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November 27, 1996

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Response to Systematic Assessment of Licensee
Performance (SALP) 13 Report
LaSalle County Nuclear Generating Station Units 1 and 2
NRC Docket Numbers 50-373/50-374

Reference: A. B. Beach letter to W. T. Subalusky dated October 17, 1996,
transmitting the NRC SALP 13 Report for LaSalle County
Station

Commonwealth Edison Company (ComEd) appreciates the NRC staff meeting with us and presenting the SALP 13 report on October 29, 1996, as well as affording us the opportunity to provide our views on the SALP results. We agree with your assessment of overall Station performance and we are disappointed in the decline in those areas you have indicated. The reference letter requested that we respond to the SALP Report addressing our actions for performance improvements in the areas of plant operations, maintenance, and engineering. This letter provides LaSalle's comments to the SALP 13 Report.

Our method for improvement at LaSalle consists of a basic three step approach. The first step is to establish the basic fundamentals of effective management, such as follow up, accountability, high standards, and critical self-assessment to effect near term improvement in human performance. The next step is to implement effective improvement planning by starting with short-term results oriented plans, and using the fundamentals referred to above, progressing to long-term plans. The third step is to put in place the processes and actions needed to maintain improvements achieved. These include on-going self-assessments, worker involvement, and significantly improved training.

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Based on a number of human performance errors, a work standdown was initiated on October 12, 1996. During this time, I met with all site departments to discuss LaSalle's performance and to communicate my expectations for both supervisors and workers. Special emphasis was placed on the first line supervisor in implementing their oversight of ongoing work and the need to coach and correct worker performance. Four key points were emphasized: (1) self-checking is expected, (2) follow procedures or stop work and correct the deficient procedure, (3) report low level problems via Problem Identification Forms (PIFs), and (4) apply peer checking and peer pressure to improve LaSalle's human performance. The subsequent slowdown of work as our staff paid greater attention to following procedures and the increase in procedure changes and self-identified procedure related problems indicate some degree of success. However, use of and adherence to procedures is still at an unacceptable level, our human performance error rate remains unacceptably high, and additional effort is required.

One important result of this standdown was the establishment of weekly departmental human performance meetings. A group of station personnel meet to determine the human performance topics to be discussed at these meetings based on the previous week's performance.

Managers have been directed to observe activities in the field, take appropriate corrective action, and provide written reports of these observations to the Station Manager and Site Vice President. The quality of these reports varies widely but is generally unacceptable and indicates our managers have a considerable amount to learn in conducting observations. Further direction and guidance is being provided.

The second step is our short-term focused planning effort intended to achieve measurable improvement in station performance, while at the same time, training our management team on how to implement improvement planning that uses accountability and focuses on results rather than actions. This effort initially involved the review of existing action plans for LaSalle and selecting those items that are essential to long-term success, yet achievable in the short-term. The results of this effort are reflected in our Upgraded 1996 Operational Plan.

The difference between this and past plans is that this plan does not try to be all encompassing. We have specifically limited plan activities to a set that are important and can be accomplished to show results by the end of December 1996. Our Upgraded 1996 Operational Plan, which has been discussed with the NRC Resident Inspectors, includes the following elements:

Safe Plant Operation - Key elements of the plans in this area are directed at achieving measurable improvement in safe plant operation and include:

- reduce operator challenges (work-arounds, temporary alterations, main control room distractions)
- improve operator performance through increased observation and coaching
- correct processes that challenge safe operation (out-of-service activities and plant labeling)

Effective Work Management - Key elements of the plans in this area focus on improving maintenance and work control including:

- reduce maintenance rework
- improve work execution
- improve work package and procedure quality

Effective Plant Support - The plans in this area differ from those in the above areas because of the need to establish fundamental management activities in the engineering area. These plans, therefore, have fewer measurable results, but focus on achieving short term improvements in technical support of the plant and the operating organization. The plans include:

- improve root cause determination and identification of necessary immediate and long term corrective actions
- take short term actions to assess and improve conformance to the design basis
- improve Engineering communication and interfaces with Operations, Maintenance and Work Control
- implement fundamental Engineering management tools
- implement short term actions of System Engineering improvement plan
- improve the quality of safety and operability evaluations

A weekly accountability meeting is being held where Action Plan Sponsors and Action Plan Team Leaders discuss assigned actions and progress towards achieving plan results. Support of other groups is requested at this meeting to ensure that any barriers to success are removed. Managers are accountable to ensure success of these near term plans. We are focused on achieving results, not just on performing activities. All members of the LaSalle staff are encouraged to understand the focus areas and objectives and be knowledgeable of the progress and results achieved.

Following is a discussion of improvement efforts in operations, maintenance, and engineering, including some examples from the Upgraded 1996 Operational Plan.

Operations

We have placed special emphasis on the fact that "Operations is in charge." I met with each shift manager to reinforce this expectation and solicited input as to what we could do to accelerate that change. Shift managers "in charge" has been communicated to all site personnel. The shift manager is now part of the LaSalle Management Team. This Team has a daily meeting in the shift manager's office to discuss plant issues and allow the shift manager to solicit any help needed to ensure safe plant operation. We understand the need for an immediate safety focus culture change. The LaSalle Management Team is working with all site personnel to support operations and to understand and remove barriers in this regard.

Operations management continues to stress key human performance attributes for safe, effective work including the need for a questioning attitude, self-check, peer-check, and procedural adherence. These are reinforced by management observations, weekly simulator evaluations, and debriefs of crew performance. This supervisory observation effort is focused on the most important areas and the results are used in regular discussions between Operations Supervisors and Operators.

Examples of operations involvement in the LaSalle Upgraded 1996 Operational Plan include the following elements directed at short-term operational improvements:

Reduce Operator Challenges: Several actions are underway to improve plant material condition. One is by reducing operator work-arounds. Seventy-six work-arounds currently exist. Operations, Maintenance, and Engineering have worked together and identified nineteen work-arounds to be eliminated by the end of the year. The remaining fifty-seven will each have an individual action plan and schedule for resolution developed by December 31, 1996. Beginning in 1997, as workarounds are identified, they will be prioritized and a resolution plan developed per the priority (i.e., Priority A is 30 days and Priority B 60 days).

With both units shutdown, management with operations input has identified a number a material condition items which will be corrected prior to start-up. This, along with the extensive work being completed during Unit 1 and Unit 2 outages, and the change of standards will result in improvement in plant material condition.

Correct Processes That Challenge Safe Plant Operation: To minimize human performance errors, plant labeling is being upgraded to support operators and other station personnel in the safe completion of operations and maintenance activities. At a recent action plan progress meeting, the labeling plan Team Leader indicated that three milestone dates had not been met. This was in part due to a failure to schedule and obtain support from other departments and is indicative of the need for continued emphasis on enforcing management expectations. Senior management is taking these opportunities to reinforce accountability and to modify individual behaviors to ensure expectations are being met. In this case, Maintenance and Stores committed the needed resources to assist in bringing the labeling plan back on schedule.

Maintenance

Several initiatives are ongoing in the maintenance area to address worker performance. Using specific criteria, weekly field observations of workers are being performed by First Line Supervisors to ensure expectations are known and accountability is pushed down to the worker level. Pre-job briefings and job turnovers have been standardized to reduce the risk of human performance errors in these processes. A review of the maintenance training programs is in progress to address current skill and knowledge-based deficiencies in the maintenance areas.

Examples of maintenance involvement in the LaSalle Upgraded 1996 Operational Plan include the following elements directed at short-term improvements:

Reduce Maintenance Rework: Reducing maintenance rework will help LaSalle Station achieve more effective work management. We have reviewed data bases for rework, identified the major contributors and analyzed those to reveal the underlying causes of rework at LaSalle. The analysis showed both skill-based errors (e.g. ineffective implementation of self-check and procedure adherence) and knowledge-based errors (e.g., knowledge weaknesses in pumps for mechanics, motors for electricians, and the EHC system for instrument techs). Corrective actions have been determined to address these and include enhanced training and additional management monitoring of activities associated with pumps, motors and EHC during L2R07 and L1F35. Increased worker involvement through meetings and informal discussions is underway to improve identification of maintenance issues, such as rework, through the PIF process. Maintenance initiated PIFs have increased (43 in August, 79 in September, 354 in October, and 118 through November 18).

Improve Work Execution: The work priorities of the Fix-It-Now (FIN) Team have been realigned to focus on emergent equipment problems, such as Main Control Room distractions, which challenge the operators. Twenty-one ARs/WRs have been identified that are within FIN Team capability. Six have been resolved and the other fifteen are scheduled for completion by December 31, 1996. We are also increasing FIN work that is classified emergent priority work. By this, we will gain quicker turn around on minor maintenance and provide a level of protection for scheduled work. We are on schedule to achieve a goal of having the percentage of FIN Team work that is higher priority increased from 20% to 40%.

Engineering

As discussed during our SALP meeting, the new engineering management team has observed deficiencies in engineering consistent with those cited in the SALP 13 report. We have put in place several stop gap measures to immediately improve the technical quality and content of selected Engineering products.

For example, we have implemented formal Department Head review and approval of engineering work products including Problem Identification Form issues, significant safety evaluations and operability evaluations, technical specification clarifications, significant root cause determinations and formal regulatory responses. This action will improve work product quality.

An Independent Review Group for Safety Evaluations and Operability Evaluations was established. This function will transition to be part of an Engineering Assurance Group which has a broader in-line and overview function. The Engineering Assurance Group is led by an industry leader in engineering assurance and will include personnel with long term, broad experience in engineering and engineering processes.

Examples of engineering involvement in the LaSalle Upgraded 1996 Operational Plan includes the following elements directed at short-term improvements in the area of Effective Plant Support:

Improve Root Cause Identification and Corrective Action Determination: A Corrective Action Review Board (CARB) has been implemented to review root cause reports for adequacy and appropriateness of corrective actions. CARB has raised the standards for rigorous root cause analyses as indicated by numerous requests for supplemental information and/or analysis prior to acceptance. Actions are also in place to push the accountability for root cause analysis quality down from the CARB to the responsible line manager. These actions are expected to increase management involvement and thus improve the capability of the staff to conduct root cause analyses and will reduce the frequency of repeat events.

Implement Short-Term Actions to Assess and Improve Conformance to the Design Basis: These activities include performing System Functional Performance Reviews for selected systems, as part of longer term reviews for all systems important to safe and reliable operation. This will better establish the detailed functional requirements, prioritize known and latent system problems, and confirm the adequacy of periodic testing for monitoring functional performance. Five systems have been selected for completing these reviews prior to startup of LaSalle Units 1 and 2 (Main Control Room Ventilation/Auxiliary Electric Equipment Room Ventilation; Core Standby Cooling (essential service water); 125 VDC (Div I and II); Reactor Core Isolation Cooling; Electrohydraulic Control). Additionally, detailed design reviews are being conducted for the first three of these systems, which will confirm the design adequacy compared to the design basis requirements via detailed review of design and analytical information. Industry personnel with extensive experience in nuclear facilities are leading the reviews and are coaching and tutoring LaSalle engineers in these processes.

As I mentioned earlier, the third step in our approach to improvement is to put in place the processes to maintain improvements achieved. Extensive effort has been exerted to upgrade LaSalle Station's ability to identify its own problems. Each Department Head is required to conduct a self-assessment of their area and meet with the Station Manager and Site Vice President to discuss problems and corrective actions being taken. Specific areas required to be discussed include personnel performance and training. Follow up in subsequent sessions is being used to hold Department Heads accountable for making improvements. Also, the Management Review Board is being reconstituted and refocused to provide more effective assessment. Groups outside of LaSalle Station are also being used more frequently to provide objective assessments of site activities. Assessments of this nature include one on inservice testing activities and two related to SQV activities.

Finally, we appreciate your acknowledgment of improvement in Radiation Protection; however, we are not satisfied with our performance in this area. Management field observations have been increased as part of the effort to improve this area. We are also working to effect improvements in Security, which declined, and Fire Protection where performance continued at only an acceptable level.

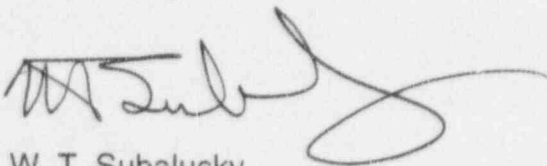
Although I believe we know the full range of performance issues that face LaSalle, an Independent Self Assessment (ISA) has been initiated for LaSalle Station. The purpose of the ISA is to revalidate known performance weaknesses at LaSalle, identify new issues and identify why past efforts to

improve performance have been ineffective. A team of utility peers and INPO assessors has been assembled to perform the assessment and will be on-site at LaSalle from December 3 to December 13. I will share the results of this Independent Self Assessment with you.

We will update our Operational Plan for the first part of 1997. As we complete this effort, we will continue to share this plan with the NRC Resident Inspectors. I hope to meet with you early in 1997 to discuss LaSalle's performance and will contact your office to set up a meeting.

It is critical through our efforts that we achieve improved human performance and plant material condition. As indicated above, our focus is on results rather than activities. In closing, we believe that we understand our performance issues and have the determination to improve through the efforts described above. If you have questions regarding the information provided, please contact me at 815-357-6761 Ext. 3600.

Respectfully,

A handwritten signature in dark ink, appearing to read 'W. T. Subalusky', with a large, stylized flourish extending from the end of the signature.

W. T. Subalusky
Site Vice President
LaSalle County Station

cc: A. B. Beach, NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
D. M. Skay, Project Manager - NRR - LaSalle
F. Niziolek, Office of Nuclear Facility Safety - IDNS
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