

MEETING ATTENDANCE SHEET

TYPE OF MEETING: WED LESSONS LEARNED PUBLIC MEETING

DATE: 2-28-00

| Name | Title/Department | Phone Number |
|-------------------|---------------------------|----------------|
| Jennifer Peters | Licensing - ONS | 5117 |
| Larry L. Mueller | Perfor & Strategy - GO | 563-5357 |
| NORIEL STEPHAN | Neel. Design Supervisor | 5909 |
| R.A. REXROAD | SENIOR STAFF ELECT. / AED | 5296 |
| A. SKILLER | SYSTEMS ENGINEER | 2833 |
| Terri Ann Glenn | Coop Engineering | 2721 |
| Michael Mansueti | PEO BOP Supervisor | 2838 |
| Elden Pletner, Jr | Eng Training Adm. | 5860 |
| LWAnn Bray | Licensing Specialist | 5587 |
| Kevin Jones. | Design Engineering | 5128 |
| Pete Dyalak | ESD | 2963 |
| LANNY BUCKLEHART | NEL / NAR | (301) 415-3053 |
| Tim McLEAVE | ENRUBERING - OSD | 462875-5174 |
| Paul Shanno | Engr / Licensing | 5815 |
| Ed McQuibban | Engr / Licensing | 2307 |
| MARICIA R. PUNSO | ENVAR | 5841 |

MEETING ATTENDANCE SHEETTYPE OF MEETING: NOED Lessons Learned - Public MeetingDATE: 2-28-00

| Name | Title/Department | Phone Number |
|--------------------|---|-----------------|
| LAWRENCE J. DUBGER | ACTING Manager, Engineering Support - CNS | 402 825-5170 |
| David E. Lorton | Consultant - Kestrel Group | 402 825-5494 |
| Charles Munschall | Chief, Project Branch C Div of Research Project, NRC R10 | 817 960-8185 |
| R.K. Thorsen | WEM | 825-2803 |
| J.E. LECHNER | ENS PROGRAMS SUPERVISOR ESD/CNS | 402 825-5686 |
| R.A. Radloff | Eng. / Licensing | 402 825-5304 |
| BRUCE RASH | SR ENS MGR / ENS | 402 825-2943 |
| R.A. Sessions | SR MGR QA | 825-5858 |
| Jim Flaherty | Asst. DED Mgr. | 825-5420 |
| Paul Gritton | Public Relations | 825-5768 |
| John Swales | VP Nuclear Energy | 825-5148 |
| Sharon Mahler | Assistant Licensing Manager / Licensing | 825-5236 |
| Norena Robinson | Lic. Specialist | 825-5691 |
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MEETING ATTENDANCE SHEETTYPE OF MEETING: Need Lessons Learned Fabric/MtgDATE: 2.28.00

| Name | Title/Department | Phone Number |
|---------------------|--------------------------------|--------------|
| Mike. Hale | Subgr Site Spnd | 5216 |
| Ken Brockman | Dir, DRP, NRC | 817/860-8248 |
| Michael Hy | Resident Inspector | 5659 |
| Jeff Clark | Sr. Resident Inspector | 5759 |
| Mike Boyce | Plant Engr. Mgr | 5100 |
| John McDonald | PLANT MGR | 5233 |
| David Nelson Madson | Licensing Engineer / Licensing | 5817 |
| JEFF ARCEVEBAUX | ENGINEERING | 5142 |
| Stan Domicki | Pressure Relieving Supv | 5732 |
| Steve Nelson | ENGINEER | 5058 |
| WILLIAM MACEE WIZEN | OPERATION | 5325 |
| David Van Der Kerk | Ops | 2904 |
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ENCLOSURE 2

NRC/CNS

Notice of Enforcement Discretion Communication Lessons Learned

Brownville, NE

February 28, 2000

Agenda

- I. Opening Remarks
- II. Time Line of REC
- III. Reactor Equipment Coolant
Amendment Request
- IV. Notice of Enforcement Discretion
Request

Agenda (continued)

V. Subsequent Communications
Regarding NOED

VI. Common Themes

VII. Corrective Actions

VIII. Closing Remarks

Opening Remarks

- Introduction of Attendees
- Review of Agenda
- Recognition That Performance on These Issues Doesn't Meet Our Standards
- Problem Facing CNS Management Is Inconsistent Performance

Opening Remarks (continued)

- Inconsistent Management and Supervisory Oversight
- Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication
- Inconsistent Application of Formal Communication Processes With NRC
- Inconsistent Accountability Related to Procedural Adherence and Implementation of Fundamental Standards

Time Line

| 6/15/99 | 12/30/99 | 12/31/99 | 1/1/00 | 1/2/00 | 1/3/00 |
|-----------------------|---|---|---|--|---|
| REC Amendment Request | <u>Morning</u> Indications of Increased REC Leakage | <u>Morning</u> Contacted PM to confirm actions | <u>Early Morning</u> Determined Sketch not to be Complete/Clear | <u>Daytime</u> CNS Discussion Re Shutdown Based on Trend and Gentleman Station Outage | <u>Daytime</u> Contact with SRI |
| | <u>Early Afternoon</u> CNS Discussions of Alternatives if REC Leakage Exceeds Limits | | <u>1:46 am</u> Declared REC Inoperable | | <u>Daytime</u> CNS Management Meeting Relative to Shutdown |
| | <u>4:00 pm</u> REC Declared Inoperable | | <u>Approx 3:00 am</u> Call to NRC Regarding Sketch | | |
| | <u>Approx 5:00 pm</u> NRC SRI & PM Notified of NOED Intent | | <u>Afternoon</u> Call with NRC to Answer Questions | | |
| | <u>Approx 8:00 pm</u> SORC Approved NOED Request | | <u>Late Evening</u> Formal NOED & Answers to Questions Submitted | | |
| | <u>Approx 9:30 pm</u> NRC verbally grants NOED | | | | |
| | <u>Approx 10:00 pm</u> Inappropriately Declared REC Operable | | | | |

2/28/2000

Nebraska Public Power District

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Time Line (continued)

| 1/4/00 | 1/5/00 | 1/6/00 | 1/7/00 | 1/8/00 |
|---|---|---|--|--|
| <p><u>Morning</u> NRC Requests Phone Call</p> | <p><u>Morning</u> Phone Call with NRC</p> | <p><u>Daytime</u> Phone Call w/NRR (11 Questions)</p> | <p><u>Approx 7:00 am</u> Level Increase in Surge Tank Noticed</p> | <p><u>2:00 am</u> Drywell Entry to Investigate Leakage</p> |
| <p>NRC Letter Issued Formally Granting NOED</p> | | | <p><u>Approx 10:00 am</u> Based on Losing Trend Data, 0800 8hr Drywell Floor Drain Leak Rate, and Discussions with Mgt, Controlled Shutdown & De-inerting Directed</p> | <p><u>11:52 am</u> Entered Mode 3</p> |

Reactor Equipment Coolant (REC) Amendment Request

- June 15, 1999 REC Amendment Request Information Not Clear and Complete
- Significant Condition Report Investigation Conducted
- Root Cause Was "Inadequate Articulation and Reinforcement of Standards and Expectations"

Notice of Enforcement Discretion Request

- REC Declared Inoperable Based on Procedural Requirements
- NOED Request Based Largely on Submitted License Amendment Request
- NOEDs Not Commonplace and No Specific CNS Process or Procedure Exists

Notice of Enforcement Discretion Request (continued)

- NRC Part 9900 and Existing CNS Correspondence Procedure Used As Guidance
- NOED Request Prepared and Internally Approved in Approximately 6 Hours
- Three-way Communication Not Practiced Relative to Exactly What the NOED Approval Meant
- Post Call Meeting Not Held to Ensure Actions Were Assigned

Subsequent Communication Regarding NOED

- Inconsistent Application of Fundamental Engineering Standards and Management Practices
- Inadequate Treatment of Key Technical Issues
- Inadequate Preparation for Conduct of Communications With NRC
- Inconsistent Supervisory and Management Oversight

Common Themes

- Inconsistent Management and Supervisory Oversight
- Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication
- Inconsistent Application of Formal Communication Processes With NRC
- Inconsistent Accountability Related to Procedural Adherence and Implementation of Fundamental Standards

Common Themes (continued)

Inconsistent Management and Supervisory Oversight (Examples of Poor Recognition and Response to Error Likely Situations)

- Turnover in Licensing and Engineering Persons Responsible for Amendment Request
- Turnover in Licensing Leadership Position
- NOED Infrequent Activity
- Extended Work Hours and Perceived Schedule Pressure
- Timeliness and Quality of Responses to Emergent Resident Issues

Common Themes (continued)

Inconsistent Management and Supervisory Oversight (continued) (Examples of Poor Work Management)

- Inconsistent Use of Fundamental Project Management Tools
- Failure to Promptly Mobilize Sufficient Engineering Manpower to Adequately Respond to the NOED and Forced Outage
- Personal Involvement of Key Managers in Work Details Subsequent to NOED
- Failure to Implement Forced Outage Procedure

Common Themes (continued)

Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication (Examples)

- Engineering Department Input to Amendment Request Limited
- Technical Contact and Licensing Contact Effectively Same Person
- Verification and Validation (V&V) Requirements Not Met
- Sound Basis for Measurement Uncertainty Not Communicated
- Understanding of Leakage Graph Correlation Not Communicated
- Fire Protection 4 Hour Report Not Clear and Complete

Common Themes (continued)

Inconsistent Application of Formal Communication Processes With NRC (Examples)

- NRC Communication Guideline Not Used
- V&V Requirements Not Met
- Formal NOED Procedure Does Not Exist
- Formal Guidance for Communication With Resident Does Not Exist
- Response to Amendment Request "11 Questions" Not Timely
- Communication Regarding Fitness for Duty Report Not Clear

Common Themes (continued)

Inconsistent Accountability Related to Procedural Adherence and Implementation of Fundamental Standards (Examples)

- Licensing Procedure 0.42, “NRC Correspondence Control
- Forced Outage Procedure

Corrective Actions

Inconsistent Management and Supervisory Oversight

- Management Expectations for Technical Involvement and Verification and Validation (V&V) Articulated and Will Be Incorporated In Procedures
- Individual Lessons Learned
- Common Themes and Corrective Actions Will Be Shared With Management Team
- Continued Focus on Staff Stability, Training, and Management Succession Planning

Corrective Actions (continued)

Inconsistent Implementation of Fundamental Engineering Standards, Leading to Inadequate Preparation for and Conduct of Communication

- Telephone Communications Guidelines Revised and on Licensing Web Page
- Management Expectations for Technical Involvement and V&V Articulated and Will Be Incorporated in Procedures
- Engineering Support Personnel Training on Roles and Responsibilities for Regulatory Submittals Will Be Conducted
- Conduct of Engineering Procedure Use Will Continue to Be Reinforced

Corrective Actions (continued)

Inconsistent Application of Formal Communication Processes With NRC

- Revised Telephone Communications Guidelines and Put on Licensing Web Page
- Management Expectations for Technical Involvement and V&V Articulated and Will Be Incorporated Into Procedures
- Memo to Supervisors on the Importance of Accurate Communication
- Licensing Rapid Response Notebook Developed

Corrective Actions (continued)

Inconsistent Application of Formal Communication Processes With NRC (continued)

- NOED Procedure Will Be Developed
- Engineering Support Personnel Training on Roles and Responsibilities for Regulatory Submittals Will Be Conducted
- Needs for Other Site Personnel Being Trained on Roles and Responsibilities for Regulatory Submittals Will Be Evaluated
- Guideline for Resident Communication Will Be Evaluated

Corrective Actions (continued)

Lack of Accountability Related to Procedural Adherence and Implementation of Fundamental Standards

- CNS Strategic Plan Identifies As a Site Wide Priority

Closing Remarks