that caused that to be. The majority of our condition reports came out of our discovery efforts off our Building Block Plans. So, that, does that answer your question, Bill?

MR. DEAN: So, really what you're saying is those items that are being deemed necessary to support restart is relatively low even though you're still identifying issues that are feeding your Corrective Action Program.

MR. PRICE: Correct.

MR. DEAN: Okay.

MR. PRICE: Okay, this next slide just goes through a little bit of our process. If I sounded a little repetitive before, I really was. The basic process behind all of our restart plans is the same as depicted on this slide.

We perform our discovery activities that are laid out in Building Block Plans, and we document all of our findings on condition reports in our Corrective Action Program. Those condition reports are classified as restart O350, restart with our site criteria and nonrestart.

Mike Roder will talk a little more about the Restart Safety Review Board in a moment, but the 350 means that it's associated directly with our Restart Checklist. Site criteria actually is restart criteria at the site that

is established that go above and beyond the 350 criteria for restart consideration.

And then, nonrestart are items that we determine are not either required for restart or not really associated with restart activities. It could be done any time. Many of those are done right away, but they're not necessarily focused from a restart perspective.

These condition reports all go through an evaluation phase, and then corrective actions come out of those restart -- excuse me. Corrective actions come out of those condition reports. And again, they are classified in the same three categories.

Then, they go on to implementation, and our priority for implementation is based on technical mode restraints, administrative mode restraints, and pretty much logic and schedule and management preference on where we want to schedule those activities.

MR. GROBE: Clark, I know that you've been spending a lot of effort on site to go through the issues that are identified to make sure that they're properly characterized as to what milestone they need to be closed by. Could you give me an idea of how many issues have previously been characterized as restart required items that are now characterized as something that can be delayed to after restart?

MR. PRICE: Where we have actually made a classification change on them? Oh, I don't know, there haven't been too many. What we do is, we go through the condition reports and evaluations, and many of those get classified as restarts. Are you talking kind of percentage-wise how many get classified as required for restart, how many post restart?

MR. GROBE: Actually what I was looking at was more specifically, as you've gone through these reviews and maybe, Randy, this is more a question for you in the Operations area. I think you've been trying to get your arms around from an Operations perspective exactly what's needed in each mode. I was wondering if there were things characterized as restart required, that you've now deferred until after restart; and how many issues like that have been coming up?

MR. RODER: I can address that right now, if you'd like.

Yeah, Jack. One of the things we did -- I'm Mike Roder, The Operations Manager.

One of the things we did in the last several weeks is, we had several work orders and several corrective actions that were coded as Priority 300. What that meant was there a high desire to get those done, however they weren't necessarily required for restart.

So, as we approach our restart dates, we are now looking at those very seriously to which ones we still want to get done and have a strong desire to get done and which ones we're going to defer to a later time.

So, we went through those, and I believe we came up with somewhere in the area of maybe two, three hundred that we deferred until later through our recent review; out of, oh, I don't know how many total. Maybe Mike Stevens has a better idea of the total number, but it was about maybe 20 percent of the electives that we deferred.

MR. GROBE: Just to make sure I understand, Mike. You've eliminated the Category 300, and that was highly desirable prior to restart and made those either restart requirements or you deferred them until after restart?

MR. RODER: That's correct.

MR. GROBE: And none of those items that you deferred are viewed as equipment operability issues or mode change restraints?

MR. RODER: No, none of them.

MR. GROBE: Have you got a sense of what your corrective action backlog is going to be at the time you restart the plant given what you know today?

MR. STEVENS: Yes, it's going to

be less than 250 corrective action work orders. We define our corrective maintenance through 18928, which is the Institute of Nuclear Power Operators definition for corrective maintenance and how the rest of the industry characterizes that. It will be less than 250.

When we started into this refueling outage, our corrective maintenance backlog was 193. So, we've taken, I don't like to always use numbers, because it really doesn't tell the story, but I can answer your question directly.

We had 160 Mode 6 restraints, that we took all the work orders, all the corrective actions, all the CRs. Each one has an owner. We had the whole team at the station go through all their assignments and identify with the Operations Mode Restraint Team, which are required for Mode 6. The result of that was 522, I believe, mode restraints. So, we went from 160, and ended up with 522.

Came into work after the Christmas holiday, all during the Christmas holiday, work control and work management worked on identifying those restraints, figuring out where they fit into schedule, readjusting our schedule so we had a total integrated picture.

The management team at the station spent two whole days touching each and every one of those owners and the system managers going through each and every one of those issues so they could understand and make recommendations.

The team constituted the Restart Station Review Board, but there were additional managers on that team to ensure that we didn't miss anything.

The result of that, what came out of that, we decided to take train one of the emergency diesel generator out of service; go perform maintenance on that machine. There is some issues with some of the bolting that make up the coupling. We didn't have the documentation to assure ourselves that those coupling bolts were tight. We needed to know that before we called that machine operable.

That came out of the Operations Department. We took that work activity. The bolts we found them at, torqued at the proper value, however we added some additional work to that outage that we normally would not have done and would not have been restrained to start up, but because we were in that condition and we had the materials ready to perform that work, we lumped those together and performed that maintenance.

We're doing those kinds of things. We're taking advantage of the system, the structure, bringing the systems back to support our milestones, as well as implementing the work orders with the resources we have, which includes the materials and the maintenance organization.

And where we can, we're implementing modifications.

For example, we took, on our decay heat system, we have decay heat valve 23. We took that apart for inspection. We wanted to replace a gasket on its bonnet because there was a indication of minor leakage. We got that identified, scheduled.

We talked with the engineering department. We found out we had a stainless steel yoke for that valve. The craftsman, because of the deep drain valve work we did, recognized that the use of the stainless steel yoke would make that valve more robust.

We had our Design Engineering Just In Time Team, which affectionately call the DE-JIT, involved in a work support center. They said they could support the paperwork necessary to put that stainless steel yoke on that valve. So, we added that work order, real time went after that.

So, there is a lot like that, Jack, with examples I can give. It's more than just the numbers. I would say we added more work, in total, as we're going forward meeting these milestones and developing this schedule and getting the work scope clearly defined and integrated.

MR. THOMAS: Does this process also capture engineering projects that are being performed at risk and ensure that the engineering work is completed prior to that equipment, or transitioning to a mode where that equipment is required?

MR. POWERS: Yes, Scott. The process for releasing work to the field; although, we have a built-in mechanism to release, where we call it an at-risk release of a modification package. The operations group cannot return a system to an operable status until work is completed satisfactorily on a modification package; and that means the mod is all complete and turned over. So, that process is built in, those checks and controls. (inaudible)

MR. GROBE: Is that microphone working? No? I think you guys are going to have to share one mike.

And you all don't have to write on the feedback form that the sound system stinks. I've already got that.

MR. POWERS: One of the things that Mike is referring to is when we release work to the field under this mechanism; for example, your earlier question, Jack, on the emergency sump work is ongoing.

We go through a process of assuring that as work is released, it's scrutinized both by the Design Engineering Manager, they're reviewing it. Also our Engineering Assessment Board takes a look at the change packages as they go to the field. And then a summary of the risk associated with that release is prepared by the engineers, for my assessment and signature.

And, when we talk about risk in this context what we're talking about is commercial risk to ourselves. We're releasing work to the field for construction; and we saw the pictures of the iron workers, boilermakers working down in the sump area. If we were to release something that, on the final package issue was, needed to be changed, then it would be at our cost and schedule to go and change it, but ultimately, the final package is issued before the system is returned to service and all the detail is provided there.

As I review the memorandum that summarizes what is required to be completed yet, the formal final package, then I can make a determination on the acceptability of the commercial risk associated with that. And I provide that then to Mike Stevens as the Outage Director. And he provides a review of that, and then releases work to the field if he believes that that's appropriate.

So, we have a number of checks and balances in the process as we go through it that allows us to provide a release of work to the field and get done those improvements that we feel are necessary in the plant. And ultimately through the program, make sure all the paperwork is finalized prior to the system being returned to operable status.

MR. MYERS: Thanks, Jim.

MR. GROBE: I appreciate that, Jim, and the reason I was asking questions, particularly about the sump mod, we went through quite a bit of planning over the last couple of weeks, and have come up with about 80 inspector weeks of effort that we need to put in on Davis-Besse before Mode 2.

And, one of the things we need to do before Mode 4 is confirm that the design of the sump that you're going to have in place at the time you go to Mode 4 is adequate. Now, I understand that you're separating that design package into a couple of pieces, but the sump is an important enough risk significant system, support system, that we want to have confidence that it's adequately addressed before the first time you go to Mode 4.

So, it's absolutely critical that we get that design work. No job is done, especially in the nuclear industry, until the paperwork is done. This job isn't done until the NRC inspects it. So, we're going to have to have time to inspect those activities, and I hope you built that appropriately into your schedule, getting this design work early enough.

We don't have any problem with your at-risk installation work. If you do it wrong, you just have to redo it. We do have a concern regarding the completion of the design and giving us enough time to inspect it.

MR. STEVENS: How many weeks did you say, Jack?

MR. GROBE: 80.

MR. STEVENS: 80 man weeks.

MR. MYERS: A couple comments, I think. We're sitting here asking some technical questions back and forth. From a public standpoint, I think it's important to note that we wound up with a reactor vessel head issue when we built the Building Blocks; and that put us into an outage that's considerably different than what we typically will do.

In a typical refueling outage, we would plan the outage probably starting a year ahead. We would know all the CRs. We would generate the condition reports. We would buy all the parts. And when we come down, we have the work plans in place, we walked all the packages down and we're ready to implement.

In this particular outage, we walked all the systems down. We decided to go over our reactor coolant pumps, once we got in our extended outage. We decided to do a lot more work, like the containment sump work, a lot of the stuff we did in containment.

And we're finding the problems on these curves, or the questions, we're finding the questions. We're generating condition questions. And it's called a CR.

Then out of that comes CAs, and that's a condition we want to go fix. And we divide those up, and there may be four CA's for CR on the average.

Then we're going to separate those things into restart pile. Now once we do that, then we have to build a work package. We have to order parts. We're actually having parts manufactured in the field.

So, we're out looking for parts and going to vendors, and parts are a really important thing with us right now. So, we've built this outage as we're going through it.

So, some of these questions that we're asking about CRs and CAs, and when are we going to have that done. A lot of it is because we're still, we're out of the discovery phase, and now we're into full implementation. We're out building work packages for people to use. We're out building, estimating the job, the times and the parts, and buying parts. So, all that is going on while these meetings are going on.

So, I think that's the reason some of these questions don't seem as clean as they should be. Is that fair?

MR. GROBE: Yep.

MR. MYERS: Okay.

MR. MENDIOLA: If I can ask a

question in a different direction on the same topic. We talked a lot about all these condition reports turning into corrective actions and then being sorted out into restart, if you will, and nonrestart. I can not get out of my head the image that there is a large stack of nonrestart corrective actions that are, that are going to be scheduled to some milestone or some future date, if you will, beyond restart.

MR. MYERS: Yep.

MR. MENDIOLA: And I'm not getting, if you will, a clear understanding of what they're being tied to or what event they're being tied to or that they're actually being scheduled to a date, an opportunity.

MR. MYERS: If they're not, you know, if they're not a restart item, then they're going into our bucket, and that bucket right now looks like, I think it's about three thousand?

MR. PRICE: Yeah, there is seven thousand.

MR. MYERS: Yeah, corrective actions that we'll probably have when we start up, is pretty much in line with what we see. How many?

MR. PRICE: Seven.

MR. MYERS: Seven? Which is,

that's --

MR. RODER: That's total.

MR. MYERS; That's total.

MR. RODER: And there is 1500 restart right now that we've identified. So, there is about 5500 that are undergoing that review process.

MR. MENDIOLA: My view is that 3000 or so of these items are suddenly going to come, for lack of better terminology, due on the plant's restart. That you'll have to suddenly, if you will, have a large crush of resources needed to plan, implement, prep for and, you know, seek an opportunity.

MR. MYERS: That's right.

MR. MENDIOLA: I want to get, if you will, the feeling that these are also being planned. If you will, that the organization, as we go through these condition reports and corrective actions, is looking beyond restart to properly place these items, if you will, in a scheme that will get them complete.

MR. POWERS: I'll give you a picture in the engineering world, Tony, on that one. We completed recently an Engineering Capabilities Assessment, as you know. One of the action items we got there is to prepare a plan, resource allocated plan, to work off the remaining actions that will be in place following the

restart of the plant.

That action plan is going to be created and be in place by June 30th. We already have that action within our Corrective Action Program. It's an item that needs to occur. Chuck Holly, who is my manager, project manager, has that action, put it together.

Dave Eshelman who is our Director of Asset, Complete Asset Management, has the action to divide resources among the FENOC fleet to ensure that resources are applied to work those off.

So, we're already turning an eye to that concern that we start up and have work ahead of us that we will be scheduling and resource we'll be working off.

MR. MENDIOLA: I would almost hope there would be, if you will, more work than you have between now and restart.

MR. POWERS: That may be the case.

MR. MYERS: I don't think that's the case. I think that there may be more activities.

MR. MENDIOLA: That's right; more activities, more, if you will, more tasks.

MR. MYERS: The big work is done. There is no containment sumps or anything like

that.

MR. POWERS: Right.

MR. MYERS: Ready for restart? Go ahead.

MR. GUDGER: I'm Dave Gudger, Manager for Performance Improvement.

We consciously underwent a review of these corrective actions and condition reports you're referring to. Most of these are conditions nonadverse to quality. We knew that we were going to move these out to a later point in time following our restart.

This process is allowing us to focus on the more critical and safety significant work for the power plant.

In doing so, part of our process is, as soon as we restart, we're going to take these items and we are going to take a look at scheduling them out, based on our resources at that time, but we wanted our staff to focus more importantly on the critical items right now. And, these items were getting in the way of that, so we took a proactive approach of this and performed that review.

MR. MENDIOLA: So, I'm sorry, to paraphrase what you said, more or less set aside for now until restart is over, at which time they will be scheduled, and resourced.

MR. GUDGER: That's correct.

MR. PRICE: Tony, one of the other things that the Restart Station Review Board does in reviewing both condition reports and corrective actions that we classify as nonrestart, we identify whether those are needed. A plant outage, refueling outage, system outage or it can be done any time on the line to help us in the future in prioritizing that work and getting it laid out.

MR. MENDIOLA: Not to belabor this more, but it seems that, if you will, what's being set up is a process now to identify those items necessary for restart in order to have them resourced and completed prior to restart; and if you will, a new separate scheme to deal with items after restart; rather than, if you will, one continuous in place process to do all work, whether it be before restart or after restart.

MR. MYERS: That's correct.

MR. MENDIOLA: What I said first, the first part?

MR. MYERS: That's correct, yes.

MR. MENDIOLA: So, the plan is to have one plan, if you will, between now and restart, and a separate plan, if you will, after restart.

MR. MYERS: That's correct.

Once, we've got these items that are on the plate that we know about. We've reviewed all those. We've characterized them for restart. And as soon as we restart, we'll start going through those activities, and we built in a midcycle outage, which will take on a lot of that.

So, we thought about that and planned that out. So, we have a midcycle that we planned in somewhere after about a year of operation. That's what our intent is there.

MR. GROBE: This is not unanticipated for a plant in your condition.

MR. MYERS: No, it's typical.

MR. GROBE: I expected there would be several thousand items that need to be addressed after restart. The number 250 corrective maintenance kind of surprised me, that seemed low, but we'll look at that.

Why don't we get on with Clark's presentation, the last couple of slides, and then we'll take a five minute break.

MR. PRICE: Okay. This last slide, I would like to present today, is a simplified version of a management tool we use on site to monitor our progress towards our Restart Checklist activities.

The first two columns that are colored in that chart, the first column -- I don't know if you can see the

overhead, or you can look on your slides.

The first column is a discovery column. That's where we do all our inspection walkdown and other types of discovery activities, document those, and complete that discovery activity. And, as you can see, most of those activities in that area are complete. Green indicates complete on the chart, and blue indicates work that is still in progress.

The second column is the implementation phase.

And then the last column that's on that, that report, is a restart ready column, which essentially says that we've completed all the discovery and implementation activities associated with the particular Restart Checklist item. And from a site perspective, we've determined it's ready for restart. It will still require NRC inspection prior to it being closed out, and closed the Restart Checklist from an NRC perspective.

So, I think from this chart, you can see we're making good progress. Kind of affectionately call it our Go Green Chart on site.

Now, next meeting when we come in, we expect to see a lot of these progress, considerably more, and many of them nearing completion, if not complete, from the work that we're going to be doing on site, and preparations for the final NRC inspections.

Any questions on this chart?

MR. GROBE: Two questions. The Boric Acid Corrosion Management Program and the Reactor Coolant System Unidentified Leakage Monitoring Program. That's 3 Delta and Echo. Are those going to be complete before the first Mode 4?

MR. PRICE: Yes, they will.

MR. GROBE: Okay. It's my expectation that we will have those two areas, those two programs inspected before you go to Mode 4 the first time. That's not a requirement on our part, but that's my expectation.

Is the Reactor Coolant System -- I think the Boric Acid Corrosion Management Program is now complete. Is the Boric Acid Reactor Coolant System Unidentified Leakage Monitoring Program, what condition is that in right now?

MR. PRICE: We're actually going to talk about that shortly. I'll defer that question, you can defer to later, to Jerry Lee, who will be discussing that program, if you would.

MR. GROBE: Okay, thank you.

MR. PRICE: Okay, if there is no other questions -- well, we're going to take a break.

MR. GROBE: It's, yeah, we've been at it for about an hour and a half, why don't we just

take a ten minute break. I hesitate saying that, because that sometimes stretches into 15, but I expect to start promptly in 10 minutes. Bill says that's a five minute break.

(Off the record.)

MR. GROBE: The number I noted was 79 inspector weeks between now and Mode 2, which is a couple of months from now, several months from now. That is performed by a fairly large number of inspectors. And these are, there is multiple inspections that are going on, on a regular basis.

Apparently, some folks developed some concerns that that was 80 weeks sequentially, or that these two gentlemen on my right are going to be performing the next 40 weeks continuous inspection. This is many inspectors coming from both Region III, other regions and headquarters that will be performing these inspections.

This is not an unusual level of work effort that is necessary to bring one of these types of outages to a closure. So, I didn't mean to cause excitement or concern that the workload was onerous or unattainable. This is something that we've clearly planned for. The NRC will put the necessary staff on this project to get the job done consistent with the schedule that FirstEnergy expects for their restart.

I don't anticipate any delays associated with NRC inspection activities. Of course, unless the inspection findings are not positive, in which case, additional work would have to be done on the part of FirstEnergy to address those issues.

So, the message you should take from those comments is the NRC clearly has its work mapped out, and resource loaded, and that we will perform the inspections that need to be performed to make sure this plant is safe before it would restart. Okay? Thanks.

Go ahead, Dave.

MR. GUDGER: I'm Dave Gudger. I'm the Manager of Performance Improvement.

MR. GROBE: I don't think your microphone is on.

MR. GUDGER: I'm Dave Gudger, Manager of Performance Improvement. Performance Improvement is responsible for the corrective action process, the day-to-day administration of the program, as well as the restart improvements that we're here to share with you today.

First, the Corrective Action Program is first line of defense for identifying and addressing problems in the plant, as Lew has previously stated.

I'm very excited to be here today. We have many

enhancements we'll share with you during the course of this presentation. These enhancements include process improvements, procedure change, oversight and training needs. This presentation provides the status of the progress the Corrective Action Program is making towards restart.

In general, the program works, as evidenced by Clark Price, who was showing you all the work activities that we have that we're working off during the course of this outage.

We performed a comprehensive assessment of the program. We learned the mechanics of the program are acceptable; however, improvement of the program's implementation is needed. The desired outcome today is to show how our action plan drive the necessary improvements for restart.

Next slide.

This slide is an overview of our program. For simplification purposes, it is comprised of four functional areas. To your left, there is rectangular boxes. It requires interactive monitoring and management feedback, which is represented by the center double areas of the program.

We utilized performance indicators to communicate this need of the program and to accomplish this. Our

enhanced performance indicators are giving us feedback on our implementation activities as well as they'll be utilized for continued plant operation.

The program's effectiveness on the interim was maintained with immediate actions that we took.

Next slide.

This slide presents some of the key actions that we took. It's not all inclusive, but these are important actions for which not only do these maintain the programs effectiveness, but also we've strengthened the program at the same time.

The first item is, we provided feedback to the initiator of condition reports, as well as their supervisors through ~~he mail~~ e-mail. This is automated and this ensures that the initiators of conditions have an understanding of how we've dispositioned them and corrected them. This is an important part of our program.

Enhanced performance indicators have been developed, as you will see, as well as we've increased our performance monitoring over the program. This is what gives us the feedback to give our management the input to make the necessary adjustments.

Supervisor awareness training of leadership behavior expectations was conducted. The supervisors are the most important part of our program. These individuals start on

the initiation of a condition report with communications up through management. They provide the leadership and direction for oversight on the evaluation process, as well as they're at the closure of the process to make the corrective actions implement in the proper way.

Operations has enhanced the senior reactor operator review standards. Operation's focus is on plant equipment and systems reviews; the impact, the way the plant operates. They are more rigorously evaluated and documented providing adequate basis for the site to understand the decision and the determination made.

The independent validation reviews have been conducted by the performance improvement organization, as well as there were other reviews during the course of the process by other review groups. This ensures the program is in compliance with the following procedure. Individuals get feedback from the various program reviews, as we've provided them in our performance indicators.

Next slide.

This slide as on overview of improvement actions that we're taking for restart. I've simplified it. It's not all inclusive again; however, it brings the major points for you to understand.

There will be process changes in the areas of communication. We're establishing routine feedback

mechanisms, as I suggested with the initiator and supervisor feedback; a newsletter and a website, as well as we have a planned case study coming up.

The database user aids provide process checklists for individuals using the program. So, we ensure that we're complying to procedures; as well as electronic forms to ease the burden and make it more efficient on the users.

Performance appraisals now include a Corrective Action Program expectation, as well as we've raised it to the highest level, it's a nuclear safety competency for our organization.

In the area of procedure enhancements, we're reformating the procedure in a work flow layout, as well as ensuring that the user has input where we are able to accept it. This increases user efficiency and ownership by the organization.

We've also included a responsibility section. Each individual that interfaces with the program up through the management ranks has responsibilities. They're ~~delineating~~ delineated in the procedure now.

We've incorporated effectiveness and collected ~~significant~~ significance reviews. Effectiveness reviews are where we evaluate corrective actions to ensure that they're addressing the causes. Collective ~~significant~~ significance reviews, we

evaluate similar issues and we look for or identify our cost-cutting causes that we can address across the organization.

In the oversight changes, we've provided the Corrective Action Review Board Charter. It now includes quorum requirements. We have specific section level managers participation, as well as we have a director chairing the board. And, lastly, we also include root cause quorum requirements of these managers.

We have root cause approval levels that have been raised. The Vice President reviews all root causes, as well as selected significant conditions adverse to quality reports will be reviewed by the Chief Operating Officer, as well as the Nuclear Group Council, which is comprised of our executive level management.

Training needs have also been addressed. We have provided root cause and evaluator training to our people. We have over 180 qualified individuals, as well as training now controls the qualifications of all of our evaluators.

We have annual, we are proposing annual site training, like plant access training and radiologic worker training which each of our folks receive each year, we are also going to have a module for the Corrective Action Program. This will bring the Corrective Action Program to the forefront of our operation.

We will also have refresher evaluator requirements. This will be conducted on a periodic basis, and it will include computer based training.

These particular improvement actions that I've described will bring the Corrective Action Program to the forefront of our operation.

Next slide.

This slide provides an overview of our top level performance indicators. As the process owner, Performance Improvement monitors the program's effectiveness. These are the top level performance indicators by which we do so. Performance indicators indicate the actions taken are effective so far, as you can see from the status here. We see positive results from these actions taken.

If there is no question on performance indicators, I'll move right on. Jack, you may have had a question earlier --

MR. GROBE: I have one question.

MR. GUDGER: -- on some of the numbers here.

MR. GROBE: The Condition Report Category, Accuracy; you call it CR Category Accuracy in your chart.

MR. GUDGER: That's correct.

MR. GROBE: That indicator kind of bounces all around, doesn't appear to be trending in any particular direction. That indicator, if I understand it correctly, is an indicator that judges how your field folk and first line supervisors assess the significance of conditions that are identified in the plant, and whether they do that accurately or not. Is that correct?

MR. GUDGER: Yes, that's correct.

MR. GROBE: Why is it that you don't have -- I interpret that as one of the many indicators that you can use to look at Safety Culture. Why is it that you're not having a positive trend in that area?

MR. GUDGER: If you look at the data that you're referring to, we have had a couple points of which it dropped, that's probably overly influenced the indicator. We consistently stayed high in the range of categorization. There is going to be some deviation, but when the supervisor makes a recommendation to the manager, we gauge the difference between when the MRB or the Management Review Board, in the morning managers meeting, determines a categorization difference.

MR. GROBE: I'm not sure you answered my question. Maybe you can, I expect that on the

30th, you're probably going to be talking about some performance indicators that you're going to be using to assess Safety Culture. Maybe you could look at this one and determine whether or not this is something that is, provides some indication of Safety Culture and whether you're comfortable that it's a valid indicator in what it's telling you.

MR. GUDGER: Okay, we'll consider that. It was not developed for Safety Culture in mind.

MR. GROBE: I understand. You're just now developing Safety Culture assessment methodology, but this seems to me to be one that goes to the appreciation of the people in the field, the staff and the first line supervisors of the relative significance of the various issues that come up. Okay. I'm going to be interested in further dialogue on that.

MR. GUDGER: Okay. These indicators show that we are improving and we're on track for restart.

Next slide.

In summary, we have an approved action plan in place that addresses the necessary improvements for the program. We are scheduled, we are scheduled for implementation of the enhanced program by the end of February, 2003.

That's all I have.

MR. DEAN: Dave, I have a question for you. It kind of ties a little bit where Jack was heading, so maybe we're foreshadowing a little bit the meeting on the 30th.

In looking ahead to the discussion later on, talking about Safety Conscious Work Environment and Safety Culture, it addresses the importance of having an effective Corrective Action Program as being an indicator that employees feel problems are being identified, that they are being resolved.

I guess what I want to ask you was, how were you tying or are you ~~typing~~ tying things that come out of the Employee Concerns Program into your Corrective Action Program in monitoring and measuring those?

MR. GUDGER: Bill Pearce will speak more toward that at the end of the presentation. We do have a strategy for how we allowed for our different programs to be integrated under the Safety Conscious Work Environment. The Corrective Action Program is one element of that; however, it is only one element of several ways for people to express their concerns.

MR. DEAN: Okay, thanks. We'll get to it later.

MR. GUDGER: Okay, any other

questions? If not, I'll turn it over to Jerry Lee.

MR. MYERS: We start out -- let me see if I can save some of the discussion we had earlier.

Question was asked earlier about backlogs, after startup. Now our backlogs after startup, I'm not going to use numbers, but let's just say we're estimating right now in the 7000 CA range. That's relatively low, you know, compared to some operating plants and also low compared to a plant that's been in an extended shutdown. So, we feel like that's in line.

The other question was asked is, are we prepared to deal with that. I thought we answered it earlier. We've already looked ahead. We know that backlog is there. And as soon as we start up, we intend to put a team together and go after that backlog and that resource. So, that workload we do anticipate and we think it's easily managed.

MR. GROBE: I hope our questions in that area were not interpreted as criticisms. It's expected that there will be a substantive amount of work that is not necessary to assure the safety of the plant, but are issues that you've identified. You've spent a lot of effort going through the plant and essentially turning over every rock, so to speak, to find what issues

might be there.

And some of them are very low level issues as far as significance, and those are going to be part of your backlog. There may be some that are more important that are part of your backlog, but don't affect safety systems or the safety of the plant in an immediate sense.

We plan on taking a pretty good look at your backlog just prior to restart, to get a sense of the, the integrated effect of that backlog; both from an impact on any safety systems. Sometimes individual issues look like they're not particularly important, but when you put it together with another 20 individual issues that didn't look pretty important, sometimes it tells a different story.

So, part of our inspection activities prior to restart, the readiness for restart, will be an integrated look at the backlog and whether or not there is some embedded safety strands there that need attention.

MR. MYERS: I understand.

MR. LEE: Good afternoon, my name is Jerry Lee, and I'm a plant engineer and I'm the owner of the Reactor Coolant Integrity Management Program or the Reactor Coolant Integrated Leakage Program.

My desire today is to provide a structural overview of this new and comprehensive program. The Reactor Coolant Leakage Program will challenge, evaluate, identify and

repair low level leakage, reinforcing a strong reactor coolant system inventory balance. The program is designed with two fundamental values of safe plant operation.

The first is to provide assurance of zero pressure, additional assurance of zero pressure boundary leakage. The second is to provide early detection and resolution of low level reactor coolant system leakage. Additionally, this program was designed to set industry standards for the identification and resolution of leakage.

This really starts by the plant employees. Their sensitivity to the reactor coolant system leak indicators, particularly the changes in the reactor coolant leakage system.

Part of this was with the reactor coolant head case study presented to the employees. This clearly identified the results of low level reactor coolant leakage.

Reactor coolant leakage trends will be made visible to plant employees using BBTB, and other media sources to ensure that leakage is clearly presented daily.

The program action triggers for adverse trends for unidentified leakage and for indirect leakage, such as containment activity, radiation elements, filter plugging, primary and secondary leaks; will be documented in corrective action programs and will be evaluated for plant impact.

Adverse trends will be, are going to be very low. The trigger for these trends are very low to provide for ample time for training and implementation for any actions required for a safe, documented and controlled function. That's up to and including a shutdown.

The improvements in the leakage rate calculation algorithm and reactor coolant system inventory balance is to insure that we have the best possible measurement and analysis results.

The Boric Acid Corrosion Control and the In-service Inspection Programs link with the Reactor Coolant System Integrated Leakage Program to form an inclusive reactor coolant system integrity management program, thus providing assurance of the reactor coolant system boundary.

Three different reactor coolant system leakage evaluation trends will be obtained from the water inconventory balance requiring, that's required to be performed at least every 72 hours. Typically, we do this daily.

These evaluation trends are cumulative. This is a summation of all the leakage that has come out from the reactor coolant system over a period of time.

We also have a rate of change, which is the actual change in the rate of leakage. This is calculated over a seven day period and extrapolated to a 13 -- or a 30-day

period.

Then we have a step change. Now, this is a sustained change in the leakage level, and it has to be stained for greater than three days. These evaluation trends were used to analyze the 1996 to 2002 leakage data from Davis-Besse. And the triggers or action levels provided in the program would have prompted the plant to take safe, or take actions to resolve leakage in the summer of 1998.

The plant will have a 7-day hold coming up. We'll do a nonnuclear heatup to normal operating power, normal operating temperature. At this point, we're really going to validate our new algorithm, and our new methodology, and make sure that we can achieve the lowest possible measured leak rate.

This is an unusual time for us, because we normally do not have steady state conditions at normal operating power and temperature -- or normal operating pressure and temperature.

Typically, we would go through Mode 3, Mode 2 and then to Mode 1, so we would not have steady state conditions. This will allow us an opportunity to fine tune this program, but it will also provide us with information for a baseline during Mode 3 testing, which can be compared to the hundred percent power data we would obtain later.

During the 7-day hold period, we will also have Engineering, Operations, Radiation Protection and In-service Inspectors, along with Boric Acid Corrosion Control Inspectors throughout Containment walking down the systems. We would do this at a pressure of approximately 250 pounds prior to the heatup. And we would do another inspection at normal operating pressure and temperature.

We'll come back down from normal operating pressure and temperature after about a 7-day hold; and we'll come back in and do another inspection of the Reactor Coolant System.

Now, each of the these evaluation trend types has three different Action Levels. The Action Levels are very low, but Action Level I, we want to provide added management oversight. We're going to bring this up to the attention of the management in the morning meeting as soon as we find an indicator. We'll increase the walkdowns and readily assessable areas throughout the plant, and we'll monitor all the indirect leakage indicators.

Action Level II, we'll come back and do again all the readily available walkdowns, accessible areas. We're doing the same actions as in Level I, but we're going to extend it. The walkdown will include some of the not readily accessible areas, such as in containment that can be accessed during power operation.

And we're going to add a containment walkdown and inspection to a forced outage list. Action Level III, we're going to repeat everything again, and evaluate and schedule a plant shutdown to find and repair the leakage.

Are there any questions?

MR. POWERS: There is a question on, with the program here, one of the things that's you designed into it is consideration for how this program enhancement would have helped us find the head degradation issue. Can you describe the sensitivity of this program?

MR. LEE: Well, the sensitivity of this program is such that had we had this program in place prior to the head degradation, we would have had about 13 opportunities -- I'm sorry, about 21 opportunities to enter Action Level III, which would mean we would look at a shutdown, schedule a shutdown to go in and inspect for leakage.

During cycle 13, that would have been eleven times of entering Action Level III, so eleven different opportunities. So, that's the sensitivity of this program.

MR. GROBE: Okay, thank you very much, Jerry. I just have one question. Maybe you're not the right guy to answer this, but I understand that

prior to restart, you're going to be installing the Flus system, the new leakage monitoring system. Are your, is your leakage management program written to address the traditional leakage monitoring tools that you have in containment, or is it also going to incorporate the input that you're going to get from the Flus Monitoring System?

MR. LEE: The program, this program is really designed for the low level leakage, that's what we're going after. The Flus Program will be incorporated into this, any new modifications in the future to give us higher detectability levels on whether it's activity or whatever, will be added into this. This is an ongoing program.

The completion of this program, it will be complete prior to entering Mode 4. We'll have some enhancement steps to come out of Mode 4, or out of the Mode 3, 7-day. We want to verify our Action Levels. We want to make them as low as possible. But the program will be in place prior to Mode 4 -- yeah, prior to Mode 4. And then we will make those enhancements prior to starting up.

MR. MYERS: So, the answer to the question is yes.

MR. LEE: Yes, sir.

MR. MYERS: It also includes the radiation monitors, stuff like that, right?

MR. LEE: It includes everything that's coming down the pike.

MR. DEAN: To build on Jack's question, I think the last time we met, there was still some, some doubt as to whether the Flus System would be installed in time for the NOT/NOP Test. Where is the status of that?

MR. SCHRAUDER: It is expected that the Flus System will be able to be installed prior to the NOP/NOT.

MR. DEAN: Okay. Thanks, Bob.

MR. HOPKINS: Yeah, I have a question. Are you going to do a similar type system at Beaver Valley or any of your other plants?

MR. MYERS: We haven't made that decision yet. I'm unable to answer that now.

MR. HOPKINS: And the improvements of the program, you say, is setting an industry standard; right? This isn't bringing you up to what the other industry has, this is going above?

MR. MYERS: This is very unique, we're excited about this program. This was something we added based on going back and reviewing the entire history over several years of the head degradation,

and saying, what could we have done different. So, what we're trying to do is take those lessons learned and anchor them using one of our processes and a procedure, so that in the future that won't be there. It will send the red flag and set the Actions Levels that management will have to look at. So, we're really excited about this program. It's unique.

MR. HOPKINS: The number of times you indicated that you had opportunities to enter Level Action III, that's just based on leakage, correct, and not the indirect indicators of one containment cooler fouling?

MR. MYERS: I think it's related on indirect --

MR. LEE: This is based on the direct.

MR. MYERS: Direct indicators.

MR. LEE: Direct indicators. Indirect indicators that we could also use to narrow down the leakage or provide us information, yes.

MR. HOPKINS: Okay.

MR. GROBE: I would like to follow-up with Jon's question with just a little more -- I get confused when you talk about operating cycles. You indicated that there were more than ten

opportunities that this program would have presented in a formal way for management to consider reactor coolant system leakage questions during Operating Cycle 13. That was from 2000 to 2002; is that correct?

MR. LEE: That would be correct, yes.

MR. GROBE: Okay. The Boric Acid Management Program, the Corrective Action Program, in this topical area, while previously it was not a specific program. I don't think there was a lack of awareness necessarily of reactor coolant system leakage at the plant. I think the Corrective Action Program itself was in fairly good shape as far as a procedure document.

I think the Boric Acid Management Program also is in fairly good shape. You've made enhancements to both of those programs, but really what was going on at the station wasn't the programs themselves, it was the people monitoring the program.

And, I appreciate this initiative. As you mentioned, Lew, this is a first in the industry. It provides an additional barrier.

MR. MYERS: Right.

MR. GROBE: And gives you additional insight that you might not have readily available to you, so I think that's positive.

But really, in all three of those areas, it's really the safety culture that resulted in failures. It wasn't the programs per se. So, I'm keenly interested, and I'm giving Mike Roder a preamble of a question I'm going to have for his discussion; I'm keenly interested in how you're considering safety culture improvements in your mode change decisions.

MR. MYERS: Let me comment on what you said too. Many of our programs like the, this is written similar to the Action Level Program that you see that works every day for chemistry control. All right?

MR. GROBE: Right.

MR. MYERS: This program is sort of molded like that. And that works, because it has trigger points where it forces you to make management decisions. What we had before did not force you to make those decisions. And it also has requirements like that, if you see these type, a Level III, you got to start scheduling within the next 30 days a shutdown, to go look for it. So, it's got management requirements.

So, that is a fundamental difference in safety culture, of anchoring a safety culture change different than what we had before. Okay?

MR. GROBE: Yep.

Any other questions?

MR. MENDIOLA: I'm sorry, you probably said it sometime in there. What's your schedule for implementation of this?

MR. LEE: We're putting together an implementation schedule today. We're getting ready to put one together, but the schedule for the actual program, the program will be implemented prior to entering Mode 4. During the 7-day hold period, the nonnuclear heatup, we will be doing some verification and some enhancements, possibly, and making sure that we have the lowest minimum detected level that we can achieve.

After we come back down from that 7-day hold, we may very well do some enhancements to the program, but the program will be complete prior to entering Mode 4.

MR. MENDIOLA: Okay. I would feel from that statement alone that there is feeling that there is no changes to any of our ~~text~~ tech. specs or your ~~text~~ tech. spec bases associated with this program?

MR. LEE: No, this is much lower than those numbers.

MR. GROBE: Okay, thank you.

MR. LEE: Now, I would like to introduce Mike Roder.

MR. RODER: Thank you, Jerry.

My name is Mike Roder, again, I am the Manager of Plant Operations. And I'm pleased to be here today to report on a couple different things.

First of all, our personnel readiness for Mode 6, and also I would like to spend a little more time on what Clark started us off on; and that's the Station Review Board, Restart Station Review Board, and how that process of reviewing the condition reports and corrective actions lead to our departmental reviews of items for Mode 6.

And also independent of that, totally independent and redundant, the Operations organization did our reviews for Mode 6, and then finally, the Multi-discipline Review that we had, spoke of earlier, about a two-day process of finding exactly what was required for our mode stations.

Next slide, please.

First of all, from personnel readiness, we spent a lot of time benchmarking over the last couple months, and developing our revised standards and expectations for operators. That was also reviewed by the Institute of Nuclear Power Operators; and they, we had some individuals on site that spent some time, spent some time with our operators and discussed our new standards and expectations.

But more importantly we take these expectations and we discuss them daily at our operator turnover, and we also

perform observations of selected expectations on a daily basis. That served to reinforce our different expectations, and also to make sure we've communicated them accurately and consistently.

To assure our team has consistent expectations, we place different Senior Reactor Operators in key decision making roles within the other organizations. And I have a couple examples up here.

First of all, we placed two Senior Reactor Operators, experienced individuals, on the Fix It Now Team. That's our rapid maintenance team.

We've also placed two senior SRO's and two staff members on our Containment Health Organization; and that served to specifically target and identify what containment health corrective actions need to be done and are required to be done prior to starting up and prior, more specifically prior to Mode 6.

We also had for about a year now an SRO with previous radiation protection experience. We have put him back on loan in the Radiation Protection Organization. That's also served to foster some additional teamwork between Operations and the other organizations.

With regard to the Senior Reactor Operator role, not only have we placed several people in our organizations, but I have spent many opportunities and time discussing the

Senior Operator's role with the Senior Operators and have, I guess -- that's a long dramatic pause. Explaining to them my reaffirmation to them as their role as an agent to the public. And that has been echoed, and I certainly appreciate the reinforcement of that by members of the NRC, both Region III Administrator and others. And I have gotten good feedback and a full understanding of that role, and more importantly too the understanding of how they have not fulfilled that role to the maximum ability.

So, from those items from both standards and expectations, placing SRO's in different organizations, and also the continued advocacy of their unique role as a licensed operator, there has been tremendous ownership displayed by the Operations organization.

MR. SIMPKINS: Mike, question for you there. This is for the Fuel Reload Readiness. Now, under the standards and expectation, would it be safe to assume that will continue after restart?

MR. RODER: My discussion about daily coverage?

MR. SIMPKINS: Yes.

MR. RODER: Oh, yes, that has become an expectation that will continue well past restart, yes.

MR. SIMPKINS: Okay. Then, the

two additional SRO's for the Fix It Now Team -- well, not necessarily containment health, but Fix It Now and the Rate Detection. Do you view that as a weakness before this issue, that you did not have Operation's representation on this?

MR. RODER: Yes, in today's world, I view that as a weakness. We did not have Operation's representation on the Fix It Now Team.

MR. SIMPKINS: Will it continue then after restart?

MR. RODER: Yes, right now we have --

MR. MYERS: Let me answer this question, as the site Vice President. I consider it a weakness in any organization that doesn't have Operation's expertise in that organization. I'll show you an Org. chart in a little while on my presentation that will demonstrate that.

MR. SIMPKINS: Okay, will this result in additional personnel coming, additional staffing, or is this just collateral duty and representation from the current SRO's?

MR. MYERS: It may result in more people getting SRO's or maybe not maintaining an SRO, but having an SRO. My belief is you should have active

SRO's in places like emergency repairs, maintenance, work scheduling, outage, all those organizations; operations, ownership should be involved in all the organizations in the plant; design changes, all those organizations.

You don't have the SROs involved, that's going to operate your plant, how can you make a design change and say it fulfills their needs? So, the expectation is we're going to need more SRO's.

MR. SIMPKINS: So, you may reactivate some SRO's?

MR. MYERS: Yes, and may get some new ones. We have two classes going on now. Two classes going now. That's consistent with our other plants too. We just finished a class of 26 people, I believe it is, at our Beaver Valley Plant, but it was sort of the same way, we have a good SRO ownership and good technical knowledge from our previous SRO experience and all of our management positions at our other plants. So, those are my expectations. There are some exceptions; there are not many.

MR. SIMPKINS: Okay. What I'm trying to narrow it down to then is, is it a licensed individual or an Operations staff person? I guess the reason why I'm asking this is I see a distinct difference between formerly licensed people perhaps regaining their

license and those actively involved in the Operations staff.

MR. MYERS: I guess the way I would answer that is, you know, what I'm accustomed to, is physically having some Operations staff people in the organizations like training and emergency preparedness that are on rotational assignments; physically in those organizations. Does that answer your question?

MR. SIMPKINS: It's starting to, yes.

MR. RODER: The answer, I believe, would be a blend. We would have some rotation of assignment. We would have some that were previously licensed, that had gained experience and then moved on to other organizations.

MR. SIMPKINS: That's fine.

MR. MYERS: If that didn't answer it, let's -- this is important.

MR. SIMPKINS: Well, my point that I was trying to get to is that, I know that during the operations cycle, at times the Operations staff was very, I don't want to say --

MR. MYERS: Strapped?

MR. SIMPKINS: Yes, pretty much so.