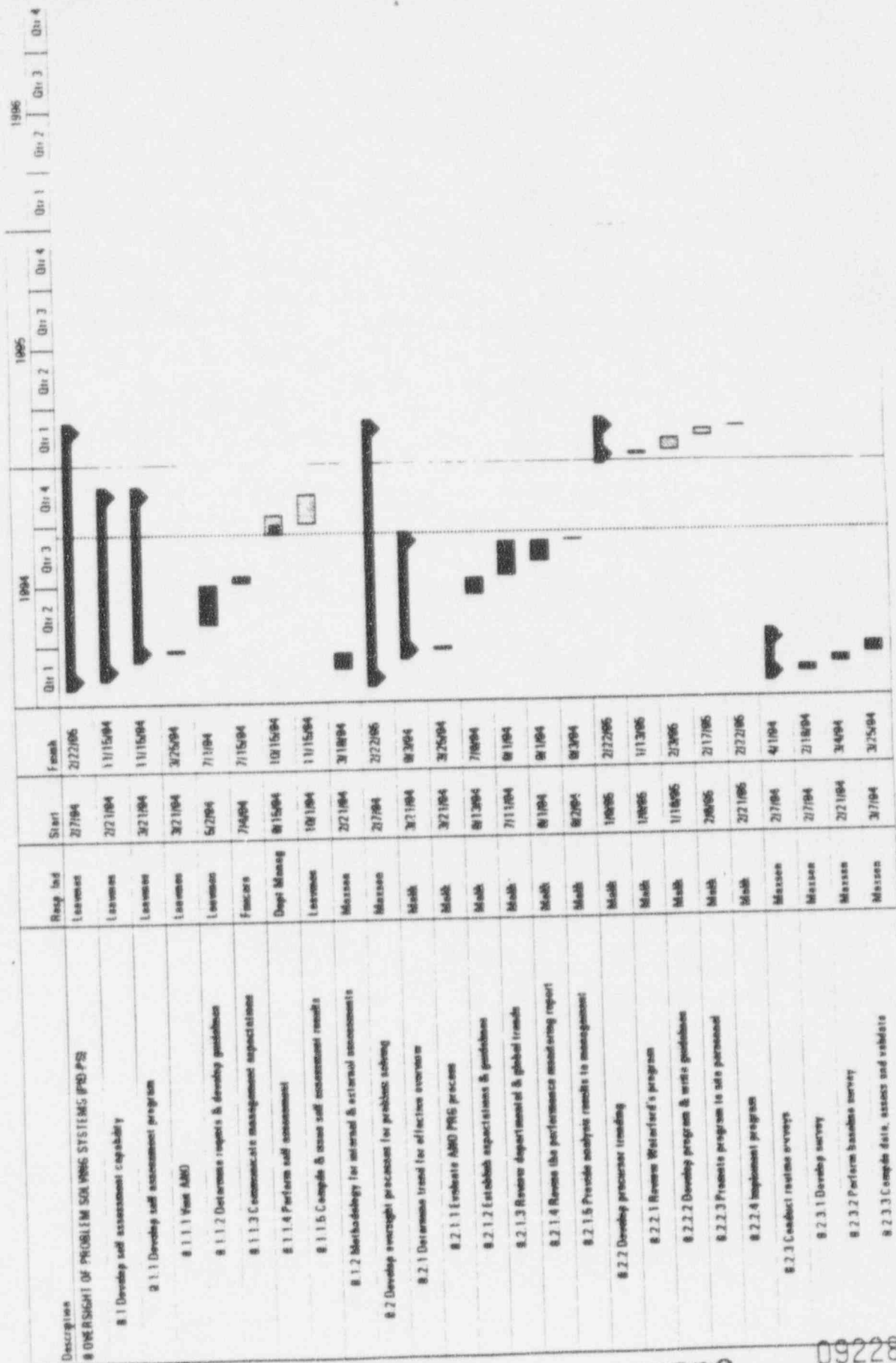
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*STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: OVERSIGHT OF PROBLEM SOLVING SYSTEMS*

- 8 2 3     Conduct routine surveys of employee perceptions regarding management expectations and overall attitudes about problem identification and problem resolution processes.
  - 8 2 3 1     Develop survey based on customer requirements (KPMT for Root Cause and Corrective Action).
  - 8 2 3 2     Perform baseline survey.
  - 8 2 3 3     Compile data; assess results; validate.
  - 8 2 3 4     Publish survey results.
  - 8 2 3 5     Baseline survey complete.

# RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: OVERSIGHT OF PROBLEM SOLVING SYSTEMS



RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: OVERSIGHT OF PROBLEM SOLVING SYSTEMS

Description	Resp. lead	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
8.2.3.4 Publish survey results	Masson	3/28/94	3/31/94												
8.2.3.5 Baseline survey complete	Masson	3/31/94	4/1/94												

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**

**PROGRAM TITLE**

Human Performance Effectiveness

**PROGRAM MANAGER**

Clay Sutherland, Manager - Human Performance

**DESCRIPTION**

Establish programs that will increase employee ownership and accountability for successful human performance and resolution of human performance issues. The programs will address proven industry methods that are effective in reducing human error by assuring that work is done correctly the first time and by identifying and correcting the root causes of human performance errors.

The removal of human performance "traps" such as poor procedure quality, procedure compliance, poor material condition due to uncorrected equipment problems, and lack of ownership/accountability are addressed elsewhere in the LTPIP:

- Additional root cause analysis methodology is addressed in Sections 6.4 and 6.5 of the Problem Identification and Root Cause Evaluation program.
- Increased accountability is addressed in Section 4.4 of the Leadership & Management program.
- Procedure upgrade and quality is addressed in Section 13.1 of the Procedures program.
- Procedure compliance is addressed in Section 13.1.5 of the Procedures program.
- Improved Standards & Expectations is addressed in the Change Management Program.

**ROOT CAUSE ADDRESSED BY THIS PROGRAM**

- Human performance and accountability.
- Organizational roles and responsibilities and improved teamwork.



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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**

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**OBJECTIVES**

- Improve the station Human Performance Enhancement System (HPES) including establishing departmental capability to investigate and evaluate human performance errors to allow more effective and timely correction of plant problems.
- Develop a human performance database to promote more effective trending, problem identification and root-cause analysis for human performance issues.
- Improve the effectiveness of the S T A R program as experience is gained to reinforce the self-check capability for all plant personnel.

**PERFORMANCE MEASURES**

- Establish a baseline for the number of significant human performance problems as identified on Condition Reports by the end of 1994.
- Establish goals for the reduction of human performance errors for 1995, 1996.
- Completion of training and certification of at least 6 HPES evaluators per year for 1994-1996.

**ACTIVITIES**

**9.1 Improve the Station HPES Capability**

- 9.1.1 Develop and implement a station HPES program procedure.
- 9.1.2 Develop an HPES training module to qualify selected department personnel as HPES evaluators.
  - 9.1.2.1 Perform a task analysis, including identifying required root-cause analysis tools, and develop or modify existing training to include those tools and identified analysis needs.
  - 9.1.2.2 Prepare lesson plans and materials for training HPES evaluators.
  - 9.1.2.3 Develop a standardized qualification process for the evaluators.

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**

- 9 1 3 Complete qualification of designated department evaluators
  - 9 1 3 1 Identify personnel from each major department to be trained as evaluators and develop the training schedule
  - 9 1 3 2 Perform HPES training on the approved schedule
  - 9 1 3 3 Certify the departmental evaluators
- 9 1 4 Commence departmental performance of HPES evaluations as specified in the HPES program procedure.
- 9.2 Develop an Effective Human Performance Database**
  - 9 2 1 Establish database specifications and requirements.
    - 9 2 1 1 Define the essential data elements of an effective human performance database using INPO good practice information and information from Entergy sites
    - 9 2 1 2 Identify potential program and hardware needs to implement an effective database management system
    - 9 2 1 3 Budget and obtain appropriate resources to perform required analysis.
  - 9 2 2 Trend human performance data.
    - 9 2 2 1 Train departmental HPES coordinators and commence input of data.
    - 9 2 2 2 Develop and issue periodic reports to management and to the departments that will support the performance improvements and objectives of this plan.
- 9.3 Improve S.T.A.R. Program Implementation**
  - 9 3 1 Emphasize the use of self checking through department training given by department evaluators.
  - 9 3 2 Assure that self checking remains an essential attribute of the long-term observation program.

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING  
PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**

- 9.3.3 Provide more feedback to employees on the lessons learned from significant human performance events at River Bend, other EOI sites, and industry wide.
- 9.4 **Reduce the number of problems resulting from human performance issues**
  - 9.4.1 Implement the human performance Quality Action Team at RBS.
  - 9.4.2 Conduct an independent assessment of human performance culture at RBS.
- 9.5 **Improve the Supervisory Effectiveness to minimize Rule/Knowledge - Based errors**
  - 9.5.1 Conduct Field Surveillances (Plant Observations)
    - 9.5.1.1 Track and trend the Management Tours and observations.
    - 9.5.1.2 Track and trend the Departmental Tours and observations.
    - 9.5.1.3 Provide coaching in the techniques of field surveillances.
    - 9.5.1.4 Provide training in techniques for observation.
  - 9.5.2 Improve the effectiveness of pre-job/pre-evolution briefings.
    - 9.5.2.1 Improve the effectiveness of briefings.
    - 9.5.2.2 Improve communications during pre-job briefings.
  - 9.5.3 Provide accountability training to supervisors.
  - 9.5.4 Provide human performance input to the Procedure Upgrade Program.
- 9.6 **Establish a site-wide accountability program**
  - 9.6.1 Account for the Human-error rate by responsible department.
    - 9.6.1.1 Develop a database capable of accounting for human-error rate by department.
    - 9.6.1.2 Provide tracking and trending of human-error rate.
    - 9.6.1.3 Provide plant management periodic reporting of the human-error rates.

**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**

- 9.6.2 Tie manager/supervisor performance to their departmental performance.
  - 9.6.2.1 Provide error-rate reports to the department managers and directors, and site VP
- 9.6.3 Provide coordination for accountability sessions for key events
- 9.6.4 Establish a River Bend accountability award program.
  - 9.6.4.1 Initiate an accountability mascot contest.
  - 9.6.4.2 Provide mascot promotional materials for distribution.
  - 9.6.4.3 Establish award criteria for the mascot contest.
- 9.7 Improve the capabilities of station personnel in the Qualification, Validation and Verification of critical information**
  - 9.7.1 Improve supervisory skills regarding human performance.
    - 9.7.1.1 Develop course materials for the supervisory skills improvement.
    - 9.7.1.2 Present training to supervisory personnel regarding human performance improvement.
  - 9.7.2 Provide Qualification, Validation, and Verification (QV&V) training for employees.
    - 9.7.2.1 Develop QV & V training for employees.
    - 9.7.2.2 Present the QV & V training to employees.
  - 9.7.3 Ensure a procedure walkdown is conducted prior to implementation of procedures.
- 9.8 Perform a reliability and Optimization Analysis of the key work processes with the greatest impact on human performance**
  - 9.8.1 Report identified procedural human performance problems to the Procedure Upgrade Project program representative.

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**STRATEGY: PROBLEM IDENTIFICATION AND PROBLEM SOLVING**  
**PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**

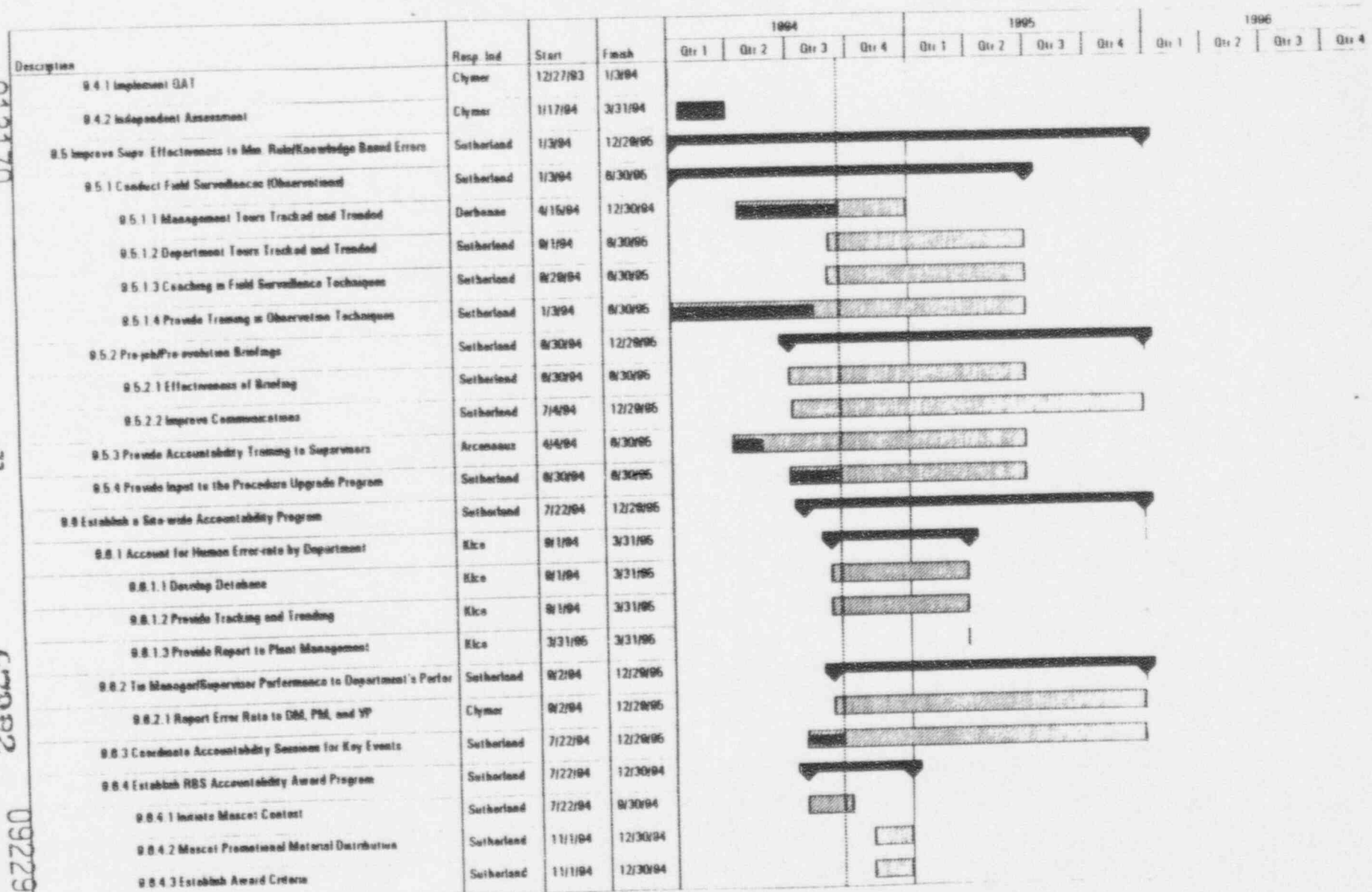
- 9 8 2 Assist the station Human Factors Engineer in identification of human performance problem areas
- 9.9 **Identify unnecessary NRC/INPO commitments related to human performance problems**
  - 9 9 1 Draft recommendations for commitment deletions which would improve human performance.
  - 9 9 2 Coordinate the deletion/revision of licensee commitments as identified above
- 9.10 **Improve station communications**
  - 9 10 1 Develop departmental communication methods.
    - 9 10 1 1 Assist in the development of departmental newsletters.
  - 9 10 2 Develop and improve on-site communication capability
    - 9 10 2 1 Personalize the "Inside Entergy" periodical.
    - 9 10 2 2 Develop a video informational communication system for on-site.
    - 9 10 2 3 Set-up a distribution mechanism for the Plan of the Day meeting minutes.

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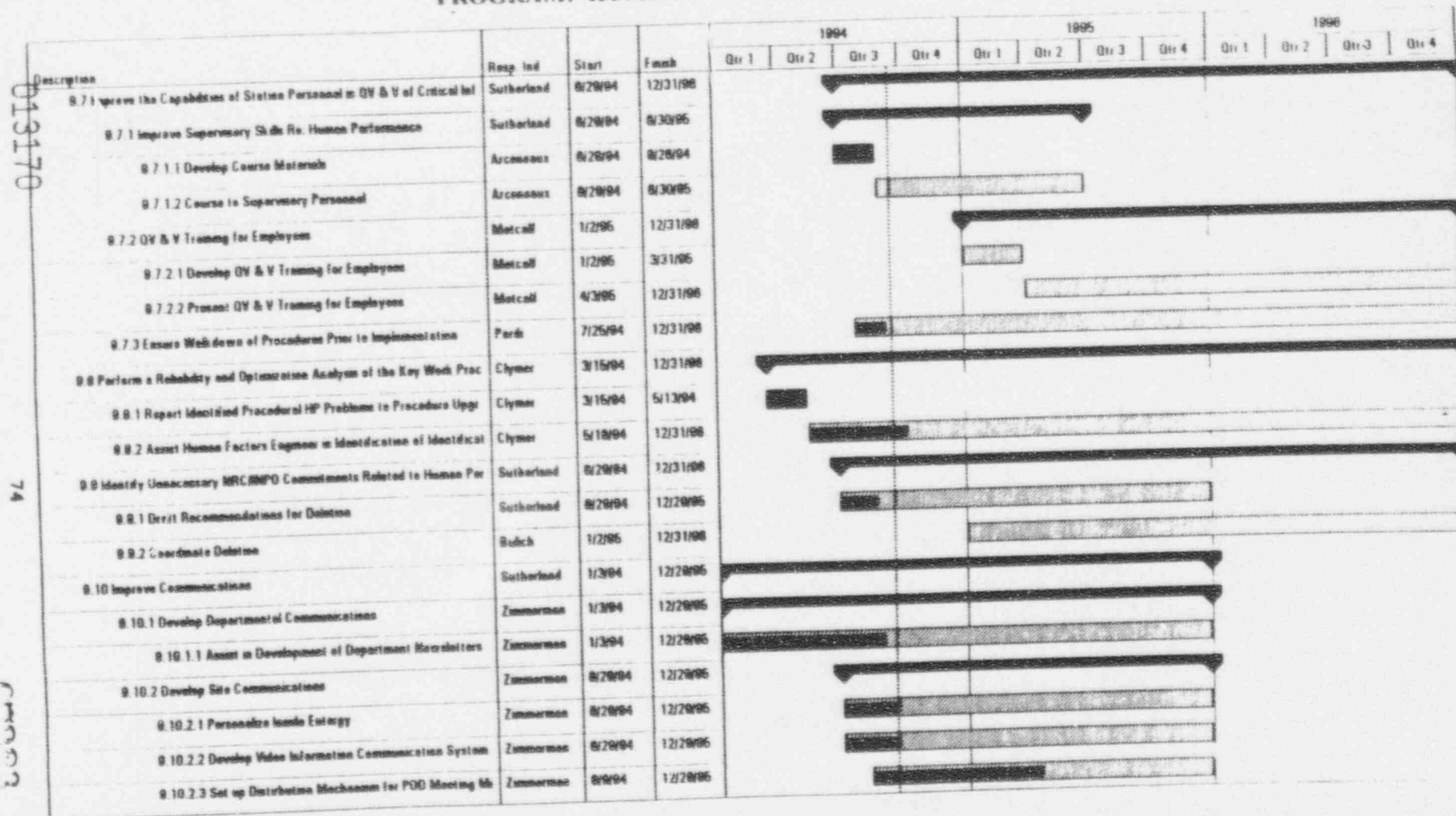


**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**



SCHEDULE ATTACHMENT

# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: HUMAN PERFORMANCE EFFECTIVENESS**



*STRATEGY: WORK PROCESS EFFICIENCY*

*PROGRAM: WORK CONTROL*

## **PROGRAM TITLE**

Work Control

## **PROGRAM MANAGER**

Rick Jackson, Senior Technical Specialist

## **DESCRIPTION**

Improve the effectiveness and efficiency of maintenance work activities through implementation of improvements in the work control process such that the plant material condition continually improves and a high level of plant reliability is achieved. These initiatives will substantially streamline the processes to get work done and correct plant equipment problems.

## **ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Critical station work processes are inefficient and have allowed backlogs of work to occur, due to:

- No single department accountable for work control.
- Overly cumbersome work control process.
- Lack of an integrated work schedule.

## **OBJECTIVES**

- Restructure the plant work-control process to streamline the performance of maintenance and test activities. Process improvements will eliminate barriers to performance of maintenance, overhaul processes that are cumbersome and empower people to achieve the required performance improvements.
- Provide an upgraded and enhanced maintenance management system including effective management tools to enhance overall process efficiency and timeliness and contribute to the ability to get the right work done on schedule.
- Improve the accuracy, usability and availability of information for maintenance planning to improve the efficiency, technical accuracy, completeness, and workability of maintenance work packages such that work can be correctly completed the first time.
- Improve the performance of preventive and predictive maintenance to improve maintenance resource utilization and improve plant reliability.

*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: WORK CONTROL*

**PERFORMANCE MEASURES**

- No priority 1 or priority 2 MWO's greater than 14 days old.
- Priority 3 non-outage corrective maintenance backlog (MWO and MWOR) greater than 3 months old.
  - Less than 300 by 12/94
  - Less than 100 by start of RF6 (Fall 1995)
- Percent of scheduled work items completed.
  - 90% by 12/94
  - 95% by 12/95
- Safety system availability and reliability meet INPO performance commitments.
- Maintenance productivity improvements (craft productivity studies):
- Adequacy and schedule performance on PM's.
  - Zero late PM's by 12/94.

**ACTIVITIES**

**10.1 Restructure the Work Control Process**

- 10.1.1 Perform an assessment of the overall work control process. This process includes all areas involved in the Maintenance Work Order (MWO) process. (i.e., maintenance operations, modifications, security, etc.)
  - 10.1.1.1 Define and map current process.
  - 10.1.1.2 Perform a customer/supplier review for the Work Management Center functions through the use of feedback forms.
  - 10.1.1.3 Define the essential support processes and programs that interface with the Work Management Center, assign responsible managers, and define their responsibilities.

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*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: WORK CONTROL*

- 10.1.1.4 Perform a multi-discipline, focused assessment of the work control process at RBS
- 10.1.2 Enhance the Work Management Center
  - 10.1.2.1 Implement improvements from the assessment process
  - 10.1.2.2 Continue to refine the system windows to optimize use of system outages and improve overall maintenance efficiency
  - 10.1.2.3 Train personnel on process improvements.
- 10.1.3 Refine and improve the rolling system schedule and interface with the Plan of the Day (POD).
  - 10.1.3.1 Incorporate planned pre-outage work.
  - 10.1.3.2 More effectively incorporate corrective maintenance actions.
  - 10.1.3.3 Incorporate all MRs.
  - 10.1.3.4 Incorporate all planned valve testing.

**10.2 Upgraded And Enhanced Maintenance Management Systems**

- 10.2.1 Define the needs and scope for an automated maintenance management system (MMS).
  - 10.2.1.1 Investigate availability of current and planned systems from Entergy and other utility stations including priority, schedule and cost.
  - 10.2.1.2 Define the interfaces and ties to RBS scheduling and other systems required.
  - 10.2.1.3 Define required tracking and performance monitoring needs to meet Work Management Center requirements.
  - 10.2.1.4 Develop plan for implementation of enhanced system.
  - 10.2.1.5 Implement upgraded system.

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**STRATEGY: WORK PROCESS EFFICIENCY**  
**PROGRAM: WORK CONTROL**

- 10.2.2 Enhance and streamline the "as is" critical maintenance processes to support effective and efficient maintenance. Processes include clearances and LCO tracking, post-maintenance test, and trouble shooting.
  - 10.2.2.1 Identify commitments.
  - 10.2.2.2 Identify program design requirements.
  - 10.2.2.3 Modify, as necessary the processes and/or take advantage of proven processes at other utilities.
- 10.2.3 Revise and streamline the Conduct of Maintenance and Conduct of Operations procedures.
  - 10.2.3.1 Review for required changes following improvement of the work control process.
  - 10.2.3.2 Revise and upgrade the procedures as necessary.

**10.3 Improve Maintenance Planning Information**

- 10.3.1 Upgrade site drawings, vendor documentation, and vendor manuals to enhance and support efficient maintenance planning.
  - 10.3.1.1 Identify documentation needing upgrade to support planning.
  - 10.3.1.2 Prioritize and schedule long-term documentation upgrade requirements.
- 10.3.2 Identify existing sources of information used in the maintenance planning process. Establish and maintain communications with the "owners" of those systems to ensure that maintenance planning needs are taken into account during evaluations, changes and/or upgrades to those systems.
  - 10.3.2.1 Review and identify upgrades needed in machinery history.
  - 10.3.2.2 Identify any changes required to enhance data input and retrieval to and from the NPRDS database.
  - 10.3.2.3 Identify any changes required to manage archived work instructions.



*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: WORK CONTROL*

- 10.3.2.4 Identify and input any required data needs to the planned MMS project.
- 10.3.2.5 Provide necessary input for planning needs to the Controlled Bill of Material project
- 10.3.2.6 Provide specific planning needs to the Vendor Technical Information Program.
- 10.3.2.7 Review any remaining engineering databases and drawings for additional planning support upgrade required.
- 10.3.2.8 Assure planning is appropriately tied into ALARA and Radiological Protection databases.
- 10.3.3 Implement approved upgrades to the planning system.
  - 10.3.3.1 Implement changes as identified on the schedule consistent with section 3.1.
  - 10.3.3.2 Establish effective fragment scheduling methods for planning and provide the linkage to daily scheduling.

**10.4 Improve Preventive and Predictive Maintenance Performance**

- 10.4.1 Review and, if necessary, revise existing preventive maintenance tasks for all disciplines.
  - 10.4.1.1 Evaluate current tasks.
  - 10.4.1.2 Determine and make enhancements as appropriate to existing tasks, substituting predictive or condition monitoring tasks for time-based tasks where appropriate.
  - 10.4.1.3 Review and consolidate duplicated tasks or combine tasks for scheduling, planning or work efficiency.
- 10.4.2 Incorporate Reliability Centered Maintenance (RCM) outputs into revised tasks.
  - 10.4.2.1 Perform the system studies on the schedule set by system engineering and maintenance.
- 10.4.3 Upgrade the PM program as a result of the system study outputs.

RIVER BEND STATION  
1994-1996 PERFORMANCE IMPROVEMENT PLAN

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*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: WORK CONTROL*

10 4 4      Conduct periodic assessments of PM program effectiveness in  
accordance with Maintenance Rule requirements

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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: WORK CONTROL**

Description	Responsible	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
10.4.1.3 Canals	Martinez	7/1/94	8/30/95												
10.4.2 Incorporate RCM	Martinez	1/3/94	12/29/95												
10.4.2.1 Perform System Studies	Martinez	1/3/94	12/29/95												
10.4.3 Upgrade PMS Program	Martinez	1/3/94	12/29/95												
10.4.4 Periodic Assessment	Martinez	7/1/94	12/31/95												

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*STRATEGY: WORK PROCESS EFFICIENCY  
PROGRAM: MATERIALS MANAGEMENT*

## **PROGRAM TITLE**

Materials Management

## **PROGRAM MANAGER**

Richard Frayer, Manager-Materials, Purchasing & Contracts

## **DESCRIPTION**

Improve the accuracy and availability of the material inventory and enhance the material control process to reduce the cycle time and resources required to obtain and install without delay the correct parts during plant maintenance and modifications. The intent is to integrate the material supply process with maintenance planning such that inventories and procurement actions match demand on a planned basis.

## **ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Critical station work processes are inefficient and have allowed backlogs of work to occur, including:

- Materials management

## **OBJECTIVES**

- Establish and maintain a high degree of accuracy between plant configuration documentation and the parts for equipment.
- Optimize the procurement cycle.
- Establish accurate planning guidelines for parts.
- Optimize the station inventory of parts to assure the appropriate level of critical parts are maintained. Share parts with other EOI plants
- Inventory levels are controlled by the critical parts list to reflect plant goals.

## **PERFORMANCE MEASURES**

Priority 1,2,3 MWO's awaiting parts less than or equal to 50.



*STRATEGY: WORK PROCESS EFFICIENCY  
PROGRAM: MATERIALS MANAGEMENT*

ACTIVITIES

11.1 Improve Deficient Areas.

11.1.1 Improve process to select and obtain parts

- 11.1.1.1 A Quality Action Team (QAT) sponsored by Engineering Support is improving parts configuration control.
- 11.1.1.2 Deleted by Program revision
- 11.1.1.3 Develop a schedule for actions from the parts QAT and submit to the Change Review Board (CRB). Ensure the following materials activities are included:
  - Verification of the on shelf material to ensure technical and quality requirements are met and material is ready for use.
  - Retagging material to the current standards to avoid installation delay.
  - Recataloging to the Entergy dictionary to facilitate parts sharing
- 11.1.1.4 Verify parts in the work planning process until the controlled bill of material is sufficiently developed to minimize delay time in planning work, (Ref. NTPIP item 2.2.4.4).
- 11.1.1.5 Bill of Materials - The activity establishes a material information database that will be a foundation for an integrated station information database.
  - Complete the Bill of Materials parts database with safety classification, part number and stock code number. (Approximately 40,000 stock items.)
  - Evaluate populating the BOM via a warehouse parts validation program, as identified in the Parts Configuration Control Quality Action Team.

11.1.2 Improve the planning/materials interface.

- 11.1.2.1 Improve the information available to planners to provide real time data on expected delivery times above and beyond our present data on inventory level.

*STRATEGY: WORK PROCESS EFFICIENCY  
PROGRAM: MATERIALS MANAGEMENT*

- 11.1.2.2 Strengthen the management of material needs for planned maintenance activities to ensure parts arrive on time for scheduled work.
- 11.1.2.3 Develop a method to track planner performance in the materials area.
- 11.1.3 Improve the overall procurement process including reviews, signoffs, tracking, automation needs and streamlining.
  - 11.1.3.1 Establish QAT.
  - 11.1.3.2 Evaluate existing processes.
  - 11.1.3.3 Deleted by program revision.
  - 11.1.3.4 Schedule recommended actions.
  - 11.1.3.5 Implement schedule.
- 11.1.4 Participate in Entergy wide MMS/MMIS replacement studies.
  - 11.1.4.1 Participate in present study of MMS replacement.
  - 11.1.4.2 Participate in PMS replacement study.
  - 11.1.4.3 Evaluate options of River Bend proceeding as a lead plant in EOI. Make recommendations to Vice President.
- 11.1.5 Catch up with other EOI plants for 1993 short-term MP&C Work Plan actions.
  - 11.1.5.1 Determine actions necessary to satisfy requirements to:
    - Justify Inventory
    - Optimize Inventory
    - Review Material
  - 11.1.5.2 Participate in Entergy Corporate MP&C assessment.
  - 11.1.5.3 Have Entergy Internal Audits audit River Bend MP&C.
- 11.1.6 Continue Materials Support Desk effort until improvements allow return to normal functions.

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**STRATEGY: WORK PROCESS EFFICIENCY**  
**PROGRAM: MATERIALS MANAGEMENT**

11.1.7 Procurement Engineering Requisitions - eliminate backlog of PER's awaiting engineering work.

- Define priority levels with corresponding nominal time - schedules
- Work all in-house PER's (approximately 350) to adhere to the defined nominal time-schedules, per their priority.

**11.2 Improve Remaining Significant Areas.**

11.2.1 Develop a station critical parts list based on work history, MMS usage, and stores planning data and adjust stocking levels to assure parts availability.

11.2.2 Develop a plan to reduce costs by sharing parts with other Entergy stations.

11.2.3 Establish a standard parts usage catalog for Engineering use in developing modifications

11.2.3.1 Define needs.

11.2.3.2 Produce catalog.

11.2.4 Use 3 Natural Work Teams applying Plan, Do, Check and Adjust (PDCA) methodology to the MP&C Work Program Elements.

11.2.5 Participate in the following studies which the MP&C KPMT believes can result in efficiency and cost improvements.

- Bar Coding Study
- Stores Overhead Account Study
- Bill of Materials Study

11.2.6 Participate in the following ongoing EOI and Systemwide efforts:

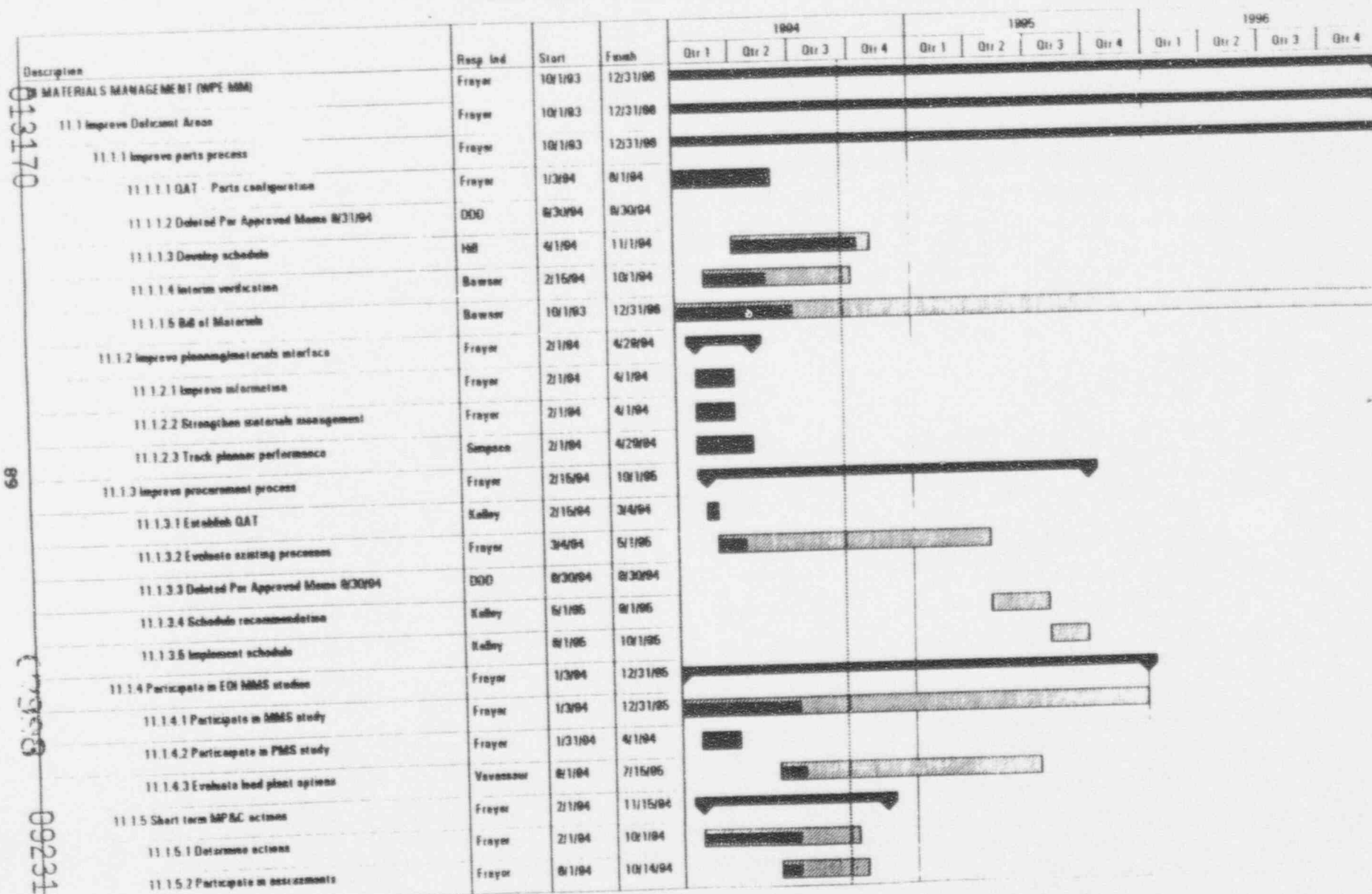
- MMS/SIMS/CMIS Replacement Study
- Commodity Teams
- Study of Standardization of Specifications and Materials

11.2.7 Continue and complete the Check and Adjust phases of the initial MP&C Key Process Team PDCA cycle (Plan and Do phases were completed during 1993).

STRATEGY: *WORK PROCESS EFFICIENCY*  
PROGRAM: *MATERIALS MANAGEMENT*

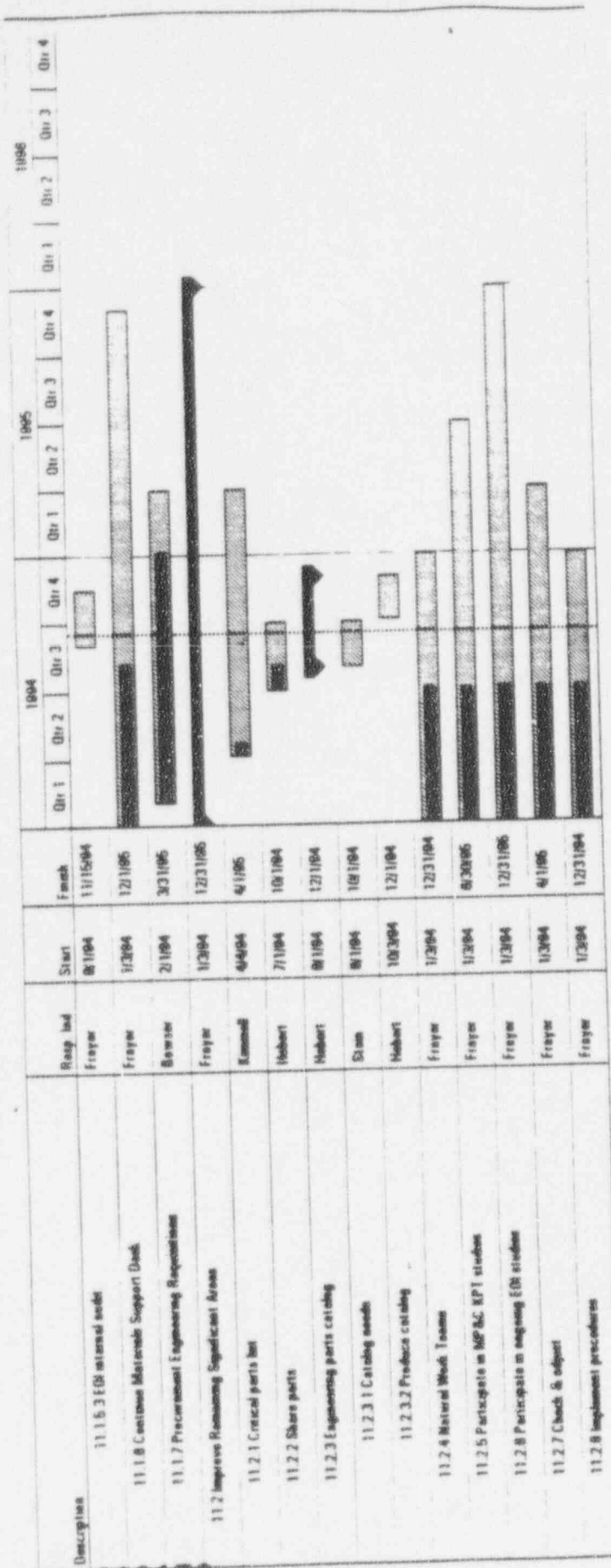
11 2 8 Implement and revise procedures as necessary for the MP&C Work program.

# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: MATERIALS MANAGEMENT**



SCHEDULE ATTACHMENT

**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: MATERIALS MANAGEMENT**



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• **STRATEGY: WORK PROCESS EFFICIENCY**  
**PROGRAM: MODIFICATIONS**

**PROGRAM TITLE**

Modifications

**PROGRAM MANAGER**

Bill Mashburn, Manager - Engineering Support

**DESCRIPTION**

Improve the plant modification process to support improvements in plant safety, reliability, and material condition.

**ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Critical station work processes are inefficient and have allowed backlogs of work to occur, including the station modification processes.

**OBJECTIVES**

- Improve the plant modification process by providing more flexibility in processing design changes, and by making the process more responsive to plant needs in terms of timeliness, cost-effectiveness and quality of design products.

**PERFORMANCE MEASURES**

- Modifications operate as required after implementation without redesign.
- A decreasing trend in the number of Field Change Notices (FCN) per Modification Request (MR).
- Improving trend in MR lifecycle (shorter).
- Refueling Outage modifications design complete 6 months prior to the outage.

**STRATEGY: WORK PROCESS EFFICIENCY**  
**PROGRAM: MODIFICATIONS**

**ACTIVITIES**

Improve The Process Used To Change The Design Of the Plant (including incorporating Design Change Controls Process Quality Action Team (QAT) recommendations).

**12.1 Streamline the modification process including more efficient use of checklists, graded modification controls, improved FCN processes and simplified FRC reviews.**

- 12.1.1 Develop graded modification controls, building from the Minor MR process improvement actions in the Near-Term Performance Improvement Plan (NTPIP).
- 12.1.2 Develop a simplified way to perform generic parts substitutions without having an MR open for an excessively long period of time
- 12.1.3 Consistent with graded controls, establish a checklist hierarchy for use with modifications, and review and simplify checklists where possible.
- 12.1.4 Flow chart the FCN process and eliminate unnecessary steps.
- 12.1.5 Prepare an approach to FRC reviews for modifications consistent with the other Entergy stations and gain FRC approval.

**12.2 Improve the completeness of the modification process by addressing spare parts, maintenance requirements and costs, simulator upgrades, and incorporation of training requirements.**

- 12.2.1 Deleted per approved program revision, see activity 11.2.3 Materials Management Program.
- 12.2.2 Continue the Design Change Controls Process Team to evaluate and improve the completeness of modification packages including spare parts (including material made obsolete), ease of maintenance, lower maintenance costs, training, and simulator upgrades that result from the modification.
- 12.2.3 Implement improvements in accordance with a schedule to be developed by the Design Change Controls Process Team.

*STRATEGY: WORK PROCESS EFFICIENCY  
PROGRAM: MODIFICATIONS*

- 12.3 Establish improved modification control mechanisms to assure that designs issued to the field are constructable and function as required, and that implementation and closure are timely.
- 12.3.1 Check and adjust the changes to the modification process that result from the QAT and other process improvements.
  - 12.3.2 Develop a modification installation and closure plan that assures the following:
    - 12.3.2.1 Effective field constructability reviews are performed.
    - 12.3.2.2 Modifications are effectively reviewed for function and maintainability.
    - 12.3.2.3 Post-installation assessments of modifications are performed.
  - 12.3.3 Clearly define the roles and responsibilities of design engineers, system engineers, computer engineers, modification and construction personnel and maintenance personnel in the modification definition, design, installation, and closure process.
  - 12.3.4 Develop a generic schedule template which will form the basis for individual modification design and installation schedules.

## RIVER BEND STATION

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## **PROGRAM TITLE**

Procedures

## **PROGRAM MANAGER**

Charlie Pardi, Coordinator Operations Support

## **DESCRIPTION**

Improve the procedure process to facilitate efficient and timely processing of procedure changes, improve procedure technical quality, and make the procedures more "user-friendly" (human factors). Assure that procedure support is effective, efficient and supports safe and reliable plant operation.

## **ROOT CAUSES ADDRESSED BY THIS PROGRAM**

Critical station work processes are inefficient and have allowed backlogs of work to occur, including:

- Plant procedures have not been properly maintained.
- Cumbersome procedure change process.

## **OBJECTIVES**

- Improve technical quality and usability (human factors) of procedures; this will reduce human errors and enhance plant reliability by supporting the quality of work.
- Improve the administrative controls for site procedures to simplify procedure content requirements and clarify hierarchy and types of procedures.
- Streamline and enhance the procedure change process (including revisions) to improve usability and to reduce cycle times, this will encourage workers to identify needed changes promptly, reduce the disruption of work activities while waiting for procedure changes, and maintain low procedure change backlogs.
- Establish effective management information systems for the processing, statusing, and control of procedures to reduce errors and reduce costs.

*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: PROCEDURES*

**PERFORMANCE MEASURES**

- Handwritten Change Notice (CN) backlog (greater than 30 days)
  - Less than 400 by 12/94
  - Less than 100 by 12/95
- Decreasing trends in Condition Reports (CRs) (inadequate procedures)
  - Reduce by 25% by 12/94
- Improving trends in customer satisfaction surveys.
- All applicable procedures scheduled to be upgraded to the new procedure Verification and Validation (V&V) process (schedule to be established by 10/31/94).

**ACTIVITIES**

**13.1 Improve Procedure Quality and Usability**

13.1.1 Develop and implement writer's guide.

13.1.1.1 Develop station generic writer's guide

13.1.1.2 Develop individual department guides that meet their specific needs  
(verbatim compliance vs. procedure adherence)

13.1.2 Develop and implement a procedure V&V process that can be effectively  
implemented by each department depending on its operational needs (e.g.  
maintenance procedures being verified and validated during first performance, or  
EOP's being verified by tabletop flowchart.)

13.1.3 Upgrade procedures (as determined by individual departments) using writer's  
guide and V&V process.

13.1.3.1 Individual departments prioritize procedures based upon the effect on  
plant operations, maintenance and cost.

13.1.3.2 Develop budgets and schedules for upgrade activities.

13.1.3.3 Implement procedure upgrades per schedule.

13.1.3.4 Check and adjust writer's guide and V&V process.



*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: PROCEDURES*

13.1.4 Conduct training for procedure writers on writer's guides, administrative requirements, and writing skills.

13.1.4.1 Develop training program

13.1.4.2 Identify people to be trained

13.1.4.3 Conduct training

13.1.5 Conduct training for procedure users to emphasize the importance of procedure adherence, and to describe the mechanisms available for changing procedures.

13.1.5.1 Develop training program

13.1.5.2 Identify personnel requesting or requiring training

13.1.5.3 Train within 90 days of request

**13.2 Improve Administrative Controls**

13.2.1 Evaluate benefits of implementation of issuing procedures via imaging (FileNet), check and adjust as necessary.

13.2.2 Eliminate unnecessary administrative requirements for developing, tracking and controlling plant procedures and revise RBNP-001 accordingly.

13.2.3 Define an improved site procedure hierarchy that simplifies control, review and approval requirements by type of procedure. Establish a clear user index and consolidate the number of procedure types.

**13.3 Streamline and Enhance Procedure Maintenance and Change Process**

13.3.1 Establish owners for plant procedures at the lowest effective organizational level.

13.3.2 Streamline the procedure change process to reduce costs and cycle time.

13.3.3 Establish improved methods for field changes to procedures that allows for user feedback without degrading the quality and usability of the procedure.

13.3.4 Improve the procedure revision process to reduce costs and cycle time for processing revisions.

*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: PROCEDURES*

**13.4 Establish Effective Information Management Systems**

13.4.1 Update and improve the process for identifying and controlling commitments and USAR and SER references in procedures.

13.4.1.1 Identify user requirements for searches and sorts

13.4.1.2 Redesign user interface and search/sort software

13.4.1.3 Remove from mainframe and transport to a more user friendly graphic interface environment (e.g. Windows.)

13.4.2 Evaluate the process, effectiveness and cost benefit for implementing electronic routing, tracking, review and approval of plant procedures and changes.

13.4.2.1 Define user requirements

13.4.2.2 Compare user requirements to existing software packages and/or custom designed software

13.4.2.3 Make recommendations for system/software changes

13.4.2.4 Implement and test

13.4.3 Evaluate and implement improved software or usage of existing software to support identified new procedure process efficiencies

13.4.3.1 Define user requirements

13.4.3.2 Compare user requirements to existing software packages and/or custom designed software

13.4.3.3 Make recommendations for system/software changes

13.4.3.4 Implement and test

**13.5 Interim Activities**

13.5.1 Provide immediate focus on procedure issues and establish a foundation for the Procedure Upgrade Program (PUP). Provide increased management attention to procedural problems and accelerate PUP implementation.

13.5.1.1 Establish interim purpose and goals

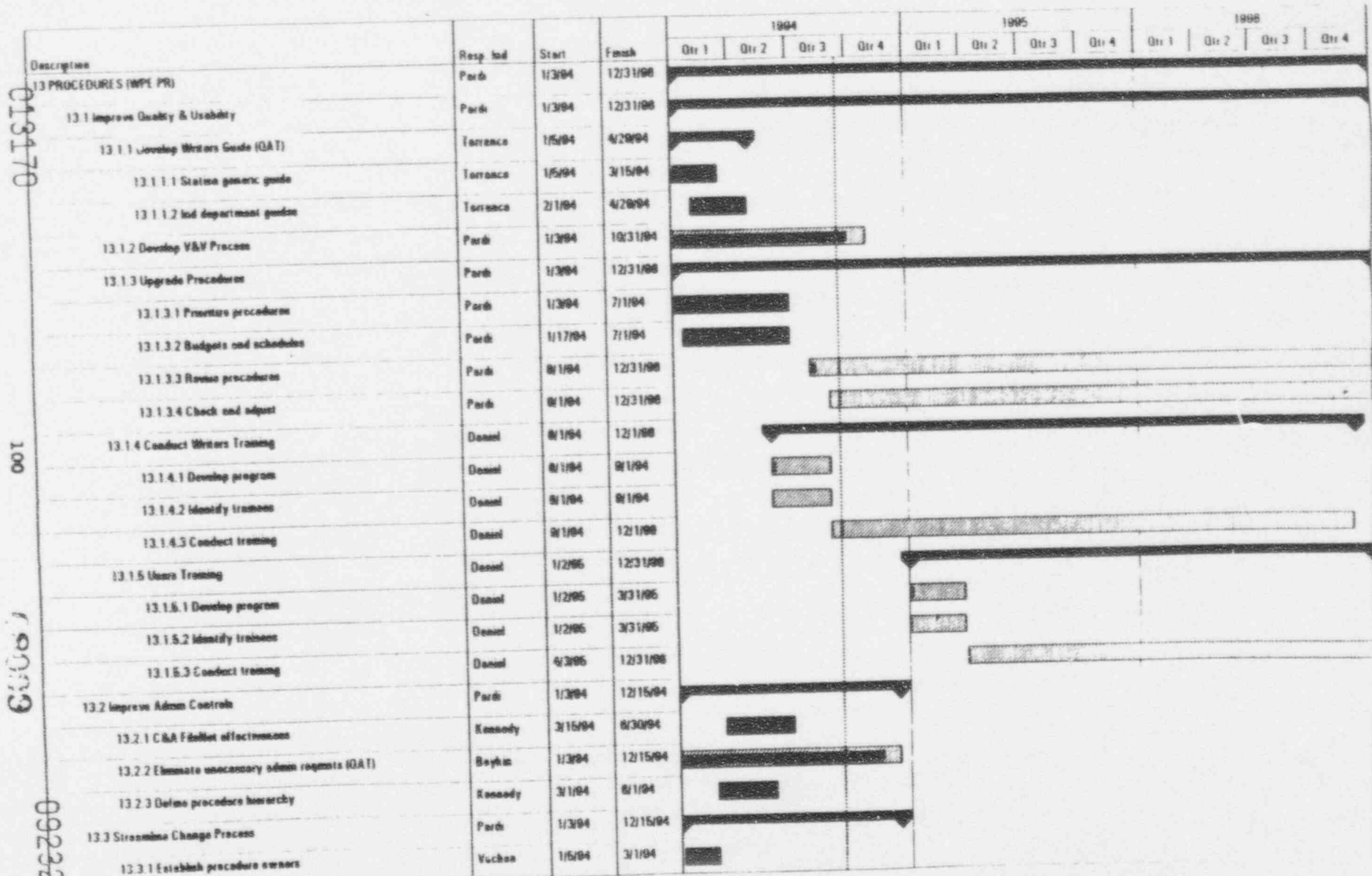
RIVER BEND STATION  
1994-1996 PERFORMANCE IMPROVEMENT PLAN

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*STRATEGY: WORK PROCESS EFFICIENCY*  
*PROGRAM: PROCEDURES*

- 13.5.1.2 Establish a policy on change notice reduction
- 13.5.1.3 Establish interim assessment criteria
- 13.5.1.4 Perform Interim Assessment
- 13.5.1.5 Prioritize procedures for Interim Revision
- 13.5.1.6 Revise prioritized procedures

# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: PROCEDURES**



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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: PROCEDURES**

Description	Responsible	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
13.5.1.5 Review procedures	Parks	9/1/94	12/31/94												

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SCHEDULE ATTACHMENT



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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: ENGINEERING SUPPORT**

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**PROGRAM TITLE**

Engineering Support

**PROGRAM MANAGER**

Ted Leonard, Director Engineering

**DESCRIPTION**

Effective engineering is important to support plant material condition and safe operation. Results of assessments, inspections and validations have identified the need for engineering enhancements. Engineering can have beneficial impact on plant performance by improving in the areas of:

- organization,
- backlog reduction,
- engineering programs and processes,
- roles and responsibilities,
- engineering and operability evaluations,
- training, and
- long-term objectives.

Engineering support was included in the Near-Term Performance Improvement Plan (NTPIP), Revision 1, December of 1993. Many of the engineering initiatives included to meet the purposes of the NTPIP already have activity completion dates as early as June of 1993. The NTPIP serves three purposes:

- 1) It addresses near-term challenges to achievement of station objectives.
- 2) It captures current improvement initiatives that are critical to near-term improvement and assures they are prioritized and integrated properly, appropriate resources are allocated, and accountability for performance results is assigned.
- 3) It serves as an input to the Long-Term Performance Improvement Plan.

The scope of improvement activities can now be expanded and carried forward into this LTPIP to transition to a more comprehensive performance (rather than critical issues) focus. The activities of this LTPIP strategic program are presented in three sections:

- 1) Section 1 summarizes the NTPIP.
- 2) Section 2 activities address some NTPIP topics continuing with further improvements, and other crucial topics that have been identified since revision 1 of the NTPIP was approved.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION  
PROGRAM: ENGINEERING SUPPORT*

- 3) Section 3 activities determine a continuation of improvements beyond those identified in sections 1 and 2. The specific engineering support performance-based action plans in section 3 will be developed into a detailed long-range plan, based on results of assessments to meet long-range objectives.

**OBJECTIVES**

- Improve RBS design and systems engineering effectiveness.
- Provide quality engineering services (i.e., accurate, thorough and timely)
- Improve the material condition of the plant through engineering support.
- Improve the reliability and performance of plant systems and components through monitoring, root cause determination, and effective technical solutions.
- Reduce the engineering backlog significantly while accomplishing the level-of-effort engineering work to support plant operations and outages.
- Maintain design bases documentation consistent with actual plant configuration, and vice versa.
- Become a proactive engineering organization with aggressive leadership.
- Become a customer-focused, highly productive engineering organization.
- Attain accountability, and thereby establish credibility as an engineering organization and individually.
- Reduce RBS average (3-year rolling average) engineering costs to be comparable to top quartile plants.

**PERFORMANCE MEASURES**

- Backlog reduction and engineering performance improvement activities of the LTPIP are maintained and implemented on schedule.
- Engineering services are rendered per approved project schedules.

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: ENGINEERING SUPPORT**

- No approved engineering evaluations are deficient or unacceptable, as determined by audits, inspections, assessments, or customer feedback.
- Design Engineering managers and plant technical supervisors successfully participate in the Management Certification program. Reference the Training LTPIP strategic program
- Engineers develop and maintain qualifications to the INPO-accredited Engineering Support Program Continuing Training.
- Improve Engineering Support by supporting the Human Performance Effectiveness LTPIP strategic program.
- Improved trends in systems reliability and performance.
- Annual departmental goals for actual expenditures vs. budgeted expenditures are met.
  - Annual departmental goals for cost savings are met.

**ACTIVITIES**

**14.1 Complete the actions of the NTPIP. Those actions are summarized here:**

- Clarify Design and System Engineering responsibilities and expectations.
- Drawing upgrade project - the NTPIP scope was to incorporate as-built changes into approximately 460 high priority drawings.
- Vendor technical manuals - the NTPIP scope was to upgrade nineteen high priority vendor manuals, and to enhance the vendor manual control and maintenance program procedures.
- Backlog of plant support open items - the NTPIP scope was to process the following numbers of high priority open items through engineering:
  - 43 Maintenance Work Orders
  - 30 Condition Reports
  - 30 field-worked Modification Requests
  - 150 Procurement Engineering Requisitions

*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

- Provide a plan to resolve NSSS drawing problems.
- Improve usability and accuracy of design documents
  - Upgrade seventeen high priority vendor skid P&IDs requiring additional mark numbers
  - Update on-line Bill of Materials database with approximately 500 items.
  - Update approximately 400 high priority Loop Calibration Reports.
- Update fire safe shutdown analysis.
- Improve process for engineering work planning and control by initiating supervisory activities and tracking RF5 activities.
- Evaluate the configuration management issues from the past two years against the drawings critical to Operations, to ensure the design drawings accurately reflect the updated physical plant.
- Establish an Engineering Review Committee utilizing multi-discipline personnel from other Entergy sites to review evaluations and provide feedback for improving the quality and depth of engineering and operability evaluations.

14.2 Take action to clear observed backlogs, to address the contributors to backlogs, and to address crucial engineering performance problems. Many of the activities in this section are continuations of NTPIP activities. Some of the performance problem issues whose crucial elements are addressed in section 2 activities have other improvements that will be scoped in the long-range plans in section 3 activities.

14.2.1 Implement a new system and design engineering support organization that reflects improved division of responsibility, accountability and span of control:

- Use engineers from other Entergy Operations sites.
- Recruit needed expertise and additional supervision.
- Create Special Projects Manager(s) to oversee complex engineering programs and processes, e.g., fire program, station component and materials information databases, etc.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

- Eliminate contractors performing permanent staff functions.
- 14.2.2 Backlog Reduction - For the backlog activities below, respective standards will be established with long-term criteria to minimize backlogs and improve processes to maintain backlogs within appropriate limits.
  - 14.2.2.1 Drawings - Roughly 11,500 changes are posted against approximately 5,600 drawings. Review and update these drawings as appropriate to ensure that no drawing has an excessive number of posted changes.
  - 14.2.2.2 Modification Requests - Perform closure activities required to eliminate the backlog of approximately twenty MRs that have been field-worked for longer than six months.
  - 14.2.2.3 Condition Reports - Reduce engineering's backlog of approximately 150 CR's to meet the Corrective Action program's backlog requirements.
  - 14.2.2.4 Procedures - Eliminate backlog of 64 outstanding Change Notices.
  - 14.2.2.5 Maintenance Work Orders - eliminate the backlog of MWO's awaiting engineering work.
- Systems Engineering:
  - Process approximately 130 MWO's awaiting procedure revisions.
  - Schedule to process approximately thirty MWO's awaiting engineering work. Enter received MWO's into the activities tracking system.
- Design Engineering:
  - Process approximately 150 Procurement Engineering information MWO's that have been in-house greater than six weeks.
  - Process approximately 150 Plant Engineering information MWO's that have been in-house greater than six weeks.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

- As received, either schedule an MWO's engineering work and accomplish the work per schedule, or accomplish engineering work for unscheduled MWO's within three months.

- 14.2.2.6 Procurement Engineering Requisitions - Activity transferred to Materials Management program as activity 11.1.7, by approved program revision.
- 14.2.2.7 Loop Calibration Reports - Review the backlog of approximately 5,000 LCR's awaiting engineering update, and revise as appropriate.
- 14.2.2.8 System Enhancement File - system engineers prioritize and sponsor significant modifications to the Change Review Board (The System Enhancement File program will be phased out when the backlog is resolved).

14.2.3 Engineering Programs and Processes

Note: The LTPIP Modifications strategic program addresses engineering support for enhancing the modifications program.

14.2.3.1 Drawing Revisions -

- Revise the process to reduce the number of outstanding changes allowed before a revision is required from ten to four.
- Assess other sites, and implement good practices at RBS.

14.2.3.2 Component Database - This activity establishes a component information database that will be a foundation for an integrated station information database to be identified in the activities of section 3.

- Complete the new component database, implement usage at RBS, and resolve differences with existing databases (NPRDS, QLIST, TRIS, LCR, IST/LLRT, NORMS, PMS1/PMS2, VALVES, EQLIST and NPRDS EQUIP. LIST).
- Validate the accuracy / completeness of the site component database.



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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

- 14.2.3.3 Bill of Materials - Activity transferred to Materials Management program as activity 11.1.1.5. by approved program revision
- 14.2.3.4 Vendor Technical Manuals -
- Complete the vendor manual upgrade project as contracted and scheduled (Upgrade approximately 580 vendor manuals)
  - Assess and define responsibilities for maintaining vendor manuals
- 14.2.3.5 Skid P&ID's -
- Create an additional eight drawings for identified skid equipment requiring additional mark numbers.
  - Determine a plan to standardize skid P&ID's, and implement the plan
- 14.2.3.6 Loop Calibration Reports -
- Assess responsibilities for maintaining LCR documentation
  - Assess hardware/software requirements.
  - Implement hardware/software requirements.
- 14.2.3.7 IST - System Engineering recently assumed responsibility for the procedures and technical basis for the program.
- Define and implement the role of engineering and operations to maintain the IST pump and valve program.
  - Designate a program manager, and assess dedicated resources
  - Perform an Entergy Operations self-assessment to check adequacy of the program from a design basis standpoint.
  - Resolve root causes identified in the assessment, and implement required corrective actions.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

- Revise the guidance document for the program plan, and develop or revise approximately 175 functional testing procedures

14.2.3.8 Procedures -

- Assess the adequacy of RBS engineering procedures, standards and guides for controlling engineering functions and programs
- Revise / create engineering procedures, standards or guides to address engineering functions and programs not adequately controlled by existing engineering documents

14.2.3.9 Work Management System - Implement an Engineering Work Management System that incorporates workload requirements and provides the necessary requirements to effectively manage the engineering workload at all levels of the engineering organizations.

14.2.3.10 Fire Protection Program -

- Complete the penetration seals and structural steel fireproofing, finalize and maintain the safe shutdown analysis, and resolve thermal lag fire barrier concerns.
- Present the final plan to the NRC.
- Perform an independent assessment, and implement resulting improvements.

14.2.3.11 Configuration Management -

- Develop a plan and schedule to take corrective actions as appropriate, resulting from the configuration management assessment done per NTPIP, step 7.8 on the drawings critical to Operations (level 1, 2 & 3 drawings).
- Support the Modification and Construction Department to work outstanding modifications affecting the control room panels, and incorporate changes to the GE control room panel drawings.

14.2.3.12 Assess the following engineering programs, with a focus on the below listed issues:

*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

FOCUS

- (14.2.3.12.1)
  - MOV programResponsibilities (Maintenance/Systems Engineering/Design Engineering), resources, valve grouping, procedures, risk-based methodology, and electrical calculations
- (14.2.3.12.2)
  - Check valvesResponsibilities (Maintenance/Systems Engineering/Design Engineering), test tracking, hardware/software, and a standard for test.
- (14.2.3.12.3)
  - Drafting / CADStaffing, performance indicators, equipment, and standards.
- (14.2.3.12.4)
  - HVACResponsibilities, drawing as-builts, and testing/monitoring.
- (14.2.3.12.5)
  - Pipe stress and supportsStaffing, information tracking, guidance documents, and software applications.
- (14.2.3.12.6)
  - Section XI (ISI & RR)Requirements and responsibilities.
- (14.2.3.12.7)
  - LLRTDefine role of Maintenance/Operations STA/Systems Engineering in the LLRT program.

14.2.4 Roles and Responsibilities

- 14.2.4.1 Assess the implementation of configuration management practices in the plant to measure the effectiveness of the roles and responsibilities activities completed per the NTPIP, section 4.5. Enhance guidelines per assessment results.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

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- 14.2.4.2 Assess System Engineering roles and responsibilities for non-critical systems.
- 14.2.4.3 Develop guidance outlining Systems Engineering roles and responsibilities to support the Corrective Action program.
- 14.2.4.4 Evaluate and improve the process and guidance for reporting conditions and making operability determinations.
- 14.2.4.5 Define engineering's role in the work planning and work control process.
- 14.2.4.6 Develop guidance outlining engineering roles and responsibilities for specialty programs (e.g., EQ, IST, ISI, MOV testing, and predictive maintenance).
- 14.2.5 Engineering and Operability Evaluations - To improve the quality and depth of engineering and operability evaluations, an Engineering Review Committee (a multi-discipline/multi-site team) has been established to review evaluations.
  - 14.2.5.1 Define responsibilities, raise standards and expectations, and enhance guidelines for performing evaluations.
    - Incorporate feedback from the Engineering Review Committee into the evaluation program.
    - Revise guidelines to include examples to model standards and expectations for evaluations.
    - Engineers develop a questioning attitude to yield thorough engineering outputs, not too focused on specific limited symptoms.
    - Engineering outputs are thorough to address issues that may pose questions related to the subject.
    - Evaluations be thorough enough to prevent deficient engineering products.
  - 14.2.5.2 Determine and establish internal monitoring to detect or prevent deficient evaluations for engineering products.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

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14.2.6 Develop and issue individual training plans to improve personnel development and performance. Accomplish training as selected and scheduled. Training to meet an individual's needs may include some or all of the following:

- INPO-accredited Engineering Support Program Continuing Training.
- Management certification/integrated system knowledge training.
- Total Quality training.
- Project management training.
- Root cause and condition reporting training.
- Human performance effectiveness training.
- Management and Supervisor training.
- Procedure writers and users training.

These training activities are described in other LTPIP strategic programs.

14.2.7 External Assessments/Inspections of Engineering Support -

14.2.7.1 During 1994, perform an INPO assist in Engineering Support to focus on Systems Engineering.

14.2.7.2 Perform a comprehensive vertical slice SSFI-type assessment to evaluate the need to enhance aspects of the design basis / configuration management process. The results will provide input to the long-range strategies for performance-based improvements in activity 3 below.

**14.3 Assess and implement strategies for engineering support performance-based improvements to meet the long-range objectives of River Bend Station.**

14.3.1 Clearly state long-range engineering organizational objectives, critical success factors, roles, and technical capability needs. Consider root causes determined for the problems/deficiencies.

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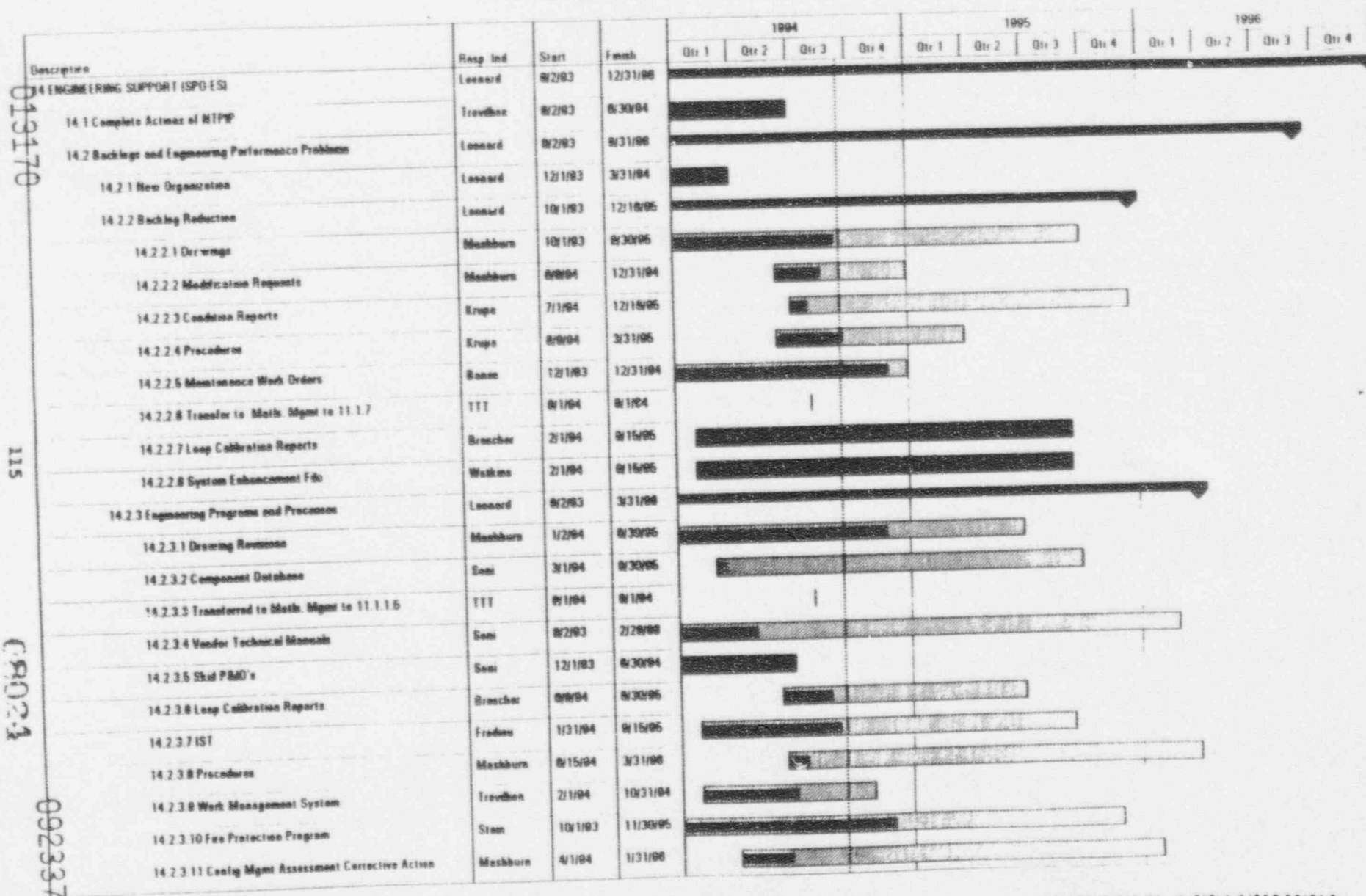
*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: ENGINEERING SUPPORT*

14.3.2 To further enhance issues such as technical competence, configuration management, Systems Engineering knowledge of design bases, identification of problems and minimization of barriers, plant reliability improvement methods, management of risk to station objectives, and ownership and accountability for the technical resolution of plant problems, evaluate and implement improvements for

- personnel development,
- engineering programs,
- engineering tools (e.g., drawings, specifications, design criteria, etc.),
- engineering information management systems, including CAD/CAE use, plant process computers, document management, and configuration management,
- procedures and processes to effectively interface engineering information systems and processes with maintenance, operations, project management, and construction,
- engineering work management system, and
- other improvements identified from internal/external assessments, inspections, evaluations or validations.



# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: ENGINEERING SUPPORT**



SCHEDULE ATTACHMENT 1

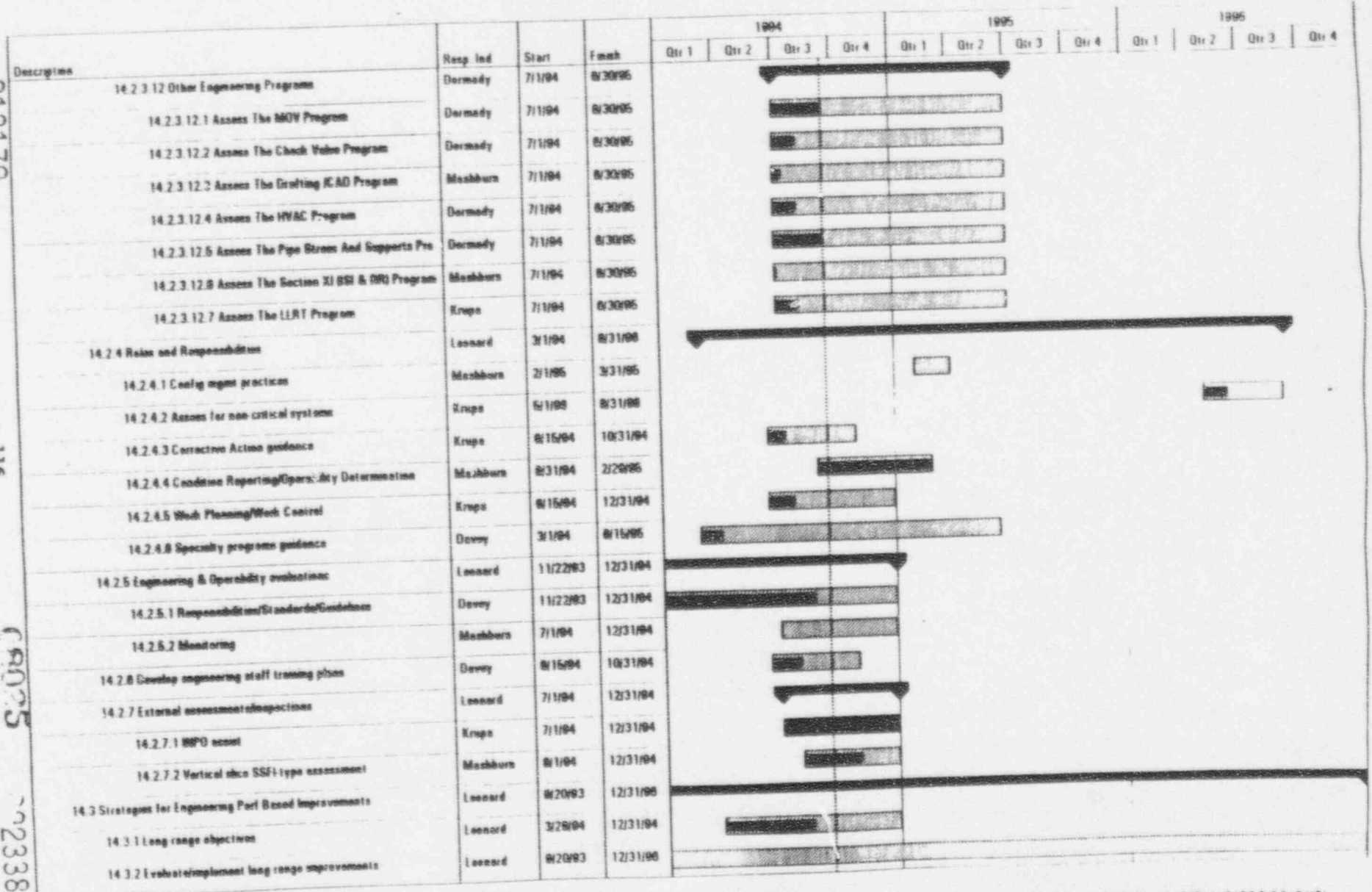
# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: ENGINEERING SUPPORT**

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SCHEDULE ATTACHMENT

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: RADIOLOGICAL PROTECTION*

**PROGRAM TITLE**

Radiological Protection

**PROGRAM MANAGER**

Bill Odell, Superintendent - Radiological Programs

**DESCRIPTION**

Establish an effective program to improve radiological protection (RP) and work practices at River Bend Station.

**OBJECTIVES**

- Establish improved processes and procedures for the management of radioactive materials to assure a high level of effective controls are provided.
- Develop the inter-departmental interfaces between radiation protection and other groups to provide more efficient and effective control of RP work.
- Improve RP technician performance to provide more effective and efficient support to plant operations and maintenance.
- Enhance River Bend exposure management to reduce overall River Bend personnel exposure.
- Improve Station personnel knowledge and awareness of RP issues to promote more effective working conditions and relationships among departments.
- Enhance individual ownership and accountability of Radiological Controls at all levels of the station organization.
- Implement observation programs, improve training, and improve qualifications to upgrade radiation worker performance.
- Implement RP programs, including assessment and performance monitoring, to identify and reinforce long-term RP program improvements.

*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: RADIOLOGICAL PROTECTION*

**PERFORMANCE MEASURES**

- The station meets its annual radiation exposure goals
- Increased involvement by rad workers in the ALARA program, as measured by implementation of approved suggestions.
- The station meets its annual radiation exposure goal and achieves INPO three year rolling average of 255 person-rem in 1998.
- Improve INPO and SALP performance ratings - Rating one.
- Improve material control and waste reduction by meeting INPO goal of 245 cubic meters in 1995.
- A reduction in RP department costs, while other measures improve - 5%/year
- Improve customer service as measured by periodic customer surveys.

**ACTIVITIES**

**15.1 Establish improvement processes and procedures for the management of radioactive materials.**

15.1.1 Improve the processes and qualifications of personnel associated with the control of and the routine bagging and tagging of radioactive materials.

15.1.1.1 Conduct appropriate benchmarking and reevaluate and revise current practices to make them more user-friendly.

15.1.1.2 Complete job and task analysis, material development and training for decontaminators to survey laundry and trash.

15.1.2 Improve the methods and techniques used for the storage and control of radioactive materials.

15.1.2.1 Improve the methods for packaging and storing material based upon benchmarking results.

15.1.2.2 Establish specific laydown and storage areas for radioactive material inventory and control.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: RADIOLOGICAL PROTECTION*

- 15.1.2.3 Evaluate the use of Sea/Land containers for interim, high-volume storage during outage periods and implement as appropriate.
- 15.1.2.4 Communicate storage expectations and requirements to plant personnel.
- 15.1.3 Evaluate high-performance team recommendations to resolve deficiencies associated with controlling tools and Maintenance and Test Equipment (M&TE) and make recommendations to the appropriate department heads.
  - 15.1.3.1 Setup tool room tubing storage area.
  - 15.1.3.2 Expand Radiological Controlled Area (RCA) M&TE and tool inventory.
  - 15.1.3.3 Restrict contaminated tools to the contaminated zone (C-zone) and contaminated system use.
  - 15.1.3.4 Separate RCA tools from c-zone tools.
  - 15.1.3.5 Eliminate the use of yellow and orange paint to designate tool use.
  - 15.1.3.6 Move RCA general area clean tools to 95' tool room.
  - 15.1.3.7 Increase staffing and use of RCA tool room.
  - 15.1.3.8 Train deconners on M&TE decon.
  - 15.1.3.9 Move standards lab to inside the protected area.
  - 15.1.3.10 Establish turbine, drywell and refuel tool rooms during outages.
  - 15.1.3.11 Eliminate or modify closed tool storage boxes throughout the plant.
  - 15.1.3.12 Move clean weld issue and clean rigging.
  - 15.1.3.13 Place freezers and ice packs inside the RCA.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: RADIOLOGICAL PROTECTION*

- 15.1.4 Improve RP monitoring through additional radmonitor installations, area survey enhancements, and other specialized survey techniques
  - 15.1.4.1 Install area monitors in high material traffic areas by the end of 1995
  - 15.1.4.2 Procure and put into service automated survey equipment for bulk outage material monitoring for RF-5 and beyond
- 15.1.5 Identify and incorporate procedure changes necessary to improve the control of radioactive materials.
  - 15.1.5.1 Complete High Performance team and benchmarking activities
  - 15.1.5.2 Develop appropriate standards, and revise control and handling procedures
- 15.1.6 Enhance radwaste minimization.
  - 15.1.6.1 Implement the radwaste minimization plan including the following steps:
    - 15.1.6.1.1 Place unwrap-it boxes at RCA entrances
    - 15.1.6.1.2 Ban wooden pallets inside the protected area
    - 15.1.6.1.3 Eliminate unprotected wood inside the RCA, phase out the use of any wood inside the RCA
    - 15.1.6.1.4 Chemistry to schedule a specific period during the day to sample material for release
    - 15.1.6.1.5 Evaluate an interim oil storage disposition area in the hot chemistry lab
  - 15.1.6.2 Provide for laundering of contaminated personal effects
  - 15.1.6.3 Increase usage of vendors licensed to receive radioactive material (e.g., scaffolding)



*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: RADIOLOGICAL PROTECTION*

**15.2 Improve inter-departmental interface with RP**

- 15.2.1 Improve the Radiation Work Permit (RWP) usability and interface with MWOs.
  - 15.2.1.1 Integrate RWP requirements into the MWO planning cycle
  - 15.2.1.2 Develop a process for and enter job location codes on the MWOs and on the schedule.
  - 15.2.1.3 Indicate RP support requirements on the RWP by using a new screening sheet.
- 15.2.2 Use Natural Work Teams to address ongoing and planned issues to promote customer-supplier relations.
- 15.2.3 Continue to provide experienced personnel on loan to augment the training staff.

**15.3 Improve RP technician performance.**

- 15.3.1 Improve the interface with maintenance planning and scheduling.
  - 15.3.1.1 Assign an RP foreman and technician.
  - 15.3.1.2 Develop RP job guides for repetitive tasks.
- 15.3.2 Radworker coaching.
  - 15.3.2.1 Complete coaching training of RP personnel
  - 15.3.2.2 Provide dedicated oversight for release of material during refueling and extended outages.
- 15.3.3 Improve the efficiency of RP resources by enhancing resource management.
  - 15.3.3.1 Optimize the use of computer technology for surveys and maps, material identification and inventory, historical data, instrumentation inventory, and identification.
  - 15.3.3.2 Establish personnel rotation during release processes  
Schedule appropriate resources for RF-5

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION  
PROGRAM: RADIOLOGICAL PROTECTION*

- 15.3.3.3 Implement new maintenance work schedule
- 15.3.4 Conduct RP training
  - 15.3.4.1 Complete benchmarking training and conduct benchmark visits
  - 15.3.4.2 Establish advanced radworker training for selected, high-dose or highly contaminated jobs
  - 15.3.4.3 Establish regular Radiation Protection Training Review Group (RPTRG) meetings to address RP training needs, and include RP supervision attendance at technician training courses
  - 15.3.4.4 Establish policy for reimbursing RP technicians for the National Registry of Radiation Protection Technicians (NRRPT) - provide for both classroom training and examination
  - 15.3.4.5 Establish integrated training with RP and other disciplines
- 15.3.5 Improve technician job performance.
  - 15.3.5.1 Develop a user-friendly RP turnover and briefing checklist for both pre-job brief and field turnover.
- 15.4 Enhance River Bend exposure management.
  - 15.4.1 Reduce plant contaminated areas.
    - 15.4.1.1 Establish a high-priority program for the identification and repair of radioactive fluid leaks (Leaker List)
  - 15.4.2 Enhance the ALARA program.
    - 15.4.2.1 Establish departmental ALARA coordinators/representatives and utilize RP ALARA group as consultants.
    - 15.4.2.2 Provide routine RP support for component and line identification in the field and on survey maps using location codes or pictures.

**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: RADIOLOGICAL PROTECTION**

- 15.4.2.3 Provide operations with instruments to evaluate work - area dose rates
- 15.4.2.4 Establish incentive program to increase ALARA suggestion input and increase worker awareness
- 15.4.2.5 Evaluate hydrogen water chemistry to reduce source term (Coordinate with Chemistry Program)

**15.5 Increase station personnel knowledge and awareness of RP issues.**

- 15.5.1 Establish more effective inter-department communications.
  - 15.5.1.1 RP foreman participate, as specified by the screening sheets, in pre-job briefings.
  - 15.5.1.2 Publish an RP newsletter at established frequency to communicate RP accomplishments, changes in requirements and general RP news.
  - 15.5.1.3 Conduct integrated training with each maintenance discipline incorporating radiological work practices
- 15.5.2 Improve communications within the RP department.
  - 15.5.2.1 Establish and conduct weekly RP/Decon communications meetings
  - 15.5.2.2 Increase technician involvement in problem resolution, Natural Work Team, and procedure revisions.
  - 15.5.2.3 Clarify RP personnel responsibilities; establish building and task assignments and job descriptions for building technicians and foreman.

**15.6 Upgrade radiation worker performance and efficiency.**

- 15.6.1 Improve performance observation and assessment capabilities.
  - 15.6.1.1 Continue the RP observation program.
  - 15.6.1.2 Establish QA surveillance of high radiation material for effective storage and control.

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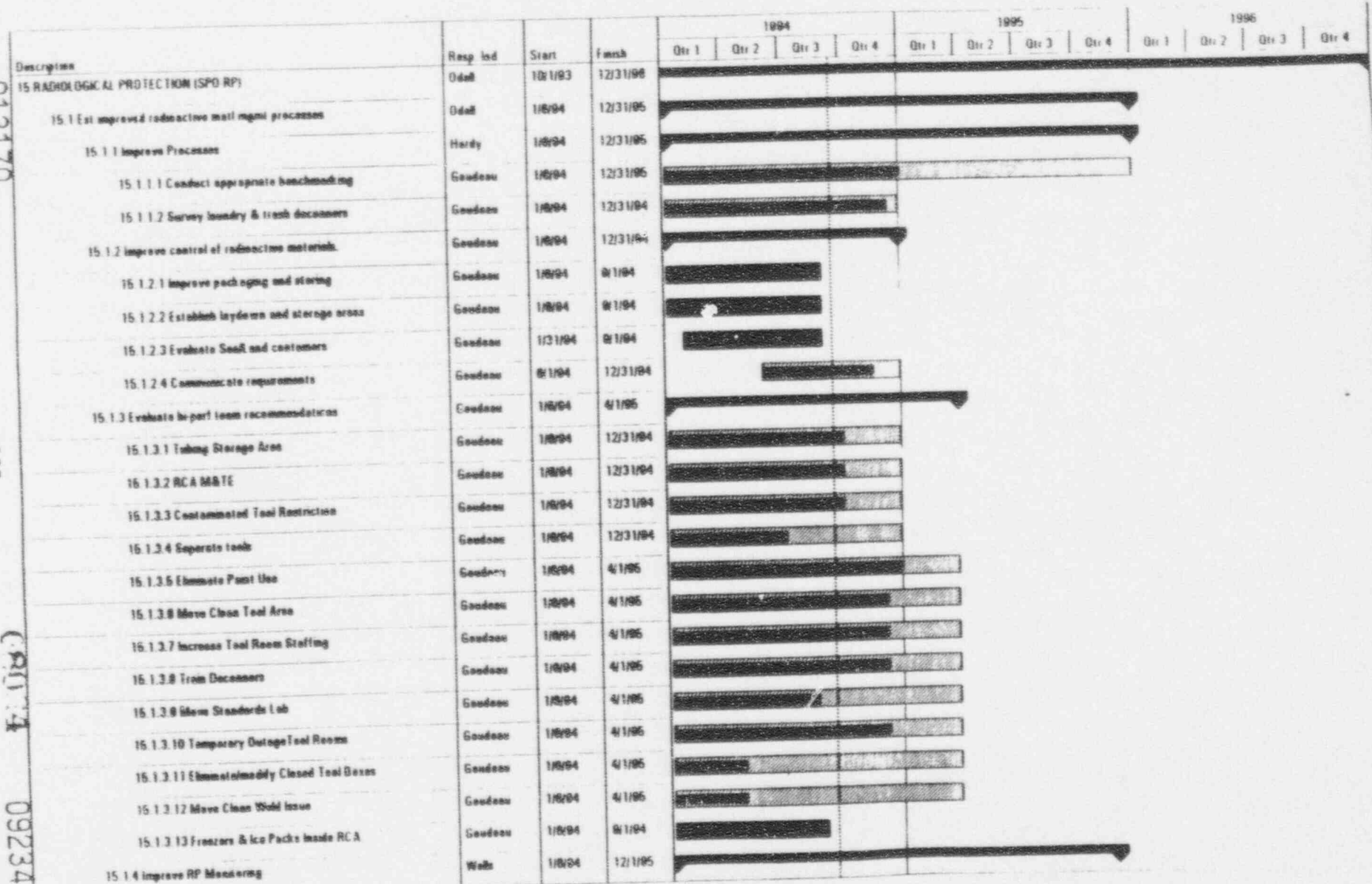
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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: RADIOLOGICAL PROTECTION**

- 15.6.1.3 Establish multi-discipline team to evaluate causes and make recommendations to mitigate gas problem.
- 15.6.2 Conduct training to enhance radworker skills.
  - 15.6.2.1 Develop a program to allow crafts to self-monitor radiological conditions during the performance of selected tasks.
  - 15.6.2.2 Address radiological attributes in task-specific training for operations and maintenance by assisting training in performing a systematic review of lesson plans for upgrade during accredited program reviews.
- 15.7 Improve RP programs.
  - 15.7.1 Improve the RP assessment and evaluation processes.
    - 15.7.1.1 Establish an effective, performance-based methodology for determining RP and radiological performance to meet management expectations.
    - 15.7.1.2 Conduct systematic self assessments of radiological activities and work practices at the station.
  - 15.7.2 Implement specific hardware improvements per planned Master Issues List items.
    - 15.7.2.1 Automated plan air sampling for particulates.
    - 15.7.2.2 Expand RCA self-access with electronic dosimetry.
    - 15.7.2.3 High radiation area surveillance using TV cameras.
    - 15.7.2.4 Expanded telemetry for radiation monitoring.
    - 15.7.2.5 Automated radiation surveys.
    - 15.7.2.6 Implement improvements for the surrogate tour system to enhance screens and add survey data.

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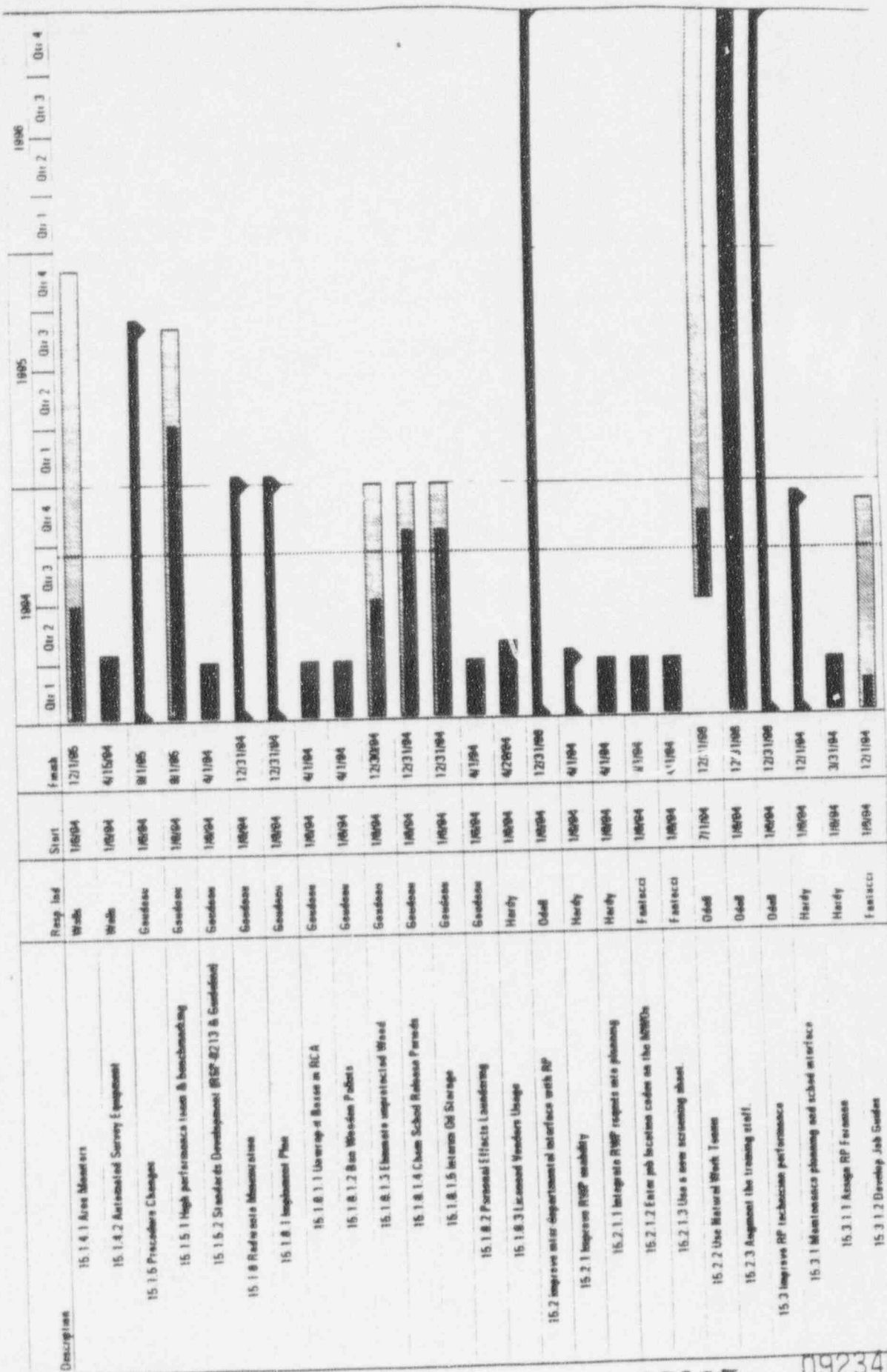
# **RIVER BEND STATION** **LONG TERM PERFORMANCE IMPROVEMENT PLAN** **PROGRAM: RADIOLOGICAL PROTECTION**



SCHEDULE ATTACHMENT I

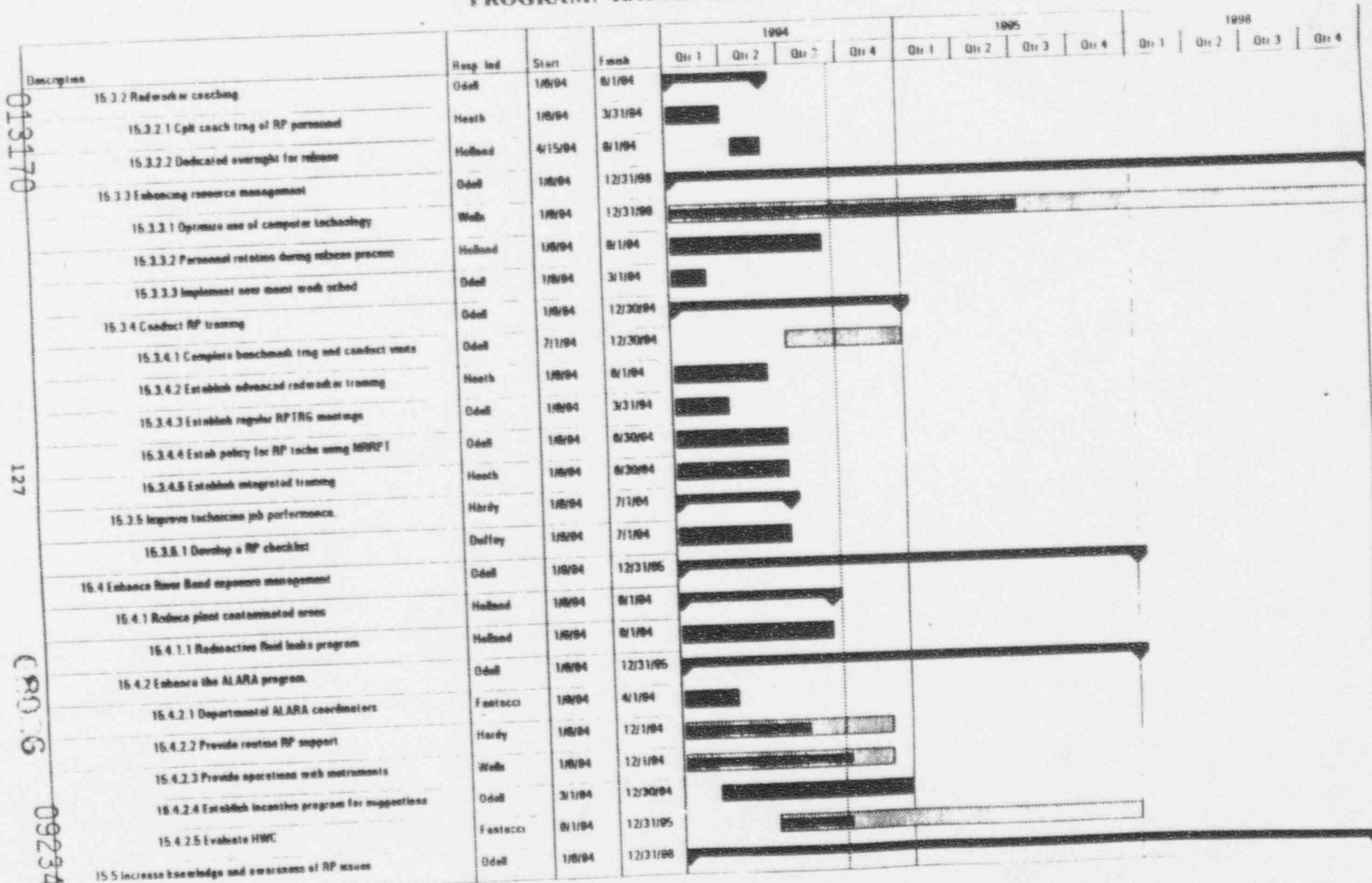


**LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: RADIOLOGICAL PROTECTION**





# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: RADIOLOGICAL PROTECTION**



SCHEDULE ATTACHMENT

**LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: RADIOLOGICAL PROTECTION**

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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: RADIOLOGICAL PROTECTION**

	Resp. Ind	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
15.7.2.5 Automated Surveys	Wells	1/8/94	12/1/94												
15.7.2.6 Sarragale Tour Improvements	Festivals	1/8/94	12/1/94												

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SCHEDULE ATTACHMENT

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: PLANT CHEMISTRY*

**PROGRAM TITLE**

Plant Chemistry

**PROGRAM MANAGER**

Jerome Holmes, Superintendent Chemical Operations

**DESCRIPTION**

Establish a plant chemistry control improvement program at River Bend Station. The program will address improvements in plant hardware and operations to achieve improved chemistry performance objectives for plant water chemistry control, and it will also provide for improved bio-fouling control. Planned improvements are a result of internal assessments, INPO evaluations and assistance recommendations, and implementation of industry best practices.

Additionally, methods will be developed to improve addressing chemistry and plant problems in a manner that establishes accountability and accomplishment. Also, programs will be evaluated and incorporated to help provide more effective and efficient support of plant operations.

**OBJECTIVES**

- Establish and implement initiatives to ensure that plant chemistry conditions exceed the standards established in the industry.
- Identify, prioritize, schedule, and resolve recurrent and long-standing chemistry problems in plant systems that can affect plant reliability, and hold people accountable to schedules.
- Benchmarking with other utilities will be performed periodically to help implement industry good practices identified.

**PERFORMANCE MEASURES**

- Achieve less than 50 gallons per day service water in-leakage into Radwaste by 12/31/94.
- Maintain Zebra Mussel control in intake piping to less than 12 mussels per square foot.
- Maintain auxiliary closed cooling water chemistry out of specification hours to less than 5%. (Applicable after repair of 1SWP\*MOV504B See step 16.1.4.3).

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: PLANT CHEMISTRY*

ACTIVITIES

- 16.1 Implement effective procedures and process improvements, including plant modifications if required, that will assist operations and chemistry in maintaining high levels of plant water chemistry standards.
  - 16.1.1 Reduce impurity inputs (including oil, total organic carbon, and conductivity) to the liquid radwaste processing system.
    - 16.1.1.1 Establish a method for optimizing oil removal from building sumps
    - 16.1.1.2 Develop and implement a program for tracking the utilization of lubricating oil consumption.
    - 16.1.1.3 Reduce service water in-leakage into liquid radwaste
    - 16.1.1.4 Reduce Total Organic Carbon (TOC) in service water.
  - 16.1.2 Perform an engineering analysis and cost-benefit analysis, including alternative solutions, for eliminating sulfate and oxygen intrusions into the makeup water storage tanks.
  - 16.1.3 Perform an engineering analysis and of alternative solutions, to remove ionic and particulate impurities from the suppression pool; schedule for implementation.
  - 16.1.4 Develop and implement improved processes to reduce auxiliary closed cooling water systems out-of-specification hours.
    - 16.1.4.1 Identify other sources of cross-contamination problems with closed cooling systems and resolve.
    - 16.1.4.2 Resolve contamination of closed cooling systems due to Rotation of Loops/ Surveillance Test Procedures (ROLs/STPs).
    - 16.1.4.3 Reduce leakage from normal service water to component cooling water (MOV\*SWP504B repaired).
  - 16.1.5 Reduce metal transport to the reactor.

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: PLANT CHEMISTRY**

- 16.1.5.1 Identify areas that are contributing to the elevated iron transport and the necessary corrective action to resolve the problems.
- 16.1.5.2 Develop schedule for installing condensate prefilters
- 16.1.6 Improve the liquid radwaste processing capability to return water to the Condensate Storage Tank (CST).
  - 16.1.6.1 Minimize ionic impurities returned from the Liquid Waster System (LWS) to the CST and update limits
  - 16.1.6.2 Evaluate a substitute for the walnut shell filter in LWS processing.
  - 16.1.6.3 Identify alternate resin types that will improve LWS processing and reduce Curies discharged.
  - 16.1.6.4 Improve the Ultrasonic Resin Cleaning (URC) operation and efficiency or identify a replacement (vibrating screens)
  - 16.1.6.5 Evaluate the need for TOC removal in radwaste.
- 16.2 **Implement changes in the operations of the plant systems that will enhance plant chemistry control and protection of plant equipment.**
  - 16.2.1 Establish and implement improved system layup practices to reduce excessive corrosion during plant outages.
    - 16.2.1.1 Identify components and time frames for layup and incorporate into administrative procedures.
    - 16.2.1.2 Develop monitoring techniques to ensure adequate layup protection and show benefit for layup practices.
  - 16.2.2 Develop and implement a Zebra Mussel treatment program, including plant modifications if required, to prevent impact upon plant operations.
    - 16.2.2.1 Determine need for hypochlorite additions to the clarifier.
    - 16.2.2.2 Develop method for monitoring buildup of Zebra Mussels in intake piping and a schedule for implementing control options.



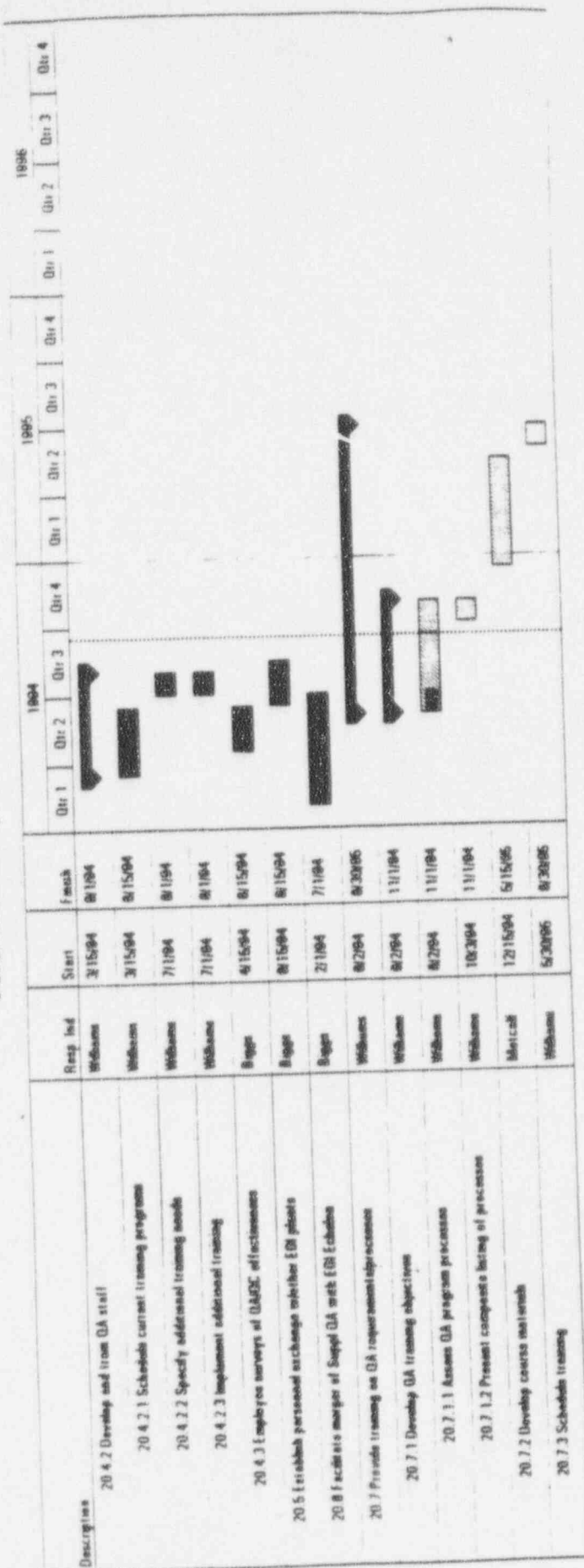
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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: PLANT CHEMISTRY*

- 16.2.3 Evaluate Hydrogen Water Chemistry/Optimum Water Chemistry (HWC/OWC) for potential implementation at River Bend
  - 16.2.3.1 Show the cost and cost benefit of switching to HWC/OWC
  - 16.2.3.2 Establish a schedule and plan for incorporating HWC/OWC if deemed necessary.
- 16.2.4 Evaluate the cost benefit analysis of implementing these station modifications through Change Review Board evaluations. (The following not shown as activities with scheduled start and finish date)
  - 16.2.4.1 Implement the MR to keep air out of demineralized water storage tanks.
  - 16.2.4.2 Complete installation and testing of the suppression clean-up system.
  - 16.2.4.3 Install new sample lines for representative sampling of iron throughout the BOP systems.
  - 16.2.4.4 Install prefilters.
  - 16.2.4.5 Evaluate the benefit and cost of eliminating copper from the condenser.
  - 16.2.4.6 Reroute chemistry sample sinks to input back into the system not LWS.
  - 16.2.4.7 Reroute unit cooler drains and sponge ball system drains to keep out of equipment drains.
  - 16.2.4.8 Complete MR to have injection lines installed at the river intake system.
  - 16.2.4.9 Install ECP monitors for monitoring of cracking potential in the reactor system.

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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: QUALITY ASSURANCE**



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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: PLANT CHEMISTRY**

Description	Resp. Ind.	Start	Finish	1994				1995				1996			
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4
18.2.1.2 Develop Monitoring Techniques	Scott	1/3/94	6/15/94	■	■										
18.2.2 Implement Zebra Mussel Program	Stame	1/3/94	6/1/94	■	■										
18.2.2.1 Hypochlorite Feed in Clarifiers	Stame	1/3/94	6/1/94	■	■										
18.2.2.2 Monitor Zebra Mussel Buildup	Stame	1/3/94	6/1/94	■	■										
18.2.3 Evaluate Hydrogen Water Chemistry	Burnett	6/1/94	6/1/95		■	■	■	■	■	■	■				
18.2.3.1 Develop Cost Benefit	Burnett	6/1/94	1/1/95		■	■	■								
18.2.3.2 Schedule HRC/DHRC if needed	Burnett	1/2/95	6/1/95					■	■	■	■				

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: LICENSING AND REGULATORY AFFAIRS**

**PROGRAM TITLE**

Licensing and Regulatory Affairs

**PROGRAM MANAGER**

Otto Bulich, Manager - Licensing

**DESCRIPTION**

Establish and maintain an effective and efficient licensing and regulatory affairs organization. Communicate with the NRC in an effective and timely fashion. Manage regulatory issues conservatively and pro-actively. Operate in a manner that appries management of impending regulatory issues and that ensures the NRC is aware of major plant initiatives by providing clear communications and an effective management/regulatory interface.

**OBJECTIVES**

- Improve the external and internal RE S regulatory interface.
- Increase the effectiveness of the commitment management system.
- Improve the efficiency of licensing activities consistent with the safety and regulatory performance of world class plants.

**PERFORMANCE MEASURES**

Regulatory Interface

- Continuous improvements in SALP.
- No late submittals (including approved extensions).
- No rejected submittals due to inadequate technical justification.

Commitments

- No late commitments.

Licensing efficiency

- Fully authorized competent staff in place by December 1994.
- A plan developed to implement licensing burden reduction measures initiated through cost-beneficial licensing actions by the end of 1996.

*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: LICENSING AND REGULATORY AFFAIRS*

ACTIVITIES

17.1 Improve the Regulatory Interface

- 17.1.1 Increase the face-to-face time with internal and external customers
  - 17.1.1.1 Establish specific assignments, frequencies, and accountabilities for periodic contact with key regulatory customers.
  - 17.1.1.2 Establish designated coordinators, standards, and guidelines for maintaining continuous contact with RBS organizations that provide or require information for regulatory interface, including inspection support.
- 17.1.2 Deleted per approved program revision. Incorporated in 17.1.4
- 17.1.3 Implement an effective process to integrate Peer Group efforts into RBS licensing activities.
- 17.1.4 Complete a process review and redesign processes and procedures to eliminate barriers and organizational boundaries that reduce regulatory interface effectiveness (also supports efficiency).
  - 17.1.4.1 Develop and implement guidelines and policies for reportability.
  - 17.1.4.2 Develop and implement guidelines and policies for operability.
  - 17.1.4.3 Develop and implement guidelines and policies for inspection support.
  - 17.1.4.4 Develop and implement guidelines and policies for submitted preparation.
  - 17.1.4.5 Develop and implement guidelines and policies for License amendment preparation.
  - 17.1.4.6 Develop and implement guidelines and policies for managing regulatory issues proactively.
- 17.1.5 Deleted per approved program revision. Incorporated in 17.1.4.4



*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION  
PROGRAM: LICENSING AND REGULATORY AFFAIRS*

- 17.1.6 Deleted per approved program revision. Incorporated into 17.1.4.6
- 17.1.7 Improve skills of staff important to an effective interface
  - 17.1.7.1 Technical knowledge
    - 17.1.7.1.1 Identify key technical knowledge requirements for Licensing staff
    - 17.1.7.1.2 Conduct the training for those requiring it
  - 17.1.7.2 Rotate a licensed operator into a licensing engineer position and evaluate the value of continuing the rotation program
  - 17.1.7.3 Rotate licensing staff into outage support engineering functions

**17.2 Increase the Effectiveness of the Commitment Management System.**

- 17.2.1 Improve the process for management (before the fact as well as after) of regulatory commitments, including tracking system.
  - 17.2.1.1 Evaluate the RBS commitment management system processes and compare to other Entergy and top performing units
  - 17.2.1.2 Identify process improvements
  - 17.2.1.3 Change policies and procedures
  - 17.2.1.4 Communicate the policies and procedures to other departments
  - 17.2.1.5 Implement the improvements
- 17.2.2 Review commitments for accuracy and duplication, consolidate and reduce where appropriate. (To be completed commensurate with procedure upgrade program implementation)
  - 17.2.2.1 Initially review open commitments pending completion
  - 17.2.2.2 Follow with closed commitments where action is complete

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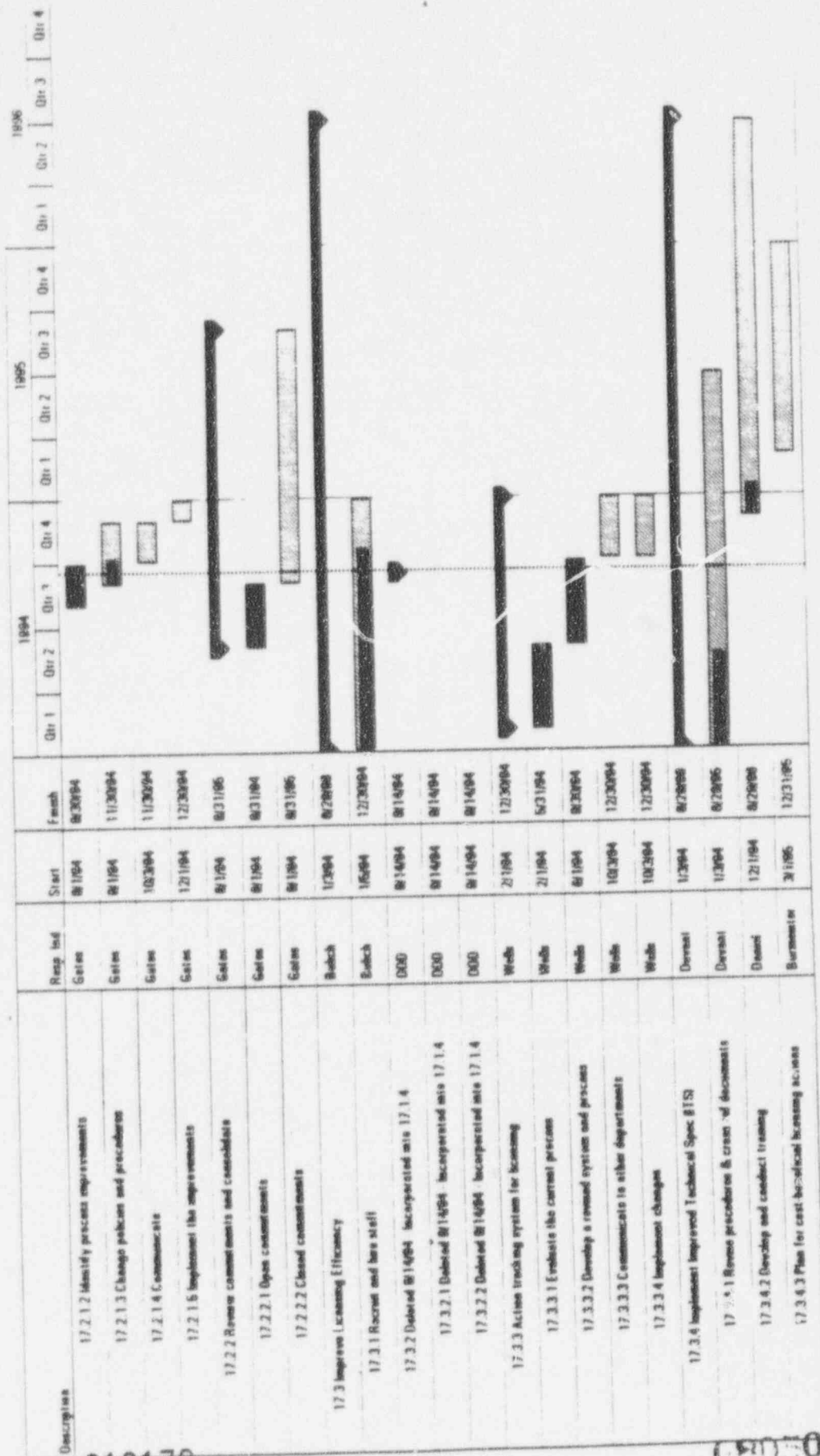
*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: LICENSING AND REGULATORY AFFAIRS*

**17.3 Improve Licensing Efficiency**

- 17.3.1 Recruit and hire staff competent to fill vacant authorized positions
- 17.3.2 Deleted per approved program revision. Incorporated into activity 17.1.4.
- 17.3.3 Implement an effective action tracking system for use by licensing and those organizations supporting the regulatory interface
  - 17.3.3.1 Evaluate the current process for action tracking.
  - 17.3.3.2 Develop a revised system and process.
  - 17.3.3.3 Communicate the system and process changes to other departments.
  - 17.3.3.4 Implement the system and process changes.
- 17.3.4 Implement Improved Technical Specifications (ITS).
  - 17.3.4.1 Revise procedures and all cross reference documents.
  - 17.3.4.2 Develop and conduct training.
  - 17.3.4.3 Develop a plan to evaluate cost-beneficial licensing actions to reduce O&M cost; continue to evaluate technical specification effectiveness.

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**RIVER BEND STATION**  
**LONG TERM PERFORMANCE IMPROVEMENT PLAN**  
**PROGRAM: LICENSING AND REGULATORY AFFAIRS**



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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: SECURITY*

**PROGRAM TITLE**

Security

**PROGRAM MANAGER**

Howard Hutchens, Superintendent - Plant Security

**DESCRIPTION**

Identify and implement improvements to station security. The improvement areas have been developed from internal assessments, and NRC inspections, and the action plans were developed to address fundamental organizational performance improvement requirements. Improvements in Safeguards Information and Access Authorization/Fitness for Duty are also included as part of this program.

**OBJECTIVES**

- Protect against malevolent use of vehicles at RBS.
- Enhance communications within the security department to promote better understanding of requirements and teamwork.
- Upgrade security support systems to promote efficiency and effectiveness.
- Improve the efficiency and effectiveness of security processes and contracts to reduce costs.
- Develop an awareness and sense of ownership in the Safeguards Information Program by all plant personnel.
- Maintain configuration control of Safeguards Information drawings.
- Strengthen the Safeguards Information Program by identifying potential weaknesses.
- Streamline granting of access authorization.

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: SECURITY**

**PERFORMANCE MEASURES**

- Improving trends in issues related to security
- Maintain Security costs and manpower resources consistent with other Entergy stations
- Reduce and/or eliminate Safeguards related events.
- Reduce volume of Safeguards Information material.
- Reduce number of outstanding drawing changes. (Safeguards related)
- Reduce access authorization cycle time from current 7 days to 72 hours by 7/1/94 (end of RF5)

**ACTIVITIES**

**18.1 Develop plan for protection against Malevolent Use of Vehicles at Riverbend Station.**

- 18.1.1 Evaluate vehicle control measures, including vehicle barrier systems that must be established to protect against use of land vehicles as sabotage devices.
- 18.1.2 Develop and submit implementation plan.
- 18.1.3 Implement plan.

**18.2 Enhance Communications Within the Security Department**

- 18.2.1 Improve continuity between shifts to standardize shift-to-shift guidance.
  - 18.2.1.1 Establish supervisory shift rotation.
  - 18.2.1.2 Establish one-source information bulletin to ensure that directions to the security force come from the proper level of authority and are in compliance with regulatory requirements.
- 18.2.2 Improve security force and management communications by establishing method to feedback concerns, suggestions and issues from the security force to management.



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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: SECURITY**

- 18.2.3 Improve communication and cooperation between security and other plant departments by establishing an effective method to feedback plant personnel concerns, suggestions and issues to security management.
- 18.3 Upgrade security support systems to promote efficiency and effectiveness.
  - 18.3.1 Upgrade the security computer system for plant access and intrusion detection.
    - 18.3.1.1 Evaluate changes needed to the security support facilities to meet Entergy system standards
    - 18.3.1.2 Provide input for necessary changes to the site master plan and to the Master Issues List
  - 18.3.2 Upgrade security department procedures
    - 18.3.2.1 Develop and implement a security procedure writers guide to provide appropriate standards for format and technical and administrative content
    - 18.3.2.2 Establish a schedule and upgrade the security procedures to meet the new standards
- 18.4 Improve the efficiency and effectiveness of security processes and contracts.
  - 18.4.1 Transition security into The Wackenhut Corporation (TWC) General Services Agreement (GSA) with EOI.
  - 18.4.2 Reduce overall security operating costs by improving resource utilization through enhanced security personnel scheduling
  - 18.4.3 Reduce RF-5 security physical support expenditures by optimizing the scheduling of training to allow for the utilization of the training shift personnel for outage support in lieu of hiring part-time or temporary support.
- 18.5 Develop an awareness and sense of ownership in the Safeguards Information Program through communications.
  - 18.5.1 Provide pamphlets to illustrate the purpose of Safeguards Information and the importance of controlling the information.

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: SECURITY**

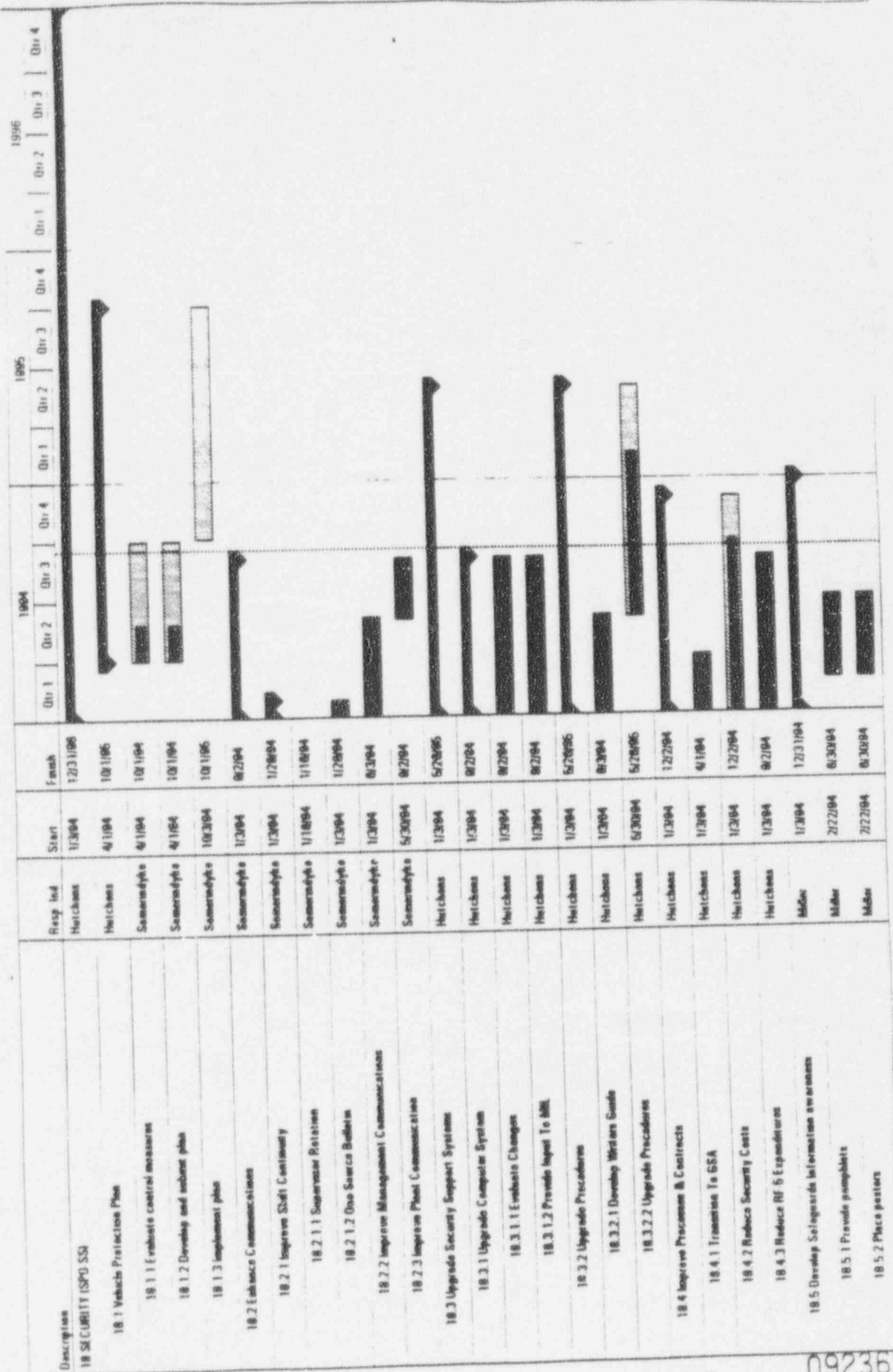
- 18.5.2 Place posters in high traffic areas throughout the site demonstrating proper methods of control
- 18.5.3 Observe handling of Safeguards documents by users
- 18.5.4 Periodically perform employee surveys to trend awareness
- 18.6 Reduction of Safeguards Information material.**
  - 18.6.1 Execute schedule of revising Safeguards drawings.
- 18.7 Improve Access Authorization/Fitness for Duty (FFD) Processes.**
  - 18.7.1 Reduce the number of self-screening contractors.
    - 18.7.1.1 Identify contractors
    - 18.7.1.2 Check and adjust.
  - 18.7.2 Develop FFD plan to consider use of one EOI central testing lab
  - 18.7.3 Revise procedures to conform to EOI standards.
  - 18.7.4 Improve Access/FFD personnel utilization to reduce cost.
    - 18.7.4.1 Reorganize existing staff similar to other EOI sites
    - 18.7.4.2 Propose use of GSA contract for manning purposes.
  - 18.7.5 Enhance Access/FFD personnel skills.
    - 18.7.5.1 Arrange visits to other EOI sites.
    - 18.7.5.2 Provide training for Access/FFD personnel in areas outside of security.
      - 18.7.5.2.1 Assess needs.
      - 18.7.5.2.2 Develop training plan.
      - 18.7.5.2.3 Implement training.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: SECURITY*

- 18.7.6 Improve support to outages
  - 18.7.6.1 Implement centralized check-in/check-out for transient workers.
  - 18.7.6.2 Implement new security tracking system. (Index)
  - 18.7.6.3 Check and adjust.
  - 18.7.6.4 Institutionalize these improvements.

**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: SECURITY**



SCHEDULE ATTACHMENT I

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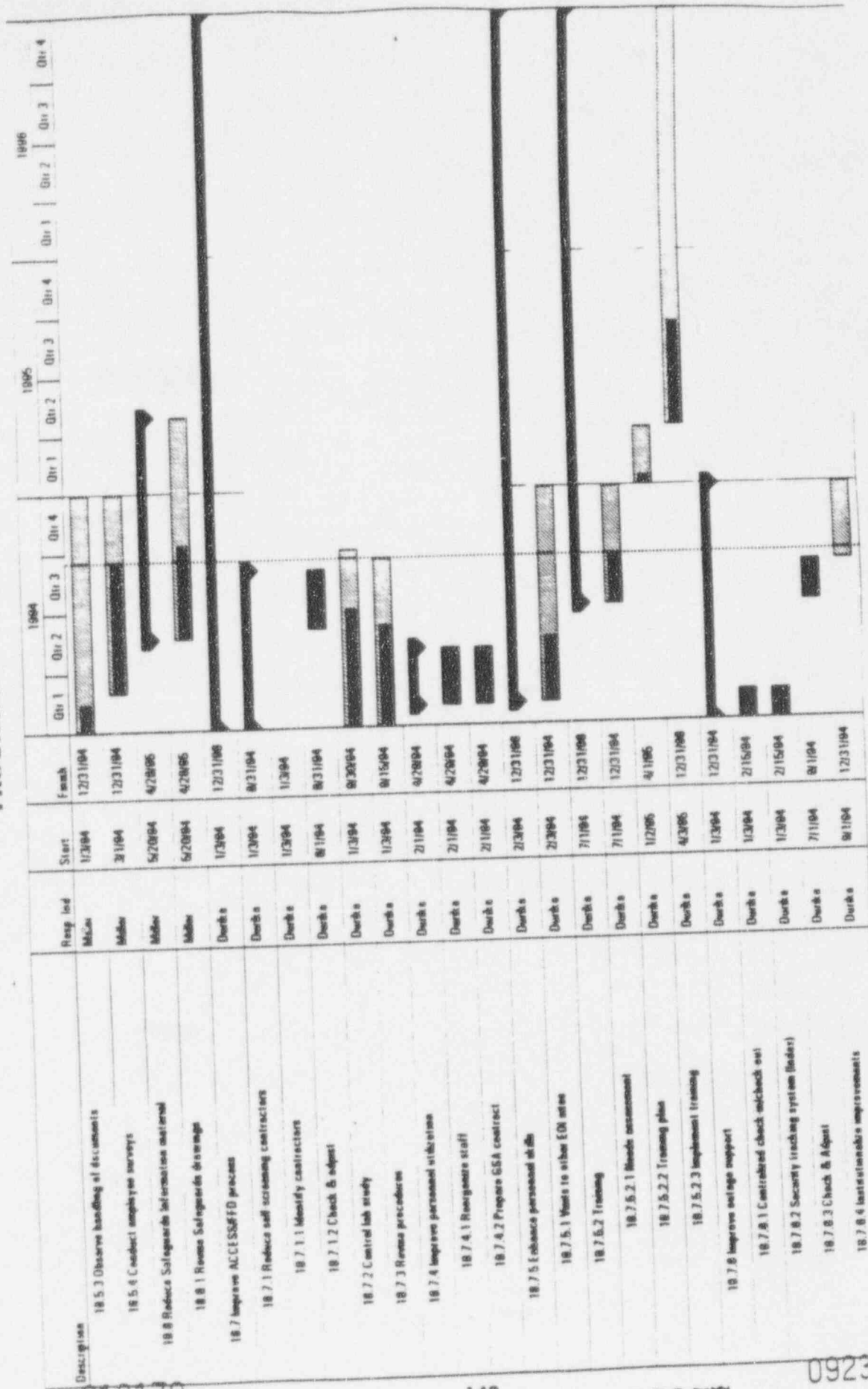
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**RIVER BEND STATION  
LONG TERM PERFORMANCE IMPROVEMENT PLAN  
PROGRAM: SECURITY**



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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: TRAINING*

**PROGRAM TITLE**

Training

**PROGRAM MANAGER**

Grant Lewis, Manager - Nuclear Training

**DESCRIPTION**

Enhance and maintain strong and effective training programs to support plant operation. Ensure RBS personnel receive the appropriate type and amount of training commensurate with their job assignments.

**OBJECTIVES**

- Increase integrated plant operations knowledge throughout the organization.
- Support and coordinate the training activities identified in other performance improvement program plans, including the Human Performance Effectiveness Program.
- Improve plant performance through high quality and effective training.

**PERFORMANCE MEASURES**

- No more than 2 condition reports per year in which the primary root cause is identified as a training deficiency.
- No more than 4 poor radiation worker practices per year in which the root cause is identified as a training deficiency as indicated by the Radiological Deficiency Report Program.
- Management Operations certification program developed by the end of 1994.
- Training Department procedures update schedule and program plan developed by August 1994.
- Revisions of Training Department procedures completed by August 1995.



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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION  
PROGRAM: TRAINING**

- Systematic review of training assessment and evaluations

- Completed by September 1994
- Improvements implemented by September 1995

**ACTIVITIES**

- 19.1 Enhance the level of integrated plant operational knowledge at RBS by implementing a management operations certification program.**

19.1.1 Identify site needs and course requirements and develop a management operations certification program.

19.1.2 Present the management operations certification training program in 1995 based on site needs.

19.1.3 Present the management operations certification training program in 1996 based on site needs.

- 19.2 Conduct a systematic review of previous training assessments, previous training evaluations and plant performance indicators to identify program improvements. Insure that follow-up has been addressed on identified areas for improvement and corrective actions.**

19.2.1 Conduct the assessment review.

19.2.2 Ensure improvements identified in the systematic review are in progress or complete and the issues are adequately addressed.

19.2.3 Complete an INPO "self-evaluation assist" visit.

- 19.3 Improve training department effectiveness.**

19.3.1 Develop a plan and schedule for revising training department procedures to improve the process, human factors, procedural compliance, and efficiency.

19.3.1.1 Validate all current commitments requirements, etc.

19.3.1.2 Develop a process, organizational structure and schedule for revising and maintaining Training Department procedures.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: TRAINING*

- 19.3.1.3 Revise training department procedures per schedule
- 19.3.2 Complete the evaluation of the current training records system, develop a plan that incorporates improvements and integrates the results of the records QAT and corporate activities in the record management areas
- 19.3.3 Complete a study of the Training Department LAN, information systems, and computer tools, and implement a plan for improvements
- 19.3.4 Develop and implement a more efficient process to maintain continuously the operations re-qualification examination bank questions when they are written and used.
- 19.3.5 Implement innovative approaches to training using integrated health physics and maintenance training and multi-discipline team training to support plant needs.
- 19.3.6 Conduct case study training based on RBS and industry experience as a means of enhancing the utilization of this experience in training
- 19.3.7 Assess the effectiveness of the Training Review Groups (TRGs) for accredited programs. This independent assessment should confirm that the TRGs effectively maintain appropriate standards in the development of quality course curricula, facilitate communication among all levels, and support training activities.
- 19.3.8 Line department to Training Department rotational assignments.
  - 19.3.8.1 Maintain line department to Training Department rotational assignments in 1994
  - 19.3.8.2 Evaluate rotational program and adjust as appropriate.
- 19.3.9 Implement a process to improve communication and feedback between Training and customer departments.
- 19.3.10 Improve Emergency Planning training.
  - 19.3.10.1 Develop concept of team training prior to 1995 exercise.
  - 19.3.10.2 Revise initial and requalification training to implement team training prior to 1996 exercise.

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: TRAINING**

**19.4 Improve Operator Performance by enhancing simulator fidelity and realism.**

- 19.4.1 Complete installation of core neutronics and recirculation thermal-hydraulic models.
- 19.4.2 Complete the installation of containment and activity transport models
- 19.4.3 Develop and implement plan for additional upgrade of simulator physical fidelity and expanded simulation capability
- 19.4.4 Develop a simulator scenario validation process.
- 19.4.5 Provide additional continuing training for operations instructors based on assessment results, instructor input, and management feedback.

**19.5 Coordinate and oversee the development and delivery of the training included in the performance improvement program plan. The following table is a summary of training planned.**

## Summary Of LTPIP Training

Notes: The table includes all training-related activities, not just those involving the Training Dept  
In some cases, activities have been reworded to highlight their training component

LTPIP Program	Description		Activity	Accountable
Change Management	Program relies on Entergy's Total Quality (TQ) training programs	5 2 -	TQ improvement implementation	Moore
Plant Chemistry	No reference to training			
Closure of Problems	Program revises Corrective Action Program (CAP) and implementing procedures	7 1 5 -	Train RBS site personnel on new CAP procedure RBNP-047	Metcalf
Engineering Support	Program relies on other LTPIP training initiatives	14 2 6 -	Conduct training for engineering staff	Davey/others
Fundamental Project Management (PM)	Program requires training in PM procedures and tools	2 4 2 -	Create and implement a PM training program	Arceneaux
Human Performance Effectiveness (PM)		9 1 2 -	Develop an HPES training module	Clymer
		9 1 3 2 -	Perform training to qualify departmental HPES evaluators	Cylmer
		9 2 2.1 -	Train on performance data collection and trending	Cylmer
Leadership and Management	This program relies on Entergy training program, some development training considered part of each manager's normal responsibilities	4 1 3, 4 5 2 -	Training on leadership and management skills	Arceneaux
		4 1 4 -	Entergy Professional Supervisor's training	Spitzfaden
		4 1 5 -	Communications skills training	Dreher
		4 2 1 -	Train personnel in TQ (inc. QAT, QP&P)	Moore
		4 2 2 -	Identify and interview customers of management training and identify additional management training program	Spitzfaden

\* Training Department

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LTPIP Program	Description	Activity	Accountable
		3 6 - Implement TQ improvement	Dept Manager
Licensing and Regulatory Affairs	Includes normal departmental skills training and Tech Spec training	17 1 7 1 2 - Conduct necessary technical training	Bulich
		17 3 4 2 - Develop and conduct training on improved Technical Specifications	Daniel*
Materials Management	No reference to training		
Modifications	No reference to training		
Oversight of Problem Solving Systems	No reference to training		
Outage Management	Includes training on various programs and procedures	3 4 1 3 - Train personnel on retest procedure	Ewing
		3 4 2 2 - Train Operations on LCOT and TRIS	Venable
		3 4 2 3 - Train Maintenance on MWOT and tagout	Ewing
		3 4 2 4 - Train Outage Management on Work Document Cross Reference (WDCR)	Lacy
Procedures	Includes training on new writer's guide and administrative controls	13 1 4 - Train procedure writers	Daniel*
		13 1 5 - Train procedure users	Daniel*
Problem Identification and Root Cause Evaluation	Includes training on revised processes and evaluation techniques	6 2 2 - Train on revised Condition Reporting (CR) process	Metcalf
		6 4 2 - Train on revised root cause analysis techniques	Leavines
		6 5 - Develop and present training on the revised root cause evaluation program	Metcalf*

\*Training Department

LTPIP Program	Description		Activity	Accountable
Quality Assurance	Includes training to increase site-wide awareness of QA requirements and upgrade staff's technical capabilities	20 4 2 -	Upgrade QA/QC staff through training	Williams
		20 7 -	Provide training to site personnel on QA requirements and processes	Williams
Radiological Protection	Training pervades this program to upgrade skills and integrate RP considerations into daily work activities	15 1 1 2 -	Train deconners to survey laundry and trash	Goudeau
		15 1 3 8 -	Train deconners on Maintenance & Test Equipment	Goudeau
		15 3 2 1 -	Coaching training for RP personnel	Heath
		15 3 4 2, 15 3 4 5 -	Conduct RP training for RP technicians and radworkers	Heath
		15 5 1 3 -	Conduct integrated training with Maintenance	Odell
		15 6 2 -	Train to enhance radworker skills	
Site Planning and Resource Allocation	No reference to training			
Security	Includes personnel skills training	18 7 5 2 -	Provide developmental (non-security) training to personnel	Durika
Training	Only direct training activities are included in this table	19 1 -	Develop and implement a management Operations certification program	Ross
Work Control	Only direct training activities are included in this table	10 1 2 3 -	Train to Work Management Center (WMC) process improvements	V Carlson

\* Training Department

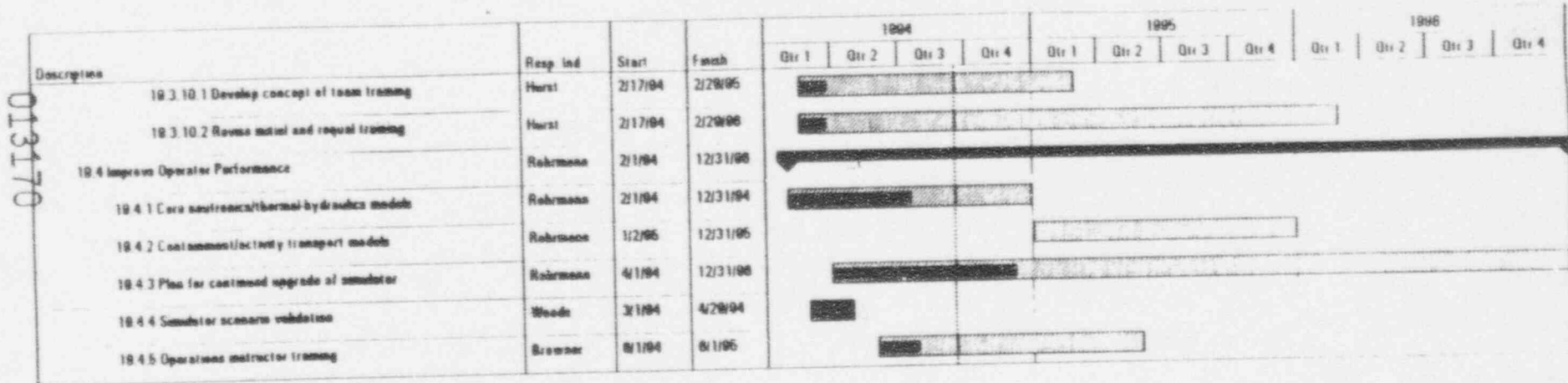


## RIVER BEND STATION

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# **RIVER BEND STATION LONG TERM PERFORMANCE IMPROVEMENT PLAN PROGRAM: TRAINING**



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SCHEDULE ATTACHMENT

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: QUALITY ASSURANCE**

**PROGRAM TITLE**

Quality Assurance

**PROGRAM MANAGER**

Ken Giadrosich, Manager Quality Assurance

**DESCRIPTION**

Enhance the capability of the QA organization to conduct business in a manner that "adds value" to plant activities and processes by conducting thorough and technically sound audits, inspections and surveillances, and improving the line organization's knowledge of QA program requirements applicable to their processes, thereby instilling the mindset of "Quality is everyone's job". Additionally, this strategy will also aggressively pursue merger of Supplier QA processes with those of Echelon.

**OBJECTIVES**

- Improve internal QA processes to eliminate recurrent problems and promote self-identification.
- Increase the technical and quality engineering capabilities of the QA organization through increased training, exchange of personnel with other EOI plants and the implementation of rotational assignments.
- Improve productivity of the QA organization through the use of sampling techniques, elimination or reduction of low value/redundant work and the use of computer applications.
- Improve site personnel's knowledge of the Quality Assurance program requirements and processes (Emphasis on individual responsibility/accountability).

**PERFORMANCE MEASURES**

- Document review time reduced by 2000 manhours.
- Increase percentage of QA personnel with technical experience in line disciplines through training and/or rotational assignments. Goal is 15% or more of personnel performing surveillance/audit functions have appropriate technical/line experience.

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: QUALITY ASSURANCE*

- No repeat problems

**ACTIVITIES**

**20.1 Improve the method used for selecting and scheduling inspection/audit areas and timing to focus on those areas identified as needing improvement from external and internal audits/surveillances/assessments.**

20.1.1 Modify, as appropriate, QA audit and surveillance programs to focus bulk of activity toward achieving improvement in weak areas and self-identification of new areas in need of improvement.

**20.2 Redirect/eliminate redundant and low value inspection/review work.**

20.2.1 Evaluate review processes to identify and redirect redundant or low value work.

20.2.1.1 Identify redundant review efforts and existing constraints which preclude eliminating this work.

20.2.1.2 Develop alternative method for review, justify the replacement and implement the change.

20.2.2 Deleted per approved program revision.

20.2.3 Deleted per approved program revision.

**20.3 Improve QA/QC organization productivity.**

20.3.1 Develop an integrated solution to reducing the redundant/low value QA/QC work in the receiving inspection function.

20.3.1.1 Analyze current work practices and automation support

20.3.1.2 Generate alternative solutions (Quality Action Team)

20.3.1.3 Implement

20.3.2 Develop an improved process for planning and conducting maintenance inspection activities.

20.3.2.1 Analyze maintenance inspection requirements, current work practices and organization interfaces/capabilities.

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**STRATEGY: SUPPORT FOR SAFE PLANT OPERATION**  
**PROGRAM: QUALITY ASSURANCE**

- 20.3.2.2 Generate alternative activities and responsibilities to streamline the process and promote line ownership for planning and inspection activities within their capabilities as appropriate.
- 20.3.2.3 Analyze and select an improved method and associated transition plan with resources and schedule information
- 20.3.2.4 Obtain approval and implement the transition.
- 20.3.2.5 Conduct a post-implementation assessment and implement lessons learned.

**20.4 Improve QA/QC technical and professional expertise.**

- 20.4.1 Determine staff technical expertise requirements needed.
    - 20.4.1.1 Assess adequacy of technical expertise of current staff in relation to projected organization functions
    - 20.4.1.2 Develop plans to augment expertise as required (e.g., Technical upgrading via rotation of assignments).
    - 20.4.1.3 Develop agreements with supporting line organizations and selected personnel and implement the plan.
  - 20.4.2 Develop and train QA/QC staff
    - 20.4.2.1 Determine training needs in subjects currently supported by training and schedule training (e.g., Teamwork, report writing, maintenance, plant systems).
    - 20.4.2.2 Specify additional training needs.
    - 20.4.2.3 Schedule/implement needed training.
  - 20.4.3 Conduct employee surveys of perceived QA/QC effectiveness
- 20.5 Establish personnel exchange program with other EOI plants to enhance RBS technical expertise. Through exchange of personnel with other EOI plants, supplement RBS audits, surveillances, and quality control activities to improve technical expertise. (GGNS, WIII -SES)**

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*STRATEGY: SUPPORT FOR SAFE PLANT OPERATION*  
*PROGRAM: QUALITY ASSURANCE*

- 20.6 Facilitate the merger of Supplier QA processes with EOI's Echelon to enable realization of merger savings.
- 20.7 Provide training on Quality Assurance requirements/processes to site personnel.
  - 20.7.1 Develop QA training objectives for site personnel; emphasize personal accountability and the mindset "Quality is everyone's job" at RBS
    - 20.7.1.1 Assess QA program processes to be included within the curriculum.
    - 20.7.1.2 Present composite listing of processes selected for inclusion in course to responsible management for validation.
  - 20.7.2 Develop course materials for use in conduct of the training - emphasis upon practical application of requirements.
  - 20.7.3 Schedule training for all site personnel.



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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE  
ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

In the Matter of )  
 )  
GULF STATES UTILITIES )  
COMPANY, et al. )  
 )  
(River Bend Station, Unit 1) )

Docket No. 50-458-OLA

94 NOV -8 P2:59  
OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I, Thomas L. Rudebusch, hereby certify that on this 3rd day of October 1994, I served on the following by hand or first class mail, postage pre-paid, copies of the CAJUN ELECTRIC POWER COOPERATIVE, INC.'S, MOTION TO COMPEL RESPONSES TO FOLLOW-UP DISCOVERY REQUESTS AND ANSWER TO MOTION FOR PROTECTIVE ORDER.

Samuel J. Chilk, Secretary  
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Office of Commission Appellate  
Adjudication  
Nuclear Regulatory Commission  
Washington, DC 20555

Administrative Judge  
Richard F. Cole  
Atomic Safety & Licensing Board  
Nuclear Regulatory Commission  
Washington, DC 20555

Administrative Judge  
B. Paul Cotter, Jr., Chairman  
Atomic Safety & Licensing Board  
Nuclear Regulatory Commission  
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