

435 NORTH MICHIGAN AVENUE  
CHICAGO, ILLINOIS 60611-4041

FOIA/PA REQUEST

Case No:

97-0004

Date Rec'd:

1-7-97

Action Off:

Pugh

Related Case:

TELEPHONE  
312/222-3292

Nuclear Regulatory Commission  
Freedom of Information Branch  
Washington, D.C.  
BY FAX

January 6, 1997

To the branch director:

This is a request under the Freedom of Information Act as amended (Title 5, U.S. Code, Section 552).

I wish to obtain copies of all documents pertaining to the 1996 Independent Self Assessment at Commonwealth Edison's LaSalle and Zion Nuclear Power Stations.

This would include, but not be limited to, electronic notes, memoranda and/or e-mail compiled or sent after a December 13 exit meeting between the utility and the assessment team. NRC staff was present at the meeting.

If all or any part of my request is denied, please list the specific exemptions on which you are relying to withhold the information. If you determine that portions of the requested material are exempt from release, I will expect, as FOIA requires, that you provide me with the non-exempt portions.

I am prepared to pay search fees and copying costs up to \$50 for the requested material, but ask that you waive any such fees.

If you have any question concerning this request, please call me at (312) 222-3296.

Sincerely,

Peter Kendall

Reporter

Chicago Tribune

435 N. Michigan Ave.

Chicago, IL 60611

Voice: 312-222-3296

FAX: 312-222-4674

(Please phone before faxing.)

## INDEPENDENT SELF-ASSESSMENT OF ZION AND LASALLE

In response to the many issues raised by the Zion E&TS inspection and the recent LaSalle AIT, ComEd initiated an Independent Self Assessment (ISA) of Zion and LaSalle stations on October 21.

- The ISA will use performance based evaluation techniques to assess both past and present performance (approximately two years).
- The assessment process will generally model the NRC IPAP process.
- The ISA will be conducted in three phases: document review (October 21-November 8); site visits (November 11-22); and analysis (December 2-January 6, 1997). The final report will be completed by January 17.
- The ISA team will be structured to allow a single integrated team to perform an assessment at both Zion and LaSalle.
- The ISA will be supplemented on-site by part-time members from INPO and industry peers. Part-time members will be current managers or individuals with experience in assessing specific performance areas.
- Team makeup: team leader, assistant team leader, support administrator, operations and training (1 full time, 2 part time), maintenance and testing (1 full time, 2 part time), E&TS (2 full time, 2 part time), plant support (1 full time, 2 part time), and management and organization (1 full time, 2 part time).
- Six members of core team: Team leader is Warren Fujimoto, former vice president, Diablo Canyon Operations and plant manager; Assistant team leader, Jack Sieber, former Sr. vice president and Chief Nuclear Officer of Duquesne Light Company's Nuclear Power Division; other members are Fred Dacimo, former vice president of Nuclear Operations at Northeast Utilities; Harry Kister, involved in power plant self-assessments since 1987; John Durham, participated in several self-assessments of nuclear power plants across the country; and Benjamin Dow, former nuclear services manager of Arkansas Power and Light.

## Zion

### ISA Exit Notes

Main Comment - Performance declining and plant is at the crossroads. Can either shut down or become a top performer.

#### 1. Plant Support

- Material condition not good
- Housekeeping not good
- Large source term
- Substantial backlog
- Larger portions of plant contaminated
- plant events higher than most plants

#### Chemistry

- Lab capability strong

#### GSIP

- Performs well
- Should be under training dept. not RP
- Ops support center susceptible to releases, not shielded or filtered

#### FP

- Meets min requirements of license
- 40 outstanding FP issues dating back to 1990

#### RP

- ALARA program not working well
- Emergent work > 50 percent
- Hot spots need attention
- 33,000 sq ft of contaminated areas, 4-5000 normal
- Housekeeping in contaminated areas bad
- Root cause of contaminated areas mainly material condition
- RP department making progress, but RP practices are weak

#### Security

- Adequate to meet the requirements - minimally
- Low morale
- Excessive OT

#### 2. Maintenance

- Recent initiatives good but will only maintain performance were it is currently
- Personnel are still in denial

- Absence of a performance improvement plan
- 50 percent emergent work, normal about 10
- 2200 action requests in backlog
- Don't have a handle on preventive maintenance
- Expectations and standards have inhibited performance improvement
- Inefficient work control process causes worker frustration
- Lack of ownership of work control system by other departments

3. Engineering

- Significantly below that of good performers
- Concentrating on short term emergent work
- Backlogs have doubled in the past year
- Proactive system engineering program has not been established
- Design basis / licensing basis not current
- Leadership not effective
- Lack of strong engineering teamwork
- Resources not dedicated
- Weak safety culture
- Inadequate safety reviews
- Inability to correct long term problems
- Not self critical
- Lack of understanding what a robust corrective action program can do
- Not positioned to be technical conscience of the station

4. Operations

- Lack of an understanding of what operational excellence is
- Operations Performance Improvement Plan misses human performance
- No teamwork between management ranks and management and the bargaining unit
- Poor line ownership of training
- Need to become more conservative in operations - lack of conservative decision making
- Long standing acceptance of sub standard performance
- No incentive for operators to go to management and loose bargaining unit protection

5. Organization and Management

- Corporate and station management have not instilled a safety culture at Zion
- Low standards of performance have been accepted
- All levels have not exhibited leadership and accountability

Zion Versus LaSalle Independent Self Assessment Concerns  
(NRC residents' notes from ISA exit meetings)

Performance Area	Zion	LaSalle
Operations	<ul style="list-style-type: none"> <li>● Lack of understanding of what operational excellence is</li> <li>● Operations performance improvement plan misses human performance</li> <li>● No teamwork between management ranks and management and the bargaining unit</li> <li>● Poor line ownership of training</li> <li>● Need to become more conservative in operations-lack of conservative decision making</li> <li>● Long standing acceptance of substandard performance</li> <li>● No incentive for operators to go to management and loose bargaining unit protection</li> </ul>	<ul style="list-style-type: none"> <li>● Lack of understanding and buy-in for operations excellence (poor procedures, no self checking, poor supervisory oversight, standards not internalized)</li> <li>● Gap exists between management and workers (OT policy, workers won't write PIFs on fellow workers, submit problems to stewarts versus PIF, mistrust between management and workers)</li> <li>● Teamwork is lacking (operational plan doesn't address human performance, NSOs not participating in briefings, NSOs not identifying equipment problems, NSOs waiting for direction, STA roles misunderstood, poor change management, "me first" attitude)</li> <li>● Weak shift manager performance (Not setting safety conscience, training ownership not present, not accountable for crew performance, don't feel empowered)</li> <li>● Training environment not conducive to affecting change (Poor communication, weak simulator scenarios, poor procedures and standards)</li> <li>● Change management problems (Delivery of reorganization not done well)</li> <li>● Lack of accountability (Discipline difficult, difficult to confront one another on performance issues)</li> <li>● Missed surveillances</li> <li>● Failed 2 of 4 simulator scenarios (did not drive in rods on reactivity control failures)</li> </ul>

Maintenance	<ul style="list-style-type: none"> <li>● Recent initiatives good but will only maintain performance where it is now</li> <li>● Personnel still in denial</li> <li>● Absence of performance improvement plan</li> <li>● High emergent work</li> <li>● 2200 ARs in backlog</li> <li>● Don't have handle on PM</li> <li>● Expectations and standards have inhibited performance improvement</li> <li>● Inefficient work control process</li> <li>● Lack of ownership of work control process</li> <li>● Material condition not good</li> </ul>	<ul style="list-style-type: none"> <li>● Clear lack of teamwork (Not everyone taking ownership to solve problems; AOV, MOV and PM project management teams good, but need more examples of effective teamwork; problems fixed for short term; poor job of communicating problems within maintenance organization; top down mentality exists; workers don't trust management; programs started but not finished; workers not fully involved)</li> <li>● Maintenance performance indicators missing (Backlog not clearly defined, rework not measured and root causes not understood, perception that all PMTs fail)</li> <li>● Performance standards missing (Housekeeping, radios, pictures reflect on professional attitude)</li> <li>● Lack of first line supervisor involvement (Supervisors spending time doing someone's elses work, lack of coaching, technical support missing)</li> <li>● Missing solid and effective training program (Workers not specialized for jobs, focus on getting units online and making money)</li> <li>● Work control problems (About 2000 WR backlog, interface problem with 75% of packages returned and analysts and workers don't communicate, control of work scope not maintained, lack of ownership for program)</li> </ul>
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# Engineering

- Significantly below that of good performers
- Concentrating on short term emergent work
- Backlogs doubled in last year
- Proactive system engineering program not established
- Design and licensing basis not current
- Leadership not effective
- Lack of strong engineering teamwork
- Resources not dedicated
- Weak safety culture
- Inadequate safety reviews
- Inability to correct long term problems
- Not self critical
- Lack of understanding of what corrective action program can do
- Not positioned to be technical conscience of station

- Design and licensing basis issues (Not adequately defined and not always understood and implemented, calculations to address inaccuracies in loop instrument calibrations, high pressure scram calculation not conservative, design deficiencies existed since 1980s, P&IDs not accurate, UFSAR review ongoing, unauthorized modifications implemented through work process)
- Engineering work quality (Not thorough and accurate, numerous PIFs, inadequate evaluations - scope and information, engineers don't recognize the degree of problems)
- Safety evaluations are inadequate (ISEG identified 40% reviewed were deficient, no technical justification for service water operability, FCRs increasing)
- Ineffective system engineering program (Program not being implemented, no monitoring or trending, reactive mode-not being managed, limited qualified system engineers, operational experience assessment program is not being effectively implemented)
- Problems with effectively managing engineering work (1200 ERs and 300 S/U issues, high engineering backlog with size likely unknown, not prioritized, engineering not committed to completion, performance indicators do not adequately reflect actual conditions)
- Past engineering leadership was weak and did not provide high standards
- Resources were not properly allocated (deferred design basis review program, instrument inaccuracies not addressed, longstanding equipment problems not fixed, design and licensing basis not understood)
- No sense of urgency to fix problems and lack of teamwork

Radiological Controls	<ul style="list-style-type: none"> <li>• Large source term</li> <li>• ALARA not working well</li> <li>• Large portions of plant contaminated/hot spots need attention</li> <li>• Housekeeping bad</li> <li>• RP department making progress but RP practices weak</li> </ul>	<ul style="list-style-type: none"> <li>• On positive side, RF organization created atmosphere of camaraderie and trust which was conducive to getting work done</li> <li>• Maintaining low worker exposures is a problem (high worker dose, high source term, numerous hot spots, cobalt reduction program going slow, much rework)</li> <li>• Low standards for accepting maintenance (not creating leak tight standards)</li> <li>• Good RP practices missing</li> <li>• RP training not efficient</li> <li>• RP technicians don't document poor practices and are not held accountable</li> </ul>
Chemistry	<ul style="list-style-type: none"> <li>• Strong lab capability</li> </ul>	<ul style="list-style-type: none"> <li>• Equipment and practices considered a strength</li> <li>• Corrosion program is missing (Implemented water biocide injection too late and slow to implement corrective actions, service water piping not assessed, no decision on hydrogen treatment of RCS leading to potential core shroud cracking)</li> </ul>
Emergency Preparedness	<ul style="list-style-type: none"> <li>• GSEP performs well</li> <li>• Operations Support Center not shielded or filtered</li> </ul>	<ul style="list-style-type: none"> <li>• Met tower doesn't meet RG 1.23</li> <li>• Lack of priorities and aggressiveness in pursuing issues</li> <li>• Worker notification not up to standards (no pagers)</li> <li>• Operational Support Center does not have filtered air</li> <li>• Unannounced drills are not performed</li> </ul>
Fire Protection	<ul style="list-style-type: none"> <li>• Meets minimum requirement of license</li> <li>• 40 outstanding FP issues dating to 1990</li> </ul>	<ul style="list-style-type: none"> <li>• Problems in the area of fire hazards (250 WRs, one of which dates back to 1993 with 50% corrective)</li> <li>• Fire protection not a high priority</li> <li>• Responsibilities not understood</li> <li>• Low standards for personnel and equipment</li> </ul>
Security	<ul style="list-style-type: none"> <li>• Adequate to meet requirements minimally</li> <li>• Low morale</li> <li>• Excessive OT</li> </ul>	<ul style="list-style-type: none"> <li>• No comments</li> </ul>



## Talking Points

### Independent Self Assessment at Zion and LaSalle Stations

- Performance at Zion and LaSalle is a major concern with Nuclear Division leadership. Even with various plans and initiatives to improve performance, the results over the past year show little or no improvement.
- To help get a clear understanding of the issues, we are beginning an intense self assessment of performance at Zion and LaSalle.
- The overriding objective of the assessments is to lead us to the RIGHT ways to effectively address our weaknesses and improve our performance.
- This is an opportunity for us. This will provide us a fresh, independent look at our situation. The team will not provide us the solutions, but will shine the light on the areas and activities where our focus can solve the problems.
- The Division has assembled a full-time assessment team with six individuals from outside ComEd -- all with extensive experience at senior levels in the nuclear industry. The full-time team will be augmented during site visit portions by eight additional industry experts, with four coming from INPO and four coming from peer plants.
- To a large extent, we all know the strengths and weaknesses the assessment team will find. The major benefit from this independent assessment will be the team's evaluation of past corrective attempts and current improvement initiatives associated with identified weaknesses.
  - Past attempts to solve weaknesses will be reviewed to determine why they didn't work.
  - Current or ongoing attempts to correct weaknesses will be evaluated to make sure they are the proper corrective steps.
- The assessment process will be done in three phases:

OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages ► 3

To MARC DABAS

Dept./Agency

From MARC HUBER

Phone #

Fax #

Fax #

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- Phase I begins next week (week of Oct. 21). Team members will review various reports and documents, such as SALP reports, INPO evaluations, quality verification reports, PIF trends, LERs and other documents pertaining to performance measure. Phase I will last about three weeks.
  - During this review, the team will identify the KEY strengths and weaknesses. Those key areas will become the focus of the assessment process.
- Phase II is the on-site assessment. The full-time team members will be joined by the eight additional people. The team will begin its work at Zion in early November and finish before Thanksgiving. It will begin its work at LaSalle after Thanksgiving and finish by mid-December.
  - At the sites, the team will focus on the KEY areas identified in Phase I.
- Phase III will be the final evaluation of the data and findings and will be done during the first half of January.

## Questions and Answers

Q1. Why were Zion and LaSalle singled out for the assessments?

A1. Both stations have been dedicating resources and time on various improvement plans. However, the results are falling short of expectations. We need to make sure our people using their valuable time on efforts that will give us results. The assessment team will help identify why past efforts did not work and evaluate how effective current efforts are.

Q2. What will be my role in this assessment?

A2. When the assessment team comes to the station, everyone must be prepared to support the team. Remember, this is an assessment we want, its findings will help us find the right solutions to our problems. Be open and honest with team members. If they need information you do not have, help hook them up with the right people.

Q4. How does this assessment differ from an INPO or NRC inspection?

Q4. The focus and the team make-up are vastly different. This team is here to focus on key weaknesses and identify why we have not been able to adequately address them. The industry expertise on this team is much different from an INPO or NRC team. The team members are professionals who have held senior positions in nuclear power plants, or are now senior leaders in power plants. Additionally, several members bring solid assessment experience.

## MANAGEMENT MEETING ON COMED INDEPENDENT SELF ASSESSMENTS

On December 23, 1996, the Regional Administrator, A. Bill Beach, and members of the Region III staff met with Harold Keiser, ComEd Chief Nuclear Operating Officer, Thomas Maiman, ComEd Senior Vice President for Nuclear Operations, William Subalesky, LaSalle Site Vice President, John Mueller, Zion Site Vice President, members of the ComEd staff, and representatives from ComEd's Independent Self Assessment (ISA) Team to discuss the ISA's findings at LaSalle and Zion and ComEd's resultant corrective action plans. Warren Fujimoto, ISA Team Leader, and ISA Team members Jack Sieber, Fred Dacimo, and John Durham conducted a presentation of the ISA findings in the areas of Engineering, Operations, and Organization and Management. Among the items noted by the ISA were: short term focus in Engineering that resulted in not dealing with long term problems; instances of unauthorized design changes; concerns with configuration management, understanding design and licensing requirements; ineffective work management; frequent management changes, low standards, and ineffective leadership; lack of understanding or commitment to operational excellence; production focused mentality; significant gap between bargaining unit and management; ineffective training; unprofessional behavior by operating crews; weak management skills and a poor management selection process. Following the ISA presentation, ComEd delineated plans for improvement that included keeping both LaSalle units shut down until the ability to operate properly had been sufficiently demonstrated.

OPTIONAL FORM 99 (7-90)

## FAX TRANSMITTAL

# of pages 2

November 22, 1996

To	From
M. DAPAS	ZION
Dept./Agency	Phone #
Fax #	Fax #
NSN 7540-01-317-7368	5099-101
GENERAL SERVICES ADMINISTRATION	

To: All Station Employees

Subject: Independent Self Assessment

This morning the Independent Self Assessment of Zion concluded with a presentation by team members to about 180 of us. Because all of you could not be present to hear the insights from the team of industry peers, I want to provide my perspective to you on the message I heard.

Although the assessment results were divided into such traditional areas as operations, maintenance and engineering, I was struck by common themes throughout the team's presentation. These themes should give us serious insight to the consequences of our performance. I was impressed by the commitment of the people who delivered the message today - they truly delivered a no-holds-barred message. That message is:

We are not helping each other succeed. We are not learning from each other or the industry - we are more interested in blaming each other - management, union, other work groups and also people outside of Zion than we are in operating Zion successfully. The way we treat each other is unprofessional and does not promote respect for each other or our jobs.

We do not approach our jobs as though we are accountable for the success of what we are doing - we have no performance measures to determine if we can even succeed. We are not willing to define high standards for performance and then hold ourselves accountable for meeting those standards. Instead we focus on our own problems, stay in our individual silos and do not contribute to our overall success.

Our work control processes inhibit performance and our engineering programs are ineffective. Our operating and maintenance standards for equipment reliability, cleanliness and radiation protection are far below what other plants view as acceptable. Plant equipment is suffering from our inability to operate and maintain it to meet minimal industry standards.

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The closing message was particularly important - in the future competitive business world, Zion can only succeed by operating safely. There is clear industry evidence that the only way plants can be competitive is to operate safely. Zion is not ready for that future. It is a matter of survival - nobody on the outside cares about our inability to work together, our broken work processes or our low standards. Zion is at a crossroad - it is up to us to determine if we will succeed.

Although some of us may believe that the message was directed to managers, and much of it was, it was also strongly delivered to senior and mid-level managers, supervisors, workers - the entire workforce. The team was clear that all levels at Zion exhibit a lack of leadership and accountability. We must get serious about ownership, accountability and performance improvement.



J. H. Mueller  
Site Vice President  
Zion Station

JHM/tis



OPTIONAL FORM 99 (7-90)

## FAX TRANSMITTAL

# of pages 2

To	M. DAPAS	From	M. HUBER
Dept / Agency		Phone #	
Fax #		Fax #	

NSN 7540 01-317 7368

5099 101

GENERAL SERVICES ADMINISTRATION

December 13, 1996

To: All Station Employees

Subject: Independent Self Assessment

Concluding two weeks on site, the Independent Self Assessment team presented its detailed findings to 200 LaSalle employees this morning. The following is a summary of what they, as peers, had to say about LaSalle Station.

There were several common themes in the areas of operations, maintenance and engineering. Giving immediate attention to these items is essential to the success of LaSalle. The main themes are:

Key attributes of a successful plant that are missing at LaSalle include: accountability, teamwork, open communications, trust between all levels, and a generally healthy working relationship.

We are not performing as a team. We are not learning either from each other or from the rest of the nuclear industry. Placing blame is prevalent throughout the facility and is hindering our progress toward successful operation. We are not treating one another with the proper professionalism or respect.

We are not accepting accountability for the results of our work, and we are not even measuring whether or not we are successful. We tend to work within silos and isolate ourselves with our own problems. We do not set high standards for our work and hold ourselves accountable for meeting those standards.

Our work control processes preclude productivity. People not working as a team contributes to the system not working effectively. There are high project backlogs, scheduling is ineffective and work packages are inadequate.

Our operations department lacks a clear understanding of operating excellence and teamwork. Significant weaknesses were also noted in shift manager performance and training. These deficiencies are magnified by the lack of acceptance of accountability for performance.

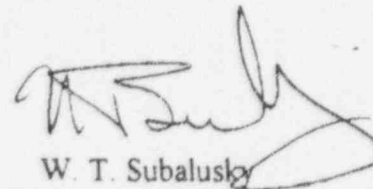
There are major problems in engineering. Deficiencies are evident in the areas of configuration management, work quality, system engineering and work management.

The need for a strong team effort extends beyond senior and mid-level management. The ISA team emphasized that the key problems of accountability, teamwork, communication

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and trust exist at all levels. Every LaSalle employee must be willing to address these critical issues if we are to achieve the potential that LaSalle Station is capable of.

In conclusion, the team's message was bleak but clear: LaSalle has a long way to go, and can only succeed in the future competitive business world by working together to achieve excellence in performance. The industry evidence is clear that the only way to excellent performance is by focusing on operating safely. LaSalle must decide now whether it will take on these issues and follow the road to a successful future, or be left behind.



W. T. Subalusky  
Site Vice President