

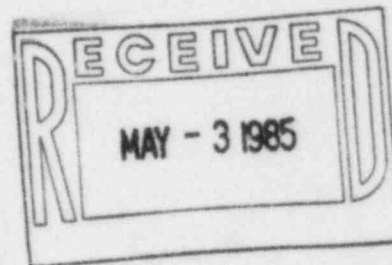


Nebraska Public Power District

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EA 82-46
50-298/12-09
50-298, 12-11

April 30, 1985



Mr. Robert D. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
Suite 1000
611 Ryan Plaza Drive
Arlington, Texas 76011

Dear Mr. Martin:

Subject: Status of District's Response to
LRS Nuclear Management Appraisal Report

Reference: 1) Letter from D. E. Schauffelberger to R. D. Martin
dated April 11, 1985, on above subject

Reference 1 forwarded to you the results of LRS's review of the District's response to its Nuclear Management Appraisal Report of April, 1983. The review has been evaluated by District management and progress has been made in closing out some of the remaining open items. These developments and a discussion of efforts to close out the remaining open items are being forwarded to you as attached.

Sincerely,

NEBRASKA PUBLIC POWER DISTRICT

Don E. Schauffelberger
Don E. Schauffelberger
General Manager

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Attachments

cc: Corporate Records

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OM-1 District Long-Range Goals and Objectives

Initial long-range goals and objectives for the District were presented on June 28, 1984. These goals and objectives were reviewed with the Board of Directors; however, no formal action was taken to "approve" them. Currently, a review of these goals and objectives is underway with the intent of adding items dealing with the nuclear area. It is an NPPD management target that before August 1, 1985, the upgraded District Goals and Objectives will have been completed and formally approved by the Board.

OM-3 More Definitive Delegation of Authority by the Board to the General Manager

A draft of a delegation of authority document, which discusses delegation by the Board to the General Manager was prepared in early 1984. This draft was submitted to the legal counsel for review. The draft has been reviewed against the State of Nebraska statutes which create and regulate the Nebraska Public Power District. It was also reviewed against the bylaws of Nebraska Public Power District. A final draft of delegation of authority by the Board to the General Manager was approved at the April, 1985 Board of Directors Meeting.

OM-8 Establish Position of AGM - Nuclear with Position Description

The position was established promptly and the position description was available shortly thereafter. The position description will be formally approved by the General Manager in May, 1985.

OM-16 Succession Planning Program

A succession plan has been implemented and the process is currently underway in the Nuclear Power Group. This effort will be completed by June 1, 1985, and will be repeated each year. To accomplish June 1 completion, succession planning activities are performed during April and May.

In parallel, the Human Resources Department is currently studying and developing a succession plan for the entire District. The completion date for this wider plan is not yet known and, for that reason, the Nuclear Power Group has implemented its own plan.

OM-18 Board and Management Must Reverse High Turnover at CNS

OM-19 Recruitment of Experienced Supervisory Personnel for CNS and the GO

OM-20 Competitive Compensation Policy

OM-21 Benefit Program and Permanent Transfer Policy

The above four items are closely related and, therefore, are discussed together.

In late 1984 NPPD conducted a salary survey of six neighboring nuclear utilities. This salary survey also included information on license bonuses and fringe benefits such as health insurance, dental insurance, vacations, holidays, etc. The six neighboring utility survey was important because it established the salary and benefit market climate in which NPPD operates.

This salary survey was presented to the Board by the AGM - Nuclear in February. Concurrently, the AGM - Nuclear proposed increasing the NPPD licensing bonus to be consistent with the six utility average. These increases were granted and increased the RO and SRO bonus from \$200 and \$300 to \$300 and \$450, respectively.

Recently, to stem the high turnover rate of I&C Technicians, the I&C Technician's salary control points and selected salaries were increased. The AGM - Nuclear intends to utilize the results of the six utility salary survey to propose to modify other selected nuclear midpoint salaries or to establish a policy of paying above midpoint salaries for selected classifications. The AGM - Nuclear will propose needed salary adjustments to the Compensation Committee.

As a result of the Nuclear Power Group staffing plan, a total of 108 people will be added. A specific provision of the plan was that five to ten nuclear-experienced people should be recruited to fill or to "back up" key positions. In some instances it will be necessary to adjust salary levels so that high quality personnel will be attracted to the position.

Changes in the benefits programs are difficult to handle as they would impact a large number of employees in a whole spectrum of salary classifications across the entire District. The NPPD Human Resources Department makes recommendations to management for potential Board action. The Board must approve all changes in the benefits area.

A transfer policy has been established for GO/CNS transfers. There has been little transfer of employees in the past months because of the major shutdown and project work going on at CNS. Many GO people are working full time at CNS and many others are spending part of their time there. Because of the shutdown, no site people are spending appreciable time at the GO. It is expected that the policy will not be utilized fully until after the shutdown and its cleanup items are completed.

O-1 Operator Retention and Six Shifts

O-2 Increase Number of Station Operators

T-6 Use of Sixth Shift for Training

The above three topics are closely related and are discussed as follows.

At the time of the 1983 Nuclear Power Group reorganization, a staffing plan was approved which added eight station operator positions. It was felt that the addition of these entry level operator positions, in addition to the operators already in the system, would enable a sixth shift to be added by the end of 1983. Due to a variety of problems, including unexpected attrition and training needs, this goal was not met. It was then expected that in 1984, a sixth shift would be implemented. Unfortunately, despite obtaining several new licenses and upgrades, NPPD was not able to maintain enough licensed personnel on shift to staff a sixth shift.

In late 1984, this whole situation was reviewed and increased personnel needs were factored into the new staffing plan. This plan was approved in March, 1985, and included an increase of eight more station operators in 1985 and up to an additional four in 1986. NPPD is targeting a six shift operation in early 1986.

S-7 Upgrade of SORC Charter on Discussion in Committee of Safety Issues

CNS will update the Station Procedure 0.3 to add a requirement that all nuclear safety-related actions taken by the SORC will be considered in committee.

S-8 Inconsistencies Between Administrative Procedures Regarding SORC

CNS hired Stone & Webster to address this concern. This work was completed prior to the NRC PAT audit in the fall of 1984. The PAT team pointed out some additional areas which need to be addressed. CNS will review the procedures and make the appropriate procedure changes by May 15, 1985.

L-2 Formal Commitment Tracking System

Effectiveness of the CNS tracking system will be enhanced by a combination of increased procedural controls and additional management attention. Procedure revisions will be initiated by May 1, 1985. Increased management attention to updating commitment tracking system inputs will be applied as an on-going activity.

T-2 Generation of a Comprehensive CNS Training Program

The CNS Training Program remains under development. A Training Department Management Plan is currently being developed. Included in this management plan will be an index of training department procedures and instructions. The plan will be drafted by June 1, 1985, and will provide the framework for the overall CNS Training Program. Under the direction of the Training Manager, hired in September, 1984, development of specific training programs for STA training; general employee training; licensed operator and senior operator training; non-licensed operator training; health physics and chemistry training; and maintenance and I&C training are in progress.

The licensed operator and senior operator training programs, as well as the non-licensed operator training program, have been substantially improved over last year. These upgraded programs will be conducted on a continuing basis while further refinements are made so as to bring them into conformance with INPO Accreditation criteria. With respect to the remaining programs, it is

expected that training in each area will be implemented during 1985. The District is committed to development of training programs suitable for INPO accreditation and plans on expending the level of effort required to achieve that objective with the established time frame, i.e., December, 1986.

In addition, initial planning for the construction of a Nuclear Training Facility and plant simulator have commenced. The Nuclear Training Facility is currently in design and it includes space for the simulator. Further, a plan to increase the total number of the CNS training staff to approximately 35 has been approved in order to provide the manpower resources necessary to achieve the desired ambitious upgrade in the CNS Training Program.

T-8 Non-Licensed Training

A station operator training program has been developed and has been reviewed by INPO. Revision and implementation of this program is proceeding concurrently with efforts to have the program accredited by INPO.

Q-2 Establish a Routine Reporting Relationship Between QA and the General Manager

The General Manager currently receives a copy of all Quality Assurance audit reports and audit follow-up reports. He also receives a copy of the monthly NCR/LER Status Report. It was intended that a monthly NPPD QA activities status report supplemented by periodic personal briefings would further the ability of the General Manager to remain abreast of quality issues at CNS.

In an effort to reduce further paperwork and to implement the intention of the recommendation in this area, our initial response has been reevaluated. The Division Manager - Quality Assurance has met this month with the General Manager to brief him on CNS Quality Assurance matters. It is anticipated that these briefings will occur on a quarterly basis hereafter.

RP-1 Plant Specific Training for HP Technicians

The Health Physics Technician Training Program is being developed to meet INPO accreditation standards by December, 1986. Current plans are to critique plant specific systems training for the HP technicians by September 1, 1985, following completion of the current pipe replacement outage.

C-1 Chemistry Training Program

The development of a formal training program for the plant chemistry technicians is included within the overall upgrade of the CNS Training Program. Work is progressing to establish this program for INPO accreditation by the end of 1986.

Plant specific systems training for chemistry technicians has been ongoing since the Fall of 1984.

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