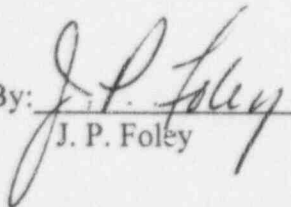
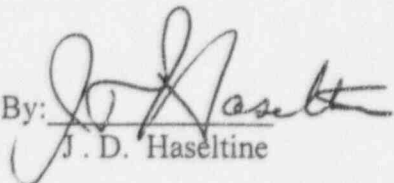


**INTEGRATED PLAN FOR  
IMPROVING CORRECTIVE ACTION PROGRAM  
AT CONNECTICUT YANKEE**

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Revision 0

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## **GOAL:**

The goal of this activity is to implement improvements to the CY corrective action program that will bring the program up to current high industry standards. Specific corrective actions to achieve this goal were identified in the common cause study completed in December 1996 in response to the apparent violations in NRC Inspections 96-201, 96-06 and 96-08. The activities described in this document will achieve those corrective actions.

## **ROLES:**

Individuals identified on the attached organization chart will be assigned lead or support roles on the tasks described below consistent with their primary area of responsibility.

## **PROCESS:**

### **Project Tasks**

The following tasks are required in order to implement the corrective actions committed to the NRC in the December 4, 1996 enforcement conference. The schedule for completion of these tasks is provided on the attached schedule. This schedule will support the commitments made to the NRC.

### **TASK 1.0 - Define Process**

Review the current ACR and AITTS processes. Ensure that purpose and goals of Corrective Action process are clearly understood and identified. Solicit feedback from users (i.e. ACR respondents, Corrective Action assignment recipients). Determine what users perceive to be the strengths and weaknesses of the current processes. Determine how users could use the system to improve performance, e.g. to reduce department error rate; to track department requirements etc.

Identify areas where process can be simplified. Eliminate steps that do not add value. Produce work flow chart and process outline. These documents will provide the bases for an interim revision to ACP 1.2-16.5 (Task 2.0), software development Task 4.0), and revised procedure(s) (Task 8.0). Charts need to be detailed enough to permit software development directly, and/or to develop a software functional specification.

Separate flow charts may be needed to cover:

- ACR process from initiation to assignment of evaluation by MRT
- ACR Evaluation by plant personnel.

- ACR Processing by C/A Department (Initial Screening and ACR package Close-out)
- Tracking (ACR evaluations; Corrective action Tracking)
- Operability/Reportability Screening by Operations.

This task will also review, identify, and define:

- Cause coding conventions;
- Program/functional area definitions and conventions;
- Department coding information;
- How to identify, capture, track personnel errors;
- What system and component level information to provide;
- What types of evaluations may be required (Post Transient Evaluation, Root Cause, Adverse Trend Evaluation, Common Cause Determination, Equipment Failure Evaluation, Apparent Cause memo, Track and Trend only);
- Significance level and relationship between significance level and evaluation types;
- Need for a system of priorities of ACR evaluations and corrective actions.

**Deliverables:**

- Flow charts that define the action tracking and ACR processes in sufficient detail for software development.
- Definition of data fields required for action tracking and ACR data bases.
- Specification and contents of "Pulldown" Menus for data bases.
- Specification of closure and change authority and database access authority
- Outline of tracking and ACR work processes.

## **TASK 2.0 - Revise ACP 1.2-16.5**

An "interim revision" that reflects the revisions to the ACR and tracking process identified in Task 1.0 above will be prepared. This procedure change will govern the ACR and Tracking process while software for the revised process is under development. Proposed changes will be reviewed with senior management and other appropriate reviewers to gain their input and concurrence with the final process. Proposed changes will be presented to department managers at one or more management meetings to make managers aware of coming changes and to help promote acceptance of the changes. Training will be provided to plant personnel commensurate with the extent of the changes being implemented.

**Deliverable:**

A revised ACP 1.2-16.5 and required training.

## **TASK 3.0 - Benchmark Other Utilities**

This activity will identify one or two utilities known to have good corrective action programs. Names of good performers will be selected based on SALP ratings or other appropriate criteria. We will solicit input from these utilities as to how their corrective action programs function, and ask for comments on our approach. Strengths identified in these programs will be incorporated into our program as deemed appropriate.

**Deliverable:**

Contacts and discussions will be documented in trip reports, minutes of meetings, or telecons. Strengths will be incorporated into CY processes and procedures.

**TASK 4.0 - Develop Software**

This task will include the development of two interrelated databases: one to capture ACR information and one to track plant action items. Two databases are needed because tracking will encompass more than just the ACR process. The software developed will be based on the output from task 1.0 above. Access to the database will be controlled so that the appropriate levels of management control changes and closure of tracked items, and so that timeliness and effectiveness of ACR evaluations and corrective actions can be monitored. Databases will be accessible to all plant personnel within the constraints of the access control provided. The database will provide an easy to use means for plant personnel to identify tracked items and related information for which they may be responsible. The database will include menu driven report capability for frequently used reports as identified in task 1.0 above. It will also provide the capability for plant personnel to perform ad hoc queries to serve their needs.

**Deliverables:**

Two interrelated databases accessible to plant personnel within certain constraints that will allow capture, tracking, analysis, and reporting of ACR and Tracking information. Analysis and reporting will be designed to provide management with the capability to monitor and assess effectiveness of the CY corrective action program, and will provide plant personnel a tool, to assist them in tracking actions for which they are responsible.

**TASK 5.0 - Develop KPIs**

Key Performance indicators will be developed for the corrective actions program. Examples of KPIs that may be developed include, but are not necessarily limited to:

- ACRs Issued over a given time period
- ACRs Evaluated over a given time period;
- ACRs closed over a given time period;
- ACR reject rate;
- Overdue ACR evaluations and Corrective Action Items

- Upcoming NRC commitments due;
- NRC commitments missed;
- Total open Action Requests;
- Action Requests closed last month;
- Overdue priority A and B Action Requests.
- Etc.

Identified strengths from benchmarked plants will be incorporated into CY KPIs as appropriate. Proposed KPIs will be discussed with management to determine final list of those to be provided.

#### **Deliverables:**

Identified Key Performance Indicators for the corrective action program and definition of the reporting format and frequency.

#### **TASK 6.0 - Software V&V**

ACR/Tracking software will be verified by a period of initial use by Corrective Action department personnel prior to implementing plant wide. This task will include performing various sorts, reports, KPI generation, Trend Report Information etc. To validate the functionality of the databases. V & V (validation and verification) in this context is not meant to imply that developed software is Quality Assurance Category software. QA records for the corrective action program will be the completed ACR files maintained by the Corrective Action Department until forwarded to Records Management.

**Deliverable:** Satisfaction on the part of the Corrective Action Department that the delivered software is capable of functioning as defined in Task 1.0

#### **TASK 7.0 - Develop Standards Document**

A Standards document will be developed that will capture management standards and expectations with respect to corrective actions. Topics addressed will include:

- Purpose, scope, and importance of the corrective action program.
- Threshold for problem identification (precursor level).
- Timeliness of evaluations.
- Thoroughness of evaluations, including generic implications.
- Importance of identifying causes.
- Relationship of Corrective Actions to Causes.
- Assignment of corrective actions.
- Timeliness of Corrective Action Implementation.
- Effectiveness of Corrective Actions.

Pertinent parts of the standards document will be incorporated into procedures that govern the corrective action program. Standards for corrective actions will also be expressed and discussed at management meetings. Expectations that Department managers convey standards and expectations to department members will be conveyed to department managers.

**Deliverables:**

A standards document for management approval and implementation, and incorporation of the intent of these standards and expectations into corrective action controlling procedures.

**TASK 8.0 - Develop New Procedures**

One or more new procedures will be developed to cover ACR initiation by plant personnel, Guidance on preparation of ACR Evaluations, Processing of ACRs, including Corrective Action Department Screening, Operability & Reportability screening, identification, capture and tracking of corrective actions, ACR approval and closure. New procedures will reflect the revised work process, new software (ACR and Tracking), incorporation of Management Standards/Expectations, and new KPI's.

**Deliverables:**

One or more Administrative procedures and Department Instructions to provide administrative guidance and control over the plant ACR and Action Tracking program.

**TASK 9.0 - Provide Plant Training**

Training will be developed and provided to plant personnel on the improved ACR and action tracking processes. Training will include the work process. Management standards and expectations, procedures, and software use.

**Deliverables:**

Training materials and training for plant personnel as described above.

**TASK 10.0 - Prepare Trend Report**

An initial trend report will be prepared based on data through the first quarter of 1997. The trend report will be based primarily on that prepared for the James A. FitzPatrick Plant. Strengths from benchmarked plants may also be incorporated. Final format and



contents of the trend report will be determined with the review and concurrence of management.

### **Interpersonal:**

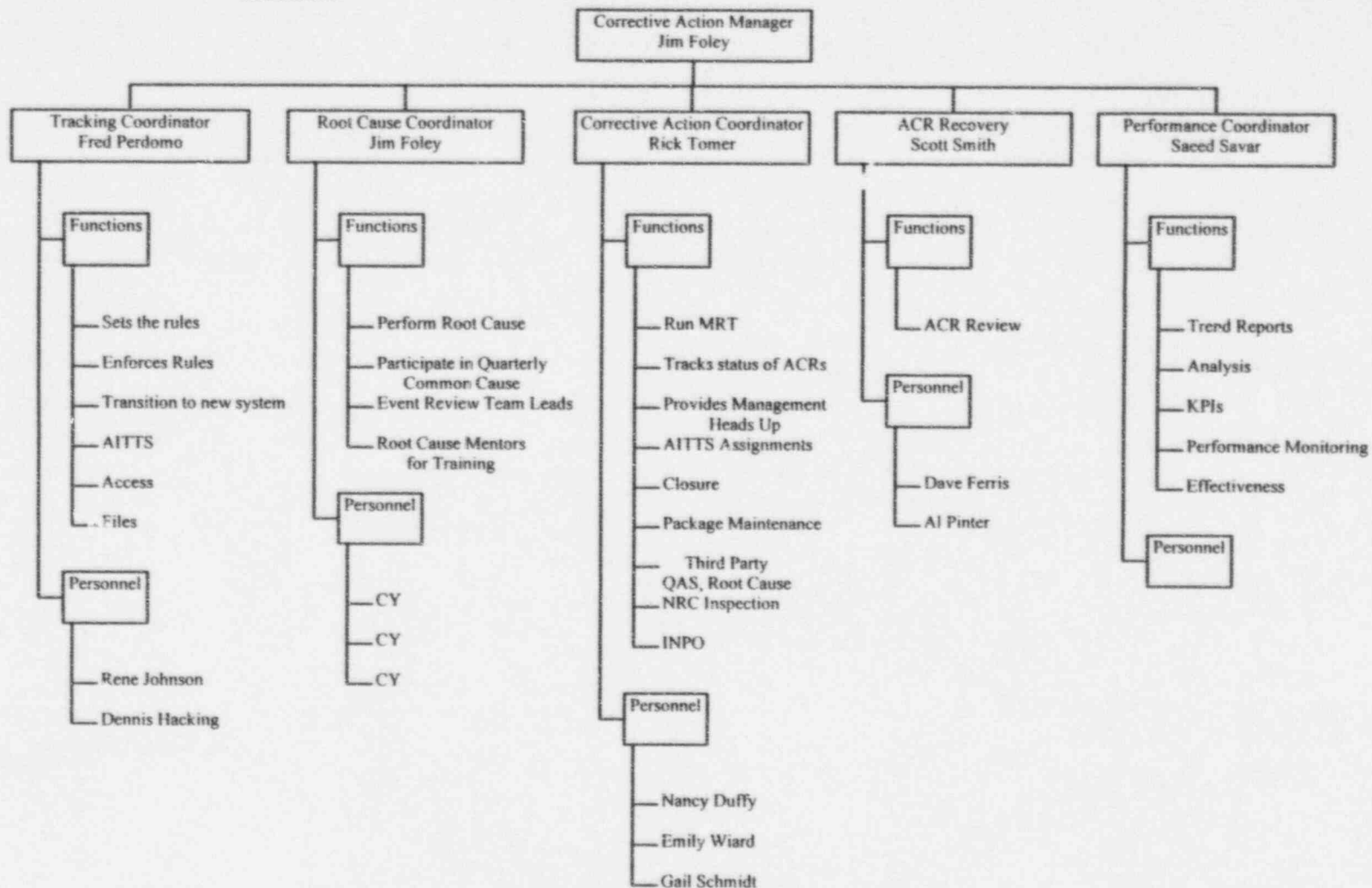
Although specific individuals from the organization chart will be assigned lead responsibilities for specific tasks, it is expected that all individuals will participate in and provide input to all activities.

Individuals participating in the activities described above are also expected to interface frequently with plant personnel to solicit their feedback so as to make the final products as useful, user friendly and acceptable to plant personnel as practical.

Individuals participating in the above activities must also recognize that implementation of these changes may be viewed as some as burdensome or unnecessary. It is therefore important to attempt to communicate why these steps are necessary, and what benefits can accrue from their implementation. All communications must be open, honest and supportive, and must not be adversarial.

# Corrective Action Program Organization

12/12/96





12/31/96

# CORRECTIVE ACTION IMPROVEMENT IMPLEMENTATION SCHEDULE

