

CAPHTON

GPU NUCLEAR

Response to the Rohrer, Hibler & Replogle (RHR) Report  
on "Primary Concerns of Licensed Nuclear Operators"

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5/25/83

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RHR TABLE  
GPUNC RESPONSE TO RHR ACTION STEPS

RHR TABLE	(A) Agree - Complete	(B) Agree - Action Underway or '83 Goal	(C) Agree - Action to be Scheduled	(D) Under Evaluation	(E) Disagree	TOTAL
#1 Safety Action Steps		10	1		1	12
#4 Training Action Steps	1	11		3		15
#5 Career Action Steps		3		1		4
#6 Cooperation Between Departments Action Steps	1	7	1			9
#7 Pay Action Steps	1	1		1		3
#8 Rotating Shift Action Steps		1		1		2
#9 Quality of Management Action Steps		2		1		3
#10 Implementation Phase Action Steps	1		1			2
TOTAL	4	35	3	7	1	50

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REF:  
RESPONSE CATEGORIES

- (A) Agree - Complete
- (B) Agree - Action Underway/'83 Goal
- (C) Agree - Action to be Scheduled
- (D) Under Evaluation
- (E) Disagree

RHR REPORT

Response Summary

<u>4).</u>	<u>ACTION STEP</u>	<u>RHR REPORT TABLE NO.</u>	<u>RESPONSE CATEGORY</u>	<u>TIME</u>	<u>RESPONSIBILITY LEAD/SUPPORT</u>
1	<p><u>Procedures</u> - Simplification of emergency operating procedures.</p> <p><u>RESPONSE:</u> TMI - Guidance for use of 25°F subcooling margin simplifies some emergency procedures, ATOG will facilitate process of identifying correct procedure for handling a plant transient.</p> <p>OC - At present, the Licensed Operators are in Training on the new symptom oriented Emergency Operating Procedures (EOP). These procedures simplify the existing Emergency Procedures and should alleviate the operator's concerns with the existing cumbersome nature of the current 500 Series Emergency procedures.</p>	1	B	1983	TMI-1 OC / NA TH
2	<p>Dialogue on and analysis of procedural compliance issues in special cases.</p> <p><u>RESPONSE:</u> TMI - Procedural compliance requirements and problems regularly discussed with licensed operators; procedure owner concept, with plant operating procedures usually assigned to an SRO, gives operators direct input and identifies specific contact person for any problems with a particular procedure. Revisions to 10CFR50 which become effective June 1, 1983 allow an SRO to depart from license conditions or technical specifications in an emergency; plant procedures will reflect this change and training on implications and implementations will be provided.</p>	1	B	1983	TMI-1 OC

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2 (con't)

RESPONSE: OC - Operations Management continues to stress verbatim compliance with procedural control. In line with this concept, a continuing dialogue with shift supervision is maintained to identify and correct those areas where this philosophy causes problems due to unique plant conditions. Operations utilizes the 107 Procedure (Procedure Control) to make changes to procedures at the time of implementation if conditions warrant (on a one-time basis) to support our verbatim compliance requirements. Our efforts in this area have received positive feedback from the NRC in the recent SALP report on Plant Operations.

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3	<p>Improve speed of feedback on procedural change recommendations made by operators. Establish policy on this.</p> <p><u>RESPONSE:</u> TMI - Procedure owner concept resulting in significant improvement; further effort is underway to streamline the required administrative and review processes.</p> <p>OC - An Operations staff Goal for 1983 is to <u>Improve Procedures and Enhance Procedure Review Compliance Through a Complete Evaluation/Review of all Operations Department Procedures.</u> A program for licensed shift personnel to review and revise the 200 and 300 Series Procedures has been developed and implemented. To date, a total of approximately 80 procedures have been reviewed and approximately 22 requests submitted for procedure revisions. The Operations Staff has also independently reviewed and revised specific administrative procedures (100 Series) as well as approximately 20 refueling procedures (205 Series). On new procedures, the Operations Staff review these procedures and encourage the writer to meet with a GSS/Shift personnel to factor their input into the final draft prior to approval.</p>	1	B	1983	TMI-1 / OC
4	<p>Improve mechanism of consultations with operations on development of procedures.</p> <p><u>RESPONSE:</u> TMI - Procedure owner concept improving consultation process; plant staff is working with Tech Functions to achieve timely responses to plant requests for procedural guidance, e.g., on OTSG tube ruptures.</p> <p>OC - Included in response to No. 3.</p>	1	B	1983	TMI-1 / OC

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5	Improve process of review of procedures by operations prior to implementation.	1	B	1983	TMI-1 OC
	<p><u>RESPONSE:</u> TMI - Major procedure changes, especially emergency procedures, are checked out at the simulator before implementation. Once approved, all shifts are trained on the procedure at the simulator.</p> <p>OC - Included in response to No. 3.</p>				
6	<u>Cooperation Between Departments</u> - Especially speed of repair of backup equipment.	1	B	1983	TMI-1 OC / M&C
	<p><u>RESPONSE:</u> TMI - Corporate Goal 9 - discussions with exempt employees or GPUN organization, TMI-1 Goal #2 - discussions with plant employees, individual discussions by VP - TMI-1.</p> <p>OC - Operations Management converses daily with M&amp;C and Plant Material on the identified needs to repair plant equipment. A concerted effort to improve the cooperation between departments is being practiced at the Manager level and strongly encouraged at the Supervisor level. Included in this effort is the identification by the Plant Division of the <u>Reduction of Backlog Maintenance Job Orders</u> as the No. 1 priority in our <u>Urgent Needs</u> list.</p>				

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7	<u>Union and Management</u> - At Oyster Creek.  <u>RESPONSE:</u> Discussions between management and RHR are planned.	1	C	1983	HR
8	<u>Operator Experience</u> - Increase "hands on" experience; more time of trainees in plant and with equipment; more coaching from shift supervisors; refine efforts for keeping instructors of trainees and licensed operators current on plant equipment, instrumentation and procedural changes.  <u>RESPONSE:</u> The availability of OC BPT plus TMI EPT and Replica simulators will greatly expand "hands on" experience (The O.C. replica is still in our future plans).  The newly established Operator Training Review Committees at TMI and O.C. will have this as an agenda item.  O.C. has committed to establish a formal OJT Program. They sent operations people to San Jose for refueling training prior to the 1983 outage.  Increase attention in supervisor Development Training to coaching and counseling.  Instructors participate in Licenced Requalification Training and have required reading assignments now. This requires further evaluation and a decision on allocation of resources to accomplish more instructor time in plant familiarization.	1	B	1983	NA / TMI-1 OC

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9	<u>Personal and Family Problems</u> - Determine utilization rates by licensed operators of Stress Control Services.  <u>RESPONSE:</u> Use of Stress Control Services will be reported by Bargaining Unit coverage and Salaried.	1	B	Early 1983	HR
10	Disseminate information on confidentiality and on availability of services through Stress Control and alternate sources.  <u>RESPONSE:</u> Information on Stress Control and similar agencies will be disseminated through use of Bulletin Boards, News Updates and similar media.	1	B	Early 1983	HR / TMI-1 OC
11	<u>Consensus on Components of Safety</u> - Develop consensus between top management and operators on those factors contributing to safety on which there is divergence.  <u>RESPONSE:</u> Table 11 was reviewed in an O/P-VP Staff Meeting on April 12, 1983. Differences between operation and top management felt to be consistent with their respective positions.	1	F	1983	NA
12	Develop consensus within top management on those factors contributing to safety on which there is divergence.  <u>RESPONSE:</u> Dr. D'Arcy requested to provide individual responses to management respondents for identification of any wide divergences from "mean weights" in Table 11.	1	B	1983	NA

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13	<u>Requalification</u> - Eliminate "comprehensive test" portion of requalification test.  <u>RESPONSE:</u> This will be an Operator Training Review Committee agenda item. By July 15th T&E Department will make its recommendation to management. (This could be effected by NRC final decision on how they will handle the 20% requalification exam audit.)	4	D	1983/1984 Decision by Mid-May	NA / TF
14	Make repetitive parts of requalification training more attractive.  <u>RESPONSE:</u> BPT and Replica Simulators will enhance training in this regard.  O.C. is presently trying to use instructors as discussion facilitators in GET requalification training. If this proves successful, the idea could be expanded into Licensed Operator Trng.	4	B	1983/1984	NA / TMI-1 OC
15	Post-schedule for coming year of requalification training including outline of content on operator Bulleting Board at each facility.  <u>RESPONSE:</u> At O.C. each trainee gets a training schedule for the next six months. This schedule will also be posted in the control room. During the first cycle of training, time was spent discussing the plans for the year.  TMI plans to do the same as O.C.	4	B	1983	NA

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16	<p>Content and Methods - Include industry and community issues as well as GPU Nuclear approach to these issues in the training of operators.</p> <p><u>RESPONSE:</u> Senior TMI managers now introduce each six-week training cycle with comments and respond to operator trainees.</p> <p>Report says operators do not want this. Plan to further evaluate with the Operator Training Review Committee.</p>	4	D	1983/1984	NA / TMI-1 OC
17	<p>Reintroduction of "systems approach" for Navy trainees to understand role of equipment in plant.</p> <p><u>RESPONSE:</u> Current CRO programs on shift time have been expanded. Also, plan to incorporate ex-Navy trainees into systems portion of non-licensed operator training. TMI has separate system training module for ex-Navy trainees.</p>	4	B	1983/1984	NA
18	<p>Develop diversified approach for mastery of theory for ex-Navy Nukes and trainees coming up from plant.</p> <p><u>RESPONSE:</u> The BPT simulators will aid in this area. The theory instruction to non-licensed operators has been increased. TMI also permitted ex-Navy trainees for RO Licenses to take validation exams ("test out") in theory area.</p>	4	B	1983/1984	NA

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19	Simulator specific to TMI.  <u>RESPONSE:</u> Placement of order expected during June 1983. This also requires commitment for additional staff to support Replica Simulator.	4	B	1982-1987	TF / NA
20	Develop method for trainee to gauge his growth in competency to operate during training period.  <u>RESPONSE:</u> The BPT simulators will aid in this area. Doing more plant walkarounds at O.C. to obtain trainee feedback. At O.C. new CRO class on-shift time increased from 13 to 20 weeks.  The training programs require qualification check-offs from which the trainee should be able to judge his own growth and accomplishment.	4	B	1983/1984	NA
21	<u>Standards</u> - Tighten standards and evaluation of trainees.  <u>RESPONSE:</u> The qualification check-offs will be used to establish performance standards for trainees.  The Licensed Operator Certification procedure at each plant plus the Control of Exam procedure also addresses this area.	4	B	Early 1984	NA / TMI-1 OC

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22	Evaluate instructors on pedagogic skills with view to coaching and improving.  <u>RESPONSE:</u> This is being done through the instructor evaluation program and the Instructor Training Program.	4	B	Mid 1983	NA
23	Develop method for monitoring and improving consistency between <u>training</u> for licensing and requalification and <u>testing</u> for the same.  <u>RESPONSE:</u> The Operator Training Review Committees will be addressing this issue.  T&E has contributed to improvements in the NRC test by providing them questions for their test bank.	4	B	1983-on	NA
24	Develop method for monitoring and improving consistency between training and ability to operate.  <u>RESPONSE:</u> T&E regularly seeks feedback from operations (and other user groups) on their training needs.	4	A	1983-on	NA / TMI-1 OC
25	Task analyses of what operators actually do as basis for training relevance.  <u>RESPONSE:</u> T&E subscribes to the task analysis approach. This issue is under study to determine what procedure is most meaningful for our situation.	4	B	1983/1984	NA / TMI-1 OC

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26	<u>Administration</u> - Promote improved relationships between operations and training personnel.  <u>RESPONSE:</u> Each site will have an Operator Training Review Committee to look at program issues. The T&E Department has a goal to establish a Training Advisory Committee which may also address this area.	4	B	Mid-1983	NA / TMI-1 OC
27	Targeted interviews in Training Department to explore issues, and other departments.  <u>RESPONSE:</u> T&E will have further discussion with RHR to determine further action.	4	D	1983	HR
28	<u>Entry</u> - Improve pay differential between licensed operators and other departments.  <u>RESPONSE:</u> Wage and license bonus amounts are established through the bargaining agreement.	5	D	1983-on	HR
29	Provide some training in theory to AO's with potential for RO.  <u>RESPONSE:</u> T&E has increased the theory training to non-licensed operators.	5	B	1983	NA

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30	<u>College Credentials</u> - Facilitate getting of degrees; credits for in-house courses, programs in area colleges, Career Counsel.	5	B	1983/1984	NA / HR
	<u>RESPONSE:</u> T&E and Human Resources are jointly developing educational career counseling programs (HR Goal 6.A). Effort underway to bring degree programs from local colleges/universities to CPUN sites. By the end of 1983, appropriate site training programs will be evaluated for granting of college credit.				
31	<u>Career Paths</u> - Develop and publish possible career paths and qualifications for them.	5	B	1983/1984	HR / NA
	<u>RESPONSE:</u> Additional career path opportunities can be made available to employees provided sufficient flexibility can be worked into shift schedules. A draft progression was sent to applicable Vice Presidents on April 18, 1983.				
32	<u>Emphasis on Cooperation</u> - Discussion of issues with department heads.	6	A	Early 1983	NA
	<u>RESPONSE:</u> Entire RHR report reviewed with O/P and Division VPs in meetings on March 22 and April 12 and 14, 1983. Several Divisions are planning followup meetings with RHR.				

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33	Reinforce concept of organizational structure that operations is a key function and other departments have support function.  <u>RESPONSE:</u> Included in effort described under No. 34.	6	B	1983	NA / OP
34	Make cooperation between departments a GPU Nuclear Corporation Objective.  <u>RESPONSE:</u> Corporate Objective No. 5 is to "... Improve GPU Nuclear's functional capabilities." All Divisions are emphasizing "concept" through staff and employee meetings, interdivisional meetings, and when needed, development of interface agreement and procedures.	6	B	1983	NA/ OP
35	Develop system for evaluating managers on cooperation.  <u>RESPONSE:</u> This is included in the Performance Appraisal form implemented in 1983. Section 3 under Performance Factors is as follows:  "3. Working Relationships"  F. Communication G. Leadership H. Teamwork I. Employee Development"  Further, the Performance Factors - Rating Definitions defines TEAMWORK as "contributing to and cooperation with others in a common effort." In each evaluation, this factor is to be reviewed by immediate supervision and those sections of departments which supervisors interface.	6	A	1983	HR

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36	<u>Facilitating Cooperation</u> - Identification of problems at interfaces between pairs of departments. Intergroup problem solving meetings.	6	B	Spring 1983	NA / ALL
	<u>RESPONSE:</u> Included in effort described under No. 34.				
37	Educate departments on each others' roles.	6	B	Early 1983	NA / ALL
	<u>RESPONSE:</u> The following steps are being considered to promote greater cooperation:				
	(a) Develop synopsis of Organization Plan for distribution to all on site. (The Organization Plan is on file in the Control Room.)				
	(b) Discuss organization and divisional functions in all training programs including CRO training. Training Department to schedule designated representatives from each Division to discuss divisional roles.				
	(c) Reinforce through "Nuclear Today" publication - "Did You Know".				

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38	<p>Training: Supervisors for cooperation, operators in persuasion vs. authoritarian approach, support department members fresh from school in importance of cooperation.</p> <p><u>RESPONSE:</u> New Supervisor Training Program will address this topic by 4th Quarter 1983.</p> <p>Future Manager, Development Program will also address this topic as will the proposed Senior Level Management Training Program.</p>	6	C	Early 1983	NA / ALL
39	<p>Get people acquainted across departments. Post photographs of both licensed operators and support department foremen and supervisors at each facility with name and function, circulate current rosters of department foremen with areas of responsibility location and phone.</p> <p><u>RESPONSE:</u> Oyster Creek and TMI will circulate current rosters of department foremen with areas of responsibility, location and phone. (Except photographs will not be posted.)</p>	6	B	Early 1983	NA HR / ALL

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40	Work toward sufficient flow of trainees so that those with operational experience can join support departments.	6	B	1983	TMI-1 OC / HR NA

RESPONSE: Current Status:

	<u>TMI-1</u>	<u>TMI-2</u>	<u>O.C.</u>
# CRO's	4/shift	3-4/shift	4/shift
# Aux Ops	6-9/shift	7+/shift	(4/shift
	(6 shifts)	(5 shifts)	(5 shifts)

OC: This has always been a goal of Operations to provide a career path and options for operators to pursue other areas where their experience and knowledge can benefit the Corporation. With achievement of the six (6) shift goal, we can focus on moving operators into other areas of the Corporation. In the interim, Operations continues to recruit and provide yearly classes of trainees consistent with budget allotment.

TMI: This is well underway and is included in the planning for critical skills section of the five year plan. The plant now has 19 licensed ROs with 3 in training; a licensed RO was just recently transferred to QA/QC as a beginning of the program to provide operators the opportunity to move into the support division.

41	<u>Pay Differentials</u> - Develop data on pay differentials between licensed operators and other disciplines at GPU Nuclear.	7	B	1983	HR
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RESPONSE: Per discussions with the O/P on April 16, 1983, this concern may be directed to the GSS or GOS levels of salary compared to other exempt positions at O.C. Human Resources will study such and respond to the applicable officer level positions.

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42	Develop data on pay differentials in Nuclear Plants run by other utilities.  <u>RESPONSE:</u> Surveys are conducted continually during the year. Most recent survey is as of 3/21/83. Attachments on CRO hourly rates vs. internal technical positions and as compared to other utilities distributed to applicable officer level positions on April 18, 1983.	7	A	1983	HR
43	Use data to reassess policies and plan appropriate action steps.  <u>RESPONSE:</u> Inasmuch as GPUNC wage and license bonus amounts are subject to the local bargaining agreements, differentials can only be adjusted through negotiations.	7	D	1983/1984	HR
44	Work to initiate 6 shifts at Oyster Creek as soon as possible.  <u>RESPONSE:</u> At the time of the study, O.C. was on a 4 shift rotating schedule; it has since been increased to 5 shifts (February 1983). Operations and T&E are striving to have sufficient licenses for 6 shift operations by the end of the 1983 outage.	8	B	1983/1984	HR / OC

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45	<u>Shift Scheduling</u> - Study feasibility of each rotation being consistently eight hours later than previous at O.C. Study feasibility of twelve hour shifts.  <u>RESPONSE:</u> This matter needs extensive review and study between Nuclear Assurance and Human Resources, applicable divisional management and operating company labor relations representation. While other options may be available, we reject the concept of 12-hour shifts, i.e., difficult to schedule, fatigue factor, reducing alertness and productivity and necessity of IBEW negotiations.	8	D	1983	HR / OC
46	Provide advance warning of changes in shift scheduling.  <u>RESPONSE:</u>  <u>TMI:</u> Advance warning of changes in shift scheduling should and will be provided whenever possible.  <u>OC:</u> Operations Management commits to providing as much advance warning of shift scheduling changes as is possible. Additionally, Operations has submitted a proposed schedule change (operators input) to Human Resources for Union concurrence. This proposed shift schedule is one preferred by the operators and implementation will be indicative to Management's desire to respond to their concerns.	9	B	1983-on	TMI-1 OC



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47	Interviews with cross-section of management on issues, concerns and quality of management.  <u>RESPONSE:</u> Director, Training & Education and VP - Nuclear Assurance are reviewing the programs available to evaluate and assess individual management styles and practices.	9	D	1983	NA
48	Assessment of managers; developmental coaching with individual managers; Management training.  <u>RESPONSE:</u> Will revise present Management Development Program to target behavioral objectives to managerial skill development. Human Resources and Training & Education are working together to guide effective assessment of manager performance.	9	B	1983-on	NA
49	Presentation of findings to Departments (so that Departments understand background of Action Steps).  <u>RESPONSE:</u> RHR Report has been distributed to appropriate management personnel in each Division. (Also see response to No. 32.)	10	A	Early 1983	NA / ALL
50	Review of suggested Action Steps to determine feasibility, timing, and participants.  <u>RESPONSE:</u> This Response Summary will be reviewed with RHR. A plan will be developed by July 1, 1983 for follow-up and feedback to operators.	10	C	Early 1983	NA / ALL

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