

January 13, 1997

Mr. Bruce D. Kenyon
President and Chief Executive Officer
Northeast Nuclear Energy Company
c/o Terry Harpster
P. O. Box 128
Waterford, Connecticut 06385-0128

Dear Mr. Kenyon:

This letter documents the meeting held between the NRC and Northeast Nuclear Energy Company on December 17, 1996 to discuss the recovery and restart plans for the three Millstone Units. At that meeting, you presented slides (Attachment 1) which outline your plans leading to the restart of each of the units. You also proposed the concurrent recovery of all of the units versus the restarting of a single unit that was previously discussed with your staff. We noted, with reservation, your projection of Millstone Unit 1 as the lead plant for readiness to restart, with Unit 3 and Unit 2 following in close succession. You acknowledged the potential impact on NRC resources in implementing our regulatory oversight activities necessary for restart with all of the units approaching readiness for restart simultaneously, and conceded arrangements to accommodate the necessary oversight activities.

We expressed a need for a consolidated listing of open issues that NNECO proposes to either complete prior to restart or to defer for each unit. A discussion ensued regarding the form the lists would take and the actual content of the listings. You indicated that NNECO would propose an approach to address this issue. However, we note the Operational Readiness Plan Punchlist provided in your letter, dated August 13, 1996, (B15839) served as a useful initial document for Unit 3. We expect similar documents for Units 1 and 2 as well as update and status information for significant changes.

We found the meeting to be useful as a first step in open communications between the NRC, NNECO and the public. We propose that a continuation of the meeting process be scheduled on a bimonthly (every two months) periodicity for the next several months to ensure adequate coordination of our combined efforts.

Your continued cooperation is appreciated.

Sincerely,

ORIGINAL SIGNED BY:

Wayne D. Lanning
Deputy Director
Inspections, SPO, NRR

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PDR ADOCK 05000245
P PDR

Enclosure: As Stated

Docket Nos. 50-245; 50-336; 50-423

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cc w/encl:

T. C. Feigenbaum, Executive Vice President - Chief Nuclear Officer
J. McElwain, Unit 1 Recovery Officer
M. Bowling, Jr., Unit 2 Recovery Officer
J. Cowan, Unit 3 Recovery Officer
D. M. Goebel, Vice President, Nuclear Oversight
J. K. Thayer, Recovery Officer, Nuclear Engineering and Support
P. D. Hinnenkamp, Director, Unit Operations
H. F. Haynes, Director, Nuclear Training
P. M. Richardson, Nuclear Unit Director, Unit 2
M. H. Brothers, Nuclear Unit Director, Unit 3
J. F. Smith, Manager, Operator Training
F. C. Rothen, Vice President, Work Services
L. M. Cuoco, Esquire
J. R. Egan, Esquire
V. Juliano, Waterford Library
Department of Public Utility Control
S. B. Comley, We The People
State of Connecticut SLO Designee

Mr. Bruce D. Kenyon

3

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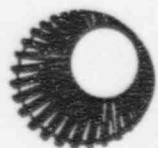
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OFFICE	RI/SPO		RI/SPO					
NAME	DURR		LANNING					
DATE	1/6/97		1/13/97					

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Millstone Station Recovery Plans

***Millstone Simulator Training Building
December 17, 1996***



**Northeast
Utilities System**

Opening Remarks

Bruce Kenyon

President & C.E.O.

Northeast Nuclear Energy Co.



**Northeast
Utilities System**

***NRC Public Meeting
12/17/96***

NU Presentation Agenda

- OPENING REMARKS

B. Kenyon

- RECOVERY PLANS

J.P. Cowan

M. Bowling

M. Brothers

J. McElwain

- ENGINEERING / SUPPORT

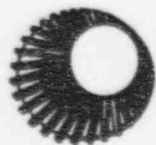
J. Thayer

- NUCLEAR OVERSIGHT

D. Goebel

- CLOSING

B. Kenyon



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Site Topics

- Self-Assessment
- Performance Indicators

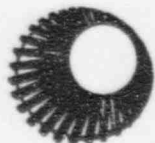
J.P. Cowan

- Nuclear Safety
- Raising Standards

M. Bowling

- Corrective Action Program
- Configuration Management

J. McElwain



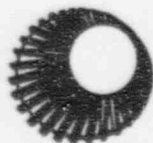
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Recovery Plans Overview

John Paul Cowan

Recovery Officer - Millstone Unit 3



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Millstone Recovery Plans

3-Phase Approach Focused on Results

- Readiness-for-Restart
- Startup and Power Ascension
- Performance Improvement Plan



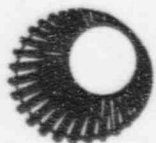
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Recovery Plan

Elements of Readiness in each Phase:

- **System**
- **Organizational**
- **Operational**
- **Regulatory**
- **Communications**



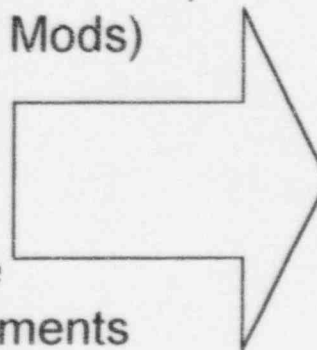
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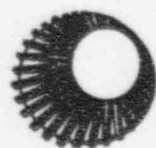
Readiness-for-Restart Schedule

Engineering Action Plan
Work Backlogs
Plant Design Changes
FSAR
Technical Specifications
Technical Review Manual
Licensing Commitments
Calculations
Drawings
Standards
Vendor Information
10CFR50.59 Changes
Design Basis Documents

Operator Burdens (Workarounds)
Bypass Jumpers (Temp Mods)
System Walk-downs
Surveillance Testing
Plant Procedures
Preventive Maintenance
System Specific Assessments
Corrective Action Program
Self-Assessment Program
Work Backlogs
Regulatory Strategy
Plant Modifications
Oversight Activities



**Operational
Readiness
Schedule**

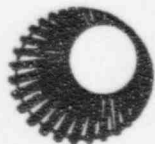


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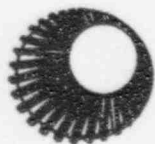
Self-Assessment

- **Line Management Critical Review Using Industry and External Operating Experience**
- **Key to Measurement of Recovery Plan Subjective Areas**
- **Measure Success of Communications and Expectation Achievement**
- **Permeates Recovery Plan -- Each Phase**



Performance Indicators

- 15-20 High-Level Overall Indicators
- Supported by Lower-Level Indicators
- Some Unit Specific Indicators
- Targets for Indicators for Each Phase of Recovery Plan

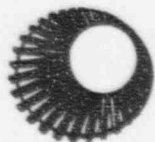


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Performance Indicators

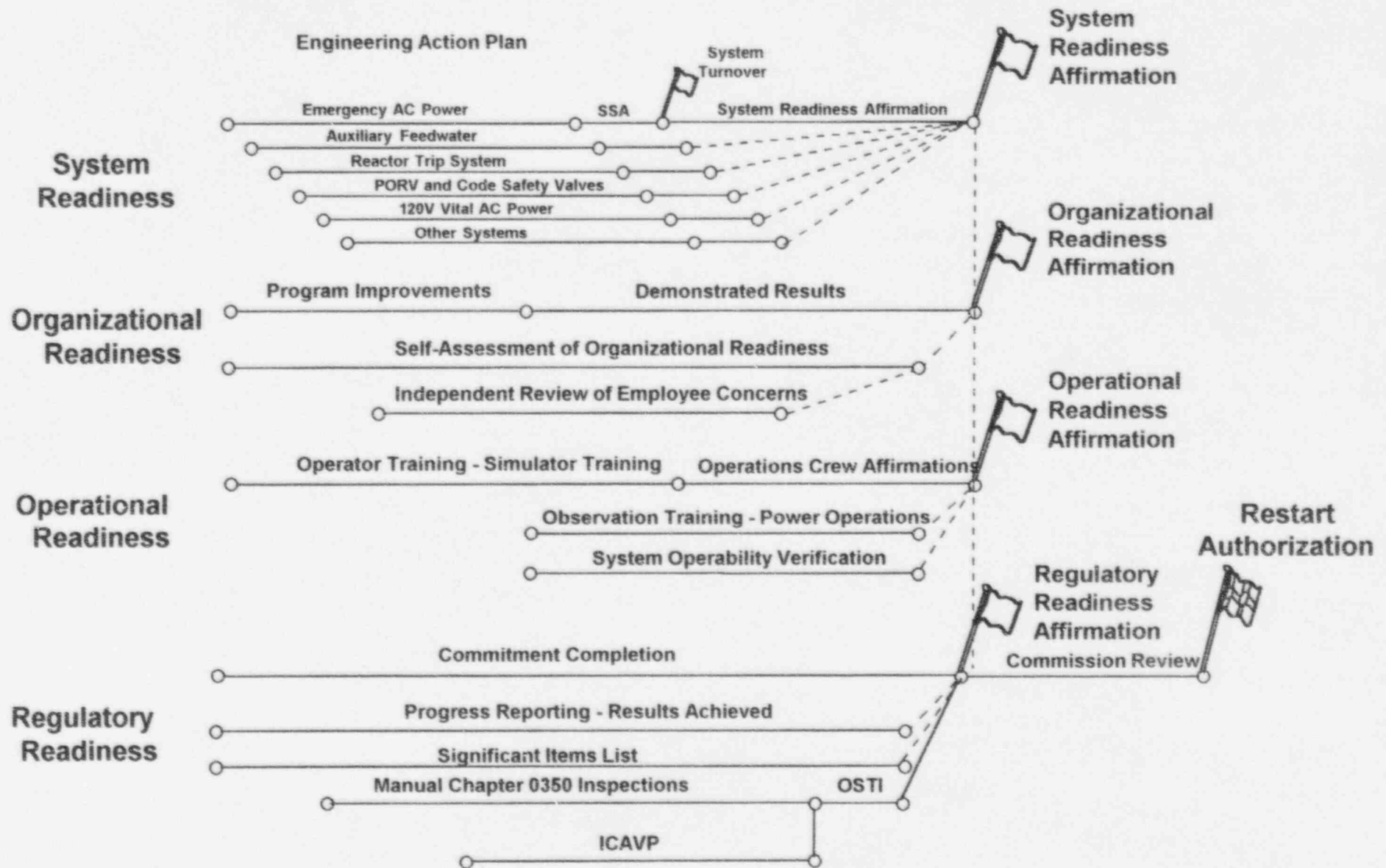
- Work Order Backlog
- Operator Work Arounds
- Temporary Modifications
- Adverse Condition Reports (ACR)
- System Affirmations
- Program Indicators (19 Programs)
- Modification Completion
- Control Room Annunciators and Deficiencies
- Open NRC Commitments
- Work Schedule Completion
- License Amendments
- Procedure Revisions



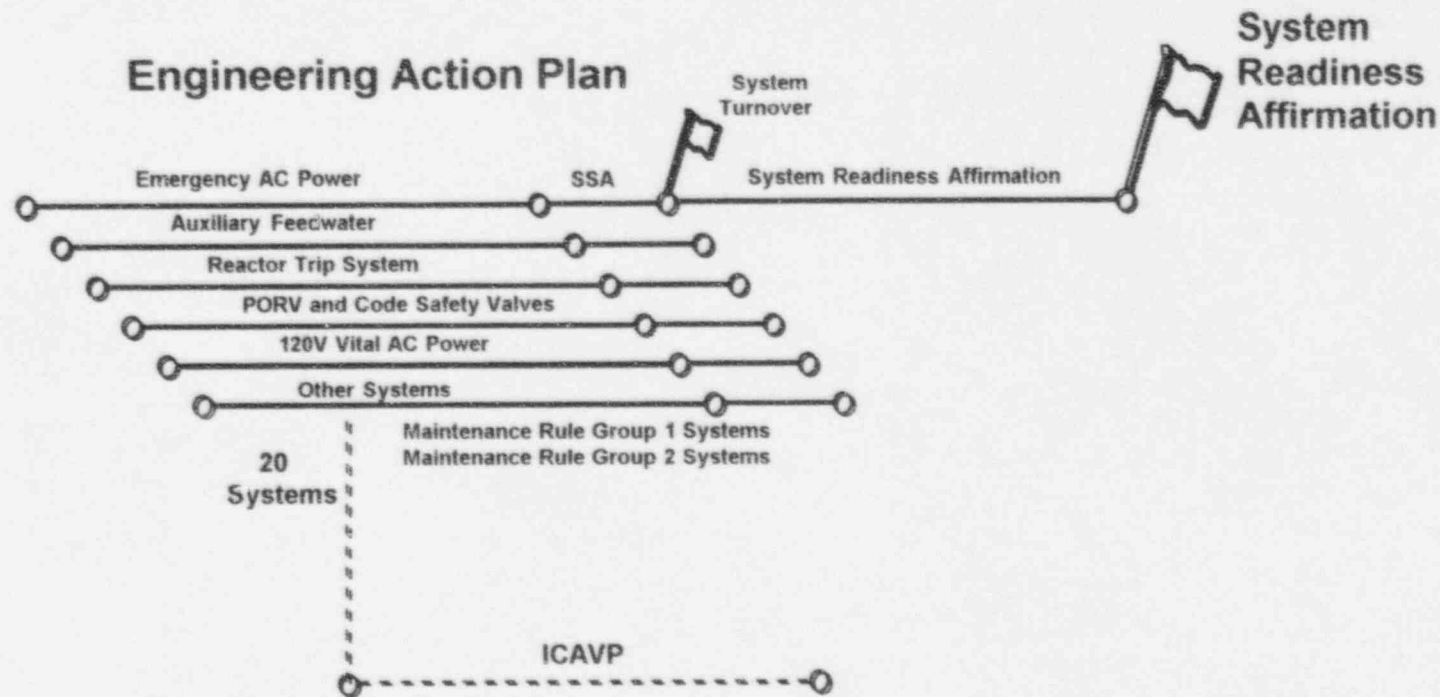
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Readiness-for-Restart



System Readiness



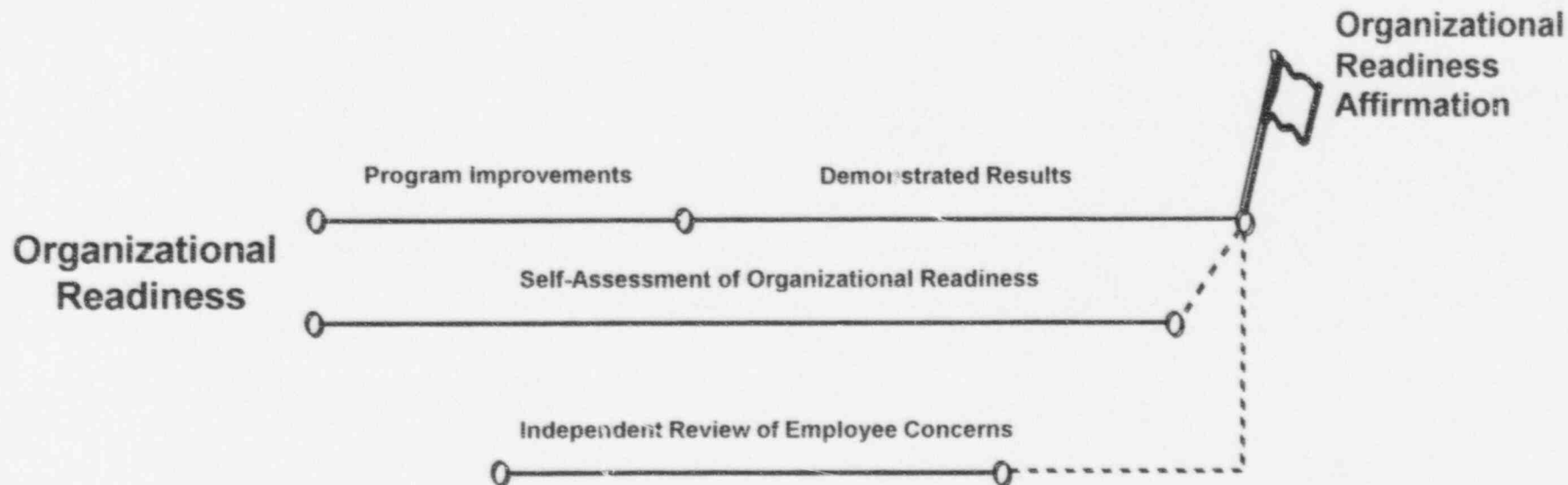
Engineering Action Plan

FSAR	Design Basis Document Packages
Calculations	Licensing Commitments
Drawings	Technical Requirements Manual
Procedures	Accident Analysis
Technical Specifications	Vendor Information
Codes and Standards	Surveillance Testing/Inspections
Preventive Maintenance	Generic Letters/Bulletins/IN
Chg. Documents (inc. 50.59)	Specifications
Temporary Modification	Walkdowns
Engineering Programs	Operator Workarounds
Corrective Action Effectiveness	

System Readiness Affirmation

Materiel Condition
 License/Design Basis
 Operating Procedures
 Maintenance Procedures
 Testing Procedures
 Corrective Maintenance Backlog
 Engineering Backlog

Organizational Readiness



Program Improvements

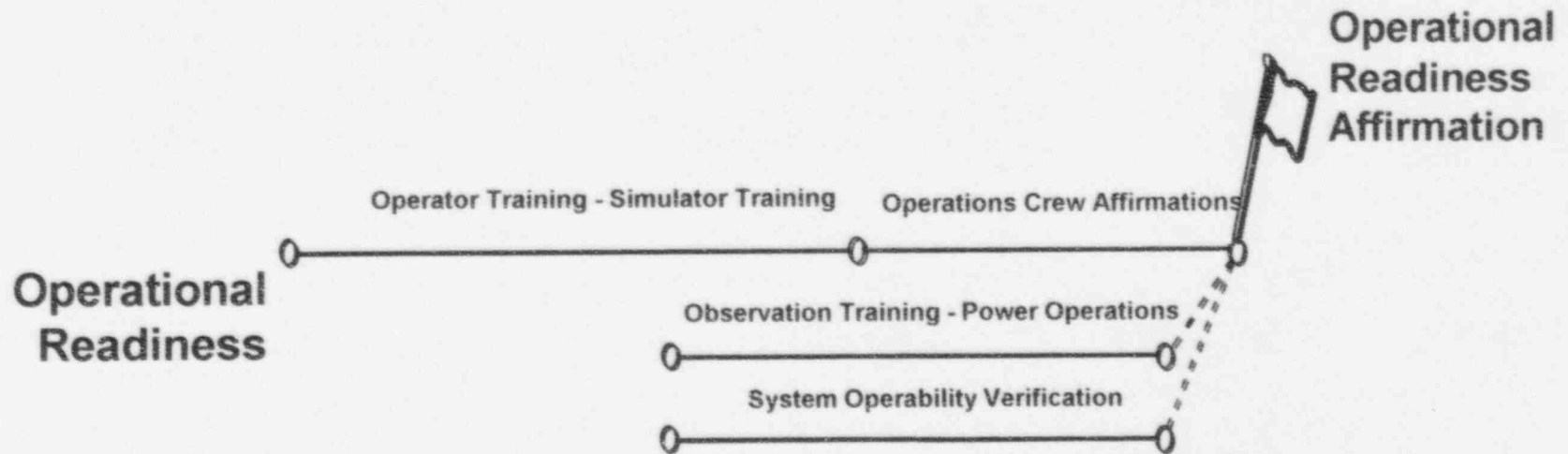
Nuclear Safety/Reactivity Management
 Leadership Development
 Employee Communications/Concerns
 Corrective Action Effectiveness
 Self-Assessment Effectiveness
 Procedure Compliance
 Work Management

Configuration Management/Design Control
 Nuclear Oversight
 Reg. Reporting & Completeness

Demonstrated Results

Key Performance Indicators
 Commitment Accomplishment
 Increased Self-Identification of Deficiencies
 Violations Decreasing
 Timely and Accurate Regulatory Reporting
 Improved Schedule Adherence
 Decreased Employee Concerns

Operational Readiness



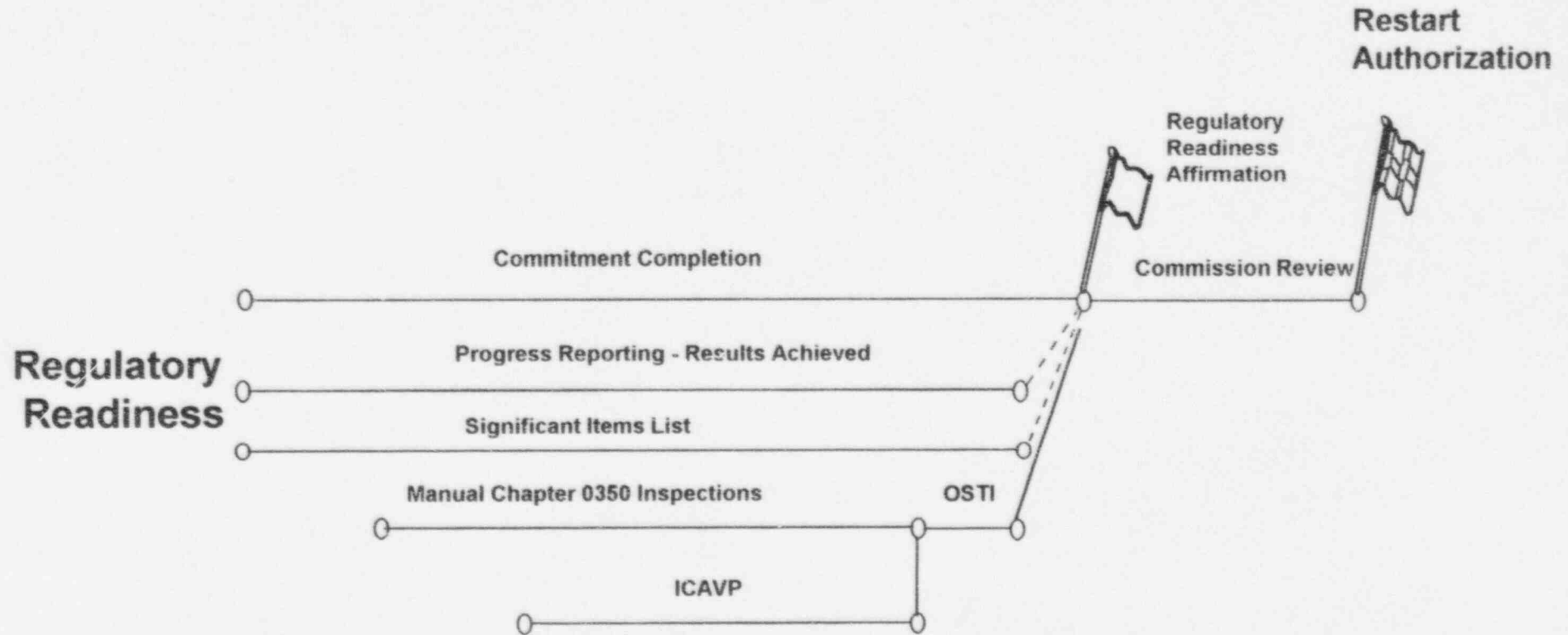
Shift Crew Training

Reactor Startup
Plant Startup
Power Operations
Abnormal Operating Procedures
Emergency Operating Procedures

Operations Crew Affirmation

Training and Qualifications
Shift Staffing
System Operability
Plant Material Condition

Regulatory Readiness



Key Reasons These Plans are Different

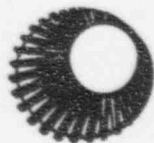
- **Results Achieved vs. Activities Done**
- **Parallels Similar Successful Nuclear Recoveries**
- **Key to Success - People in a Positive Environment**
- **Long-Term Focus vs. Short Term Objectives**
- **New Leadership**

Unit 2

Operational Readiness Plan

Marty Bowling

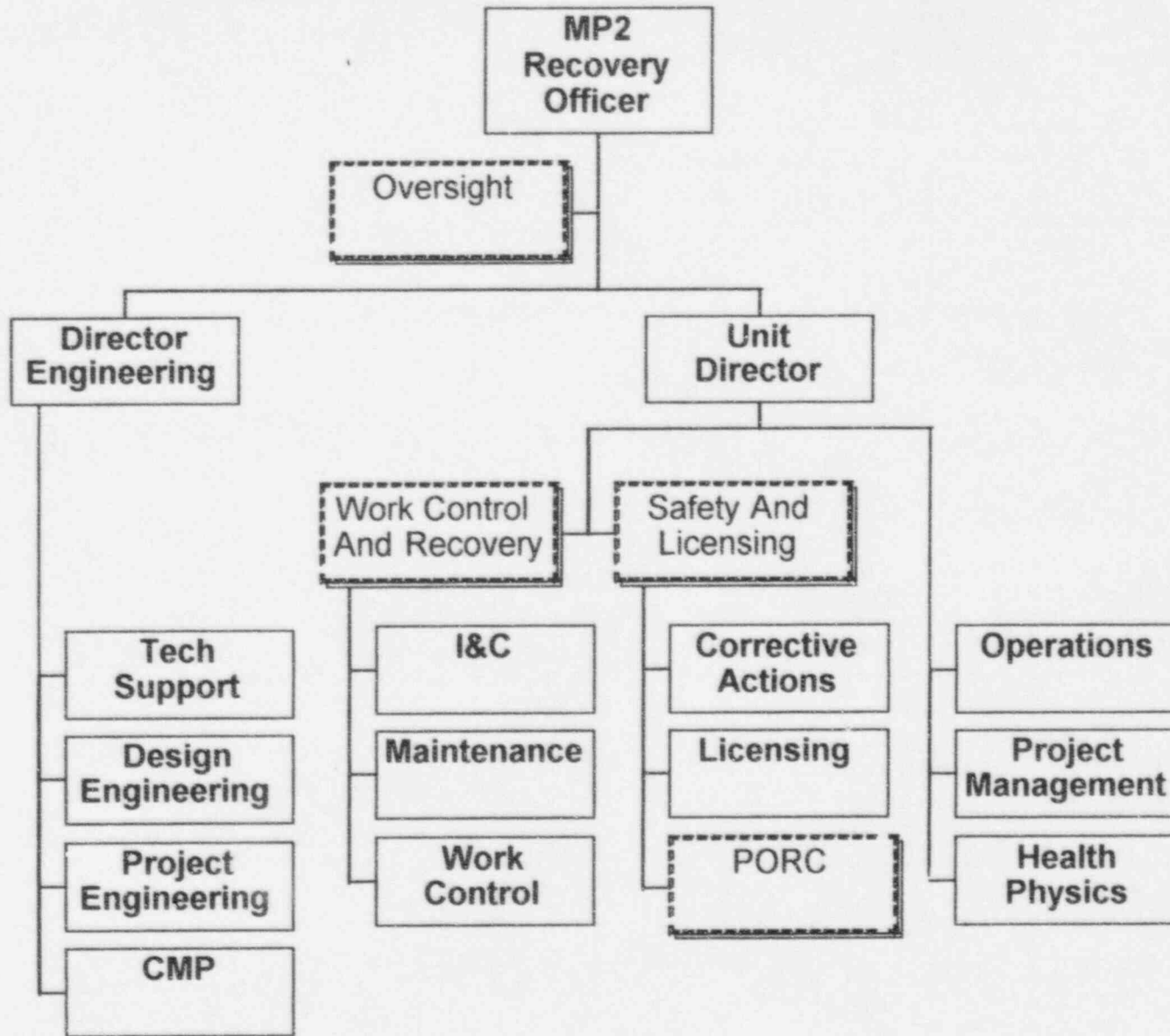
Recovery Officer - Millstone Unit 2



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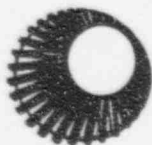
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MP2 Recovery Organization



Organizational Readiness

- **Refocused Organization on Nuclear Safety and Corrective Actions**
- **Nuclear Safety Policy**
- **Raise Standards**
- **Corrective Action Program**

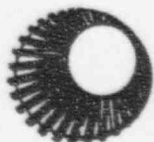


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Nuclear Safety Policy

- **Profound Respect For The Reactor Core**
 - defense-in-depth
 - conservative decision making
- **Will Provide Guidance for Conservative Decision Making**



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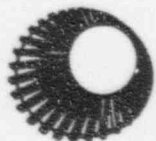
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Raising Standards

- **Leadership Development**
- **Departmental Excellence Plans and Self-Assessment**
- **Technical Procedure Group Enhancements**
- **Coaching**
- **Human Performance Enhancement System (HPES)**
- **Utilization of INPO Assistance**
- **Training**
 - *50.59*
 - *Human Error*
 - *Self-Assessment*
 - *Observation*
 - *Root Cause*
 - *First Line*

Measuring Organizational Readiness

- Level 1 Management Accountability System
- Unit Performance Indicators
- Organizational Readiness Self-Assessment

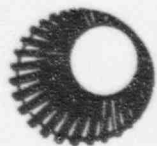


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System Readiness

- **Configuration Management**
- **Physical Readiness of Plant**

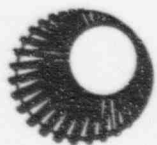


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Major Maintenance

- Main Generator Stator Repair
- Replace "C" RCP Seal
- "A" and "B" LPSI Motor Inspection/Overhaul
- Repair 2-SI-645 LPSI Injection Valve
- HPSI Pump Overhaul

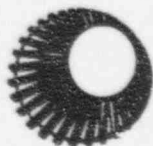


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Major Modifications

- RBCCW Intersystem LOCA Rupture Disk Modification
- Pressurizer Level Modifications
- Containment Radiation Monitor Isolation Modifications
- Hydrogen Sampling/PASS Design Mods
- Repower Hydrogen Purge Containment Isolation Valves



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Regulatory Readiness

- Actions necessary to restore full compliance to NRC regulations and 10CFR50 Appendix B will be completed
- Meet open LER commitments
- Respond to 10 CFR 50.54(f)
- Demonstrate compliance with 10CFR50.46 for large-break LOCA model



Operational Readiness

- **Conduct Special Testing and Inspection**
- **Review and Incorporate Relevant Industry Operating Experience**
- **Resolve Aux Bldg Ventilation, Heatup/Cooldown and Water Hammer Issues**
- **Conduct Simulator Training for Heatup and Startup**
- **Perform Readiness Assessments for each Mode Change**
- **Conduct Operational Readiness Review**

Conduct Special Testing and Inspection

- **Steam Generator Tubes ECT**
- **CEDM housing nozzle crack inspections**
- **RBCCW Full Flow and Balancing Testing**
- **Service Water Heat Exchanger Testing**
- **“B” HPSI Pump Curve Verification**
- **MOV's**
- **LPSI Injection Valves**

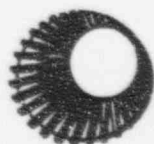


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Communications Readiness

- Convey high standards and expectations
- Reestablish employee credibility and trust of management by listening and then resolving issues
- Develop teamwork and organizational buy-in
- Convey sense of progress and accomplishment

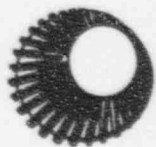


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Milestone Schedule

- Mode 6 12/96
- Fuel Offload 1/97
- CMP Self-Assessment Q1
- ICAVP Q2
- 50.54f Response Q3
- Organizational Readiness
Self-Assessment Q3
- Operational Readiness
Self-Assessment Q3
- Restart Readiness Q4



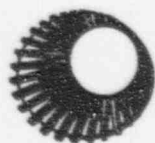
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Unit 3 Recovery Plan

Mike Brothers

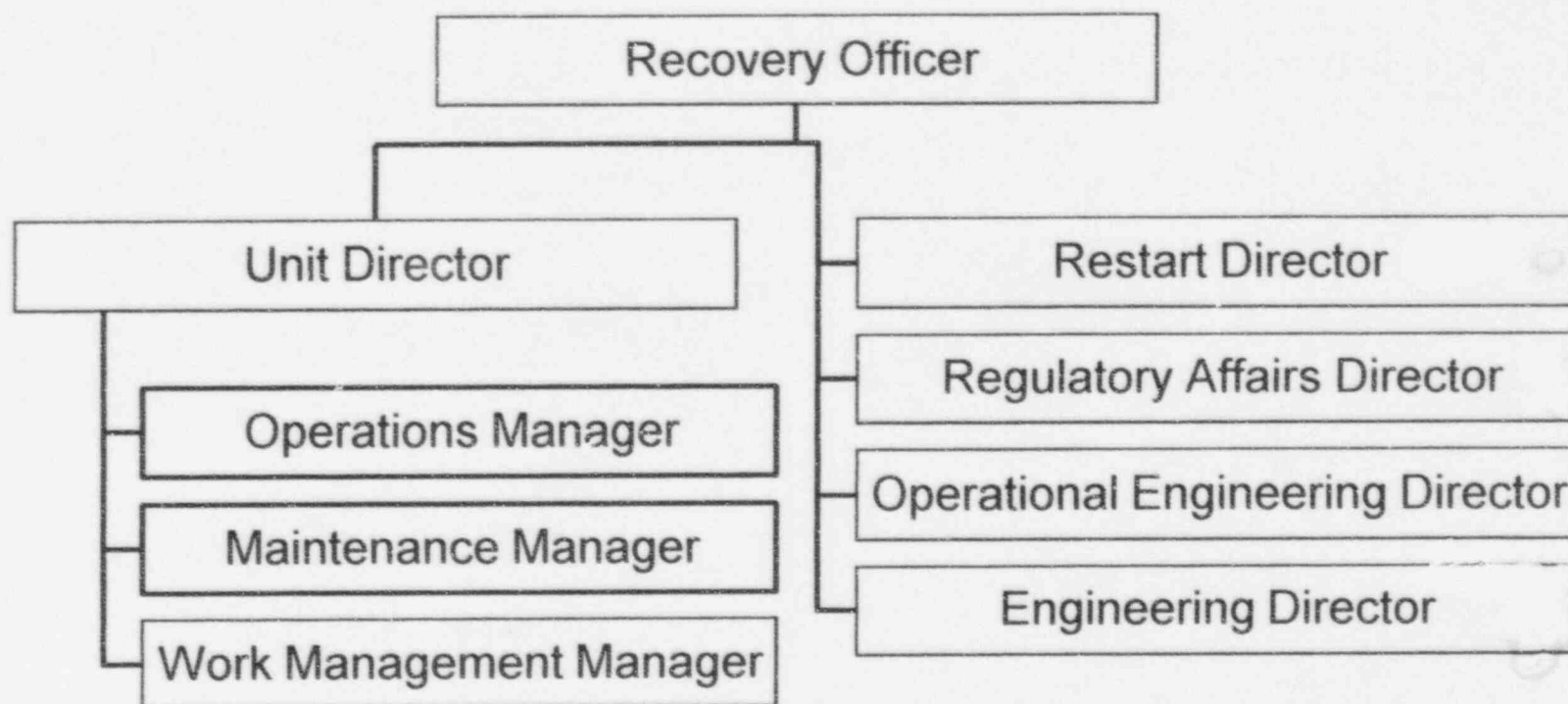
Unit Director Millstone 3



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Unit 3 Recovery Organization



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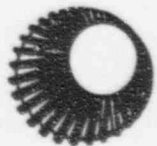
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System Readiness

- **Engineering Action Plan**
 - *Configuration Management Plan*
 - *Maintenance Rule Group 1&2 systems*
 - *restore license/design basis*
- **System-Specific Assessments**
 - *system verification of License/Design Basis*
 - *pre-determined sampling methodology*
- **Materiel Condition**
 - *engineering backlog*
 - *corrective maintenance backlog*

Major Maintenance

- Generator Stator Cooling Epoxy Coating
- Reactor Coolant Pump Replacement
- Letdown Heat Exchanger Replacement



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Major Modifications

- **RSS / QSS / SIH Thermal Re-analysis**
- **ECCS Orifice Installation**
- **RHR / RPCCW Flow Control Valve Replacement**
- **Service Water Piping Modifications (MCC / Rod Control)**



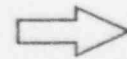
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Organizational Readiness

Improvements Made

First Quarter



Results Achieved

Before Restart

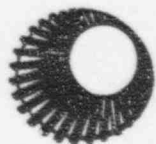
Improvement Examples:

- Engineering Roles and Responsibilities**
- Corrective Action Program**
- 10CFR 50.59 Process**
- Correspondence Validation**
- Maintenance Rule Implementation**
- Self-Assessment Program**

Operational Readiness

Self-Assessments and Improvements in:

- **Shutdown Risk Management**
- **Reactivity Management**
- **Shift Crew Training and Qualifications**
- **Power Operations Observation Training**
- **Classroom and Simulator Training**



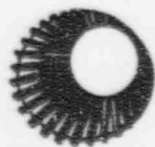
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Regulatory Readiness

Completion and Coordination of:

- **Commitment Validation**
- **MC 0350 Inspections**
- **Independent Review of Employee Concerns**
- **Independent Corrective Action Verification Program**
- **Operational Safety Team Inspection**
- **Staff and Commission Review**



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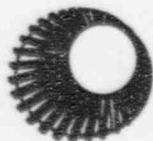
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Communications Strategy

- **Three Communications Interfaces**
 - *employee*
 - *regulator*
 - *community*
- **Strategy Includes**
 - *written plan and schedule*
 - *regular progress updates*
 - *consistent key indicators*
 - *management / supervisory communications*

Overall Screening Criteria

- Conditions affecting operability, reportability or reliability of risk and safety significant systems
- Regulatory compliance
- Required changes to Technical Specifications
- Affects FSAR
- Impacts Operations critical drawings



ISP Integration

	Communications	Leadership	Corrective Action	Procedure Use	Work Planning	Reactivity Mgmt	Operations
System			X				
Organizational	X	X	X	X	X	X	X
Operational					X	X	
Regulatory	X		X				
Communications	X						

Quarterly Milestone Schedule

First Quarter:

- | | |
|---------------------------------------|-------------|
| - Publish Schedule | December 27 |
| - Define Key Indicators | January 20 |
| - Establish Restart Indicator Targets | February 15 |
| - Complete Program Improvements | March 30 |

Operations

Maintenance

Engineering

Work Management

Second Quarter:

ICAVP

Third Quarter:

OSTI

Fourth Quarter:

Restart Readiness

Unit 1 Recovery Plan

Jack McElwain

Recovery Officer - Millstone Unit 1

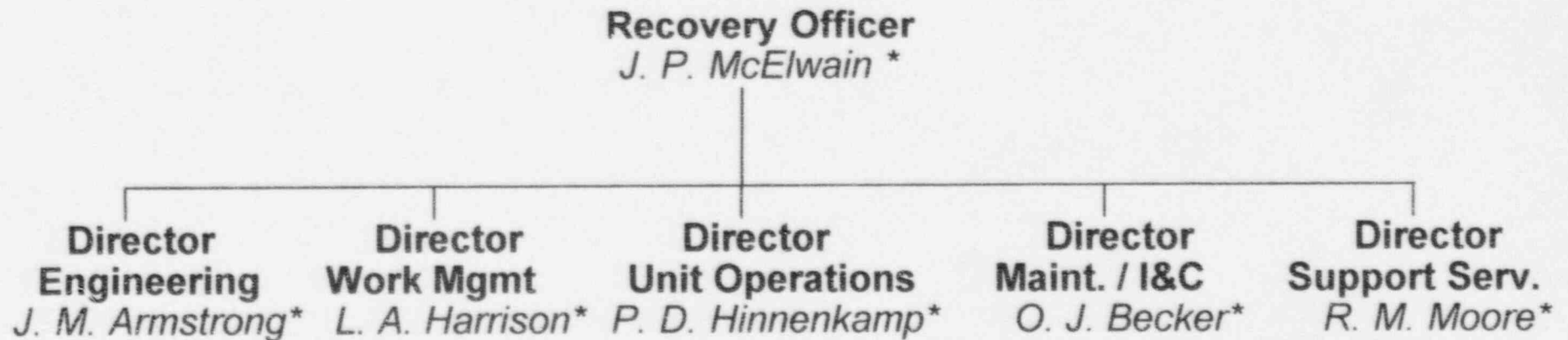


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Organizational Chart

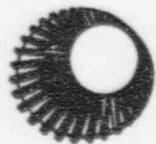
Millstone Unit 1



* On Loan from PECO Energy Company

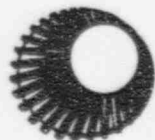
Organizational Readiness

- **Management Oversight**
 - *re-organization*
 - *raise standards*
 - *roles / responsibilities clarified*
- **PORC**
- **Corrective Action Process**
- **Procedures**
- **Work Management**



Corrective Action Program

- **Revise Corrective Action Process**
- **Train Employees to Ensure Understanding of Program**
- **Establish Strong Line Management Ownership and Accountability**
- **Quality and Timely Corrective Action Resolution**
- **Effective Issue Tracking and Trending**
- **Effective Commitment Tracking**

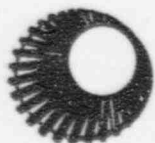


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System Readiness

- **System & Plant Readiness**
 - *restart modifications*
 - *CM / PM Scope*
 - *temp mods / operator work arounds/ NCRs*
- **Configuration Management**
 - *10CFR50.59 training*
 - *Design & Configuration Process*
 - *Design Changes in System Readiness*



Configuration Management

- Configuration Management Plan
 - design / licensing bases defined*
 - licensing commitments verified*
- Design Control Process Improvements
 - design control manual*
 - operations critical drawings*
- 10CFR 50.59 Process Improvements
- Engineering Skills Enhancements



Major Maintenance

- Recirculation Pump Shaft Replacement
- Reactor Feed Pump Overhaul
- Service Water Pipe Replacement

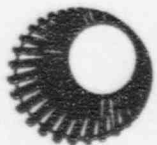


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Major Modifications

- Intake Structure Ventilation Upgrade
- USI A46 Relay Program Upgrade
- IGSCC Counter Measures
- NRC Generic Letter 89-10 Initiatives

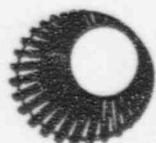


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Operational Readiness

- Licensed Operator Training Program
- Shift Crew Evaluation
- Operational Standards Manual
- Shift Manager Role Enhancement
- Upgrade Off-Normal Procedures

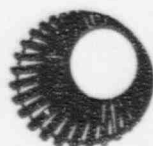


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Regulatory Readiness

- License Amendments
- NRC Commitments
- Regulatory Communication Enhancements
- ICAVP Scheduling



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Communications

- All-Hands Meetings
- Supervisor Meetings
- Management Observation
- Employee Surveys

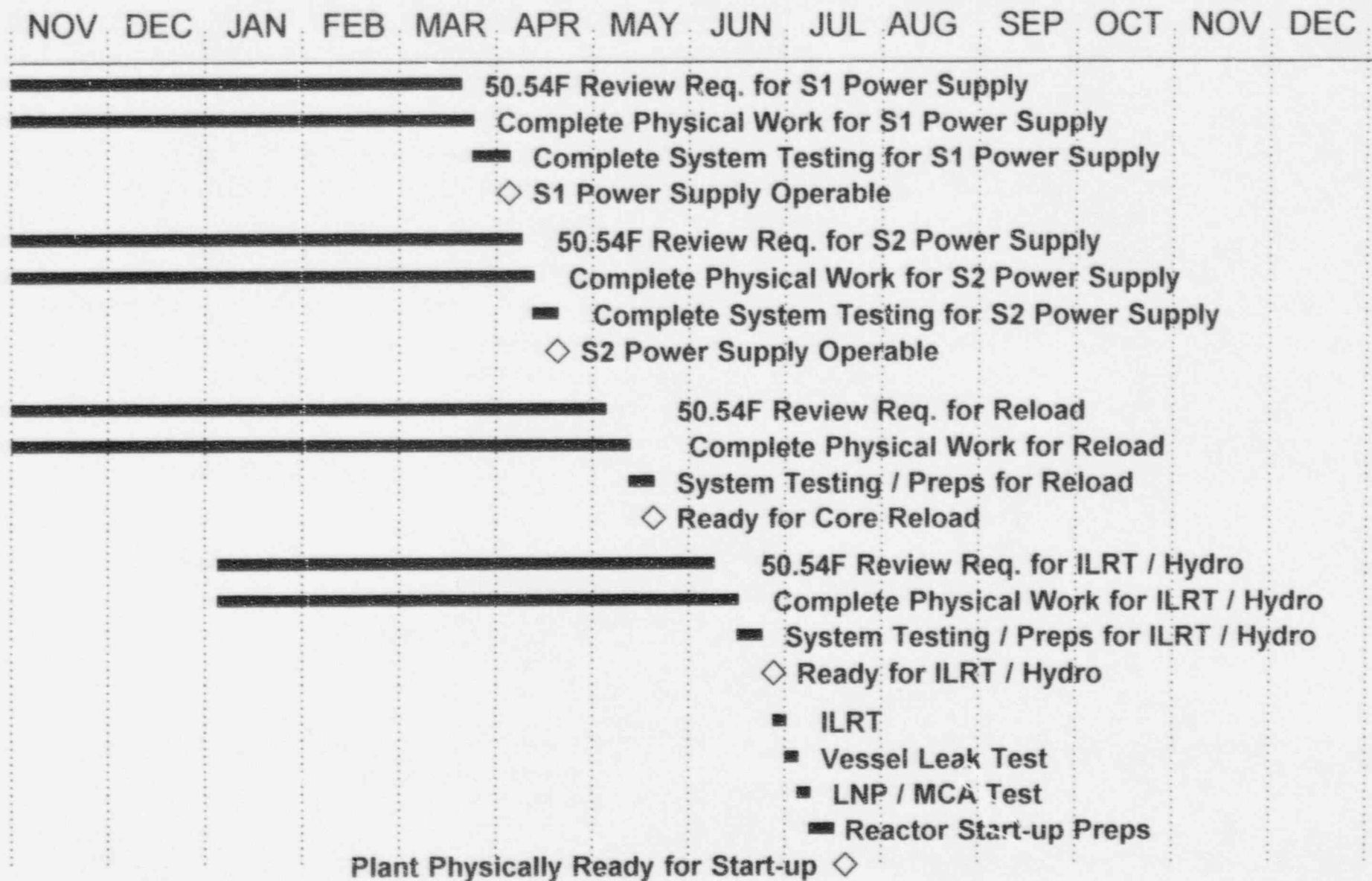


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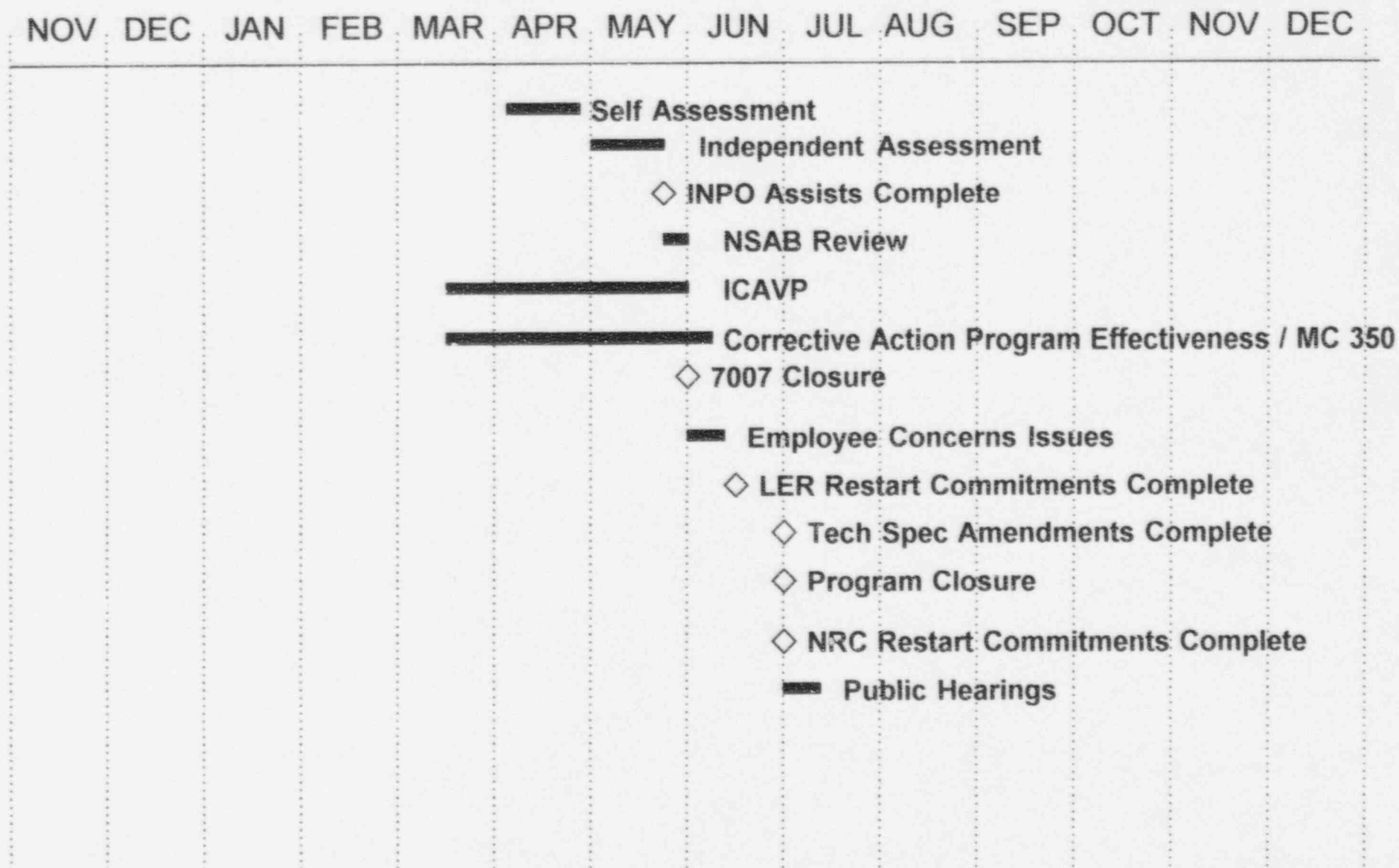
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Milestone Schedule

Physical Plant Completion

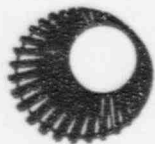


Milestone Schedule Regulatory / Program Issues



Milestone Schedule

- ICAVP 3/97
- Phase I Refueling Systems 5/97
- Phase I Start-up Systems 7/97
- OSTI Q2
- Restart Readiness Q3



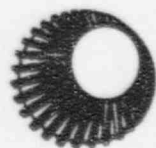
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Nuclear Engineering and Support

Jay Thayer

***Recovery Officer - Engineering
and Support***

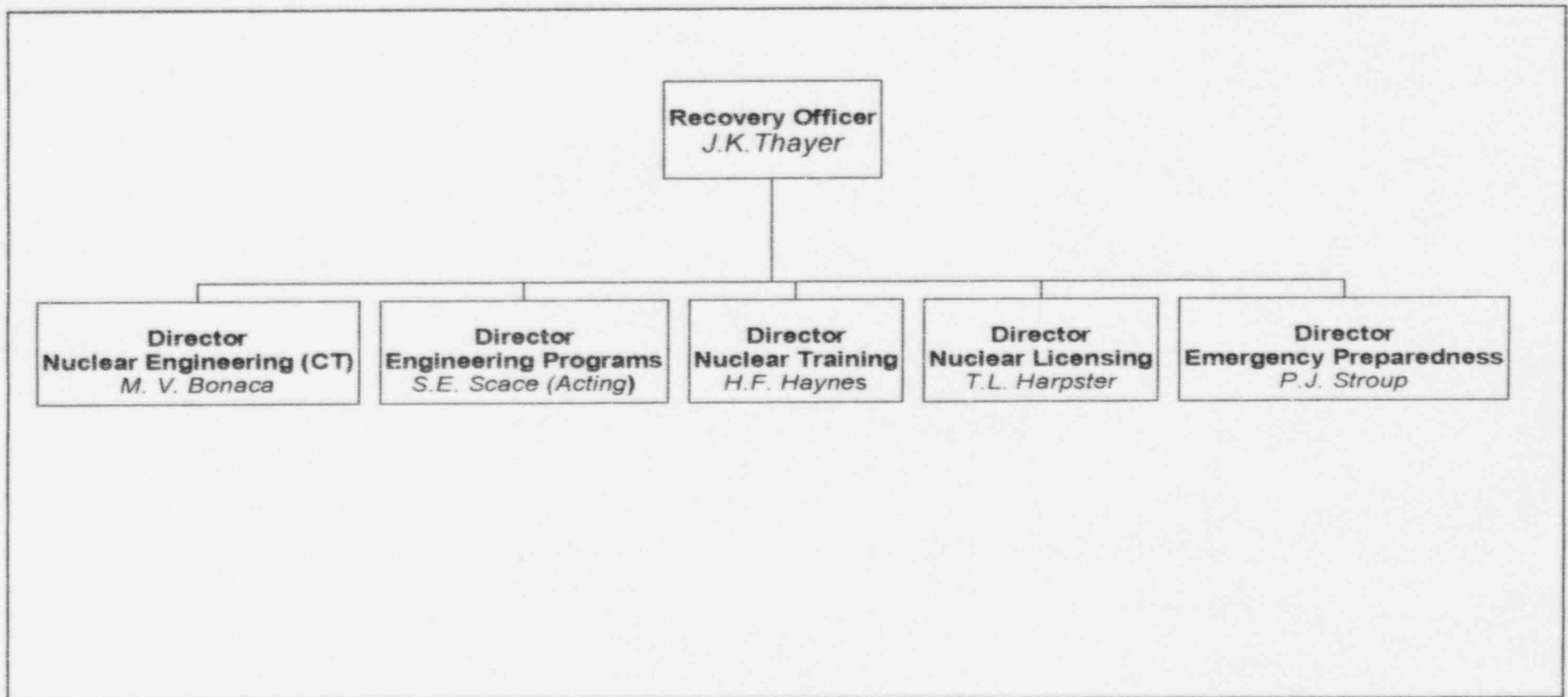


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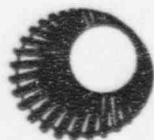
Organizational Chart

Nuclear Engineering and Support



Objectives

- **Integrate Engineering and Support Recovery Activities with Unit Recovery Plans**
- **Benchmark Site Programs with Industry Best Practices**

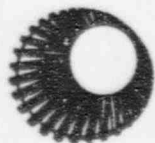


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Licensing

- **Unitize Regulatory Compliance**
- **Line Accountability for Commitments**
- **Central Group for Site / Generic / Strategic Issues**
- **Reinforce Roles and Responsibilities via Communications Plan**

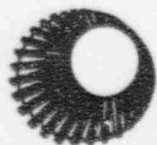


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Engineering Programs

- Delineate Responsibilities Between Units and Programs Group
- Develop Program Standard
- Benchmark against Industry Standards
- Provide Implementation Support to Units
- Joint Self Assessment of Performance

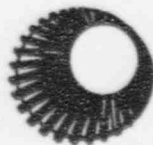


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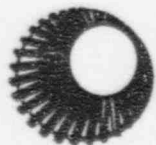
Training

- Improvement Plan initiated in October:
 - *instructor performance*
 - *licensed operator training*
 - *simulator performance*
 - *line ownership of training*
- Unit 1 License Training Experience
- Self assessment to determine additional enhancements



Emergency Planning

- Reorganization to Provide Focused Support to Units
- Evaluate Lessons Learned from CY and Millstone Exercises
- Integrate into Recovery Plan

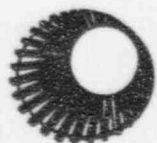


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Performance Measures

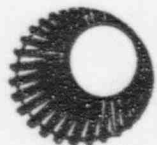
- Key Indicators:
 - *licensing*
 - *engineering programs*
 - *training*
 - *emergency planning*
- Align with Unit Indicators



Recovery Plan for Nuclear Oversight

Dave Goebel

Vice President Nuclear Oversight



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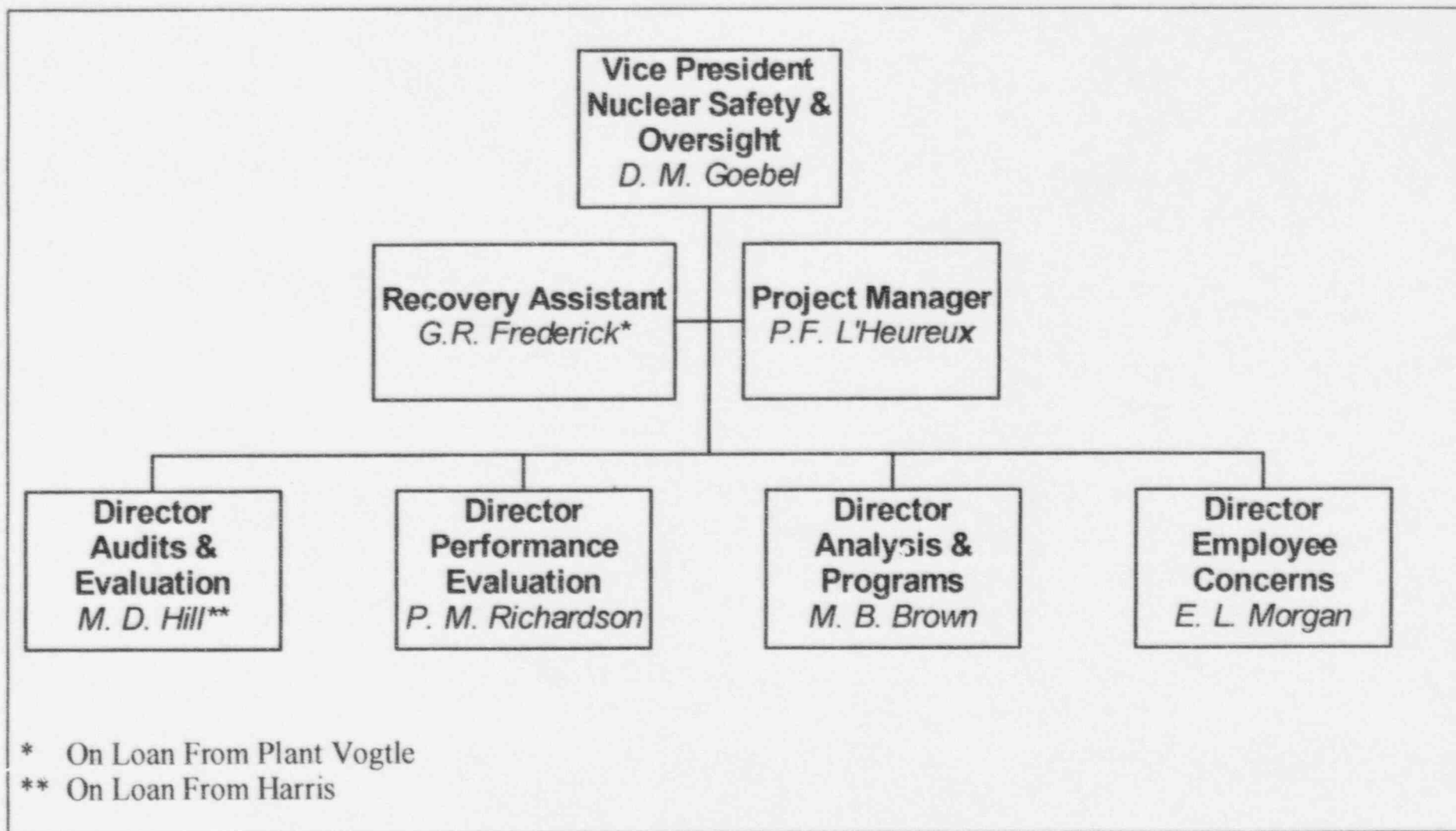
Recovery Plan Purpose

- **Implement an Oversight Organization that Will Effectively Identify and Pursue Correction of Conditions Adverse to Quality.**
- **Identify Actions to Increase the Effectiveness of the Line and Support Organizations, the NSAB, and the Employee Concerns Program.**



Organization Chart

Nuclear Oversight

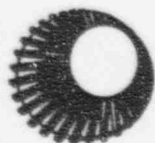


Recovery Plan Objectives

- 1. Effective Oversight Organization.
(Organizational)**
- 2. Enhance ability to identify and correct conditions adverse to quality. (System)**
- 3. Oversee unit recovery activities. (Operational)**
- 4. Effective Employee Concerns Program.
(Organizational)**
- 5. Effective NSAB.**
- 6. Oversight of support org. recovery activities.**
- 7. Transition quality functions, analysis, and self assessment into the Line organization.**

Objective #1

**Implement an Oversight Organization to
Provide Oversight of NU Nuclear Units.**

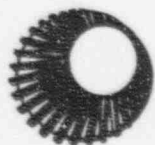


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Objective # 2

**Enhance the Ability of NU Nuclear
Line Individuals, Work Groups,
Supervision and Management to
Identify and Correct Conditions
Adverse to Quality**

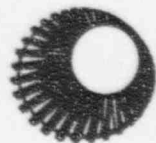


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Objective #3

**Provide Oversight of NU Nuclear Unit
Recovery Activities.**



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Objective #4

**Develop and Implement an Effective
Employee Concerns Program (ECP).**



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Objective #5

**Enhance the Effectiveness of the
Nuclear Safety Assessment Board
(NSAB) and Its Subcommittees.**

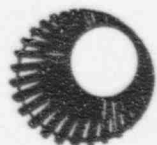


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Objective #6

**Provide Oversight of NU Nuclear
Support Organizations (*Work Services
and Nuclear Engineering and Support*)
Recovery Activities.**

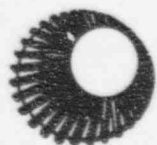


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Objective #7

Begin a Continuous Improvement Process Which Will Transition Quality Functions, Analysis, and Assessment of Staff Activities Into the Line Organization.



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Performance Indicators

- # of Nuclear Oversight prepared ACRs
- # of Unit Self Identified Deficiencies vs. Total # of Deficiencies
- Audit and Surveillance Schedule Compliance
- Trending from Employee Surveys
- Training and Development Effectiveness Measures



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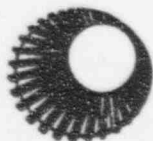
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Schedule

- **Organization Established** 12/9/96
- **Oversight Recovery Plan Approved** 12/11/96
- **Independent Assessment of Oversight** TBD
- **Oversight of Line Activities**
Continuous Improvement TBD

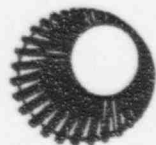
Current Status

- **New Organization Defined and Key Managers Chosen**
- **Recovery Plan Developed and Approved (Revisions Will Address Emerging Issues)**
- **Employee Concerns Program in Development**
- **Closure of Objectives will be Based on Effectiveness Evaluation (KPIs and Independent Assessment)**



Closing Remarks

Bruce Kenyon



Northeast
Utilities System

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