



ESK-97-046

February 17, 1997

United States Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Quad Cities Station Units 1 and 2
Response to the SALP 13 Report
NRC Docket Nos. 50-254 and 50-265

Reference: Mr. A. B. Beach letter to Mr. E. S. Kraft, Jr.
dated December 4, 1996, transmitting the
Quad Cities Station SALP 13 Report

This letter provides the station's response to the assessment of Quad Cities Station performance, as provided in the referenced Systematic Assessment of Licensee Performance (SALP) report and discussed during the public meeting held at Quad Cities Station on December 18, 1996.

The management at Quad Cities Station understands the overall assessment of Quad Cities Station's strengths and weaknesses as identified in the SALP 13 report. In the response to SALP 11 and 12, the Course of Action (COA) was the plan for station initiated improvements. The station is currently closing out this plan and will perform an effectiveness review of the plan. Results of the review will be provided at a later date. The Quad Cities Station 1997 Operational Plan will guide our efforts to improve performance at Quad Cities Station through the specific actions contained in the plan. The details of the action plans and actions taken to complete them will be maintained at Quad Cities Station and available for NRC Staff review. As I indicated in our discussion during the meeting, we will make adjustments in our action plans to add emphasis to those ongoing improvement efforts where our progress may not be as rapid as we desire. Our action plans are, by design, flexible enough to allow for those adjustments.

We will assess the effectiveness of the actions within the 1997 Plan, and adjust these action plans where necessary. ComEd and Quad Cities Station are dedicated and committed to this plan as the vehicle to achieve performance improvement.

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We acknowledge the improvements in station performance noted in the SALP report; however, we are acutely aware that many more steps are necessary. I assure you, as Site Vice President, I take personal responsibility and assume all accountability for the actions necessary to improve our overall performance. I believe that the Quad Cities Station team understands the urgency and necessity of supporting our mission to improve performance in all areas of plant operations.

Attached is a summary of the significant issues raised in the SALP report, and the station's actions to correct them.

If there are any questions or comments concerning this response, please call me at (309) 654-2241 extension 3600.

Sincerely,


E. S. Kraft, Jr.
Site Vice President
Quad Cities Station

Attachment: (a) Significant Issues Identified in SALP 13 Report

cc: A. B. Beach, Regional Administrator, Region III
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SIGNIFICANT ISSUES IDENTIFIED IN SALP 13 REPORT

The following is a discussion of the major issues identified in the SALP 13 report as needing additional management attention.

Material Condition -

Improving the station's ability to resolve material condition and equipment issues is a key "strategic" component of the Quad Cities Station 1997 Operational Plan. Improvement projects and actions have been developed to address improving the resolution of material conditions and equipment issues. Improvement initiatives include: Scheduling of all work requests in the station backlog, aligning of all system surveillance and PMs into their respective work week window, backlog reduction, goals in key material condition indicators, improvement of maintenance work processes, and reduction of equipment related Operator Compensatory measures.

Work Control Processes -

Quad Cities recognizes the need to continue improvements in the planning, scheduling, and execution of work. Some initiatives are already underway and improvements have been noted during the final months of the SALP period. Those areas where we are currently working for change and are making progress include:

- Improved System Engineering input at the beginning of the work schedule cycle (Week 13), which had been identified as a weakness.
- A ComEd Division level effort where all sites are working together to improve the ability to get work done.
- Implemented a refinement to our work prioritization process, to lessen the schedule impact of emergent work.
- Strengthening and improving work week critiques.

Other issues to be addressed in the near term are: improving the proficiency of some of our schedulers in the use of our scheduling software (P/2) through focused training, formal training in project management for work week managers to improve their skills in managing complex schedules, and improvements in reliable forecasting of available manpower for accomplishing work.

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SIGNIFICANT ISSUES IDENTIFIED IN SALP 13 REPORT

Other efforts for the coming year are being guided by actions in our 1997 Operational Plan. The areas being addressed in those actions include: work backlog reduction, improved efficiency in schedule implementation, work prioritization, schedule adherence reporting and accountability, and improved outage scheduling.

Effective Corrective Actions

ComEd has undertaken a Nuclear Division initiative to improve the Corrective Action Process in all six nuclear sites. The initiatives include the adoption of Nuclear Station Work Procedures (NSWPs) which will provide instructions on the identification, root cause determination, tracking and trending, resolution, and measurement of effectiveness of corrective actions. These NSWPs are currently being reviewed, approved, and implemented by each of the respective station management teams.

Quality of Engineering Activities

The concerns regarding Engineering corrective actions identified poor root causes and corrective actions are not implemented in a timely manner. The timeliness of implementation relates to improved work management and proper prioritization of engineering tasks.

Substantial efforts are contained in the 1997 Operational Plan to improve the Engineering department performance in this area. Actions to be taken include: Establishment of an Engineering Assurance group to provide feedback to determine corrective actions, overview the quality of the engineering product deliverables, establishment of a "Plant Response Team" to provide for the identification and resolution of plant problems on an expedited basis, improved training for engineers on the station licensing basis and root cause, reduction of the station design drawing backlog and open design changes.

The quality of Root Cause Analysis (RCA) will also be improved by the development of additional system historical packages and by further training of specific personnel in RCA techniques. The historical packages provide the engineer with equipment failure histories. This information allows the engineer to focus the root cause effort on the components with the highest failure rates. This training is scheduled throughout 1997; an effectiveness review of the training program will be conducted to determine future training requirements and any required changes to the program. Systems selected for historical package development include Recirculation, 125 VDC, and Instrument Air.

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SIGNIFICANT ISSUES IDENTIFIED IN SALP 13 REPORT

A substantial effort to prioritize and schedule engineering resources is in progress so that the proper focus can be placed on the corrective action issues. The Plant Response Team will deal with day-to-day emergent issues. The mission of this team will be to deal with emergent issues in a timely manner to allow the production arms of engineering to focus on process, production and longer-term initiatives.

The Fire Protection Improvement Plan will continue to be worked in 1997. This plan consists of items such as a review of Appendix R shutdown commitments and capabilities, upgrading of Fire Protection (FP) documentation as necessary to current plant conditions, improvement of the safe shutdown procedures and an improved process for control and updating of FP documentation.

Quality of Maintenance Activities-

Quad Cities Station recognizes the need to improve the quality of maintenance work through improvements in training, procedures, and work practices. Actions to improve the effectiveness of the maintenance supervisors will serve as the engine to enforce the quality work habits throughout the Maintenance organization.

The station's 1997 Operational Plan contains improvement initiatives that will have a direct bearing on improving the quality of maintenance work. These initiatives include: Improved valve procedures and training, improved pump maintenance procedures and training, development of a maintenance standards handbook, upgrade of machinist qualification, implementation of a self-check simulator for 1997 training, and enhancements to the Maintenance Supervisor qualifications.

Quad Cities recognizes the need for good supervisory involvement and oversight during maintenance activities as indicated by the Maintenance First Line Supervisor improvement initiative implemented in March, 1996. However, the maintenance department recognizes that additional emphasis needs to be placed on maintenance supervision to become more critical when performing overviews of job activities.

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SIGNIFICANT ISSUES IDENTIFIED IN SALP 13 REPORT

The station's 1997 Operational Plan contains several action plans to achieve the above expectations. The initiatives include: distribution of a maintenance standards and expectations manual to all maintenance personnel, assessment of the maintenance standards and overviews, identification of barriers which impede the First Line Supervisors time in the field, implement revised training standards for maintenance First Line Supervisors. The revised training standards include On-the-Job (OJT) requirements detailing management's expectations of the First Line Supervisor and their Roles and Responsibilities.

Safety System Performance -

Quad Cities recognizes that Operators continue to be challenged by safety system performance problems. The station's 1997 Operational Plan contains an action plan for the development of an Improved Safety System Performance team (a part of the station's Engaging the Work Force effort). The station has set a performance standard of the reduction of unavailability of selected safety systems by 20% (compared to 1996 results). Specific improvement initiatives are planned for Residual Heat Removal Service Water, High Pressure Coolant Injection, and Control Room Ventilation. The effectiveness of these actions will be reviewed by the System Engineering Department as part of their self-assessment program.

Station Self-Assessment Process -

Quad Cities Station recognizes that an effective self-assessment process will be a major tool in the improvement of the station's performance. As part of the 1997 Operational Plan, the development and implementation of departmental self-assessment programs will be initiated. This will be performed in all functional areas.

The Site Quality Verification organization will conduct reviews of each department's self-assessment activities. In addition, the 1997 Operational Plan calls for assessments of this process to be performed for effectiveness.