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NYN- 92173

December 31, 1992

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

- References:
- (a) Facility Operating License No. NPF-86, Docket No. 50-443
  - (b) NHY Letter NYN-92045 dated April 10, 1992, "Auxiliary Operator Performance Concerns," T. C. Feigenbaum to T. T. Martin
  - (c) North Atlantic Letter NYN-92116 dated August 18, 1992, "Auxiliary Operator Performance Concerns Action Plan," T. C. Feigenbaum to T. T. Martin

Subject: Auxiliary Operator Performance Concerns Action Plan

Gentlemen:

In a letter dated April 10, 1992 [Reference (b)], North Atlantic Energy Service Corporation (North Atlantic) committed to provide you with a report regarding the action plans and implementation schedules for each of the recommendations provided in the assessment of the Auxiliary Operator Performance Concerns. Accordingly, the Enclosure contains a description of the individual action plans and implementation schedules as of December 15, 1992. This is a followup status report to the one submitted in a letter dated August 18, 1992 [Reference (c)], for the period ending July 31, 1992. It should be noted that the due dates for some actions have been extended since the last status report to more accurately reflect implementation schedules and progress.

Should you have any questions regarding the Auxiliary Operator Performance Concerns Action Plan, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,

  
Ted C. Feigenbaum

TCF:JES/jes

Enclosure

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December 31, 1992  
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North Atlantic  
December 31, 1992

ENCLOSURE TO NYN-92173

AUXILIARY OPERATOR PERFORMANCE CONCERNS  
ACTION PLAN  
STATUS AS OF DECEMBER 15, 1992

Introduction

The Auxiliary Operator (AO) Performance Concerns Action Plan is contained in the "Summary Report by the Executive Director - Nuclear Production Regarding AO Performance Concerns" which is Enclosure 1 to NHY letter NYN-92045 dated April 10, 1992, "Auxiliary Operator Performance Concerns," T. C. Feigenbaum to T. T. Martin [Reference (b)]. The Action Plan consists of four recommendations made by the Executive Director - Nuclear Production and 21 recommendations made by the Independent Review Team (IRT) and endorsed by the Executive Director - Nuclear Production.

Each of the recommendations required individual action plans to be developed and schedules established for the completion of reviews and/or actions. This has been accomplished and the status of each recommendation is provided below.

The recommendations, as described in NYN-92045 and numbered EDNP-1 through EDNP-4 and IRT-1 through IRT-21, are repeated along with the current status.

Action Plan Status

1. RECOMMENDATION NO. EDNP-1

New Hampshire Yankee should acquire the services of an expert consultant to work with Management in order to enhance communications and team building. The consultant should be selected by May 15, 1992.

Status

As stated in the last status report [Reference (c)], North Atlantic had engaged the services of Senn-Delaney Leadership Consulting Group (Senn-Delaney) to provide Executive Management with analysis and training relative to leadership, communications and teambuilding within the company. North Atlantic, working with Senn-Delaney, has developed a project called "North Atlantic TIDE: Teamwork In Developing Excellence." North Atlantic TIDE was implemented in a three phase program consisting of 1) a Needs Assessment Audit, 2) Analyses Feedback Report, and 3) Communication and Team Building Process. All of three steps of this program have been completed. Executive Management has directed that the results of the program be incorporated into the ongoing North Atlantic training program.

Scheduled Completion

Completed.

2. RECOMMENDATION NO. EDNP-2

Management should review its hiring and orientation practices in order to assure that they consider all appropriate attributes for hiring and developing employees. This review will be initiated by the Executive Director Nuclear Production, the Station Manager, and the Employee Relations Manager.

Status

The Employee Relations Department has reviewed the North Atlantic hiring and orientation practices. An action plan was developed and is currently being implemented to provide information regarding the North Atlantic Values for Excellence, work ethic expectations and management expectations to applicants. Specifically, these actions include: a letter from executive management to perspective employees stating North Atlantic's expectations and the consequences of failing to adhere to these expectations; a revised employee orientation video tape to also convey expectations; and meetings between the Senior Vice President and new employees for the same.

Scheduled Completion

The enhancements to the employee orientation process are currently scheduled to be implemented by February 28, 1993.

3. RECOMMENDATION NO. EDNP-3

Management should redouble its efforts in its support and communication with the on-shift crews. The Station Manager, Operations Manager, and the Shift Superintendents will develop a plan to foster better communications.

Status

The Station Manager and the Operations Manager have implemented a team building and communication plan utilizing department meetings, Operations management presentations during shift crew and Fire Fighters training weeks, and selective shift crew meetings in a non-plant environment. The Station Manager has discussed the issue of fostering better communications with the Operations Group Manager and shift crews. In addition, the Station Manager has scheduled to meet with each Shift Superintendent semi-annually to discuss his evaluation and progress, and to emphasize actions that the Shift Superintendent should take to ensure that the station is operated in accordance with North Atlantic policies in a strong, conservative manner during all shifts. This recommendation is also being implemented in conjunction with recommendation IRT-17. In addition, North Atlantic is utilizing the services of an industrial psychologist to assist in the team building and communication effort utilizing experience gained from the many industries involved in shift and rotating shift work. At the completion of the initial review, the appropriate aspects of the plan will be incorporated in North Atlantic policies, programs and procedures.

Scheduled Completion

This recommendation is currently scheduled to be completed by February 28, 1993.

4. RECOMMENDATION NO. EDNP-4

Management should review industry experience with regard to these types of concerns and implement the lessons learned.

Status

North Atlantic has discussed the AO performance concerns with several utilities and INPO. No significant lessons learned have resulted from these discussions as of this time. In light of this, this issue will be kept open for additional review in the Spring of 1993. If lessons learned are forthcoming at that time, then a summary report of all related problems and corrective actions will be prepared. North Atlantic will then determine the appropriate elements from the industry review to be incorporated into company programs, procedures and guidance.

Scheduled Completion

The summary report is currently scheduled to be completed by March 31, 1993. Management analysis of any recommendations is scheduled to be completed by May 31, 1993.

5. RECOMMENDATION NO. IRT-1

Executive Management should review and evaluate the procedure compliance policy scope with regard to the applicability of verbatim compliance.

Status

A task team has been established to conduct a review of the procedure compliance policy scope and applicability and to provide recommendations addressing potential policy revisions. As of this time, the task team has presented management with a draft procedure compliance policy for review and comment. Upon approval of the revised policy, individual manuals, programs, and procedures will be reviewed and recommendations for revisions will be provided to Executive Management for consideration. When Executive Management has determined the appropriate revisions, the normal procedure revision process will be utilized for implementation. This recommendation is being pursued in conjunction with IRT-3 and IRT-20 to allow an integrated approach to policy, program, manual and procedure changes.

Scheduled Completion

Policy revisions are scheduled to be completed by May 31, 1993.

6. RECOMMENDATION NO. IRT-2

Conduct refresher training on a periodic basis in the following:

- Procedure Compliance Policy.

- Need for integrity/accuracy/completeness when documenting work activities. Emphasizing that all documentation may be needed to reconstruct work activities.
- NRC regulation on willful misconduct by licensed and/or unlicensed employees.

#### Status

As described in the last status report [Reference (c)], the General Employee Training (GET) Program, including initial and requalification training, was reviewed and revised to incorporate the appropriate updates and additions. The GET training is providing up-to-date information during both initial and requalification training to address the elements of the recommendation. The completed actions were reviewed by the Independent Review Team and determined to have satisfactorily addressed the recommendation.

#### Scheduled Completion

Complete.

### 7. RECOMMENDATION NO. IRT-3

Streamline Company operations by consolidating and eliminating (as possible) programs, policies, manuals and procedures. Emphasis should be placed on eliminating redundancy and excessive administrative requirements and documentation (e.g., canceling Nuclear Production Manual, quarterly surveillance for Shift Superintendents to review Work Request priorities, procedure for bulletin boards). Consider using outside expertise.

#### Status

The Assistant Station Manager has reviewed the AO Action Plan and previous self assessments related to Attention-to-Detail and Configuration Control. The review consolidated similar recommendations and produced additional recommendations that involve changes to North Atlantic policies, programs, manuals and procedures. The combined action plan has been approved and this recommendation will be finalized and implemented in conjunction with IRT-1 and IRT-20.

As part of implementing this recommendation, the Nuclear Production Management Manual has been cancelled and non-redundant requirements have been included in the Station Management Manual. Additionally, the North Atlantic Management Manual has been revised to simplify and recognize two distinct program and procedure review/approval processes, i.e., those program and procedure revisions that require review and approval by the Station Operation Review Committee (SORC), and those that do not.

Furthermore, the Station Management Manual has undergone several revisions to improve human factors aspects. This included improving readability and reformatting policies, programs, SORC, and administrative chapters.



#### Scheduled Completion

All actions to address this recommendation are scheduled to be completed by May 31, 1993.

#### 8. RECOMMENDATION NO. IRT-4

Determine where operations administrative burdens for compliance with Technical Specifications and NRC commitments can be reduced by design enhancements. Examples:

- EFW back leakage temperature monitoring
- Spent Fuel Pool cooling pumps area temperature

#### Status

The Operations Department is reviewing the various requirements for the AOs and identifying potential design changes. The Shift Superintendents have been requested to participate in this process. The Station Manager will review the recommendations and determine which design enhancements should be included in the North Atlantic Long Range Plan.

#### Scheduled Completion

The review of potential design changes is currently scheduled to be completed by February 28, 1993.

#### 9. RECOMMENDATION NO. IRT-5

Review and revise the AO logs to eliminate checks determined to be excessive (e.g., Cooling Tower and CST every four hours).

#### Status

As described in the last status report [Reference (c)], the AO logs were reviewed and revised to include additional criteria for the areas on the rounds and to eliminate excessive checks. The revised logs were reviewed by the Independent Review Team and determined to have satisfactorily addressed the recommendation.

#### Scheduled Completion

Complete.

#### 10. RECOMMENDATION NO. IRT-6

Consider providing Auxiliary Operators with updated tools for recording rounds data to provide consistent documentation and enhanced capability for equipment monitoring.



Consider systems such as used by Virginia Power (Nuclear Plant Journal, Jan-Feb, 1992).

#### Status

The Operations Department is reviewing the AO rounds data recording requirements and evaluating the potential for utilizing updated tools. The Information Resources Group has also been involved in this process and has met with various vendors. Any recommendations made by Operations and the Information Resources Group will be reviewed by the Station Manager to determine if they will be pursued.

#### Scheduled Completion

The Station Manager's review is currently scheduled to be completed by February 28, 1993.

### 11. RECOMMENDATION NO. IRT-7

Revise the AO Initial Training Program so that at the start and the end of the program, the Executive Director Nuclear Production, Station Manager, Operations Manager, and Training Manager address the Company's expectations and standards that the AO must meet, and convey the consequences of failing to meet these expectations and standards. This should be emphasized annually during AO Continuing Training.

#### Status

The AO Initial Training Program includes presentations at the beginning of the program. The 1992 AO Class began training on July 13, 1992 and the Executive Director-Nuclear Production, Station Manager, Operations Manager, Assistant Operations Manager and Training Manager addressed the class during the first three days of training to discuss management's expectations and North Atlantic's Values for Excellence. In addition, a session will be held on the last day of training to discuss management issues and reinforce previous presentations.

The AO Initial Training Program description currently incorporates the elements of this recommendation. Additionally, the AO Continuing Training Program description will be revised to incorporate these elements after they are adequately tested with the 1992 Class.

#### Scheduled Completion

The AO Continuing Training program description is currently scheduled to be revised by February 28, 1993.

### 12. RECOMMENDATION NO. IRT-8

Revise the AO Initial Training Program so that upon AO's arrival at training, the Shift Superintendent (SS) delivers Operations Department expectations to the new AO

(orientation). In addition, an AO currently on the shift meeting these expectations will be assigned as a mentor to train this new AO on job requirements during the OJT process. This will include signing of all qual guide related material. The Shift Superintendent will be responsible for monitoring the progress of assigned AOs throughout the training program to make sure the department's expectations are being met.

#### Status

The AO Initial Training Program Description currently contains the elements of this recommendation. The 1992 AO Class was able to spend approximately two weeks on shift prior to beginning the classroom training. During this period they met the Shift Superintendent and shift personnel and spent time in the Control Room and on the various AO watchstations.

A sponsor was assigned to each AO trainee when he arrived on shift for the first week of on the job training (OJT). The sponsor will fulfill the functions of the mentor as described in the recommendation. The sponsor will sign appropriate qualification guide related material.

The AO Initial Training Program Description and Qualification Guide have been revised to include the elements of this recommendation. These documents will be rereviewed after they are utilized and tested with the 1992 AO class. The classroom phase will be completed at the end of January 1993.

#### Scheduled Completion

The rereview of the AO Initial Training Program is currently scheduled to be completed by April 30, 1993.

### 13. RECOMMENDATION NO. IRT-9

Revise the AO OJT Program to incorporate the Operations Good Practice on AO logs and round taking.

#### Status

The AO OJT Lesson Plans have been revised to incorporate the good practices on AO logs and round taking that are described in procedure OP10.8, "Auxiliary Operator Watchstanding Practice."

#### Scheduled Completion

Complete.

### 14. RECOMMENDATION NO. IRT-10

Add signature blocks on the OJT qual guide to include:

- AO mentor, stating that the AO trainee is ready for qualification approval.

- AO trainee, stating he accepts all responsibility of information found in qual guide.
- Shift Superintendent, stating his expectations have been met.
- Operations Manger, stating that the department expectations have been met.

Status

The AO OJT qualification guide has been revised to include the signature blocks stated in this recommendation.

Scheduled Completion

Complete.

15. RECOMMENDATION NO. IRT-11

Review applicable OJT lesson plans and Job Performance Measures (i.e., rounds, logs keeping, CST integrity checks) to ensure that AO administrative requirements have been included in these lesson plans.

Status

The applicable OJT lesson plans and Job Performance Measures have been reviewed and the AO administrative requirements have been incorporated as appropriate.

Scheduled Completion

Complete.

16. RECOMMENDATION NO. IRT-12

Operations and Training should re-evaluate the priority placed on the AO Continuing Training Program. Training should ensure adequate instructor resources are available to conduct the program. Training should consider placing an instructor on-shift in the plant to conduct training.

Status

The Operations Curriculum Advisory Council has reviewed the AO Continuing Training Program and determined that the appropriate priority is placed on the program. Training has increased the instructor staffing by one position to provide additional support to the AO Continuing Training Program and to supplement the on shift on-the-job training administration.

Scheduled Completion

Complete.

17. RECOMMENDATION NO. IRT-13

Re-evaluate the AO training commitments to see if any requirements can be reduced or eliminated. Recommend that some of the requirements deemed necessary be fulfilled on shift.

Status

As described in the last status report [Reference (c)], the AO Initial and Continuing Training Programs were reviewed by the Operations Curriculum Advisory Committee (CAC) to determine if any elements could be reduced, eliminated or combined. In addition, the CAC enlisted a review, by 28 Training and Station Staff personnel, of the current AO training program and several lessons were identified that could be eliminated. The recommendations of the review group were accepted by the CAC and the AO Initial and Continuing Training Programs were revised. The completed actions were reviewed by the Independent Review Team and determined to have satisfactorily addressed the intent of the recommendation.

Scheduled Completion

Complete.

18. RECOMMENDATION NO. IRT-14

Provide consistent administration of exams, written or walkthrough, to document students have comprehension of the material.

Status

The Operations Curriculum Advisory Committee (CAC) has mandated that weekly examinations be given during the AO Continuing Training Program. These examinations are administered as described in Section 8.0 of the AO Continuing Program Description. The CAC will annually evaluate the effectiveness of these exams as described in Section 13 of the AO Continuing Program Description.

Scheduled Completion

The CAC review of the AO Continuing Program Description is scheduled to be completed by December 31, 1992.

19. RECOMMENDATION NO. IRT-15

Examine the training feedback disposition process to ensure that actions are properly addressed and implemented.

Status

The Operations Department discussed this recommendation at an Operations Curriculum Advisory Committee (CAC) meeting and determined that training feedback

items discussed at a CAC meeting will be added to the Operations Department worklist. This action has been completed. Additionally, Training Group Procedure NT-8000 has been determined to provide actions and controls for an effective training feedback process.

Scheduled Completion

Complete.

20. RECOMMENDATION NO. IRT-16

Develop a standard orientation program for new employees to convey clear and concise Management expectations and develop a means to reinforce these expectations on a requalification basis. (See Recommendation #7 and #8 for example).

Status

The Employee Relations Department and the Training Department have developed an enhanced orientation program that incorporates the elements of this recommendation. Specifically, this included the revision of the lesson plans for Site Orientation, General Employee Training (GET), and the Computer Based GET, to address procedure compliance and deliberate misconduct.

Scheduled Completion

Complete.

21. RECOMMENDATION NO. IRT-17

Develop team building opportunities with all on-shift Operations personnel. Consider periodic gatherings, other than shift turnover, which would encourage team interplay.

Status

The Operations Department currently conducts monthly meetings with all on-shift personnel to provide team building opportunities and to encourage team interplay. North Atlantic will continue these monthly meetings as appropriate. This recommendation encompasses similar issues described in EDNP-3. See EDNP-3 for additional details.

Scheduled Completion

Complete.

22. RECOMMENDATION NO. IRT-18

Develop Operations Department good practices to incorporate Operations standards, management expectations and good practices pertaining to AO logs and watchstanding.

#### Status

As described in the last status report [Reference (c)], the Operations Department developed a single procedure OP10.8, "Auxiliary Operator Watchstanding Practice" that covers AO logs and watchstanding. The Independent Review Team reviewed OP10.8 and determined that the procedure adequately addresses the intent of the recommendations.

#### Scheduled Completion

Complete.

#### 23. RECOMMENDATION NO. IRT-19

Develop Operations Department Qualification Program and include this program in the NYQM.

#### Status

The Operations Department is developing the Qualification Program for inclusion in the NYQM.

#### Scheduled Completion

The Operations Department Qualification Program is currently scheduled to be completed by May 15, 1993.

#### 24. RECOMMENDATION NO. IRT-20

Review and evaluate the processes utilized to manage technical and administrative tasks to streamline and consolidate the Management function. Encourage the decision making process to be made at the appropriate levels in the organization. Allow managers more time to manage people and to develop strategies in order to facilitate improved interpersonal communications. Consider using consultants to complete this review and provide specific recommendations.

#### Status

The processes utilized to manage technical and administrative tasks are being reviewed in conjunction with IRT-1 and IRT-3. The processes determined to require revision will be revised in an integrated manner with other related policy, program, manual and procedure changes.

Currently, the following summary actions have been implemented to address this recommendation: revising procedures to allow approval authority to take place at the appropriate organizational level; consolidation and standardization of procedures to improve efficiency; and conducting meetings with personnel to solicit input on other

actions that may be taken to encourage the decision making process to be made at the appropriate levels in the organization.

Scheduled Completion

This recommendation is scheduled to be completed by May 31, 1993.

25. RECOMMENDATION NO. IRT-21

Operations Management should ensure that the intent of OAL14 #8, "Plant Performance Monitoring" is met.

Status

The Operations Manager has reviewed different options to expand or enhance the instructions for implementing OAL14 #8. As a result of this review, OAL14 #8 was revised to ensure that the Shift Superintendent performs or directs an independent unannounced monitoring task each calendar quarter. Additionally, OAL14 #15 was revised to ensure that the Operations Technical Project Supervisor performs a bi-weekly verification of the AO rounds using security door access records, AO round sheets, and/or other means as appropriate. This surveillance will be conducted on a random basis.

Scheduled Completion

Complete.