



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

DEC 31 1996

Michael B. Sellman, Vice President
Operations - Waterford
Entergy Operations, Inc.
P.O. Box B
Killona, Louisiana 70066

SUBJECT: WATERFORD 3 PERFORMANCE IMPROVEMENT PLAN

This refers to the meeting conducted in the Region IV office on December 18, 1996. This meeting related to a discussion presented to NRC Region IV personnel on continuing efforts to improve overall performance at Waterford 3. The presentation focused on assessments, areas for improvement, initiatives, and accomplishments in operations, maintenance, engineering, and plant support. Other topics included, improving the safety culture, personnel and management issues, and corrective actions.

We appreciated the update on the status of your performance improvement plan.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in cursive script that reads "J. E. Dyer".

J. E. Dyer, Director
Division of Reactor Projects

Docket No.: 50-382
License No.: NPF-38

Enclosures:

1. Attendance List
2. Licensee Presentation

9701070023 961231
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DEC 31 1996

Entergy Operations, Inc.

-4-

bcc to DMB (IE45)

bcc distrib. by RIV:

L. J. Callan
DRP Director
Branch Chief (DRP/D)
Project Engineer (DRP/D)
Branch Chief (DRP/TSS)

Resident Inspector
DRS-PSB
MIS System
RIV File
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

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GEW <i>[Signature]</i>	PHH <i>[Signature]</i>	JEDyer <i>[Signature]</i>					
12/30/96	12/31/96	12/31/96					

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070001

DEC 31 1996

Entergy Operations, Inc.

-4-

bcc to DMB (IE45)

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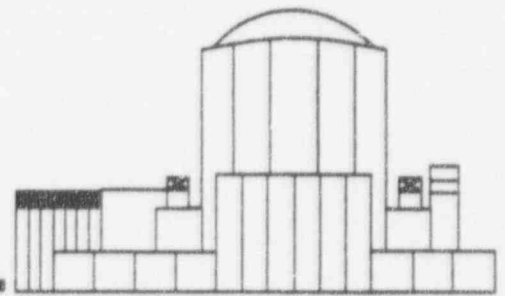
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GEW <i>[Signature]</i>	PHHarrell <i>[Signature]</i>	JEDyer <i>[Signature]</i>				
12/30/96	12/31/96	12/31/96				

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ENTERGY



WATERFORD SES - UNIT3



**LEADING THE WAY
TO EXCELLENCE**

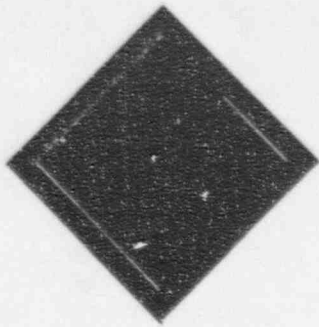
Safety

Efficiency

Generation

W3 / NRC MANAGEMENT MEETING

December 18, 1996



AGENDA

Introduction/Purpose

Bounding of Issues/Becoming Self Driven

- Operations
- Engineering

- Maintenance
- Plant Support
- Other
 - > Safety Culture
 - > People
 - > Corrective Actions

Self-Assessment

Summary

M. Sellman, V.P. Operations

C. Dugger, Gen. Mgr. Plant Operations

A. Wrape, Dir. Design Engineering

F. Titus, V.P. Engineering

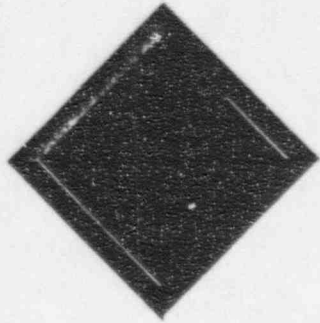
C. Dugger, Gen. Mgr. Plant Operations

F. Drummond, Dir. Site Support

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M. Sellman, V.P. Operations



PURPOSE

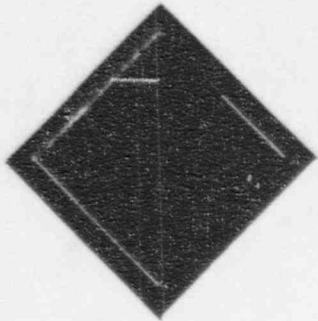
To Discuss:

W3's perspective on where we are with respect to bounding concerns -- are we in recovery or discovery?

W3's perspective with respect to who's the catalyst (forcing function) -- W3 or the NRC. Would W3 pursue and develop issues fully if we didn't have NRC oversight?

Additionally:

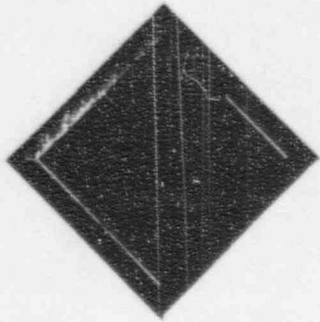
- Provide Accomplishments
- Where Do We Go From Here



PERFORMANCE ROOT CAUSES

(from 6/11/96 FOCUS Plan Presentation)

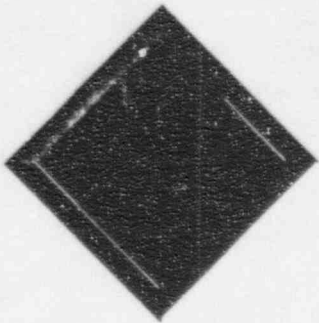
- Self-Critical Attitude Not Fostered by Management
- Management Has Not Provided Leadership in Setting Appropriate Expectations
- High Standards for Safety and Regulatory Performance Have Not Been Set With Same Vigor As Has Occurred for Cost and Operational Performance
- Insular Behavior Prevented Earlier Correction



PERFORMANCE ROOT CAUSES

How W3 Looks Today (*cont.*)

- Self-Critical Attitude Not Fostered by Management
 - Timeless Principles
- Management Has Not Provided Leadership in Setting Appropriate Expectations
 - True North Goals
 - Goal Alignment
 - Significant Progress in Laying Out Expectations



PERFORMANCE ROOT CAUSES

How W3 Looks Today (*cont.*)

- High Standards for Safety and Regulatory Performance Have Not Been Set With Same Vigor As Has Occurred for Cost and Operational Performance
 - Employee Communications (Grassroots Advisory, FOCUS QAT, Meet With Mike, etc.)
 - Resources and cost are no longer impediments to plant safety and regulatory performance
 - Timely Communication with the NRC

- Insular Behavior Prevented Earlier Correction
 - Assessments

W3 Assessments Status

Black: Corporate Assessment/Outside Assessment
Red: W3 Assessment
Blue: Not Assessed

Corporate Assessments

1. Chemistry
2. Radiation Protection
3. Operations
4. Maintenance/P&S
5. Maintenance Rule
6. System Review - HPSI
7. Engineering & Tech. Support
8. System Review - CR HVAC
9. Training

ENGINEERING	MAINTENANCE	OPERATIONS	PLANT SUPPORT	OTHER
Design Effectiveness (5)	Diagnostic Maint. of Structures, Systems, Components	System Lineups	Radiological Controls (2)	Safety Culture - Employee Concerns
Maintenance Rule	Predictive Maint. of Structures, Systems, Components	Monitoring of Plant Conditions	Emergency Preparedness	People (Employees, Management)
Modification Implementation	Preventive Maint. of Structures, Systems, Components	Logging of Plant Conditions	Security	Corrective Action (6)
Emergency Engineering & TS	Corrective Maint. of Structures, Systems, Components	Response to Off Normal Conditions	Chemistry	Procedure Compliance
Engineering Support of Maintenance (5) (7)	Surveillance Testing	Adequacy of EOPs	Fire Protection	Quality Assurance, Training
Engineering Support of Operations (6) (7)	Inservice Inspection & Testing	Implementation of EOPs	Occupational Rad. Safety (2)	Organization
Procurement Activities (7)	Instrument Calibration	Manipulating Reactor Controls	Radiation Waste Management	OE&E
Configuration Management (6)	Equipment Operability Tests	CR Prof. & Comm.	Radiological Effluent Control (1) (2)	NRC Comm. Assessments
Systems/ Design Basis	Post-Maintenance Testing	Operations Use of and Control of Tech Specs	Transportation of Radioactive Materials	
IST	Post Outage Testing	Operations Control of Work Activities	Emerg. Plan Notifications	
Calculations (5) (6)	Special Tests	Post Maintenance Testing	Interactions w/Offsite Orgs.	
FSAR Implementation (5) (6)	Work Control	Primary Coolant Leakage Systems	Phys. Security	
System Engineering (5) (6)	Work Efficiency	Questioning Attitudes and Ownership of Plant	FFD	
	Instrument Set Point Control	Findings from INPO E&A Visit	Access Authorization	
	Work Planning	OPI	Control of Spec. Nuc. Mat.	
			Housekeeping	

W3 Assessments Status

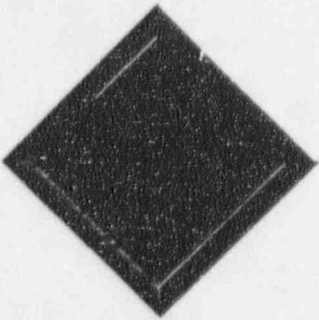
Corporate Assessments

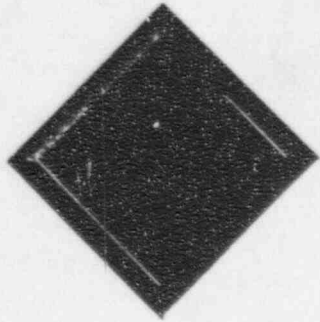
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OPERATIONS

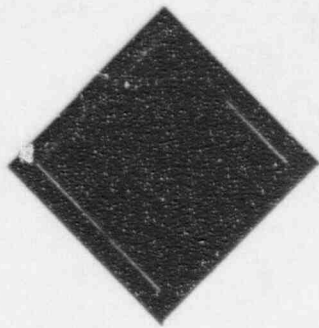




OPERATIONS

Bounding the Issues and Becoming Self-Driven

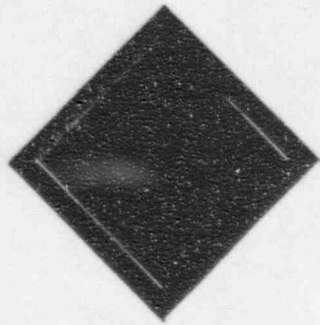
- 1996 Assessments
- Areas for Improvement
- Initiatives and Accomplishments
- Conclusion
- 1997 Assessments



OPERATIONS

1996 Operations Assessments

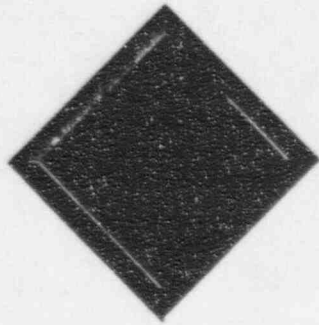
- Monitoring of Plant Conditions
- Logging of Plant Conditions
- Manipulating Reactor Controls
- Control Room Professionalism and Communications
- Post-Maintenance Testing
- Primary Coolant Leakage Systems
- Questioning Attitude and Ownership of Plant
- Findings of Previous INPO E&A Visit



OPERATIONS

Areas for Improvement

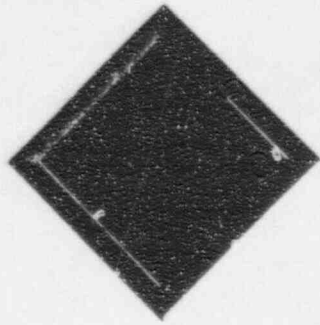
- LCO Entry
- Personnel Error Rate
- Ops Procedure Backlog
- Plant Cleanliness
- Control of M&TE
- Computer Applications



OPERATIONS

Initiatives and Accomplishments

- New work planning meetings owned and chaired by Operations
- Operations instituted affected SS review of weekly work schedule one week prior to implementation
- Aggressively staffing Operations department, including contract help with procedure backlog. Admin. staff is being restructured
- Restructured fire brigade
- Parallel run of Contingency/Caution Tag/Deviation databases
- Revise Emergency Plan logistics to improve Control Room response
- Revise Emergency Operating Procedures

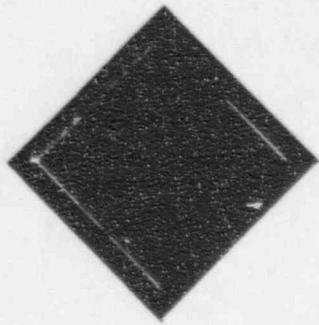


OPERATIONS

Conclusion

We are improving and realize we have some distance to go. Our efforts are focused on:

- Identifying, correcting, and bringing to closure our own problems
- Tech spec LCO entry and compliance
- Continue to advance Operations ownership of Waterford 3
- Aggressively pursuing daily operations with questioning attitude

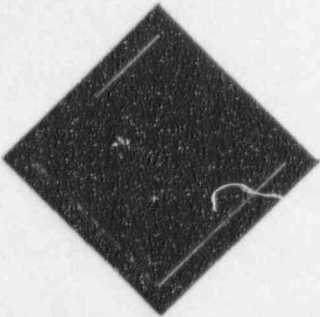


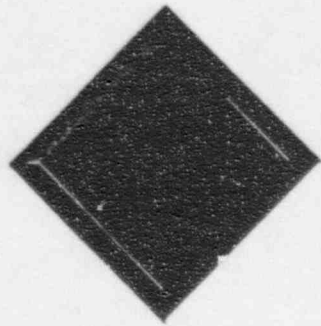
OPERATIONS

1997 Operations Assessments

- LCO Entry and Tech Spec Usage (12/96)
- Equipment Out of Service Process (1/97)
- Configuration Control (2/97)
- Simulator Operations (7/97)
- Operator Rounds (8/97)
- EOP Implementation (10/97)

ENGINEERING

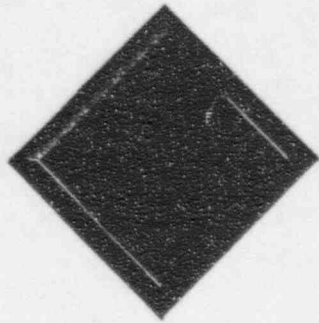




ENGINEERING

Bounding the Issues and Becoming Self-Driven

- 1996 Assessments
- Assessment Insights
- Actions Taken and Results
- Future Challenges
- Conclusion

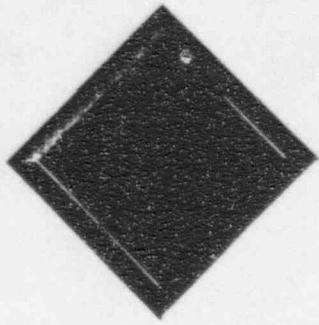


ENGINEERING

1996 Assessments

- HPSI
- Entergy Engineering & Technical Support
- Ultimate Heat Sink
- Entergy FSAR
- IST Audits
- NRC E&TS
- Control Room HVAC
- INPO design basis
- Maintenance rule assessment
- Entergy evaluation of engineering working relationships
- Entergy design basis*

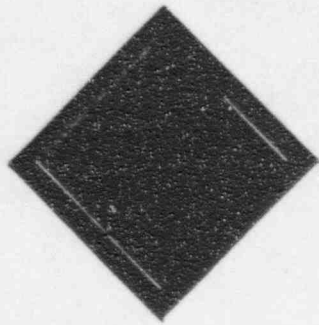
* In progress



ENGINEERING

Assessment Insights

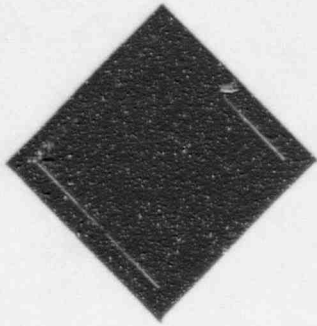
- Design/Licensing Basis
 - Majority of system reviews originally intended by the FOCUS plan have been accomplished as a result of assessments and recent corrective action activities.
 - Weaknesses in design basis documentation have been noted.
 - Engineering rigor needs to improve in the areas of assumptions, questioning attitude and evaluations.



ENGINEERING

Assessment Insights (Cont.)

- Design/Licensing Basis (Cont.)
 - Some challenging issues have emerged. To date, these have not involved a significant impact on plant safety.
 - Corporate evaluation of W3's design basis is underway. This will supplement the FOCUS Plan results to determine the scope of future design basis documentation upgrade work.



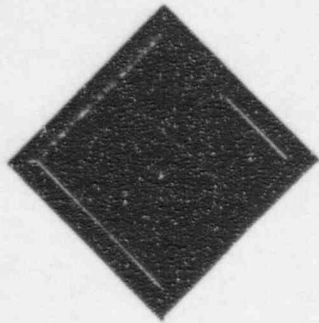
ENGINEERING

Actions Taken and Results

- Design/Licensing Basis
 - W3 is committed to licensing & design basis alignment. This has been demonstrated in response to recent assessment findings.

Examples:

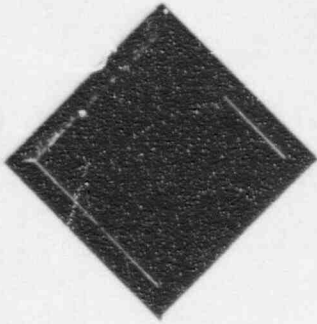
- ◇ ACCW waterhammer (DC-3470)
- ◇ CVR-401 A&B
- ◇ Containment isolation CVR-402 A&B (check valve)
- ◇ HVC-101 & 102 testing
- ◇ UHS tornado protection
- ◇ BRTG monitor power supply
- ◇ EDG fuel oil capacity plans



ENGINEERING

Actions Taken and Results (Cont.)

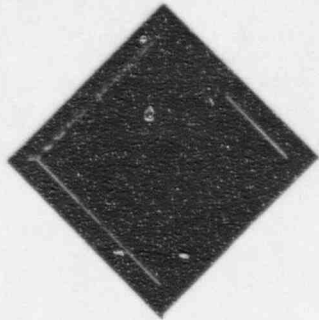
- Engineering Practices That Have Changed
 - Fix vs. evaluate is a theme
 - Optimism is fine, but don't assume the condition is correct in all cases.
 - Solve the problem the first time. Be thorough. Bound the issues.



ENGINEERING

Actions Taken and Results (Cont.)

- Engineering Practices That Have Changed (Cont.)
 - “Resources” and “cost” are not constraints.
Adequate staffing and funding are available.
 - Testing is the preferred method for demonstrating operability even if it is not specifically required.
 - Support the plant. Ops needs are a priority.

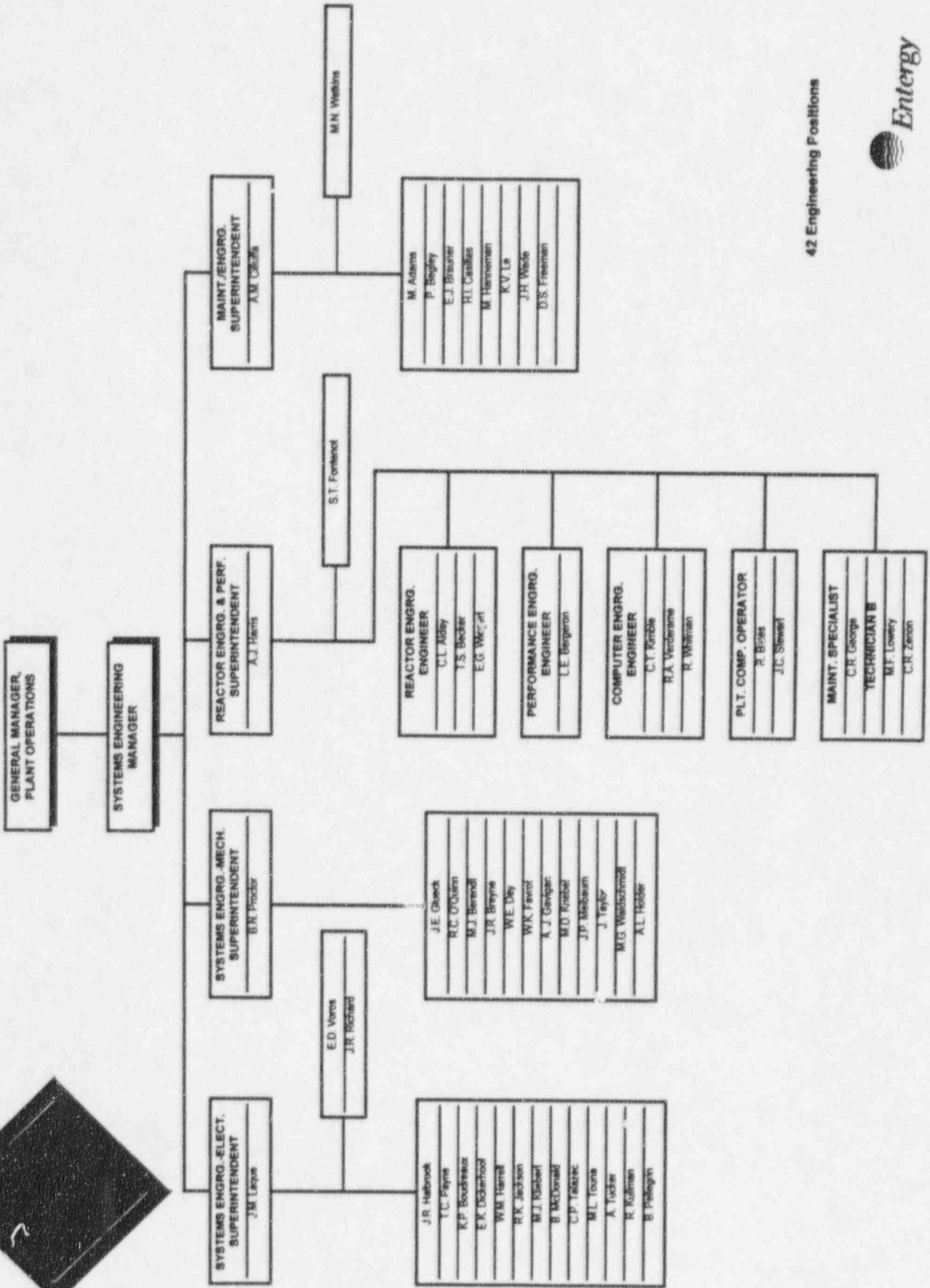


ENGINEERING

Actions Taken and Results (Cont.)

- Significant Engineering Management rotation
- Implemented Design Review Committee
- Strengthened partnership with Plant
 - DE became full voting member on PORC
 - Maintenance Rule expert panel
- Plant engineering organizational review

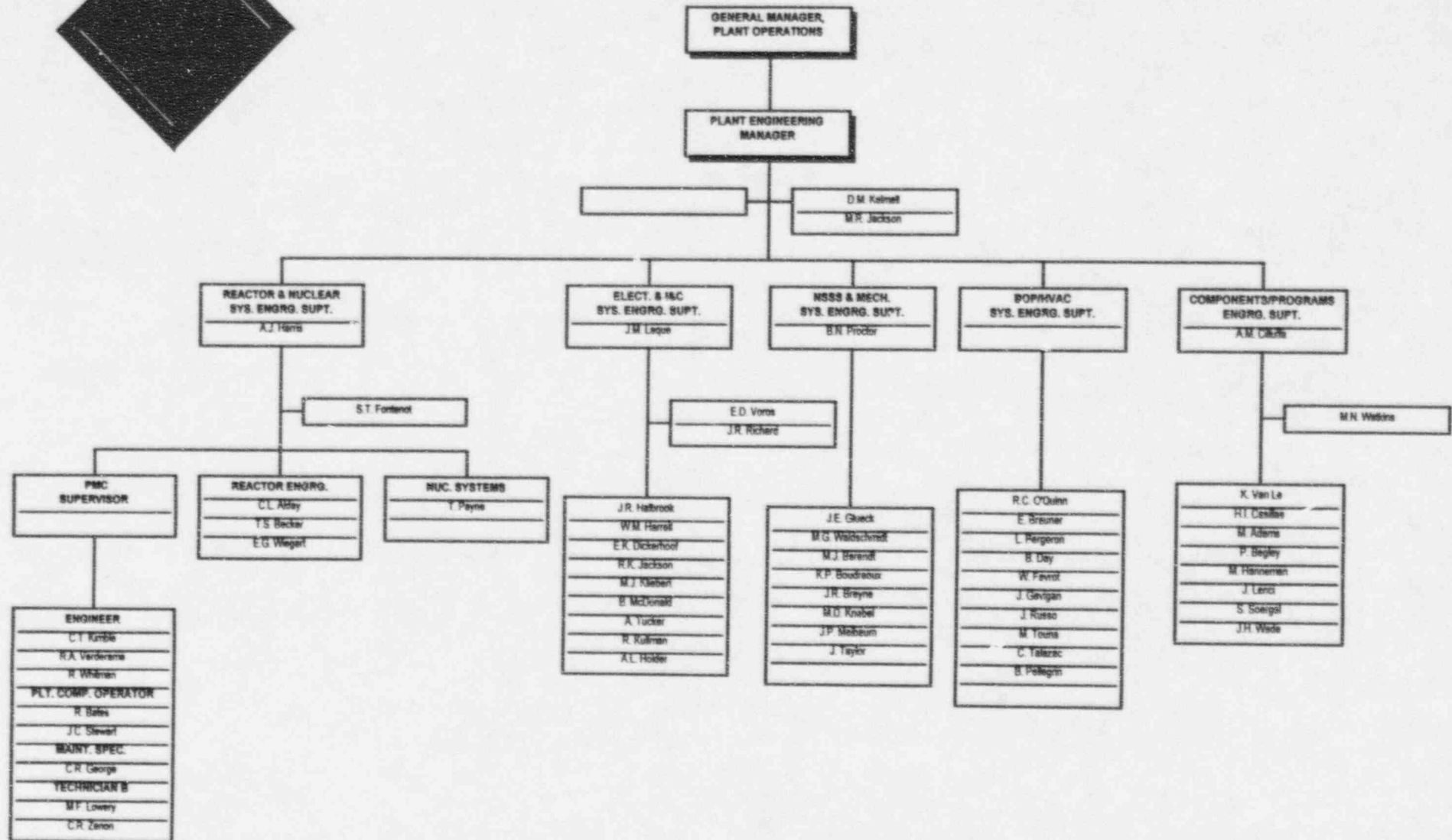
"PRESENT CHART"



42 Engineering Positions

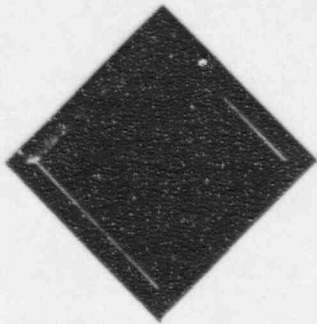


"APPROVED CHART"

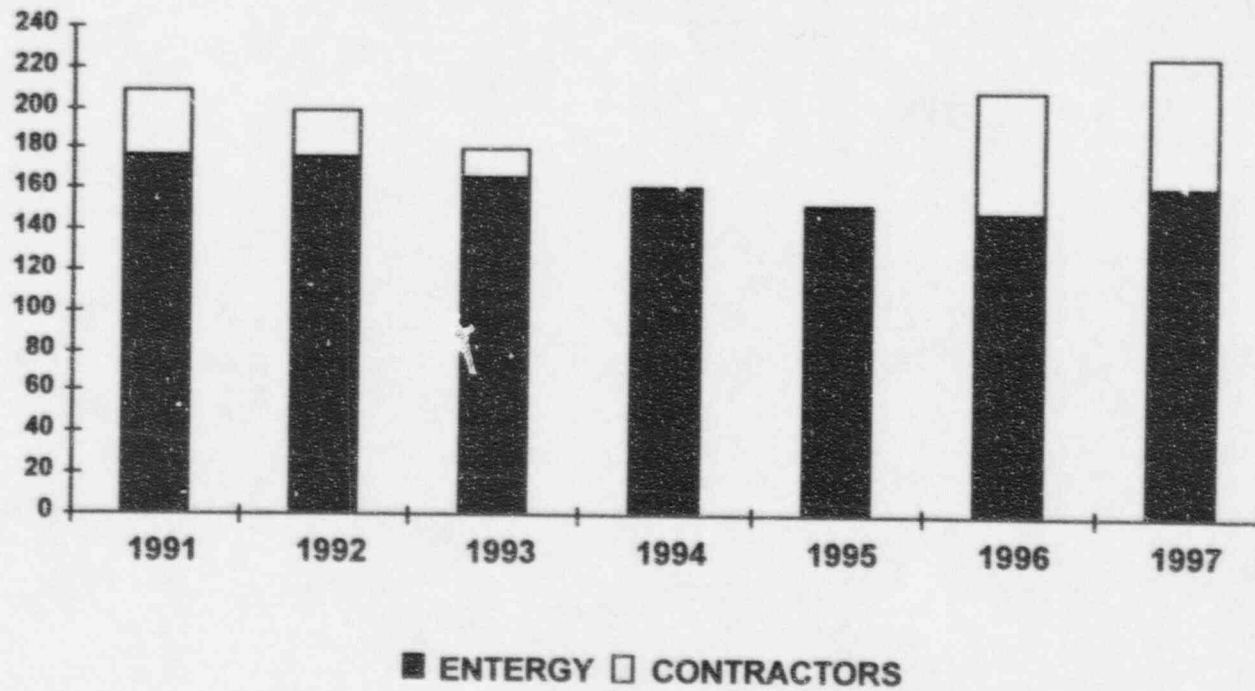


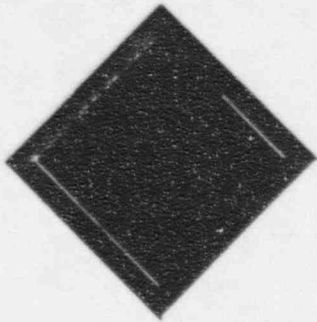
46 Engineering Positions





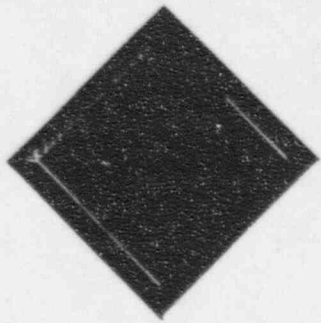
ENGINEERING STAFFING





Actions Taken and Results (Cont.)

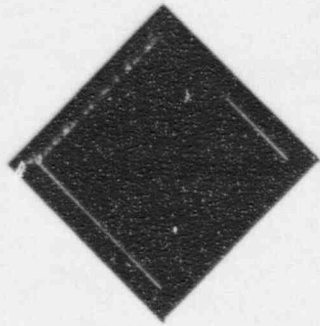
- Commissioned EOI System Wide Design Basis Integration Review
- Reevaluate DBD's mission
 - Capture critical system/component assumptions
 - Margin Control
- Selected Design Basis Reconstitution
 - Containment Penetration Review
 - IST plan reconstitution
 - Tornado/Missile Design Basis Review



ENGINEERING

Victories

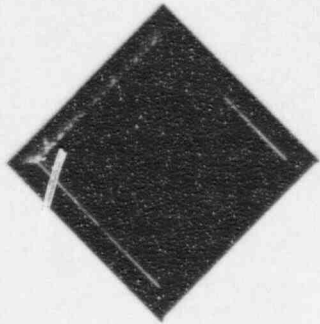
- Accumulator replacement
- NRC E&TS hydraulic reviews
- MOV fasteners
- BRGM Independent Power Supply



ENGINEERING

Future Challenges

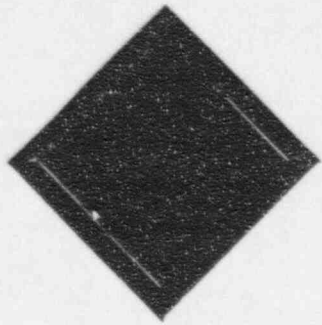
- Assessment corrective action
- Selected design basis reconstitution
- Engineering Request (ER) process implementation
- Modifications
- Backlog reduction



ENGINEERING

Future Challenges (Cont.)

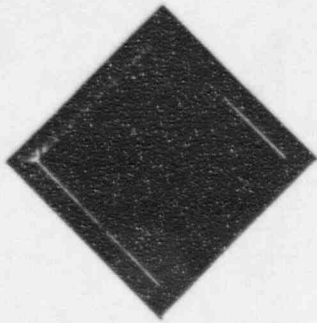
- Design Basis Review
 - A corporate Design Basis review will identify gaps in design basis documentation.
 - Significant work has already been done on the Electrical Distribution, UHS, EFW, Containment Isolation, and Control Room Ventilation systems.
 - Combined, these two efforts provide a solid foundation for embarking on filling Design Basis gaps in these areas.



ENGINEERING

Conclusions - Bounded Areas

- | | |
|------------------------------|---------------|
| • Fixing Problems | Fixed |
| • Questioning Attitude | Much Improved |
| • Working Relationships | Fixed |
| • Work Quality | Improving |
| • Design Basis Documentation | Assessing |

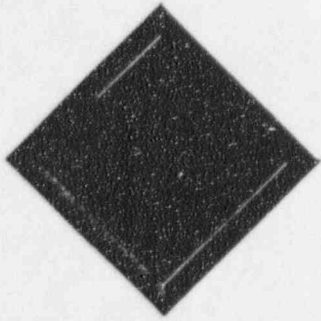


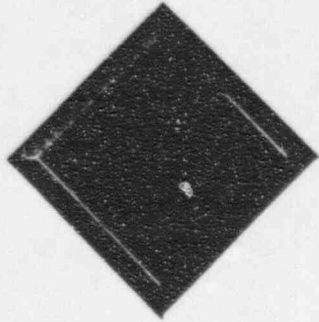
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Conclusions - Bounded Areas

- Electrical Design Good
- Piping Analysis Good
- Setpoints Good
- NSSS Systems Adequate w/Exceptions
- A/E Mechanical Systems Assessing

MAINTENANCE

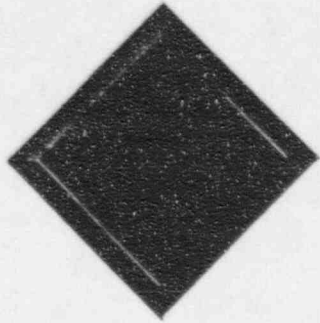




MAINTENANCE

Bounding the Issues and Becoming Self-Driven

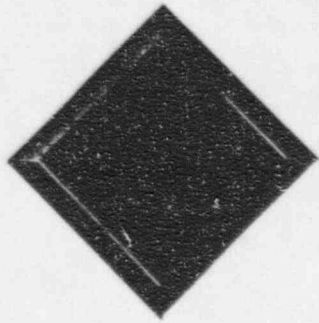
- 1996 Assessments
- Areas for Improvement
- Initiatives
- Results of Critical Management Reviews
- Conclusions
- 1997 Assessments



MAINTENANCE

1996 Assessments

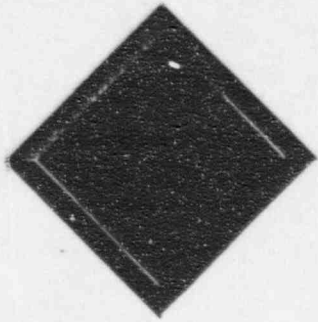
- Predictive Maintenance of Structures, Systems, Components
- Corrective Maintenance of Structures, Systems, Components
- Inservice Inspection & Testing
- Post Outage Testing
- Work Control
- Work Efficiency



MAINTENANCE

Areas for Improvement

- Work control needs improvement
- More critical oversight of field activities
- Worker practice improvements needed
- Foreign material exclusion improvements
- Safety practices
- Human performance
 - Procedure compliance
 - Work instructions improvement needed
- Post-maintenance testing during outages needs improvement

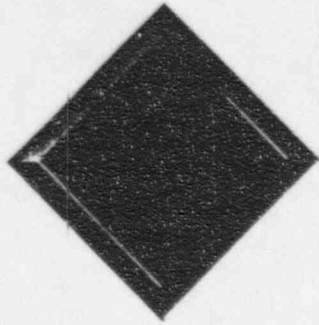


MAINTENANCE

Maintenance and Planning & Scheduling address areas in focus plans.

Initiatives:

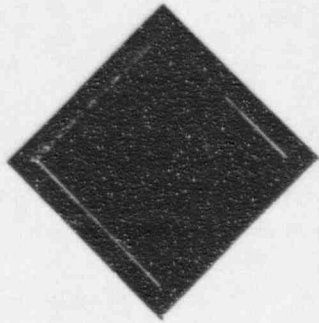
- Work control natural work team kicked off
- Spare parts availability natural work team kicked off
- System Outage Coordinator implemented
- Schedule compliance monitored
- Operations owns schedule and chairs Work Control Meetings



MAINTENANCE

Initiatives (Cont.)

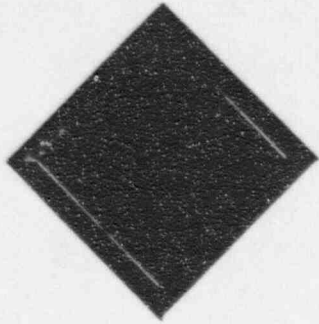
- Work plans developed for system outages
- Tagouts submitted four days in advance
- Supervisor expectations published
- Supervisor checklist being published
- Biweekly worker feedback meetings (AIM)
- Monthly supervisors' seminars
- Foreign material exclusion program enhanced and training in progress



MAINTENANCE

Initiatives (Cont.)

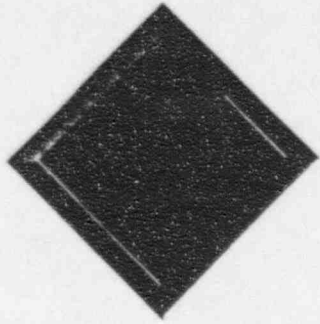
- Improving Human Performance training
- Enhanced tool box knowledge for fasteners
- Revitalizing zone ownership program
- Outage post-maintenance testing program enhanced



MAINTENANCE

Results

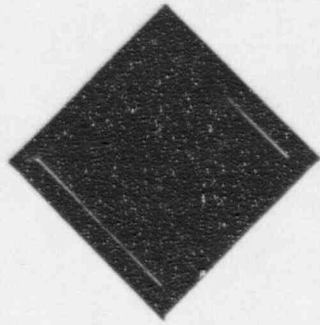
- Worker practice errors low (1.6 per 10,000 manhours)
- Maintenance rework rate very low
- Materiel condition improvement realized
- Housekeeping has improved
- Low safety system unavailability



MAINTENANCE

Conclusions

- Assessments and audits have been beneficial
- Improvements have been realized in most areas
- Continued emphasis on work control, FME, and human performance



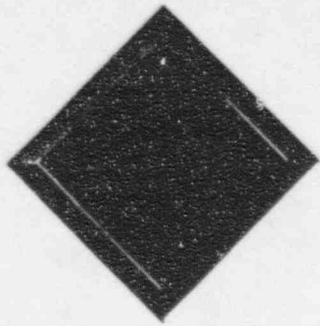
MAINTENANCE

1997 Assessments

- FME
- Housekeeping
- M&TE Control and Use
- Supervisor Activity in Field
- Worker Practices
- Work Control
- 45 assessments that touch on parts of maintenance

PLANT SUPPORT / OTHER

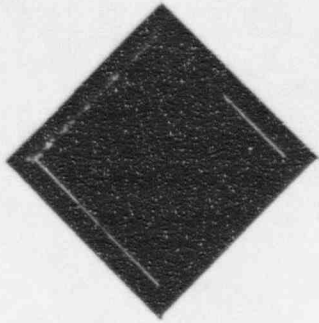




PLANT SUPPORT

Bounding the Issues and Becoming Self-Driven

- Summary From All Areas
 - Radiation Protection
 - Chemistry
 - Emergency Planning
 - Fire Protection
 - Security



PLANT SUPPORT

Radiation Protection

- 4 Assessments

Chemistry

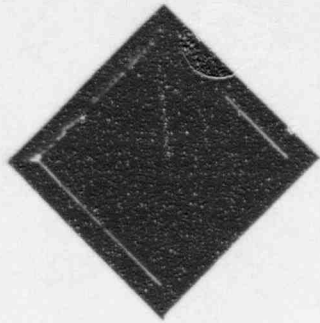
- 4 Assessments

Emergency Planning

- 4 Assessments
- 7 Drill Activities

Fire Protection

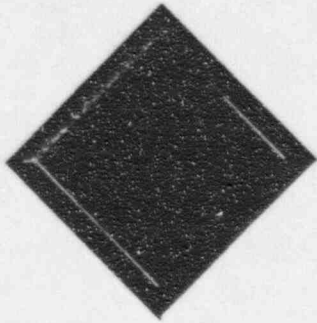
- 4 Assessments



PLANT SUPPORT (Cont.)

Security

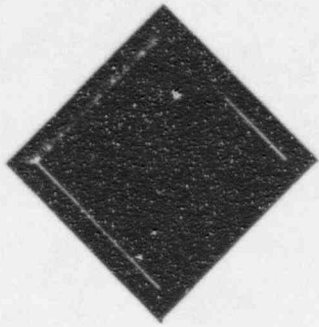
- 3 Assessments
 - General Manager Plant Operations Assessment - February 1996
 - Director Site Support Assessment - April 1996
 - Director Site Support Assessment - December 1996



PLANT SUPPORT (Cont.)

Security (Cont.)

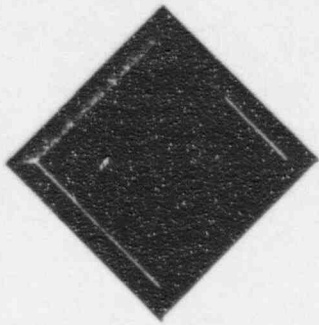
- Results
 - February/April 1996 “Processes” Adequate but Need Improvement
 - February/April 1996 “People Elements” - Needed Immediate Change
 - December 1996 “People Elements” - Improvement Apparent and Continuing
 - December 1996 Regulatory Performance Improved
 - December 1996 Needed Process Improvements Identified



OTHER

Bounding the Issues and Becoming Self-Driven

- Safety Culture - Employee Concern
- People (Employees, Management)
- Corrective Action



OTHER

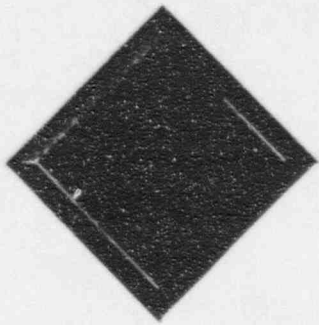
Safety Culture

Direction - Nuclear Safety Review

- Q Team (Old EC Program)
- Program needed overhaul
- More detailed review necessary
- Supervisors not sensitive to employee needs

Safety Culture Survey/Review

- Revised program is an alternative method to address any concern
- Contract and EOI Management is better informed in responding to employee concerns
- Departmental culture/concerns surveys are used to evaluate safety culture



OTHER

Safety Culture (Cont.)

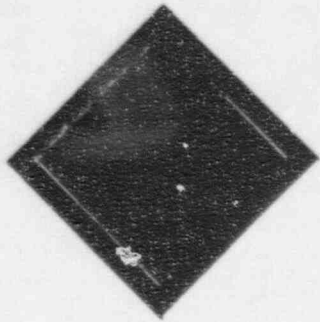
NRC Review

- Identified similar issues

Results to Date

- Program overhauled
- New coordinator
- Management training complete
- Improvement in cultural changes
- Improvement in identifying employee concerns

1997 - will perform an additional review



OTHER

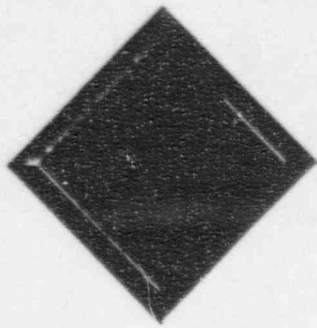
People

Management / Organization

- New Management
- Management Performance Improvements
- Management By Walking Around
- True North Goals & Goal Alignment

People

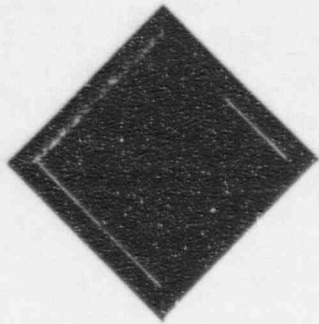
- Employee Communication Efforts
- Timeless Principles
- Expectations



OTHER

Corrective Action Program Achievements

- Conservative Problem Identification Culture
- New Grading Process Places Focus on Safety
- New Trending Program Monitors Effectiveness and Communicates Priorities
- New Human Performance Event Investigation Process
- Regular Trend and Assessment Meetings Provide a Broader Look at Issues and Ensure Senior Management Involvement
- Root Cause Analysis Program Improvements Promote More Thorough and Detailed Analysis



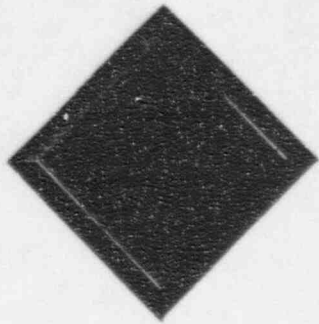
OTHER

Corrective Action Program Challenges

- Multi-discipline Teams Being Initiated to Evaluate Issues Involving
 - Procedure Noncompliance
 - Ineffective Corrective Action (Recurring Events)
 - Inadequate Procedures
 - Inadequate Design

- Goal is to Validate the Issue and Identify Underlying Causes and Generic Corrective Actions

- Focus Plan Provides for Continued Improvements in the Corrective Action, Root Cause Analysis and Plant Trending Programs



SELF ASSESSMENTS

Key to Success

- Used Extensively in FOCUS Plan
- Outside View of Waterford's Performance

Current Performance

- Corporate Self-Assessments
- Departmental Initiated/Coordinated Assessments

Future Direction

- Aggressive use of Corporate Assessments
- Initiate Site-Based Self-Assessment Process

1997 W3 Assessments

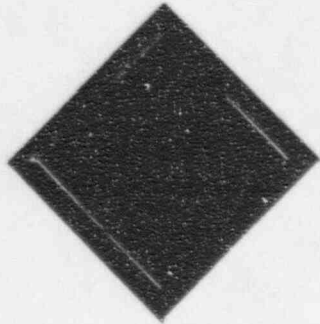
ENGINEERING	MAINTENANCE	OPERATIONS	PLANT SUPPORT	OTHER
* (See Below)	FME	Adequacy of EOPs	Emergency Preparedness	Safety Culture - Employee Concern
	Housekeeping	Implementation of EOPs	Security	QA
	M&TE Control and Use	Operations Use of and Control of Tech Specs	Emergency Plan Notifications	Training
	Supervisor Activity in Field	LCO Entry and Tech Spec Usage	Interactions with Offsite Organizations	Organization
	Worker Practices	Equipment Out of Service Process	Physical Security	OE&E
	Work Control	Configuration Control	Fitness for Duty	NRC Communications Assessments
	45 Assessments that Touch on Parts of Maintenance	Simulator Operations	Access Authorization	
		Operator Rounds	Transportation of Radioactive Materials	Human Performance
			Radiation Waste Management	

* Engineering has performed a significant amount of assessments in 1996 – both Systems and Programs. Engineering is going to use the results of those assessments and the ongoing Corporate Design Basis Review, NRC E&TS Report, and SALP Report to finalize the 1997 Assessment Plan.

1997 W3 Assessments

ENGINEERING	MAINTENANCE	OPERATIONS	PLANT SUPPORT	OTHER
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SUMMARY

- W3 recognizes we had and will continue to have challenges
- W3 recognizes that in the past, NRC presence was needed to help push resolution of issues
- Much has been accomplished in 1996 to change culture
- W3 is self-driven to find and fix problems and now taking control of our own destiny
- Issues are being bounded