

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

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October 6, 1983

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

IN THE MATTER OF
METROPOLITAN EDISON COMPANY
(Three Mile Island Nuclear Station, Unit 1)
Docket No. 50-289 (Restart)

Dear Chairman Edles and Judges Buck and Kohl:

Consistent with our having provided past INPO evaluations of TMI-1, I enclose for the Appeal Board and parties information provided to GPU Nuclear at the recent INPO conference of Chief Executive Officers. As the operator of both TMI-1 and Oyster Creek, Licensee received information on both units. The enclosed materials relate only to TMI-1 and, with the exception of participation in the NPRDS program, rate TMI-1 as average or in the top-one-sixth of all operating plants in the country. With respect to Licensee's participation in NPRDS, this program has

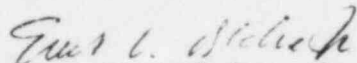
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Administrative Judges
Edles, Buck and Kohl
October 6, 1983
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been the subject of increased Licensee efforts during 1983, and a summary status report currently in preparation for submittal to INPO will be distributed as well to the Board and parties.

Respectfully submitted,


Ernest L. Blake, Jr.
Counsel for Licensee

cc: Attached Service List
ELB/lam

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	
(Three Mile Island Nuclear)	(Restart)
Station, Unit No. 1))	

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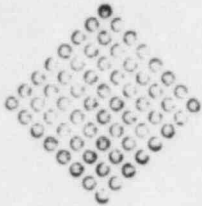
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Management Involvement
September 21-23, 1983
The Waverly Hotel



GPU NUCLEAR CORPORATION

Mr. Herman M. Dieckamp

INSTITUTE OF NUCLEAR POWER OPERATIONS

FOLLOW-UP ON INPO PROGRAMS

CEO WORKSHOP

SEPTEMBER 1983

L. F. SILLIN, JR.

L. F. SILLIN, JR.
FOLLOW-UP ON INPO PROGRAMS
CEO WORKSHOP
SEPTEMBER 1983

GOOD MORNING, AGAIN. AS MANY OF YOU MAY SURMISE, BILL LEE, IN HIS KEYNOTE ADDRESS, EMPHASIZED THE THEME OF THIS WORKSHOP, "MANAGEMENT INVOLVEMENT." I WOULD LIKE TO ENDORSE BILL'S COMMENTS AND CARRY THE SUBJECT FURTHER.

IN ESTABLISHING INPO, THE NUCLEAR UTILITY INDUSTRY TOOK THE UNPRECEDENTED STEP OF EMBRACING THE CONCEPT OF SELF-IMPROVEMENT AND SELF-REGULATION. IN DOING SO, IT ASSUMED A MAJOR RESPONSIBILITY. WE, IN EFFECT, CONCLUDED THAT COMPLIANCE WITH REGULATORY REQUIREMENTS ALONE DID NOT PROVIDE THE LEVEL OF ASSURANCE WE BELIEVE NECESSARY TO PROTECT THE HEALTH AND SAFETY OF THE PUBLIC, OUR EMPLOYEES AND THE SUBSTANTIAL INVESTMENTS IN OUR NUCLEAR FACILITIES. WE ADOPTED A PHILOSOPHY BY WHICH ALL OF THE NUCLEAR UTILITIES WOULD OPERATE AND WE COMMITTED OURSELVES INDIVIDUALLY AND COLLECTIVELY TO ACHIEVE A STANDARD OF EXCELLENCE IN THE CONDUCT OF OUR NUCLEAR POWER RESPONSIBILITIES. INPO WAS CREATED AS AN INDEPENDENT ORGANIZATION, NOT ONLY TO POINT US IN THE RIGHT DIRECTION, BUT TO ASSIST US IN ACHIEVING EXCELLENCE.

EVEN BEFORE PAT HAGGERTY'S SPEECH TO US IN 1980, THE INDUSTRY RECOGNIZED THAT THE SUCCESS OF INPO REQUIRED A

GOVERNING BODY THAT WOULD BE ACTIVELY INVOLVED IN ASSURING THE CONSISTENT EFFORTS NECESSARY TO DEMONSTRATE THE VALIDITY OF THE CONCEPT OF SELF-IMPROVEMENT AND SELF-REGULATION. THUS, IN ESTABLISHING INPO, THE INDUSTRY DECIDED INPO SHOULD HAVE A STRONG BOARD OF DIRECTORS -- MADE UP OF ELEVEN REPRESENTATIVES OF THE UTILITY INDUSTRY. TO ENSURE THAT THE WORKING KNOWLEDGE OF THE INDUSTRY WAS REFLECTED IN THE BOARD'S DELIBERATIONS, THE BY-LAWS SPECIFIED THAT TWO OF THE DIRECTORS MUST HAVE HAD RECENT EXPERIENCE IN THE SUPERVISION OF THE OPERATIONS OF A NUCLEAR POWER PLANT. THE DECISIONS MADE IN 1979 WERE IMPLEMENTED AND HAVE BEEN FOLLOWED FAITHFULLY SINCE THEN. AS I NOTED IN MY OPENING COMMENTS THIS MORNING, THE BOARD HAS BEEN ACTIVE IN CHARTING INPO'S COURSE AND INTIMATELY INVOLVED IN REVIEWING INPO'S OPERATION, PROGRAMS, AND EFFECTIVENESS. IN ADDITION, THE BOARD HAS MONITORED THE QUALITY OF THE PROFESSIONAL STAFF AND TESTED THE SOUNDNESS OF ITS PROGRAMS.

INVOLVEMENT OF THE BOARD OF DIRECTORS CONTINUES TODAY. I HAVE NOT, IN MY EXPERIENCE, SEEN A BOARD THAT TAKES ITS RESPONSIBILITIES SO SERIOUSLY.

THE STAFF FULLY UNDERSTANDS ITS FUNCTION IS TO SERVE THE INDUSTRY. THEY ARE DEDICATED, HIGHLY PROFESSIONAL INDIVIDUALS WHO ARE AWARE OF THEIR RESPONSIBILITIES AND COMMITTED TO THE SUCCESS OF INPO'S MISSION.

THE BOARD OF DIRECTORS CONCLUDED THAT IT WAS THEIR OBLIGATION TO SPEAK DIRECTLY TO YOU, NOT THROUGH THE INPO STAFF, ON SOME PERCEPTIONS OF THE INDUSTRY AND OF THE STEPS THEY CONCLUDED INPO MUST TAKE IF IT IS TO DISCHARGE ITS RESPONSIBILITIES TO YOU AND TO THE NUCLEAR UTILITY INDUSTRY. I AM HERE TO REPORT TO YOU AT THEIR REQUEST AND ON THEIR BEHALF. I WOULD LIKE TO REMIND YOU OF THE INDIVIDUALS WHO ARE CURRENTLY SERVING ON THE INPO BOARD, IN ADDITION TO MYSELF. THEY ARE:

- O AL BARKER, CHAIRMAN, PUBLIC SERVICE OF INDIANA
- O BILL CONWAY, PRESIDENT, VERMONT YANKEE NUCLEAR
POWER CORPORATION
- O JOE FARLEY, PRESIDENT, ALABAMA POWER COMPANY
- O BILL LEE, CHAIRMAN, DUKE POWER COMPANY
- O FRANK LINDER, GENERAL MANAGER, DAIRYLAND POWER
COOPERATIVE
- O MAC MCCARTHY, CHAIRMAN, THE DETROIT EDISON COMPANY
- O JIM O'CONNOR, CHAIRMAN AND PRESIDENT, COMMONWEALTH
EDISON COMPANY
- O HUGH PARRIS, MANAGER OF POWER, TENNESSEE VALLEY
AUTHORITY
- O BERNIE REZNICEK, GENERAL MANAGER, OMAHA
PUBLIC POWER DISTRICT
- O TED ULLRICH, SUPERINTENDENT OF NUCLEAR SERVICES,
OF PHILADELPHIA ELECTRIC COMPANY

INPO, UNDER THE LEADERSHIP OF DENNIS WILKINSON, HAS ENCOURAGED ITS MEMBERS TO BRING FORTH THEIR QUESTIONS AND CONCERNS. INPO'S POLICY IS TO BE AN OPEN ORGANIZATION, COMMITTED TO PROVIDING ASSISTANCE TO ITS MEMBERS AND ENCOURAGING ALL TO IMPROVE THE STANDARDS OF PERFORMANCE IN DISCHARGING THEIR NUCLEAR POWER RESPONSIBILITIES. INSTITUTIONALLY, INPO UNDERSTANDS THAT CONSTRUCTIVE CRITICISM CAN RESULT IN SELF-IMPROVEMENT OF ITSELF AND OF ITS MEMBERS. THUS IN THE COURSE OF THE WORK OF THE IRGs, IN THE CONDUCT OF PLANT EVALUATIONS AND WORKSHOPS, WE SOLICIT INPUT FROM THE MEMBERS AS TO HOW TO IMPROVE INPO'S OPERATION. WHILE WE CAN'T MEET EVERYONE'S SPECIFIC RECOMMENDATIONS, INPO ENDEAVORS TO TAKE THEM ALL INTO ACCOUNT. WE USE THIS OCCASION TODAY TO REAFFIRM THIS POLICY WHILE ALSO SOLICITING YOUR UNDERSTANDING THAT THE BOARD IS COMMITTED TO SERVING THE OVERALL BEST INTEREST OF ITS MEMBERS AND TO CARRYING OUT THE FUNDAMENTAL PURPOSES FOR WHICH THE ORGANIZATION WAS ESTABLISHED.

INPO HAS NOW BEEN IN BUSINESS ALMOST FOUR YEARS AND IS WELL INTO ITS THIRD ROUND OF PLANT EVALUATIONS AND HAS NOW CONDUCTED FOUR CONSTRUCTION PROJECT EVALUATIONS. INPO CAN SPEAK WITH GREATER CONFIDENCE ABOUT THE INDUSTRY'S AND EACH UTILITY'S PROGRESS. WE REPORT TO YOU THAT OVERALL THE INDUSTRY'S PERFORMANCE IS IMPROVING SIGNIFICANTLY. IT CAN BE DEMONSTRATED, IT CAN BE MEASURED, AND, WE SHOULD ALL TAKE PRIDE IN THIS OVERALL ACCOMPLISHMENT. THIS IMPROVEMENT, IF PURSUED VIGOROUSLY BY EACH UTILITY, CAN BE A CRITICAL

ELEMENT IN RE-ESTABLISHING A FUTURE FOR THIS TECHNOLOGY AND IN DEMONSTRATING THAT SELF-IMPROVEMENT AND SELF-REGULATION ARE THE RIGHT ROAD TO SOUND CONSTRUCTION AND SAFE AND RELIABLE OPERATIONS OF NUCLEAR POWER PLANTS. INPO'S SUCCESS WILL BE OF SIGNIFICANT IMPORTANCE TO OUR CONSUMERS, SHAREHOLDERS, EMPLOYEES AND TO THE COUNTRY.

IN THE THIRD ROUND EVALUATIONS OF OPERATING PLANTS, WE ARE, AS I NOTED, SEEING IMPROVED LEVELS OF PERFORMANCE. ON THE OTHER HAND, WHILE OBSERVING SUCH IMPROVEMENT, WE HAVE TO ADDRESS TOGETHER, WHICH IS THE CENTRAL THEME OF MY TALK, THE AREAS WHERE WE SEE INSUFFICIENT IMPROVEMENT AND RESPONSIVENESS.

RECENTLY, THE NRC ISSUED SECY 83-248 WHICH BILL ALLUDED TO THIS MORNING. IN A LETTER TO CHAIRMAN PALLADINO, I WROTE THE FOLLOWING:

"IT IS MY BELIEF THAT INPO IS THE MOST SIGNIFICANT UNDERTAKING BY ANY U.S. INDUSTRY FOR SELF-IMPROVEMENT AND SELF-REGULATION. IT IS A UNIQUE AND POWERFUL CONCEPT. IT HAS THE POTENTIAL TO BRING ABOUT SUBSTANTIAL IMPROVEMENTS IN THE QUALITY OF OPERATIONS OF U. S. NUCLEAR PLANTS. IT ALSO HAS THE POTENTIAL TO SERVE AS A MODEL FOR OTHER U. S. INDUSTRIES."

I BELIEVE THAT FIRMLY. BUT, AT THE SAME TIME, I ALSO FEEL THAT WE MUST CONSTANTLY REMIND OURSELVES OF WHAT INPO'S

ROLE IS AND OF WHAT OUR RESPONSIBILITIES ARE AS LICENSEES OF NUCLEAR PLANTS. INPO IS HERE TO HELP US, TO ASSURE OUR PROGRESS AND TO SERVE NOT ONLY AS A CONSCIENCE TO INDUSTRY, BUT TO BRING ABOUT THE ACHIEVEMENT OF EXCELLENCE. INPO WAS NOT CREATED TO BRAG ON US, DO PR FOR US, OR MAKE US FEEL MORE COMFORTABLE. WE EXPECT IT TO CALL OUT OUR WEAKNESSES AND ASSURE THAT WE ARE OVERCOMING THEM. WE EXPECT IT TO BE SURE THAT WE DO NOT BECOME COMPLACENT OR TOO COMFORTABLE. WITH COMPLACENCY COMES A DANGER, A CONTAGIOUS DANGER, OF SATISFACTION WITH STATUS QUO. THE INDUSTRY CAN ILL AFFORD SUCH A TRAP. WE DO NOT NEED ANOTHER TMI TO SERVE AS A CATALYST. WE MUST CONSTANTLY REMIND OURSELVES THAT EXCELLENCE, IN EVERY ASPECT OF NUCLEAR OPERATION, MUST BE THE GOAL FOR WHICH WE CONSISTENTLY AND CONSCIENTIOUSLY STRIVE. AS BILL LEE POINTED OUT, THE FAILURE OF ONE IS A FAILURE FOR ALL; AND NOW IT WOULD ALSO MEAN A FAILURE OF THE CONCEPT INPO REPRESENTS.

USING INPO FOR SELF-IMPROVEMENT AND SELF-REGULATION IS BASED ON VOLUNTEERISM. IT IS A POWERFUL CONCEPT DEPENDENT ON EACH MEMBER OF THIS COLLEGIAL BODY FULFILLING HIS RESPONSIBILITIES TO THE WHOLE BODY. OUR FOREMOST OBJECTIVE IS TO MAKE THE PROCESS WORK IF WE ARE TO PROVE THE VALIDITY OF THE CONCEPT, AND THUS PREVENT THE FURTHER INTRUSION OF GOVERNMENT AND PRESCRIPTIVE REGULATION INTO OUR MANAGEMENT. INPO'S SUCCESS IS ESSENTIAL IF WE ARE TO PRESERVE THE NUCLEAR OPTION TO SERVE OUR CUSTOMERS' AND THE NATION'S NEEDS.

I AM CONFIDENT THAT THERE IS GOOD ACCEPTANCE AND APPROVAL OF THESE BROAD PRINCIPLES. BUT THE QUESTION IS RAISED: HOW DOES IT WORK WHEN A UTILITY IS UNRESPONSIVE AND IS NOT MEETING ITS RESPONSIBILITIES TO THE WHOLE INDUSTRY? THAT IS THE QUESTION THE INPO BOARD CALLED ON ME TO ADDRESS TODAY. THE INDUSTRY HAS HAD THE BENEFIT OF INPO AS I HAVE SAID FOR ALMOST FOUR YEARS. THE INPO STAFF IS IN ITS THIRD ROUND OF PLANT EVALUATIONS. THE EVENTS ANALYSIS PROGRAM IS IN PLACE, A COMMITMENT HAS BEEN MADE TO AN EFFECTIVE NPRDS AND INPO IS GAINING EXPERIENCE AND CONFIDENCE IN ITS ABILITY TO ASSESS THE PROGRESS OF THE INDUSTRY. AND AS NOTED EARLIER, WE HAVE LEARNED THAT THE OVERALL PERFORMANCE OF THE INDUSTRY IS GETTING BETTER. IT IS NOT SURPRISING SOME UTILITIES' QUALITY OF COMMITMENT AND RESPONSIVENESS ON A DAY IN, DAY OUT BASIS IS BETTER THAN OTHERS. SOME UTILITIES ARE MAKING SIGNIFICANTLY GREATER PROGRESS IN IMPROVING THEIR OPERATIONS THAN ARE OTHERS. THE PROBLEM IS THAT THE DIFFERENCE, IN SOME CASES, IS CONSIDERABLE. THAT IS, WE HAVE TO REPORT SOME UTILITIES HAVE NOT YET DEMONSTRATED THE COMMITMENT THAT THE INDUSTRY MADE TO INPO AND THAT WE MADE TO EACH OTHER IN THE TRAUMATIC PERIOD FOLLOWING TMI. THIS SITUATION, IF CONTINUED AND LEFT UNADDRESSED IN AN EFFECTIVE WAY, WILL THREATEN THE NUCLEAR INDUSTRY AND CHALLENGE THE SUCCESS OF INPO. THERE IS SKEPTICISM BY THOSE ON THE PERIPHERY WHO ARE OBSERVING US AND JUDGING THE INDUSTRY'S WORD AND COMMITMENT AND INPO'S VALUE TO THE INDUSTRY AND THE NATION.

IN SEVERAL FORUMS, BEFORE THE NRC, THE ACRS, THE FINANCIAL COMMUNITY, THE PRESS, THE QUESTION HAS ARISEN "WHAT WILL INPO DO, WHAT WILL THE INDUSTRY DO, OR WHAT IS THE MECHANISM THAT INPO HAS TO DEAL WITH UTILITIES THAT ARE UNRESPONSIVE TO THE RECOMMENDATIONS OF INPO." WITH CONSISTENCY, WE HAVE REPLIED, "SAFETY IS A POWERFUL WORD -- KNOWLEDGE OF PEER PRESSURE -- INDUSTRY'S UNDERSTANDING THAT ONE FAILURE CAN AFFECT THE WHOLE INDUSTRY." INPO IS CALLED UPON TO SERVE AS PROXY FOR THE INDUSTRY IN PURSUING THE ISSUE OF RESPONSIVENESS AND CORRECTIVE ACTIONS.

INPO WAS ESTABLISHED AS A CONSCIENCE FOR ALL OF US. IT IS TO ASSIST THE INDUSTRY. IT IS TO ENCOURAGE US. IT MUST ALSO DEMONSTRATE THE CAPACITY TO AFFECT IMPROVEMENT AMONG ALL OF ITS MEMBERS. INPO MUST BE PREPARED, BASED UPON SIGNIFICANT INDICATORS, TO IDENTIFY UNRESPONSIVE UTILITIES AND TO EXPLICITLY BRING ABOUT NEEDED CHANGE. OUR INABILITY TO ACHIEVE THIS RESULT WOULD CONFIRM THE VIEWS OF THE SKEPTICS AND UNDERMINE THE NOBLE GOALS WE SET FOR OURSELVES AS AN INDUSTRY. INPO CAN ONLY BE EFFECTIVE IF EVERY MEMBER OF INPO KEEPS THE INDUSTRY'S COMMITMENT OF BEING RESPONSIVE TO INPO EVALUATIONS AND FINDINGS AND BY ORGANIZING ITS ACTIVITIES IN SUCH A MANNER THAT SUFFICIENT ATTENTION IS PAID TO THE PROCESS IT HAS ESTABLISHED.

WITH THE EXPERIENCE GAINED OVER THE LAST FOUR YEARS, AND THE INCREASED KNOWLEDGE AND PROFESSIONALISM AVAILABLE AT INPO, HAS COME CONFIDENCE THAT WE CAN SHARE WITH YOU SOME

IMPORTANT INDICATORS BY WHICH TO JUDGE YOURSELF AND BY WHICH YOUR PROGRESS CAN BE MEASURED WITHIN THE INDUSTRY. WE ARE SATISFIED THAT THE INITIAL INDICATORS ARE WELL FOUNDED AND REQUIRE CLOSE ATTENTION. IT IS NOT INPO'S INTENTION TO RANK UTILITIES BUT RATHER IDENTIFY AREAS WHERE ATTENTION IS NEEDED. WHILE MANY UTILITIES, AS ALREADY NOTED, ARE DOING BETTER OVERALL, NO UTILITY HAS ACHIEVED EXCELLENCE IN EVERY CATEGORY. THUS, THE OBLIGATION OF SELF-IMPROVEMENT EXTENDS TO ALL. HOWEVER, MOST CRITICAL ARE THE CASES WHERE UTILITIES FALL AT THE LOW END OF THE SPECTRUM IN A NUMBER OF CATEGORIES AND THE COMMITMENT TO SELF-IMPROVEMENT IS NOT BEING GIVEN URGENT OR SERIOUS ATTENTION. THE LATTER CASES ARE THE ONES ABOUT WHICH THE INPO BOARD IS MOST CONCERNED.

PART OF THE DIFFICULTY THAT SOME UTILITIES HAVE EXPERIENCED HAS BEEN IN THE NATURE OF INPO'S REPORTS. WHILE THERE HAVE BEEN AREAS NEEDING IMPROVEMENT IDENTIFIED AND RESPONSES CALLED FOR, BECAUSE OF CONCERN FOR THE SENSITIVE NATURE OF THE REPORTS AND THEIR POSSIBLE MISUSE, COMFORTING WORDS HAVE BEEN INCLUDED IN THE SUMMARY. WE FIND THAT OFTEN TIMES, THE COMFORTING WORDS EXPRESSED IN THE SUMMARY RESULTED IN THE MANAGEMENT PLACING TOO MUCH EMPHASIS ON THEM RATHER THAN GIVING NEEDED ATTENTION TO THE AREAS REQUIRING IMPROVEMENT.

INPO HAS TRIED TO ADDRESS THIS SITUATION BY EXPANDING AT THE EXIT INTERVIEW ITS REVIEW OF THE AREAS NEEDING MANAGEMENT ATTENTION. WE HAVE FOUND THIS PROCESS IS NOT

TOTALLY SATISFACTORY. THUS, AS WE MOVE AHEAD IN THE THIRD ROUND EVALUATION REPORTS, THERE WILL BE GREATER ATTENTION GIVEN TO WHETHER THE COMFORT WORDS CAN BE JUSTIFIABLY INCLUDED IN THE REPORT TO THE UTILITY. THE INPO STAFF WILL BE ENDEAVORING TO MAKE THE REPORTS CLEARER AND MORE TO THE POINT. AND WE BELIEVE THIS WILL BETTER MEET INPO'S RESPONSIBILITY TO YOU.

IN VIEW OF THIS CHANGE, THE BOARD OF DIRECTORS ADOPTED YESTERDAY A POLICY THAT WILL LIMIT THE DISTRIBUTION OF EVALUATION REPORTS IN THAT IT WILL NO LONGER ENCOURAGE BROAD INDUSTRYWIDE DISTRIBUTION. HOWEVER, THE INPO BOARD WILL CONTINUE TO GET ALL REPORTS AND FOR THOSE UTILITIES WHO ARE MEMBERS OF NEIL, WHICH HAS MADE IT A CONDITION OF INSURANCE, WE WILL FORWARD A COPY OF THE REPORTS TO NEIL. THE POLICY REQUESTS THE UTILITY'S PERMISSION FOR INPO TO PROVIDE A COPY TO NRC HEADQUARTERS IN WASHINGTON, D. C. SINCE MEMBER COMPANIES WILL NOT BE RECEIVING ONE ANOTHER'S EVALUATION REPORTS, TWO OF THE DOCUMENTS THAT INPO PRODUCES TAKE ON GREATER SIGNIFICANCE. THE FIRST IS THEIR PERIODIC SUMMARY OF RECURRING FINDINGS AND GOOD PRACTICES. THESE SUMMARIES OF THE LESSONS LEARNED FROM ALL EVALUATION REPORTS WILL BE SENT TO ALL MEMBERS AND PARTICIPANTS. THE SECOND IS THE REPORT OF FOREMOST SAFETY AND RELIABILITY ISSUES. THIS REPORT IS BASED ON THE ENTIRE SCOPE OF THE WORK OF THE INPO STAFF: THEIR OBSERVATIONS, THEIR EVALUATIONS, AND THEIR EVENT ANALYSIS PROGRAM. THIS SECOND DOCUMENT SHOULD BE USED BY THE CEO TO LOOK AT HOW WELL HIS ORGANIZATION IS DEALING

WITH THESE CENTRAL ISSUES AND HE SHOULD EXAMINE INPO'S REPORTS TO HIS UTILITY IN THE CONTEXT OF THESE ISSUES. THE ISSUES IN THIS REPORT SHOULD BE VIEWED BY YOU AS REQUIRING SIGNIFICANT MANAGEMENT ATTENTION AND INVOLVEMENT.

THE MOST RECENT COPY OF THIS DOCUMENT, WHICH WAS MAY 1983, CONTAINS NINE ISSUES. I WOULD LIKE TO CALL THEM TO YOUR ATTENTION. THE DOCUMENT WILL BE REVISED AS REQUIRED AND WILL BE REVIEWED AT LEAST ANNUALLY TO ENSURE THAT YOU AND THE INDUSTRY ARE KEPT UPDATED. THE ISSUES IN THE MAY 1983 EDITION ARE:

- O SUPERVISORY INVOLVEMENT, AT ALL LEVELS, IN STATION OPERATION
- O PROFESSIONALISM AND PROFESSIONAL DISCIPLINE AMONG OPERATOR AND CRAFT PERSONNEL
- O DEVELOPMENT AND IMPLEMENTATION OF TRAINING PROGRAMS FOR NUCLEAR PLANT PERSONNEL
- O IDENTIFICATION AND CORRECTION OF THE ROOT CAUSES OF OPERATIONAL PROBLEMS, EQUIPMENT MALFUNCTION, AND ABNORMAL CONDITIONS
- O MANAGEMENT ATTENTION TO PROPER CHEMISTRY CONTROL

- O MANAGEMENT INVOLVEMENT IN THE RADIOLOGICAL PROTECTION ASPECTS OF STATION OPERATIONS
- O MANAGEMENT OF DESIGN CONTROL PROGRAMS
- O SHORTAGE OF PERSONNEL IN CERTAIN TECHNICAL AND SKILLED POSITIONS
- O USE OF OPERATING EXPERIENCES AT OTHER NUCLEAR STATIONS

RETURNING TO THE CONCERN I EXPRESSED EARLIER REGARDING THE UNRESPONSIVE UTILITY, INPO IS DEVELOPING FOR BOARD APPROVAL A FORMAL PROCEDURE THAT WOULD BE INITIATED WHENEVER A UTILITY HAS NOT TAKEN NECESSARY CORRECTIVE ACTIONS WHICH IN THE AGGREGATE CAUSE CONCERNS REGARDING THE VULNERABILITY OF ITS FACILITY. CRITERIA THAT WILL BE INITIALLY UTILIZED BY INPO AND THE BOARD FOCUS ON THOSE AREAS OF PERFORMANCE THAT ARE RELATED TO THE NINE FOREMOST SAFETY & RELIABILITY ISSUES. THE INDICATORS THAT CURRENTLY WILL BE USED ARE:

- O NUMBER OF REPEAT FINDINGS FROM PREVIOUS EVALUATIONS.

- O THE NUMBER OF APPENDIX 1 FINDINGS. APPENDIX 1 FINDINGS ARE THOSE REQUIRING CORRECTIVE ACTION OF A LONGER TERM NATURE THAT ARE CARRIED FORWARD FROM A PREVIOUS EVALUATION.
- O ATTENTION PAID TO CORRECTIVE ACTIONS CALLED FOR IN SOERS
- O DEGREE TO WHICH THE UTILITY IS PARTICIPATING IN THE NUCLEAR PLANT RELIABILITY DATA SYSTEM
- O AN OVERALL ASSESSMENT OF THE PERFORMANCE OF THE PLANT, BASED ON THE COMBINED JUDGEMENTS OF INPO STAFF AS A RESULT OF INTERACTIONS WITH THE UTILITIES AND BASED PRIMARILY ON THE EVALUATIONS.

IN USING THESE INITIAL INDICATORS, WE WILL NOT RANK PLANTS. BUT, WE ARE PROVIDING INDICATORS WHICH WILL BE IMPORTANT TO EACH CEO AND TO INPO'S BOARD IN MEASURING PROGRESS AND COMMITMENT TO THE RESPONSIBILITY OWED TO THE INDUSTRY. YOU SHOULD KNOW THAT THE FIRST FOUR INDICATORS SHOW A GOOD CORRELATION WITH THE MORE SUBJECTIVE INDICATOR THAT INPO STAFF MIGHT MAKE ON THE BASIS OF ITS FIRST HAND OBSERVATIONS. IT HAS BEEN OUR INTENT TO SEEK INDICATORS OF PERFORMANCE THAT CAN BE QUANTIFIED. IN THE END, OF COURSE, A SUBJECTIVE EVALUATION WILL OF NECESSITY HAVE TO BE BROUGHT TO BEAR IN MAKING AN ASSESSMENT OF A UTILITY'S OVERALL

PERFORMANCE. BECAUSE OF ITS IMPORTANCE, WE WILL MEET WITH ALL CEOs IN THIS ROOM THIS AFTERNOON AT 4:30 TO DISCUSS THIS SUBJECT IN MORE DETAIL. IF THE CEO IS NOT PRESENT, WE ARE ASKING THE SENIOR REPRESENTATIVE FROM HIS UTILITY TO JOIN US.

IN SUMMARY, WE ARE TRYING TO GIVE EACH CEO SOME ADDITIONAL INFORMATION AND INDICATORS BY WHICH HE CAN MEASURE THE PERFORMANCE AND ASSESS THE IMPROVEMENT OF HIS OWN NUCLEAR FACILITIES. THIS WILL AID HIM IN DISCHARGING HIS RESPONSIBILITY TO HIS COMPANY AND TO THE INDUSTRY. INPO'S ANALYSIS OF YOUR UTILITY'S PERFORMANCE IN THE CONTEXT OF THESE INDICATORS SHOULD RECEIVE YOUR CAREFUL ATTENTION. NO UTILITY, AS I HAVE PREVIOUSLY STATED, HAS ACHIEVED THE STANDARD OF EXCELLENCE IN EVERY CATEGORY. THUS, COMMITMENT AND INVOLVEMENT ARE REQUIRED BY ALL. SOME UTILITIES WILL FIND THEY NEED TO MAKE A MAJOR NEW COMMITMENT FOR IMPROVED PERFORMANCE. OUR PURPOSE IN PRESENTING THIS INFORMATION TO YOU IS TO ASSIST YOU AND TO HELP YOU IN YOUR SELF-IMPROVEMENT PROGRAMS. THIS SPEAKS TO THE CENTRAL THEME OF THIS WORKSHOP SINCE MANAGEMENT COMMITMENT AND INVOLVEMENT BY ALL MEMBERS WILL BE NECESSARY. THE LATTER IS THE ESSENTIAL COMPONENT TO THE INDUSTRY'S ABILITY TO DEMONSTRATE THAT SELF-IMPROVEMENT AND SELF-REGULATION CAN WORK.

FINALLY, I WANT TO RE-EMPHASIZE MY EARLIER CONCLUSION, WHICH WAS THAT THE INDUSTRY CAN TAKE CONFIDENCE IN THE FACT THAT THERE HAS BEEN DEMONSTRATED PROGRESS AND CAN TAKE PRIDE

IN THE KNOWLEDGE THAT THE CREATIVE INDUSTRY INITIATIVE, WHICH INPO REPRESENTS, CAN FULFILL ITS MISSION. THE STEPS WE ARE INITIATING AND THAT I AM REPORTING TO YOU, ARE TO BETTER ENSURE THAT INPO IS SUCCESSFUL IN ITS MISSION. WE MUST ALL WORK TO MINIMIZE THE FAILURES THAT CAN RESULT IN ADVERSE PUBLIC AND REGULATORY REACTION AND WHICH WOULD BE SO DETRIMENTAL TO THE INDUSTRY. WE ARE CALLING FOR THE COMMITMENT OF EACH CEO AND FOR EVERY NUCLEAR UTILITY TO PARTICIPATE FULLY AND CONSCIENTIOUSLY IN DEMONSTRATING THE VALIDITY OF INPO. WITH YOUR SPIRIT OF UNDERSTANDING, COOPERATION AND RE-DEDICATION TO THAT COMMITMENT, INPO WILL LIVE UP TO THE HIGH EXPECTATIONS THAT WE ENCOURAGED THE INDUSTRY, THE REGULATORS AND THE PUBLIC TO UNDERSTAND THAT ITS FORMATION WOULD PRODUCE.

INSTITUTE OF NUCLEAR POWER OPERATIONS

EXECUTIVE SESSION TALK

CEO WORKSHOP

SEPTEMBER 1983

L. F. SILLIN, JR.

L. F. SILLIN, JR.
EXECUTIVE SESSION TALK
CEO WORKSHOP
SEPTEMBER 1983

THIS MORNING, AND IN THE BREAKOUT SESSIONS THIS AFTERNOON, WE DISCUSSED MANAGEMENT INVOLVEMENT IN SOME DETAIL. AS I PROMISED THIS MORNING, I NOW WANT TO TALK CANDIDLY ABOUT SPECIFIC INFORMATION INPO HAS DEVELOPED, AT THE BOARD'S REQUEST, THAT CAN ASSIST YOU IN THE SUPERVISION OF YOUR NUCLEAR OPERATIONS. AS WE GO THROUGH THIS MATERIAL, I CALL ON ALL OF YOU TO TAKE A BROAD INDUSTRY PERSPECTIVE, AS THE INPO BOARD HAS TRIED TO DO.

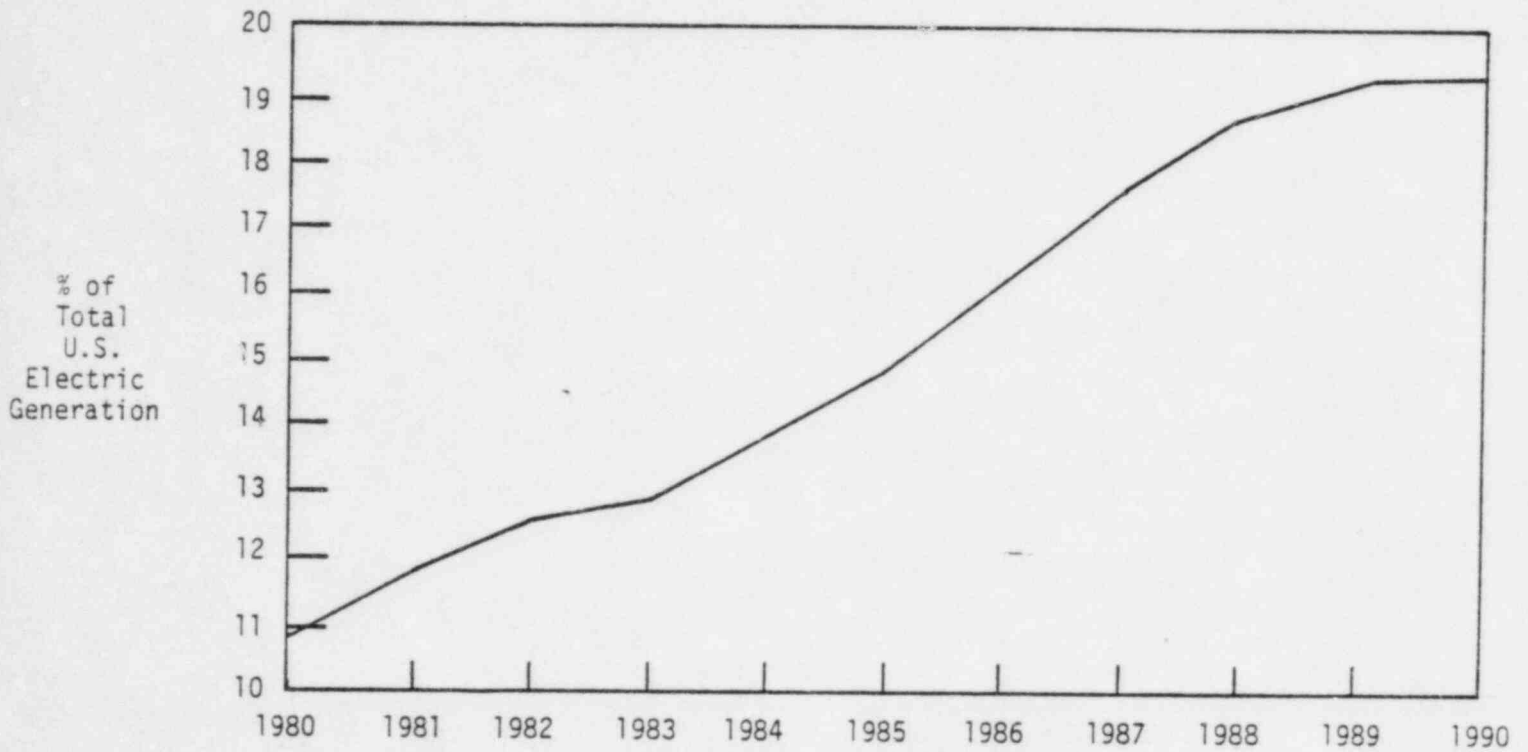
LET ME DIGRESS BRIEFLY BEFORE WE GO THROUGH THE FOLDERS YOU ARE BEING PROVIDED. PLEASE DON'T OPEN THEM YET.

THIS SLIDE SHOWS THE PROJECTED DOMESTIC GROWTH IN NUCLEAR ELECTRIC GENERATION OVER THE NEXT FEW YEARS.

SLIDE 1
PROJECTED DOMESTIC NUCLEAR GENERATION

NOTE THAT NUCLEAR ELECTRICAL GENERATION IN THE UNITED STATES IS SCHEDULED TO ALMOST DOUBLE BETWEEN 1982 AND 1990. IN 1982, ACCORDING TO DEPARTMENT OF ENERGY FIGURES, NUCLEAR ACCOUNTED FOR 12.6% OF THE NATION'S TOTAL ELECTRICAL OUTPUT. BY 1990, NUCLEAR WILL BE APPROACHING 20%. BY 1990,

DOE Estimated Generation, Nuclear,
Based on Moderate Oil Hikes



Source: U.S. Dept. of Energy's Energy Information Agency

WE WILL BE OPERATING 135 INDIVIDUAL REACTORS, ALMOST TWICE AS MANY AS AT THE TIME OF TMI.

I POINT OUT THESE FACTS FOR TWO REASONS. FIRST, WITH OVER 50 NEW UNITS COMING ON LINE, THE STATISTICAL CHANCE OF A SERIOUS ACCIDENT IS GREATER. BY THE TIME TMI OCCURRED, WE HAD ACCUMULATED APPROXIMATELY 425 REACTOR YEARS OF EXPERIENCE. BY THE END OF NEXT YEAR WE WILL HAVE ACCUMULATED 425 MORE REACTOR YEARS OF EXPERIENCE. WE HAVE GOT TO BE A LOT BETTER THAN WE WERE IN THE PRE-TMI ERA.

MY SECOND POINT IS THAT THE STAKES ARE TOO HIGH TO ACCEPT THE RISK OF ANOTHER SERIOUS ACCIDENT. WITH UP TO 20% OF OUR ELECTRICAL POWER COMING FROM NUCLEAR BY THE END OF THIS DECADE, IT IS NOT JUST ONE COMPANY OR OUR INDUSTRY THAT IS AT RISK, THE FUTURE OF THE NATION IS AT STAKE.

EARLIER THIS YEAR, THE INPO BOARD ASKED THE STAFF TO ASSESS OUR PROGRESS AS AN INDUSTRY AND TO REPORT TO THE BOARD AREAS IN NEED OF INDUSTRY ATTENTION AND UTILITIES THAT WERE OF MOST CONCERN. AFTER REVIEWING THIS INFORMATION, WE FELT COMPELLED TO SHARE IT WITH YOU. WE CONCLUDED, IN FACT, THAT IT WOULD BE IRRESPONSIBLE ON OUR PART NOT TO DO SO.

BASED ON A NUMBER OF INDICATORS OF COMMITMENT, RESPONSIVENESS, AND PERFORMANCE, INPO DETERMINED THAT OUR PLANTS FIT A TYPICAL DISTRIBUTION CURVE.

SLIDE 2

NORMAL DISTRIBUTION CURVE

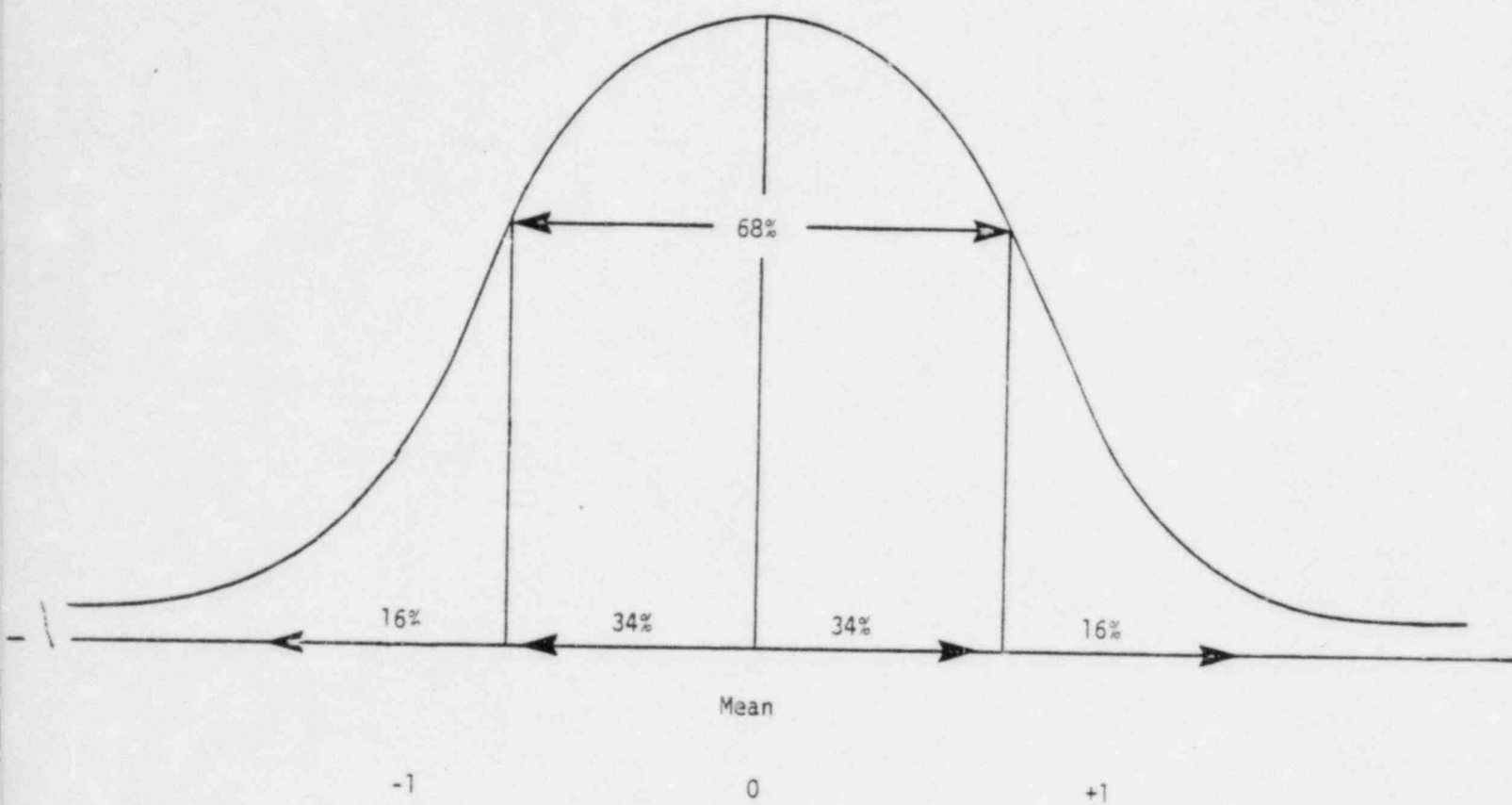
ALL OF YOU WILL RECOGNIZE THIS STANDARD DISTRIBUTION. IT IS SOMETIMES CALLED A NORMAL OR GAUSSIAN DISTRIBUTION. THE CURVE HAS BEEN DIVIDED INTO THREE SEGMENTS WHICH GIVE AN INDICATION OF HOW FAR A GIVEN VALUE IS FROM THE AVERAGE OR MEAN.

THE THING I WANT TO POINT OUT IS THAT THE GROUP ON THE LEFT IS SIGNIFICANTLY DISTINCT FROM THE MIDDLE OR AVERAGE, AS IS THE GROUP ON THE RIGHT. THE VERTICAL LINE ON THE LEFT HAS BEEN DRAWN SO THAT ONLY 16% OF THE SAMPLE IS ON THE LEFT. THAT GIVES 16% ON THE RIGHT AND 68% IN THE MIDDLE.

INPO USED THIS GENERAL APPROACH FOR ALL OF THE INDICATORS WE WILL DISCUSS. SO, IF THEY SAY YOU'RE ON THE LEFT IN AN AREA, SAY IN REPEAT OR RELATED FINDINGS, IT IS SIGNIFICANT. FOR THIS IDEAL DISTRIBUTION YOU'RE IN THE LEFT 16%, OR 84% OF THE PLANTS HAVE FEWER REPEAT OR RELATED FINDINGS THAN YOUR PLANT.

LET ME SHOW YOU THE RANGES OF THE COMMITMENT/ PERFORMANCE INDICATORS.

Normal Curve



Slide 2

SLIDE 3

COMMITMENT/PERFORMANCE INDICATOR RANGES

FOR EACH INDICATOR, YOUR PLANT WAS GIVEN A -1 IF IT WAS IN THE LEFT SIDE OF THE DISTRIBUTION, A 0 IF IT FELL IN THE MIDDLE, AND A +1 IF IT WAS IN THE RIGHT SIDE OF THE DISTRIBUTION.

LET'S TAKE RELATED FINDINGS, FOR EXAMPLE. THESE ARE THE EVALUATION FINDINGS THAT WERE NOT PROPERLY RESOLVED WHEN INPO CAME BACK FOR THE SECOND OR THIRD EVALUATION. SOME WERE REPEATS OF EARLIER FINDINGS AND SOME RELATE TO ISSUES FROM THE PREVIOUS EVALUATION THAT WERE NOT FULLY RESOLVED. WE REFER TO BOTH AS RELATED FINDINGS. THERE WERE SEVERAL PLANTS THAT HAD 10 OR MORE RELATED FINDINGS. IF YOUR PLANT IS ONE OF THESE, THEN YOUR INDICATOR FOR THIS CATEGORY IS -1 AND 84% OF THE PLANTS HAD FEWER RELATED FINDINGS THAN YOUR PLANT. LIKewise, THERE WERE SEVERAL PLANTS WHICH HAD 3 OR LESS RELATED FINDINGS. THESE PLANTS WERE GIVEN AN INDICATOR OF +1.

NOW LET'S LOOK AT RED TAB SOER RECOMMENDATIONS. THESE ARE THE HIGHEST PRIORITY RECOMMENDATIONS FROM THE PROGRAM THAT WE, AS AN INDUSTRY, ESTABLISHED TO SCREEN OPERATING EVENTS AND IDENTIFY THE PRECURSORS OF MORE SERIOUS EVENTS. THERE WERE SEVERAL PLANTS THAT HAD COMPLETED LESS THAN 60% OF THESE RECOMMENDATIONS SATISFACTORILY. THESE PLANTS WERE GIVEN A -1. ON THE OTHER HAND, QUITE A FEW PLANTS HAD

SLIDE 3

COMMITMENT/PERFORMANCE INDICATOR RANGES

<u>CATEGORY</u>	<u>INDICATOR</u>		
	<u>-1</u>	<u>0</u>	<u>+1</u>
1. RELATED FINDINGS	10 OR MORE	4-9	0 - 3
2. RED TAB SOER IMPLEMENTATION	0 - 60%	61 - 89%	90 - 100%
3. "OTHER" SOER IMPLEMENTATION	0 - 40%	41 - 79%	80 - 100%
4. NPRDS PARTICIPATION	MINIMAL ACTIVITY	INTERMITTENT ACTIVITY	CONSISTENT ACTIVITY
5. APPENDIX I FINDINGS	7 OR MORE	1 - 6	0
<hr/>			
APPROXIMATE % OF PLANTS BY CATEGORY	16%	68%	16%

IMPLEMENTED 90% OR MORE OF THE RED TAB SOER RECOMMENDATIONS. THESE PLANTS WERE ASSIGNED AN INDICATOR OF +1.

THIS SLIDE SHOULD GIVE YOU A GOOD IDEA OF HOW THE INDICATORS WERE DERIVED AND WHY THE BOARD ASKED INPO TO DEVELOP PLANT SPECIFIC DATA FOR THIS MEETING. EACH OF US NEEDS TO KNOW WHERE HE STANDS IN CERTAIN AREAS THAT NEED ATTENTION AND THAT INPO IS COMPETENT TO ASSESS. I THINK YOU CAN SEE FROM THE SLIDE THAT WE, AS AN INDUSTRY, HAVE A LONG WAY TO GO. WE CANNOT CLAIM WE ARE ACHIEVING EXCELLENCE WHEN THERE ARE SEVERAL REPEAT FINDINGS IN A TYPICAL EVALUATION, AND 10 OR 12 OR EVEN MORE IN SOME. LIKEWISE, WHEN INPO FINDS OVER HALF OF THEIR SIGNIFICANT OPERATING EXPERIENCE RECOMMENDATIONS UNRESOLVED AT MANY PLANTS, IT IS A MATTER THAT DESERVES OUR ATTENTION.

WE STRUGGLED WITH THE QUESTION OF HOW TO PROMOTE THE IMPROVEMENTS THAT ARE NEEDED -- THE EXCELLENCE IN OPERATIONS WE MUST ACHIEVE -- AND CONCLUDED THAT WE HAD TO PROVIDE YOU WITH SPECIFIC INFORMATION THAT WOULD GIVE YOU A CLEAR UNDERSTANDING. LET ME REVIEW SOME OF THE CONSIDERATIONS THAT WENT INTO THIS DECISION:

- O IN HIS MAY 22, 1980 SPEECH, WHICH YOU HEARD THIS MORNING, PAT HAGGERTY STATED THAT AT THE TIME OF TMI NEITHER THE UTILITY INDUSTRY NOR THE NRC HAD GRASPED THE NEED FOR A COMPREHENSIVE STATISTICAL

EVALUATION OF THE SAFETY RECORD OF THE INDUSTRY AS A WHOLE AND THE RELATIVE PERFORMANCE OF EACH UNIT WITHIN THAT WHOLE. HE SAID THAT, IF I WERE YOU, I WOULD NOT BE SATISFIED UNTIL THE INPO EFFORTS RESULT IN AN ADEQUATE, QUANTITATIVE MEASURE OF THE STATUS AND PROGRESS OF THE ENTIRE INDUSTRY AND OF EACH UTILITY WITHIN IT..... THOSE WERE COMMENTS WE COULD NOT FORGET.

O THE INPO ADVISORY COUNCIL HAS REPEATEDLY REMINDED US OF THE NEED FOR PERFORMANCE AND PROGRESS INDICATORS AND OF THE NEED TO LET UTILITIES KNOW WHERE THEY STAND IN UNAMBIGUOUS TERMS. REMEMBER THAT INPO'S ADVISORY COUNCIL, COMPRISED OF DISTINGUISHED AMERICANS FROM MANY FIELDS, IS ADVISORY TO THE BOARD OF DIRECTORS.

O WE HAVE RECOGNIZED THAT WITHOUT CANDID FEEDBACK, PEOPLE TEND TO MISLEAD THEMSELVES INTO THINKING THEY'RE DOING BETTER THAN THEY REALLY ARE. IN FACT, THE WORST SITUATION ARISES BECAUSE SOME OF THE PLANTS INPO IS CONCERNED ABOUT THINK THEY'RE IN THE BEST SHAPE.

WE ON THE BOARD FULLY REALIZE THE SENSITIVITY OF THE STEP WE ARE TAKING. EACH OF YOU IS BEING PROVIDED DATA ONLY FOR YOUR PLANTS. AND THE ONLY GROUP OUTSIDE SENIOR INPO MANAGEMENT WHO WILL HAVE ACCESS TO THIS INFORMATION IS THE BOARD OF DIRECTORS.

LET'S GO THROUGH THE FOLDERS. AS WE DO, YOU MAY WANT TO REFER TO THE COMMITMENT/PERFORMANCE INDICATOR RANGES ON THE SLIDE (SLIDE 3). IF YOUR PLANT IS UNDER CONSTRUCTION, YOU WILL FIND COPIES OF MY TALKS IN YOUR FOLDER ALONG WITH EXAMPLE PAGES FOR THE INDICATORS. IF YOUR PLANT IS IN THE NTOL PHASE, OR RECENTLY BEGAN OPERATING, YOU WILL FIND ONLY LIMITED DATA. THE CONCEPTS WE ARE DISCUSSING, HOWEVER, SHOULD BE OF VALUE TO ALL PRESENT.

PLEASE LOOK FIRST AT RELATED FINDINGS. NOTE THAT THE NUMBER OF RELATED FINDINGS AT THE TIME OF THE LAST EVALUATION IS SHOWN. I THINK YOU CAN SEE THAT VIRTUALLY ALL OF US CAN DO BETTER AND SOME OF US NEED TO DO A LOT BETTER.

IF YOU HAD 3 OR LESS THEN YOUR COMMITMENT/PERFORMANCE INDICATOR IS A +1. IF YOU HAD 10 OR MORE ITS A -1. AND A ZERO IF YOU'RE IN THE MIDDLE. REMEMBER THAT YOU ONLY GET A +1 OR A -1 IF YOU'RE DISTINCTLY AWAY FROM THE AVERAGE. THIS IS THE STATISTICAL PRINCIPLE I DISCUSSED EARLIER. WE DIDN'T GIVE YOU A DOWN CHECK IF YOU WERE SLIGHTLY BELOW AVERAGE -- ONLY IF YOU WERE CLEARLY AND DISTINCTLY BELOW AVERAGE. WE APPLIED THIS PRINCIPAL IN EVERY CASE TO FOLLOW.

PLEASE NOW LOOK AT ITEM NUMBER TWO IN THE FOLDER, RED TAB SOERS. THESE ARE RECOMMENDATIONS BASED ON PRECURSORS THAT DEMAND IMMEDIATE ATTENTION. SATISFACTORY COMPLETION OF THESE RECOMMENDATIONS IS A GOOD INDICATOR THAT YOUR PLANT IS PAYING ATTENTION TO INDUSTRY EXPERIENCE AND THE RESULTANT LESSONS LEARNED. A COMMITMENT/PERFORMANCE INDICATOR OF -1 WAS ASSIGNED TO PLANTS THAT HAD IMPLEMENTED 60% OR LESS OF THE RED TAB SOER RECOMMENDATIONS.

RECALL THAT THERE WERE PRECURSORS OF TMI. EVERY INDIVIDUAL UTILITY COUNTS ON INPO TO ANALYZE EVERY OTHER UTILITIES' EVENTS. THE NRC COUNTS ON THIS PROGRAM. THEY HAVE NOT DUPLICATED IT. WE HAVE GOT TO BE MORE RESPONSIVE TO THE RECOMMENDATIONS COMING OUT OF THIS PROGRAM AND AGAIN SOME UTILITIES ARE JUST NOT PAYING ENOUGH ATTENTION TO THIS VITAL AREA.

NEXT IS OTHER SOERS, THE RECOMMENDATIONS OF LOWER PRIORITY THAN RED TAB. THESE ARE THE GREEN AND YELLOW TAB SOERS. THESE ARE ALL IMPORTANT RECOMMENDATIONS TO SAFETY AND RELIABILITY; THEY'RE JUST NOT JUDGED TO BE AS URGENT AS THE RED TABS. IF YOUR PLANT GOT A -1, THEN YOU HAD SATISFACTORILY COMPLETED 40% OR LESS OF THE GREEN AND YELLOW SOER RECOMMENDATIONS AND OVER 80% OF THE PLANTS WERE DOING BETTER THAN YOURS.

THE INFORMATION PROVIDED TO YOU ON SOER STATUS IS CURRENT AS OF THE LAST INPO EVALUATION BECAUSE THAT IS THE LAST TIME INPO COULD CHECK. YOU MAY BE DOING BETTER NOW.

NEXT IS NPRDS PARTICIPATION. THIS INFORMATION IS CURRENT AS OF SEPTEMBER 10TH OF THIS YEAR, SINCE INPO'S COMPUTER RECORDS ALL NPRDS TRANSACTIONS. AN INDICATOR OF -1 WAS ASSIGNED TO PLANTS THAT HAVE HAD MINIMAL PARTICIPATION TO DATE. THIS HAS REALLY BECOME A BELLWEATHER PROGRAM FOR INPO. THERE HAVE BEEN MANY EXPRESSIONS OF SKEPTICISM REGARDING THE INDUSTRY'S COMMITMENT TO NPRDS. AFTER INPO'S BRIEFING OF THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS ON AUGUST 4, THE ACRS EXPRESSED MORE CONCERN ABOUT THE FUTURE OF NPRDS THAN ANY OTHER INPO PROGRAM. UTILITY PARTICIPATION IS INCREASING FAST BUT WE NEED FULL, 100% PARTICIPATION. WE HAVE INCLUDED A SCHEDULE OF REQUESTED ACTIONS TO GET NPRDS FULLY OPERATIONAL. I URGE YOU TO USE THIS SCHEDULE AT YOUR UTILITY.

NEXT IS APPENDIX I FINDINGS. THESE ARE FINDINGS THAT ARE CARRIED FORWARD FROM PREVIOUS EVALUATION REPORTS, EITHER BECAUSE RESPONSE ACTIONS WERE SCHEDULED BEYOND THE DATE OF THE MOST RECENT EVALUATION, OR BECAUSE THE SCHEDULE SLIPPED. SOME APPENDIX I FINDINGS ARE EXPECTED, BUT A LARGE NUMBER INDICATES A LACK OF COMMITMENT, OR, POTENTIALLY, A GROWING BACKLOG. IF A PLANT HAD 7 OR MORE APPENDIX I FINDINGS, A COMMITMENT/PERFORMANCE INDICATOR OF -1 WAS ASSIGNED. AS YOU WILL SEE IN A FEW MINUTES, WE ASSIGNED THIS CATEGORY A CONSIDERABLY LOWER WEIGHT THAN REPEAT FINDINGS OR SOERS.

LETS LOOK BACK AT THE SLIDE FOR A MINUTE. THE RANGES SHOWN FOR EACH INDICATOR ARE A REFLECTION OF OUR CURRENT SITUATION, AND SHOULD NOT BE USED IN SETTING GOALS FOR OUR PLANTS. FOR EXAMPLE, IF YOUR PLANT HAD SEVERAL RELATED FINDINGS, YOUR GOAL SHOULD BE ZERO RELATED FINDINGS AT THE NEXT EVALUATION, OR ONE OR TWO AT MOST, AND NOT 9 OR LESS. AT THE END OF ANOTHER ROUND OF EVALUATIONS, I HOPE INPO WILL BE ABLE TO REPORT THAT THERE ARE NO PLANTS, OR VERY FEW, WITH MORE THAN 3 RELATED FINDINGS.

THE NEXT ITEM IN YOUR FOLDER IS INPO'S OVERALL PROFESSIONAL ASSESSMENT OF HOW YOUR PLANTS ARE DOING. THIS INDICATOR IS INPO'S SUBJECTIVE BEST JUDGEMENT; BASED PRIMARILY ON EVALUATIONS CONDUCTED TO DATE, WITH APPROPRIATE EMPHASIS ON THE MOST RECENT EVALUATION. INPO USED THE SAME APPROACH HERE AS IN THE EARLIER CATEGORIES. A "PLUS" INDICATES APPROXIMATELY THE TOP SIXTH AND A "MINUS" ROUGHLY MEANS THE LOWER ONE SIXTH. IN OTHER WORDS, YOUR PLANT WAS NOT GIVEN A MINUS UNLESS IT WAS, IN INPO'S OPINION, SIGNIFICANTLY TO THE LEFT OF THE MIDDLE.

THE FINAL PAGE IS A SUMMARY OF THE PREVIOUS INDICATORS, WITH WEIGHTING FACTORS THAT WE THINK ARE CURRENTLY APPROPRIATE. PLEASE NOTE THAT THE SUBJECTIVE CATEGORY, THE INPO ASSESSMENT INDICATOR, AMOUNTS TO ONE THIRD OF THE OVERALL WEIGHTING.

THE MAXIMUM NET TOTAL NUMBER, POSITIVE OR NEGATIVE, IS 15. IF YOUR PLANT'S NET COMMITMENT/PERFORMANCE INDICATOR IS

IN THE -7 RANGE OR LOWER, YOU SHOULD FEEL VERY UNCOMFORTABLE. IF IT IS +6 OR GREATER, YOUR PLANT IS DOING BETTER THAN MOST. HOWEVER, THERE IS STILL MUCH ROOM FOR IMPROVEMENT BY ALL OF US BECAUSE WE NEED TO MOVE THE ENTIRE CURVE TO THE RIGHT. NO ONE GOT A +15, OR EVEN CLOSE.

THE SYSTEM I HAVE DESCRIBED IS NOT PERFECT. HOWEVER, WE TRIED OTHER APPROACHES AND OTHER WEIGHTING FACTORS AND THE PLANTS OF MOST CONCERN CAME OUT ABOUT THE SAME.

WE DO HAVE A SUBJECTIVE FACTOR, EQUAL IN WEIGHT TO ONE THIRD OF THE TOTAL. WE CONCLUDED THAT IT WOULD BE UNWISE TO PLACE EMPHASIS ON THE SELECTED HARD DATA, WHILE IGNORING INPO'S OVERALL PROFESSIONAL OPINION. I ENCOURAGE YOU TO USE THIS INFORMATION IN A CONSTRUCTIVE MANNER AND TO SEE THAT THE PEOPLE IN YOUR UTILITY THAT YOU SHARE IT WITH ALSO USE IT IN A CONSTRUCTIVE MANNER. PLEASE RECOGNIZE THAT THE INFORMATION PROVIDED, EXCEPT IN THE NPRDS AREA, IS BASED ON THE LAST EVALUATION AND IS THEREFORE SOMEWHAT OUT OF DATE FOR MANY PLANTS. PLEASE CONSIDER IT IN THAT CONTEXT, AND IF IMPROVEMENTS HAVE BEEN MADE SINCE THE LAST EVALUATION, THAT IS WHAT WE'RE ALL AFTER.

ABOVE ALL ELSE, REMEMBER THAT WE ALL NEED IMPROVEMENT. AS AN INDUSTRY, AND AS INPO'S BOARD ACTING ON BEHALF OF THE INDUSTRY, WE HAVE AN OBLIGATION TO CALL THIS MATERIAL TO YOUR ATTENTION. AT PAST CEO WORKSHOPS YOU HAVE ASKED FOR INDICATORS THAT WILL HELP YOU IMPROVE YOUR OPERATION. THIS MORNING WE HAD A PANEL DISCUSSION OF INPO'S

PERFORMANCE MONITORING GOOD PRACTICE AND I THINK THAT'S HEADED IN THE RIGHT DIRECTION. BUT HERE WE ARE GIVING YOU SOME SOLID INDICATORS THAT MANY OF YOU CAN PUT TO IMMEDIATE USE. AS INDIVIDUAL EXECUTIVES, WE HAVE AN OBLIGATION TO USE THIS MATERIAL TO IMPROVE PLANT SAFETY AND TO DO EVERYTHING IN OUR POWER TO AVOID AN EVENT THAT COULD HAVE GRAVE CONSEQUENCES FOR EVERY UTILITY AND, YES, EVEN THE NATION.

BEFORE I CLOSE I WANT TO MENTION ACCREDITATION, AN IMPORTANT PROGRAM TO ASSIST UTILITIES IN DEVELOPING TRAINING PROGRAMS THAT PRODUCE WELL-QUALIFIED, COMPETENT PERSONNEL TO OPERATE OUR NUCLEAR POWER PLANTS. WE LOOKED AT THE STATUS OF THIS PROGRAM AND ALREADY THERE ARE SIGNS OF A FEW UTILITIES LEADING THE PACK AND SOME OTHERS WHO ARE SIGNIFICANTLY BEHIND. SINCE MANY UTILITIES ARE WORKING TO PREPARE FOR ACCREDITATION, BUT HAVE NOT COMMUNICATED THIS TO INPO, WE THOUGHT IT WAS PREMATURE TO ASSIGN A COMMITMENT/PERFORMANCE INDICATOR. IN THE COMING MONTHS AND YEARS THIS PROGRAM WILL REQUIRE A SIGNIFICANT COMMITMENT BY EACH OF US, AND THE BOARD HAS ASKED INPO TO KEEP IT ADVISED OF PROGRESS. ACCREDITATION PROGRESS IS, HOWEVER, A GOOD INDICATOR OF COMMITMENT AND PERFORMANCE AND IT IS ONE THAT INPO WILL BE USING IN THE NEAR FUTURE. I AM SURE THAT OTHER INDICATORS WILL BE DEVELOPED IN THE FUTURE AND WE WILL KEEP YOU INFORMED.

THERE IS A COPY OF THIS TALK, AS WELL AS A COPY OF THE TALK I GAVE THIS MORNING, IN THE FRONT OF EACH FOLDER. FOR THOSE OF YOU WHO ARE HERE REPRESENTING YOUR CEO, I REQUEST THAT YOU ASK YOUR CEO TO READ THESE TALKS AS HE REVIEWS THE MATERIAL PROVIDED. I WOULD ALSO ENCOURAGE YOU TO HAVE EACH OF YOUR TOP MANAGERS WITH WHOM YOU SHARE THIS MATERIAL TAKE THE TIME TO READ THESE TALKS.

RELATED FINDINGS

GPU NUCLEAR CORPORATION

These are findings in the most recent evaluation report that were related, at least in part, to findings in the previous evaluation report. As such, each related finding indicates that a previously identified issue was not fully resolved or the intended improvement was not fully achieved. In many cases, management initiated corrective action, but through a lack of management involvement, the corrective action was not fully implemented or did not correct the root cause.

TMI-1

Number of Related
Findings

2

Commitment/Performance
Indicator: (-1, 0, +1)

+1

ACTION REQUESTED:

Timely and effective resolution of evaluation findings.

SEE-IN

SIGNIFICANT EVENT EVALUATION
AND INFORMATION NETWORK

RED TAB SOER RECOMMENDATION STATUS

GPU NUCLEAR CORPORATION

A red tab indicates the highest priority SOER recommendations. This summary shows the number of recommendations outstanding at the time of the last INPO evaluation.

<u>Red Tab Recommendations:</u>	<u>TMI-1</u>
Number Open	1
Number Satisfactorily Completed	31
% Satisfactory Completion	96.9
<u>Commitment/Performance Indicator: (-1, 0, +1)</u>	+1

ACTION REQUESTED: Continue timely resolution of Red Tab SOER recommendations as a high priority for TMI-1.

More timely resolution of Red Tab SOER recommendations for Oyster Creek.

SEE-IN

SIGNIFICANT EVENT EVALUATION
AND INFORMATION NETWORK

OTHER SOER RECOMMENDATION STATUS

GPU NUCLEAR CORPORATION

"Other" recommendations (which include Yellow Tab and Green Tab SOER recommendations) although not of the priority of Red Tab SOER recommendations also require timely resolution. This summary shows the number of recommendations outstanding at the time of the last INPO evaluation.

<u>Other Recommendations:</u>	<u>TMI-1</u>
Number Open	54
Number Satisfactorily Completed	70
% Satisfactory Completion	56.4
<u>Commitment/Performance Indicator: (-1, 0, +1)</u>	0

ACTION REQUESTED: More timely resolution of Green and Yellow Tab SOER recommendations.

NPRDS REPORTING STATUS

GPU NUCLEAR CORPORATION

The Nuclear Plant Reliability Data System (NPRDS) is an industrywide system for tracking the performance of selected systems and components at nuclear power plants. Each utility's participation in NPRDS has been measured by the continuity of failure reporting, timeliness of reporting, and use of the interactive data entry feature.

Three Mile Island 1 - one failure report submitted since 1980

- one timely failure reported
- interactive data entry used for engineering data and one failure

TMI-1

Commitment/Performance Indicator: (-1, 0, +1)

-1

ACTIONS REQUESTED OF EACH UTILITY

<u>ACTION ITEM</u>	<u>DATE DUE</u>
1. Report recent component failures routinely, using interactive data entry.	currently
o Report failure backlog from previous years.	as schedule permits
2. Complete training of personnel, and begin use of the INPO NPRDS data base. (The Southwest Research Institute data base will not be available after December 31, 1983.)	December 31, 1983
3. Achieve routine use of NPRDS data to support and complement plant programs in the areas outlined in the attached executive summary.	September 1, 1984, preferably earlier
4. Complete scoping and reporting of engineering data per the Reportable Scope Manuals issued in July 1983. (This effort should commence in October 1983.)	December 31, 1984

NPRDS

EXECUTIVE SUMMARY

The Nuclear Plant Reliability Data System (NPRDS) is an industrywide system for tracking the performance of selected systems and components at nuclear power plants. All U.S. plants in commercial operation (except for six atypical, early-vintage units) supply detailed design data, operating characteristics, and performance data on systems and components (typically six to seven thousand components from some thirty systems per unit). The value of NPRDS lies in the ready availability of this data to engineering and operation groups throughout the nuclear industry for a wide range of potential applications.

Although NPRDS has proven useful as a broad-based equipment history file, it was originally developed to meet the needs of various industry groups for statistical data to measure and improve plant reliability and maintainability. When these groups set up NPRDS in the early 1970s, Southwest Research Institute was contracted to maintain the data base under the direction of an American Nuclear Society subcommittee. Today, the Institute of Nuclear Power Operations (INPO) is responsible for all data processing, data base maintenance, and the routine production of summary reports. The primary users of the data (utilities, NSSS vendors, architect-engineers, and the Nuclear Regulatory Commission) are represented on an advisory group to help INPO ensure that the system meets their needs.

There are two basic kinds of information submitted to NPRDS -- engineering/test information and failure reports. The engineering/test record on a component contains information necessary to identify the component and its application, such as manufacturer, model number, operating environment, size, horsepower, and test frequencies. This information is submitted once, when the component is placed in service, and stored in the data base. Then, whenever that component fails to perform as intended, a report is submitted containing a description of the failure mode, cause and effect, corrective actions taken, and other information necessary to assess the failure.

The data is easily retrievable from the computer, and the engineering and failure information can be combined in various ways. A search of the failure records then identifies problems experienced with that component in other plants and the corrective actions taken. There are several hundred searches of the data base in a typical month. Uses of the data are varied, but may be summarized as follows:

Utility and plant staffs

- o as a comprehensive equipment history file to support maintenance planning and repair activities
- o to avoid forced or prolonged outages by identifying other plants stocking a needed piece of equipment for a possible loan
- o spare parts stocking based on mean-time-between-failures
- o comparison of component failure rates at a given plant with the industry average failure rate

Design groups

- o identification of common failure modes and causes
- o vendor selection based on component application and performance
- o identification of component wearout and aging patterns
- o engineering studies of component performance as a function of operating characteristics, such as test frequency and operating environment
- o input to plant availability improvement programs

Operating experience reviewers

- o identification of significant failure modes affecting safety or availability
- o trending of component failure rates
- o development of accurate failure probability estimates for use in fault tree analyses (PRA studies)

NPRDS data is available to users either through various quarterly and annual summary reports or through direct, on-line access of the data base from a computer terminal. For further information, contact the Manager, NPRDS Department, at (404) 953-3600.

APPENDIX I FINDINGS

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These are findings that were carried forward from previous evaluation reports, either because response actions were scheduled out beyond the date of the most recent evaluation or because the schedule slipped with reasonable justification. Some Appendix I findings are expected, but a large number indicates a lack of commitment or, potentially, a growing backlog.

	<u>TMI-1</u>
<u>Number of Appendix I Findings</u>	4
<u>Commitment/Performance Indicator: (-1, 0, +1)</u>	0

ACTION REQUESTED:

Timely resolution of evaluation findings to minimize the number carried forward in succeeding reports.

INPO ASSESSMENT

GPU NUCLEAR CORPORATION

This indicator is INPO's subjective best judgement, based primarily on evaluations conducted to date, with appropriate emphasis on the most recent evaluation. INPO used the same approach here as in the earlier categories. A "plus" indicates that the plant is in the approximate top one-sixth (about 16%). A "minus" means roughly the lower one sixth. In other words, your plant was not given a minus unless it was, in INPO's opinion, significantly left of the average.

TMI-1

Commitment/Performance
Indicator: (-1, 0, +1)

0

COMMITMENT/PERFORMANCE INDICATOR SUMMARY

GPU NUCLEAR CORPORATION

TMI-1

<u>CATEGORY</u>	<u>INDICATOR</u>	<u>WEIGHT</u>	<u>NET</u>
1. Related Findings (-1, 0, +1)	+1	3	+3
2. Red Tab SOERs (-1, 0, +1)	+1	2	+2
3. "Other" SOERs (-1, 0, +1)	0	2	0
4. NPRDS Participation (-1, 0, +1)	-1	2	-2
5. Appendix I Findings (-1, 0, +1)	0	1	0
6. INPO Assessment (-1, 0, +1)	0	<u>5</u>	<u>0</u>
	Maximum Total	15	
		Actual Total	+3

*Findings and SOER indicators are as of last evaluation in May 1983.