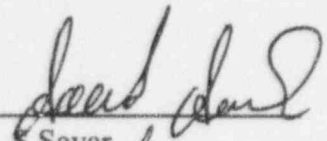
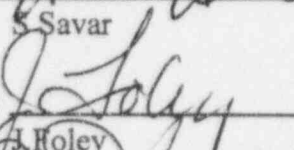
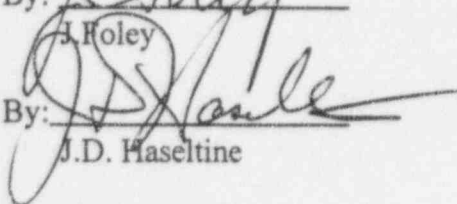


**INTEGRATED PLAN FOR IMPROVEMENT OF  
MANAGEMENT STANDARDS AT  
CONNECTICUT YANKEE NUCLEAR POWER STATION**

**Revision 0  
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## **GOAL**

The goal of this activity is to establish, document, communicate, and implement effective management standards at Connecticut Yankee Nuclear Power Station. Northeast Utilities has identified various recommended corrective actions in order to establish and maintain high management standards throughout the nuclear organization. These recommended corrective actions were presented to the NRC during the Enforcement Conference held for response to apparent violations in NRC Inspection Reports 96-201, 96-06, and 96-08. The purpose of activities described in this document is to implement those corrective actions.

The management at Connecticut Yankee Nuclear Power Station has been criticized in various studies, Root Cause Evaluations, NRC Inspection Reports, and other internal assessments for not establishing and maintaining high standards with respect to regulatory compliance, corrective actions, conservative decision making, employee concerns, design basis documentation, and procedural compliance. There is documented objective evidence that lack of implementation of high management standards throughout the nuclear organization has been a contributing cause of various events, problems, violations, and findings at Connecticut Yankee Nuclear Power Station.

## **ROLES**

The Station Manager will have the overall responsibility for implementation of the management standards. He will also establish the methods for communication of management standards throughout the nuclear organization at CY. Department Managers will establish the standards at the department level. The corrective action program manager will establish and implement methods to monitor the effectiveness of the management standards as part of the plant corrective action process. It should be noted that every individual within the CYPKO organization plays a vital role in implementation of management standards.

## **PROCESS**

### **Project Tasks**

Management standards are the set of policies, rules, goals, and objectives established by the management and used as guidelines by plant personnel during the decision making process in conducting plant activities. Management standards are the driving force for the plant culture which establish management perspective and expectations on the level of performance requirements associated with these activities. The problem here at CY appears to be rooted in communication of the standards and "buy in" at all levels of the organization. Studies performed concluded that management standards were being compromised in order to reach cost reduction goals and maintain plant capacity (choosing

to keep plant running through equipment problems). In addition, excellence was always evaluated with respect to the cost associated with it.

In order to ensure "buy in" at all levels of the organization, and successful implementation, the standards of performance will be first established at the department level. This method in lieu of the top down approach will ensure participation at all levels and open the lines of communication within the organization.

It is expected that the process for improvement of management standards will start on April 1, 1997. This date is selected to allow for implementation of the new decommissioning organization and the Management team.

#### **TASK 1.0 - Establish & Document Standards for Performance at the Department Level**

Each department within the plant (Operations, Engineering, Maintenance, Chemistry, Licensing, Instrument Control & Electrical, Training, Material Control, Emergency Planning, Technical Support, etc.,) will establish the standards of performance applicable to the department activities. The standards will be developed using input from individuals within the department. Individuals will provide input through departmental meetings specifically held for soliciting standards inputs. The purpose of these meetings will be to allow open and candid discussion within each department. These meetings may be facilitated by someone from outside of the organization. Each department manager will decide on other means of soliciting input from individuals with the organization. This may include memos, specific forms, etc.,.

##### **Deliverables:**

Each department standards once finalized will be documented and published. The method used to document and publish the standards will be determined (Procedures, Guidelines). These standards will then be distributed to the plant senior management and directors..

Each department will also develop documentation which would provides objective evidence on how the specific standards will be implemented.

It is estimated that this task will take six (6) weeks to be completed with the approximate completion date of May 15 1997.

#### **TASK 2.0 - Establish & Document Plant Level Management Standards**

The Management Team will use the department level standards and methods of implementation as the basis for establishing the management standards. In addition, the management team should be aware of the following:

1. Recommended corrective actions identified in the Common Cause Study of Apparent Violations at Connecticut Yankee Station, Dated December 1996;
2. Conclusion from the Report of the Fundamental Cause Assessment Team, Dated July 1996;
3. Conclusions from the Independent Review Team (IRT) Report on the November 2, 1996 Radiological Incident and Reactor Disassembly delay at Haddam Neck Plant;
4. Results from the Benchmark Study (to be performed in January 1997);
5. Nuclear Group Policies 1.1 through 5.7

As a minimum management standards will be established in the following primary areas:

- Regulatory Compliance
- Quality Assurance
- Safe Plant Operation
- Radiation Protection
- Employee Concern
- Questioning Attitude
- Procedural Adherence
- Attention to details
- Communication
- Training
- Testing
- Knowledge base with respect to regulatory issues
- Knowledge base with respect to plant design and licensing basis
- Problem identification, evaluation, and correction. Include expectations for timeliness and effectiveness.
- The need for rigor and precision in engineering analyses and calculations, and other plant processes as appropriate.
- The need for a broad based approach to root cause analyses and engineering evaluations.
- The need for rigor in verifying design inputs and other information that serves as input to plant work processes.
- The importance of maintaining licensing and design basis

The management team will maintain clear and candid communications within the organization through the development process and solicit comments before the final issue of the management standards and the plans for implementation.

#### **Deliverables:**

Standards once finalized will be documented and published. The method used to document and publish the standards will be determined (Procedures, Guidelines). These standards will then be distributed to the plant senior management and directors..

Management Team will also develop documentation which would provides objective evidence on how the specific standards will be implemented.

It is estimated that this task will take six (6) weeks to be completed with the approximate completion date of June 30, 1997.

### **TASK 3.0 - Communication & Implementation**

The management standard no matter how high established will not be implemented unless the following is achieved:

- Acknowledgment of the standards by the entire organization,
- Commitment and discipline on part of the entire organization to maintain them,

Various means of communication and implementation should be evaluated for communicating management standards and expectations to plant personnel on a regular basis. Variety of formats and media such as weekly tailboard meetings, periodic standowns, bulletin boards, and newsletters may be used.

#### **Deliverables:**

The management standards can be implemented and communicated by various methods such as:

- Policy Documents
- Mission Statement Documents
- Procedures
- Guidance Documents
- Training

### **TASK 4.0 - Effectiveness Measurement**

The effectiveness of the management standards will be determined by Key Performance Indicators (KPIs) currently being developed as part of the corrective action program. There will be a link between data captured in the ACR process and the areas identified under Task 2.0, above. For example, if the results from a root cause evaluation or Adverse Condition Report (ACR) evaluation indicates that lack of attention to details was a contributing factor in creating a problem, the effectiveness of the standards and their implementation will be re-evaluated.

#### **Deliverables:**

This task will be completed as the Key Performance Indicators are developed as part of the corrective action program.

The first indication of the effectiveness will be published as part of quarterly Key Performance Indicator (KPI) at the end first quarter following the implementation of management standards.

#### **TASK 5.0 - Benchmarking**

The purpose of the benchmarking will be to get input from other utilities that have successfully initiated, revised, and implemented the management standards. Utilities selected will be the ones that have been criticized for lack of adequate management standards and its implementation.

#### **Deliverables:**

A report that compares the management standards and its implementation plan to two other utilities. This record will also include recommendations for improvements in the establishing and implementations plans of management standards at CY. The benchmark reports will be completed by February 28, 1996.

#### **Interpersonal**

The approach used here to establish the management standards at CY requires clear vertical and horizontal communications throughout the organization. This requires frequent interfaces at various levels. Although specific individuals will be assigned lead responsibilities for specific tasks, it is expected that they 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. It is also important to communicate the importance of successful implementation of management standards, and what benefits can accrue from their implementation. Communications must be open, honest and supportive, and must not be adversarial.