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U. S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response to the 1992 Initial SALP Report

GNRO: 92/00147

Gentlemen:

We are pleased to respond to the 1992 initial SALP report for Grand Gulf.

In preparing our comments we were gratified to note the close convergence between the NRC's assessment of our strengths and challenges, and the results of our own assessments. Reaching a shared viewpoint is something that we can all be proud of, and is a tribute to the quality of our communications and the constructive approach taken by the NRC in the SALP process.

The major challenges for the future are clear - scram reduction and continuous improvement. We believe that we have the blueprint, the motivation and the top-notch personnel necessary to get us there.

Yours truly,

W. T. Cottle

WTC/MJM/be

attachments: 1. Response to the 1992 Initial SALP Report
cc: (See page 2)

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ENTERGY OPERATIONS COMMENTS

1992 INITIAL SALP REPORT

I. Introduction

As Mr. Ebner indicated in his remarks on November 13, maintaining a superior level of performance may be as difficult as getting there in the first place. We are pleased that Grand Gulf personnel undertook the challenge of not only maintaining, but continuing to improve on a sound performance record.

We have a lot to be proud of this past SALP period including:

- Safe operation and the absence of significant events
- Strong performance by all site personnel
- Innovative approaches to technical problems
- Excellent outage performance
- Strengthening safety culture
- Increased focus on continuous improvement
- Good regulatory communications

We are particularly proud of our personnel - their commitment to excellence and their continuing enthusiasm for quality performance.

II. The Process Management Challenge

In retrospect, each SALP period has a dominant theme and challenge that drives growth of the Grand Gulf organization. While we continued to maintain and build upon our past successes, this SALP period presented fresh challenges in terms of persistent problems with hardware-related scrams that, initially, were unresponsive to our standard approach to problem solving. Developing long-term solutions to these problems required us to focus as much attention on the areas of process and organization as we had given to the technical issues involved. Consequently, this SALP period has been characterized by our growing

recognition that process management is as important, if not more so, than issue management.

We found that seemingly unrelated hardware scrams had hidden commonalities consisting of process difficulties and organizational problems. As the SALP period progressed and we became more sophisticated at diagnosing process problems, it became apparent that the underlying causes of hardware scrams also contributed to problems in other areas. As a result, Grand Gulf developed a comprehensive action plan intended, in part, to improve the quality of key site processes. Although we are in the early stages of implementation, we expect this effort (discussed in more detail below) to pay handsome dividends for the future.

Shifting focus from issue management to process management has not been an easy task for us, nor is the process complete. In the course of doing so, however, we believe that we have taken another step towards organizational maturity, and enhanced the traditional strengths of Grand Gulf by developing even stronger bonds of teamwork and common purpose.

III. Integrated Site Action Plan

The Integrated Site Action Plan (ISAP) is a collection of improvement initiatives designed to enhance Grand Gulf performance in the areas of management oversight, interdepartmental processes and people issues. The purposes of the plan are:

- To provide site focus on high priority items that are important to the overall success of Grand Gulf.
- To effect a dramatic reduction in scram frequency.
- To generate a step increase in the quality of functional site processes and a corresponding increase in management oversight of, and site personnel commitment to, those processes that lead to error-free performance.
- To eliminate periodic increases of inattention to detail events.
- To ensure all personnel are aware of their responsibilities and are accountable for their actions.

Implementation of the plan has begun, with most actions to be complete prior to the next refueling outage. Although the individual elements of the ISAP are extensive, it is worthwhile to briefly discuss a few of the major activities.

- Trip-critical systems: A concerted effort is underway to focus attention and resources on systems whose failure could initiate scrams. Root cause evaluation, preventive maintenance, operational evolutions and other activities will be especially focused, or receive enhanced management oversight, when applied to trip-critical systems. In addition, the reliability centered maintenance schedule is being revised to give preference to trip-critical systems.
- Root cause evaluation and trending: We are in the process of creating a dedicated root cause analysis group within our Performance & System Engineering department. This group will be responsible for conducting or overseeing root cause evaluations for significant problems, including the failure of trip-critical components and safety-significant events. Similarly, a centralized performance monitoring and trending program will be developed within the Quality Programs department. The purpose of this effort is to provide early indication of adverse trends affecting trip-critical equipment.
- Corrective action program: The site-wide corrective action program is being upgraded to increase consistency amongst deficiency identification documents, to emphasize the need for early problem identification and to deliver training to a broad range of site personnel.
- Enhanced self-assessment capabilities: We are taking a fresh look at site and departmental goals and performance measures to ensure proper alignment with corporate goals on safety, cost and operational performance. A site performance monitoring system will be implemented to synthesize a wide range of measures into a relatively small set of overall performance measures. Additionally, every site department will perform selected self-assessments to evaluate their key processes.

The ISAP is dynamic - we expect the plan to change to accommodate changing conditions and intend to keep the NRC informed of our progress.

IV. SALP Recommendations

In its report, the SALP Board made the following recommendation in the area of Engineering/Technical Support.

Management attention should continue to focus on scram reduction and training of operators.

Scram reduction had been an area of constant focus during the preceding SALP period and will continue to occupy significant management attention for the foreseeable future. In addition to concentrating resources on fundamental process areas affecting scram rate, as described for the ISAP above, Grand Gulf management continues to address the hardware issues associated with plant trips. Extensive modifications have been made and continue to be made to minimize the potential for further lightning induced scrams. We continue to pursue feedwater/condensate, load shedding and sequencing and other hardware related scram initiators. In some cases, the technical issues we face are complex and not amenable to easy solutions. But, we are confident that our continued attention to these problems will result in a marked improvement in scram rate for the upcoming SALP period.

Like scram reduction, operator training commanded serious management attention during the last SALP period. Due to decreasing performance on initial and requalification operator examinations, a number of programmatic improvements were implemented. Based on early indications from the requalification program we are cautiously optimistic that the combination of programmatic improvements, new leadership and focused management attention has resulted in a return to improved performance in the training area. However, we will continue to stress the importance of operator training and maintain increased management oversight of this critical area.

We would also like to take this opportunity to clarify a portion of the SALP report. With respect to operator training, no clear distinction is made between comments associated with the requalification training program and comments tied to the initial training program. In particular, the report seems to imply that "failure to properly prepare or remediate candidates and lack of instructor certification in technical skills" were contributors to weaknesses in the requalification program. We believe that such problems should properly be attributed to the initial training program.

SALP Functional Area Challenges

The challenges presented to us by the NRC in the November 13 SALP meeting coincided with our own assessment of necessary goals for the upcoming SALP period. We agree that continued success is dependent, in large measure, upon satisfying the following objectives.

A. Operations

- Continue focus on inattention to detail

A major focus of the ISAP is personal responsibility and accountability which includes the concepts of attention to detail, procedural compliance, self-verification, and other factors associated with human performance. While concentrating renewed effort in these areas, we intend to continue past successful actions such as close tracking of inattention to detail trends.

- Housekeeping in inaccessible areas (i.e., RHR & RCIC rooms)

To provide added emphasis, non-licensed operators are conducting tours of the ECCS pump room areas. We have assigned responsibility for pump room cleanliness to the appropriate building operators and management will continue to emphasize and check past problem areas.

B. Radiological Controls

- Maintaining low dose for major work

Grand Gulf has been very successful in reducing dose associated with major work. We recognize that the NRC's challenge in this case is to maintain our high level of performance. In addition to continued attention on work planning activities, personal responsibility for dose and similar efforts, we are launching a major initiative to reduce plant source terms. We believe this approach to be a viable means of significant dose reduction in the future.

- Control PCEs during major work

The primary contributor to personnel contamination events (PCEs) was determined to be disreect particles from laundered protective clothing. Accordingly, we have initiated a number of actions in conjunction with our laundry contractor to reduce the number of these events.

C. Maintenance/Surveillance

- Procedural adequacy

The weaknesses noted with procedural adequacy occurred during the first half of the previous SALP period and have been successfully addressed. We will continue to trend procedural deficiencies along with personnel errors in order to provide early identification of adverse trends, and will continue to discuss the trends during periodic management meetings.

- Work backlog

As noted in the SALP report, the work request backlog is on a positive downward trend. We intend to continue our actions such as reviewing the 10 oldest work orders in weekly meetings with plant management, and search for additional effective ways to achieve and maintain a low backlog.

- Continue focus on equipment failures contributing to events

This issue is related to scram reduction and is discussed under the Integrated Site Action Plan and SALP Recommendations, above.

- Control contract workers

Control of contract workers will be an area of continuing emphasis during this next SALP period. We have implemented a number of enhancements in this area including a new training module for new contract employees, daily briefings for contract supervision and foremen and monthly reviews by a group of plant, contract and supervision personnel of work problems encountered in the field.

D. Emergency Preparedness

- Maintaining timely EOF activation

During the October 1992 NRC graded exercise, the EOF was operational within 45 minutes. The Backup EOF was activated in 66 minutes. A major contributor to improvement in the activation time was the definition of minimum staffing requirements through administrative procedures. The Emergency Preparedness organization will continue to monitor the activation time for all facilities during future drills.

E. Security

- Equipment errors/age of system

As noted during the SALP exit meeting, we are making good progress on the south perimeter upgrade project and will continue to place emphasis on project completion.

F. Engineering/Technical Support

- Maintaining systems engineers in preventative versus reactive mode

System engineers are central to a number of interdepartmental processes whose inefficiencies can seriously impair the ability of the engineer to function regardless of how well the department is organized and managed. Consequently, a primary focus of the Integrated Site Action Plan is on improvement of key work processes that cross departmental boundaries. We expect process changes to reduce workload, improve efficiency and allow system engineers increased control of external factors that today adversely affect their function. In addition, the Performance & System Engineering department has initiated an effort to re-define the system engineering responsibilities with emphasis on system prioritization, elimination of non-essential work and setting thresholds for acceptable workload.

- Operator training

Discussed under SALP Recommendations, above.

- Reduction of scrams due to design related problems

Discussed under the Integrated Site Action Plan and SALP Recommendations, above.

G. Safety Assessment/Quality Verification

- Continue management focus on prior planning

Prior planning of regulatory submittals is a distinct advantage for Grand Gulf as well as the NRC as it allows early identification of problems, rational resource allocation and an overall lower dedication of resources. We intend to continue this practice and have provided the NRR Project Manager with anticipated licensing actions for the current cycle of operation and the next refueling outage.

- Continue performance based audits

Performance based audits are a centerpiece of the Grand Gulf approach to quality assurance. As the "value added" of compliance based audits continues to decline, we expect performance based audits for both the industry and NRC to assume increasing prominence and importance.