

July 1, 2005

CAL 3-04-001

Mr. Dennis L. Koehl
Site Vice-President
Point Beach Nuclear Plant
Nuclear Management Company, LLC
6590 Nuclear Road
Two Rivers, WI 54241-9516

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
NRC SPECIAL INSPECTION REPORT 05000266/2005014;
05000301/2005014

Dear Mr. Koehl:

On June 17, 2005, the U.S. Nuclear Regulatory Commission (NRC) completed a special inspection at your Point Beach Nuclear Plant, Units 1 and 2. The purpose of the inspection was to review your progress in meeting the commitments documented in the Confirmatory Action Letter (CAL) dated April 21, 2004. The enclosed report documents the inspection results. The preliminary results were discussed on June 17, 2005, with Mr. James McCarthy and other members of your staff.

The inspection examined activities conducted under the CAL and your license as they relate to safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of activities, and interviews with personnel.

The inspectors identified no violations of NRC requirements and no findings.

On January 19, 2005, I and members of my staff met with Mr. McCarthy and other members of your staff to discuss previous NRC observations on inconsistency in the quality of the CAL item closure packages and ambiguity with the actual closure status of several of the packages. During the present inspection, we noted an overall marked improvement in package quality and no ambiguity on package status.

As a result of this inspection, we noted improvement in the area of Human Performance. We will continue to monitor the effectiveness of your actions taken in this area as well as the areas of Engineering Design Control, Engineering/Operations Interface, Emergency Preparedness, and the Corrective Action Program. Our focus will be to ascertain whether or not your actions taken in these areas demonstrate sustainable improved performance.

If you have any questions regarding the results of the inspection, please contact me or Mr. Patrick Loudon of my staff at (630) 829-9627.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and any response you provide will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Steven A. Reynolds
Deputy Director
Division of Reactor Projects

Docket Nos. 50-266; 50-301
License Nos. DPR-24; DPR-27

Enclosure: Inspection Report 05000266/2005014; 05000301/2005014
w/Attachment: Supplemental Information

cc w/encl: F. Kuester, President and Chief
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J. Cowan, Executive Vice President
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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-266; 50-301

License Nos: DPR-24; DPR-27

Report No: 05000266/2005014; 05000301/2005014

Licensee: Nuclear Management Company, LLC

Facility: Point Beach Nuclear Plant, Units 1 and 2

Location: 6610 Nuclear Road
Two Rivers, WI 54241

Dates: June 13 - 17, 2005

Inspectors: M. Kunowski, Project Engineer
J. Jacobson, Senior Engineering Inspector

Approved by: P. Loudon, Chief
Branch 5
Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

IR 05000266/2005014, 05000301/2005014; Nuclear Management Company; on 6/13/2005 - 06/17/2005; Point Beach Nuclear Plant, Units 1 & 2; Special Inspection, Confirmatory Action Letter Followup.

This report covers a special inspection conducted to review the licensee's progress in meeting commitments documented in Confirmatory Action Letter (CAL) 3-04-001, dated April 21, 2004. No findings were identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

None.

B. Licensee-Identified Findings

None.

REPORT DETAILS

1. Background

In the first quarter of 2003, Point Beach Nuclear Plant entered the Multiple/Repetitive Degraded Cornerstone Column (Column IV) of the Action Matrix of NRC Inspection Manual Chapter 0305, "Operating Reactor Assessment Program," as a result of a high safety significance (Red) inspection finding. The finding involved the potential for a common mode failure of the auxiliary feedwater system (AFW) following a loss of the instrument air system. This issue was initially identified in November 2001. A second Red inspection finding (Yellow for Unit 1 and Red for Unit 2) was subsequently identified which involved the potential common mode failure of the AFW pumps due to plugging of the recirculation line pressure reduction orifices. This issue was initially identified in October 2002. From July 28 to December 16, 2003, the NRC conducted a three-phase supplemental inspection to review the corrective actions for the two AFW issues, in accordance with NRC Inspection Procedure (IP) 95003, "Supplemental Inspection for Repetitive Degraded Cornerstones, Multiple Degraded Cornerstones, Multiple Yellow Inputs, or One Red Input." The results of this inspection were documented in Inspection Report (IR) 05000266/2003007; 05000301/2003007, dated February 4, 2004. Subsequently, on March 17, 2004, a Notice of Violation and a \$60,000 civil penalty were issued for a problem identified during the IP 95003 inspection regarding unauthorized changes to the Emergency Action Level scheme in the Point Beach Emergency Response Plan.

On April 21, 2004, Confirmatory Action Letter (CAL) 3-04-001 was issued documenting commitments made by Nuclear Management Company, LLC (NMC) in a March 22, 2004, letter to address areas of regulatory concern identified during the IP 95003 inspection. The basis for these commitments is the NMC Point Beach Excellence Plan, an improvement plan intended to focus the Point Beach organization, site programs, and initiatives on not only the performance issues identified during the IP 95003 inspection but also on issues identified through internal assessments and on areas for meeting NMC's goal of improving performance at Point Beach. Updates of the Excellence Plan were submitted to the NRC on April 1, August 13, and December 28, 2004. The Excellence Plan is composed of Action Plans to address improvement areas. Each Action Plan is composed of Action Steps with corresponding due dates. Of the total 1841 Action Steps in the Excellence Plan, 143 steps were part of the NMC March 22nd commitment letter.

In June 2004, the initial special inspection of the licensee's implementation of the commitments in the CAL was conducted (IR 05000266/2004005; 05000301/2004005). Of the 6 Action Step closure packages reviewed, 2 packages had problems indicative of a need for licensee management to provide additional oversight of package quality. An in-progress assessment of additional Action Step closure packages was conducted in July during an NRC Safety System Design and Performance Capability inspection (IR 05000266/2004004; 05000301/2004004). In August and September, Action Step closure packages pertaining to emergency preparedness were reviewed during an inspection (IR 05000266/2004007; 05000301/2004007). As with the inspection in June, additional information for several packages was required in order for the inspectors to

conclude that all necessary actions related to emergency preparedness had been completed. In late August to early November 2004, eight Action Step closure packages were reviewed during an expanded problem identification and resolution inspection (IR 05000266/2004008; 05000301/2004008). During that inspection, the inspectors concluded that one of the packages, pertaining to the conduct of an interim effectiveness review of improvements and corrective actions for the operating experience program, was closed prematurely. And in January 2005, the NRC completed its second CAL commitment-specific special inspection (IR 05000266/2004011; 05000301/2004011). Closure packages for 24 Action Steps specifically committed to in the CAL by the licensee and packages for two Action Steps not committed to in the CAL were reviewed by the inspectors. The inspectors identified no findings; however, they did identify inconsistency in the quality of the closure packages and ambiguity with the actual closure status of several of the packages. This issue was discussed further with the licensee and corrective actions were taken.

The main purpose of the current inspection was to review the licensee's progress in implementing CAL commitments. The inspection consisted of interviews with personnel, attendance at plant meetings, in-plant observations, and a review of procedures, Action Plan Action Step closure packages, and other plant records. The Action Steps reviewed by the inspectors are discussed below, grouped in four of the five regulatory areas of concern from the April 21, 2004, CAL.

2. Review of Completed Excellence Plan Action Plan Action Steps

i. Regulatory Area of Concern: Human Performance

a. Inspection Scope

The inspectors reviewed the following completed Excellence Plan Action Plan Action Steps associated with the CAL human performance area of regulatory concern.

b. Observations

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-01-001	Improve Human Performance and Work Practices	22

This step consisted of conducting a final effectiveness review of Action Plan OR-01-001, which implemented the infrastructure of human performance improvement at the site. The inspectors interviewed site personnel, including the human performance coordinator. In addition, various human performance tools, procedures, and internal information from the licensee were reviewed.

Implementation of Action Plan Action Step

The effectiveness review, conducted February 28 - March 4, 2005, concluded that actions taken as part of the Action Plan had been effective at improving human performance. Inspector followup indicated that much of the success of the Action Plan

had to do with the conscientiousness of the station's Human Performance Coordinator, who had been assigned to that position since mid-June 2004, and upper management support. Continuation of these efforts and continuing increased buy-in from plant staff and line management should ensure sustainability of the improvements made to date. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step. The inspectors also noted that the closure package for this effectiveness review was complete and of high quality.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-01-004	Individual Behavioral Excellence	19

This step required that senior managers discuss department performance indicators at Management Review Meetings (MRMs), monthly meetings of station and offsite NMC upper management.

Implementation of Action Plan Action Step

The department performance indicators were contained in the licensee's "ACEMAN" database. Point Beach Nuclear Plant Business Manual Procedure (NP) 1.1.10, "Human Performance Program," Revision 3, was issued on July 28, 2004, and contained the "ACEMAN" roll-up requirements and the requirement to have the data reviewed by management on a monthly basis. This database review was also discussed in the Job Aid, dated May 9, 2005, for the monthly MRMs and the core agenda slides for the MRM contained a note to ensure that deletion of this agenda item did not occur because of its relation to an NRC CAL commitment. The NRC inspectors also verified that the performance indicators were an agenda item and discussed at the April 30, 2005, MRM.

The licensee has proceduralized the requirement for monthly management review of department performance indicators and provided reasonable assurance that this practice would continue in the future. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant issues with the actions taken to complete this step.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-01-004	Individual Behavioral Excellence	36

This step consisted of conducting a final effectiveness review of efforts to improve individual behavior/performance. These efforts were based on implementing the licensee's ACEMAN model for human performance improvement and the licensee's "Picture of Excellence."

Implementation of Action Plan Action Step

The effectiveness review, conducted October 25 - November 5, 2004, concluded that individual behaviors at Point Beach had improved since implementation of the various Action Plan steps. The efforts of the Human Performance Coordinator, station upper management, and corporate upper management, and refinements of the ACEMAN model and in the implementation of the "Picture of Excellence" have helped in the increasingly institutionalized focus of plant staff on individual (and group) performance improvement. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step. The inspectors also noted that the closure package for this effectiveness review was complete and of high quality.

ii. **Regulatory Area of Concern: Engineering Design Control**

a. Scope

The inspectors reviewed the following completed Excellence Plan Action Plan Action Steps associated with the CAL engineering design control area of regulatory concern.

b. Observations

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-005	Improve Human Performance in Engineering	19

This step consisted of performing an effectiveness review (EFR055644) of the efforts to improve human performance in engineering and to maintain the 12-month average of days between event clock resets greater than 10.

Implementation of Action Plan Action Step

The objectives of this Action Plan were to establish an engineering Human Performance Improvement Team (HPIT), establish a process for identifying and evaluating human performance events, provide training, and achieve an improving trend in the Engineering Event Clock performance indicator. An interim effectiveness review (EFR055643) was conducted by the licensee in September 2004 and was reviewed by the NRC inspectors (IR 05000266/2004011; 05000301/2004011). This review indicated that additional supervisory training was needed and that sustained improved performance was required to achieve the greater than 10 day engineering human performance indicator.

Lesson Plan ESC-050-001L, "Human Performance Tools for Engineering Supervision," Revision 0, was prepared and approved on January 10, 2005, and supervisory training was conducted on January 11. The 12-month average days between event clock resets had improved from 6.9 days in July 2004 to 15.2 days in May 2005 and reached the commitment goal of greater than 10 days in January 2005. Evaluation of this performance indicator was part of the charter for the engineering HPIT and the indicator

was reviewed monthly at the MRM, attended by site and offsite NMC senior managers. The current effectiveness review concluded that all four objectives for this Action Plan had been met. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-015	Establish an Engineering Safety and Design Review Group (ESDRG)	6

This step required that a process be established to provide feedback to engineering staff regarding comments or issues identified during ESDRG review of engineering products.

Implementation of Action Plan Action Step

Engineering Supplemental Guidelines (ESG) 6.3, "Engineering Safety and Design Review Group Feedback Process," was issued on June 4, 2004. Subsequent to this, an effectiveness review (EFR055478) was conducted and identified areas for improvement in the feedback process. One of the improvements consisted of providing more descriptive feedback memos to engineering personnel by providing examples of comments from the reviewers with added details from the reviewed products to provide a better understanding of the condition and applicability of the comments.

The effectiveness review also determined that the respective engineering supervisors did not consistently share the content of the feedback memos with the staff. This resulted in a missed learning opportunity. As a result, ESG 6.3 was revised to include the requirement that sharing of the ESDRG comments with the engineering staff be documented. In addition to improving the feedback memos, corrective action CA060195 was issued to track the initiation of information sharing sessions between the ESDRG and the engineering groups.

The inspectors reviewed the feedback memo dated December 1, 2004, and attended an information sharing session on March 2, 2005. The memo was found to be effective in summarizing the ESDRG reviews and the specific examples were an aid in understanding the comments. The information sharing session was found to demonstrate a good safety focus and provide informative examples. Staff interaction was considered excellent. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-015	Establish an Engineering Safety and Design Review Group	7

This step, part of the licensee's effort to improve the products of the engineering group, consisted of performing an effectiveness review (EFR055478) to evaluate the impact of the ESDRG on engineering product quality.

Implementation of Action Plan Action Step

The licensee's effectiveness review was reviewed by the NRC inspectors during a previous inspection (IR 05000266/2004011; 05000301/2004011). The licensee's Quality Review Team "scores" of engineering products continued to show an improving trend. The issues identified in the effectiveness review regarding ESDRG feedback were adequately resolved and are discussed above. The ESDRG continued to provide an effective vehicle in assuring quality engineering products. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
EQ-15-011	Procure Transformer Tap Change Material	12

This step required that any materials needed to change transformer taps on the Unit Auxiliary Transformers and the Low Voltage Station Auxiliary Transformer be procured for the Bolted Fault Project.

Implementation of Action Plan Action Step

The licensee reviewed the Component Instruction Manual for the transformers and determined that they were equipped with no-load tap changers; therefore, no materials were required to accomplish tap changes. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

iii. **Regulatory Area of Concern: Engineering/Operations Interface**

a. Scope

The inspectors reviewed the following completed Excellence Plan Action Plan Action Steps associated with the CAL engineering/operations interface area of regulatory concern.

b. Observations

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-016	Reduce Operable But Degraded/But Non-Conforming Backlog	5

This step required that any operability determinations open longer than 1 fuel cycle have documented justification and plant manager approval.

Implementation of Action Plan Action Step

The inspectors were provided with a summary of justifications dated March 9, 2005, for those operability determinations remaining open greater than 1 fuel cycle. The inspectors reviewed the justifications for the 12 operability determinations remaining open and did not identify any significant problems with actions taken to complete this step. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-017	Improve Operations Department and Engineering Department Interface	1

This step required the implementing of an operational decision-making procedure to help improve the operations/engineering interface.

Implementation of Action Plan Action Step

NP 1.1.12, "Operational Decision Making Issue Evaluation Process," Revision 0, was issued on July 30, 2004. This procedure established requirements for evaluation of technical and operational decisions that affected plant operations, safety, reliability, and material condition. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors noted that the licensee has been inconsistent in its use of the procedure when degraded plant conditions were identified. For example, the procedure was not implemented in August 2004 when the control room ventilation system was degraded and in February 2005 after an offsite grid disturbance affected the safety-related battery chargers, one of which required troubleshooting and repair. Noteworthy, is that the procedure was implemented during the current Unit 2 refueling outage on two occasions. Overall, the inspectors concluded that the NP 1.1.12 process has been an effective tool to address previous concerns in this area. The inspectors will continue to monitor the licensee's use of the process to fully understand the threshold for the implementation of the process.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-017	Improve Operations Department and Engineering Department Interface	2

This step required a self-assessment be performed of the Plant Health Committee (PHC) per fleet procedure FP-PA-SA-03, "Snapshot Self Assessment Process."

Implementation of Action Plan Action Step

A self-assessment was conducted on August 26, 2004 in accordance with fleet procedure FP-PA-SA-03. The assessment identified that while good issues were presented to the PHC, the PHC lacked a process to plan and develop a business case for long-term equipment projects. Also, the PHC had not established a prioritized list of long-term equipment problems requiring resource allocation. The PHC was formed early in 2003; however, meetings were not held routinely and were frequently cancelled. The assessment concluded that the PHC had not yet demonstrated a long term commitment to review system and program health.

In response to the issues identified above, the licensee issued procedure NP 1.1.15, "Identification, Approval, and Tracking of Plant Health Equipment Issues," dated June 10, 2005. This procedure described the process for the PHC to identify, rank, approve, prioritize, and disposition equipment issues. The procedure also provided guidance on the process to present the issues and requirements to monitor the progress of action completion. Plant Health Equipment issues were tracked on a list and prioritized based on the Equipment Grading Sheet score so that site resources could be applied to those issues determined to be the most important. The list tracked long-term, operator-burden, and resource-burden issues. Those projects costing in excess of \$50,000 were processed in accordance with procedure NP 12.2.1, "Project Management Process," dated September 22, 2004.

The procedures discussed above appeared to address the weaknesses identified in the self-assessment and provided a structure to the PHC process. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-017	Improve Operations Department and Engineering Department Interface	4

This step required a self-assessment of the Design Engineering Review Board (DRB) per fleet procedure FP-PA-SA-03, "Snapshot Self Assessment Process."

Implementation of Action Plan Action Step

Self-assessment PBSA-ENG-04-013, Revision 1, was issued on May 3, 2005, to evaluate the effectiveness of the DRB. This assessment reviewed associated procedures, memos, and corrective actions, and conducted a survey of engineering and operations DRB members. The assessment concluded that the DRB was an effective tool to increase ownership and participation in the modification process and provide comprehensive reviews of modifications. Feedback from the DRB to the engineering staff provided direct improvements in the modifications, as well as increased awareness of considerations applicable to future modification work. The licensee completed the

Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OR-08-017	Improve Operations Department and Engineering Interface	6

This step required improved communications between operations and engineering personnel to achieve a common understanding of system design bases and operational practice to reduce operator burdens (e.g., operator workarounds, control room deficiencies, lit annunciators, and temporary modifications).

Implementation of Action Plan Action Step

Procedure NP 2.1.4, "Operator Burdens," Revision 5, was issued to define, review, categorize, and track these issues. Awareness of operator burdens has been raised by maintaining a list of these items and including it in the PBNP status report as part of the daily production meeting. During the plan-of-the-day meetings, on a weekly basis, operator burdens were reviewed and discussed. Total operator burdens were discussed and tracked on a monthly basis with NMC management. This increased focus has resulted in a reduction of operator burdens since the end of the first quarter of 2004 to consistently under the fleet expectation of less than 36. The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any significant problems with actions taken to complete this step.

iv. Regulatory Area of Concern: Corrective Action Program

a. Scope

The inspectors reviewed the following completed Excellence Plan Action Plan Action Steps associated with the CAL corrective action program area of regulatory concern.

b. Observations

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OP-10-010	Operating Experience (OE) Improvement Plan	23

This step consisted of performing an effectiveness review of the implementation of CA032717 within the maintenance department as well as effectiveness of the OE Improvement Plan. CA032717, "CAL STEP - Maint Use of OE During Prejob Briefs," August 12, 2003, was the item established in the station's corrective action program to track the completion of OP-10-010, step 22, to implement a new electronic method for accessing OE for pre-job briefs for maintenance.

Implementation of Action Plan Action Step

The effectiveness review was conducted, from January 10-14, 2005, as a self-assessment of the operating experience program. It concluded that, overall, actions taken as part of the Action Plan to improve the program had been effective and were sustainable. Several areas were identified where enhancements were deemed appropriate and corrective action program documents (CAPs) were subsequently generated to track the completion of these items. For CA32717, the effectiveness review concluded that, whereas the database had been established and was being used, a plan was needed to populate the pre-job database with briefs for the various repetitive jobs performed by the maintenance department and formalized in procedures and routine surveillances/tasks (so called "callups"). This issue is discussed below.

The licensee completed the Action Plan Action Step as committed in the March 22, 2004, letter and as incorporated in the CAL. The inspectors did not identify any problems with actions taken to complete this step. The closure package for this effectiveness review was complete and of high quality, and the licensee made good use of expertise from outside of NMC in the conduct of the review, with personnel from a leading industry group and other utilities.

<u>Action Plan</u>	<u>Title</u>	<u>Step</u>
OP-10-010	Operating Experience (OE) Improvement Plan	22

This step consisted of implementing a new electronic method for access of OE for pre-job briefs for maintenance. As discussed above, this step was designated as CA032717 in the station's corrective action program.

Implementation of Action Plan Action Step

The effectiveness review conducted as part of Step 23 of Action Plan OP-10-010 identified the need for a plan to be developed to ensure that the database was populated with all of the relevant information from the various maintenance documents. Although some of the documents had been entered into the database and the resulting "canned" pre-job briefs had been used or were available for use in November 2004, a large number of maintenance procedures and callups had not been entered. In addition, the effectiveness review identified that an understanding of how the database would be populated and who would do the populating was not clearly understood by relevant personnel, procedural guidance on this issue was not definitive, most of the OE in the database was external OE and not internal OE, the level of knowledge in the maintenance planning group about the database was inconsistent, operations planners had been given a general familiarization of the database but not detailed training to allow them to use the database, only one maintenance person and two operations persons were populating the database, and radiation protection supervisors had not had time to input radiation protection information into the database.

In the response to the observations during the effectiveness review, the licensee wrote CAP061651, "Need to Populate the Pre-job Brief Data Base," January 24, 2005. From this CAP, several corrective actions (CAs) were generated, including CAs to train

appropriate staff members, with a due date of June 24, 2005, and fully populate the database, with a due date of December 28, 2005.

In revision 3 of the Excellence Plan, which was incorporated in the April 21, 2004, CAL, the licensee committed to complete this Action Step in the third quarter of 2004. Based on the "implementation" of the database in November 2004, the problems identified with the database in January 2005 during the effectiveness review, and the protracted due date of December 28, 2005, needed for fully populating the database, the inspectors concluded that this Action Step had not been completed by the committed due date.

4OA6 Meetings

.1 Exit Meeting

On June 17, 2005, the inspectors presented the preliminary inspection results to Mr. James McCarthy and other members of the Point Beach staff. In particular, the inspectors discussed their observations regarding the pre-job briefing database Action Step and the need for correspondence from the licensee updating the commitment. The licensee acknowledged the observations and indicated that the completion dates of the corrective actions for the identified problems would be evaluated. The licensee did not identify any information, provided to or reviewed by the inspectors and likely to be included in the inspection report, as proprietary.

4OA7 Licensee-Identified Violation

None.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

M. Arnold, Excellence Team Specialist
T. Carter, System Engineering Manager
S. Cassidy-smith, Communications Manager
B. Cruise, General Supervisor - Maintenance Support
F. Flentje, Regulatory Affairs Principal Analyst
R. Flessner, Excellence Team Lead
M. Lorek, Plant Manager
J. McCarthy, Site Director of Operations
D. Peterson, Human Performance Coordinator
L. Peterson, Design Engineer Manager
S. Pfaff, Acting Performance Assessment Manager
S. Ruesch, Procedures Manager
J. Schweitzer, Site Engineering Director
G. Sherwood, Programs Engineering Manager
W. Smith, Production Planning Manager

Nuclear Regulatory Commission

P. Loudon, Chief, Reactor Projects, Branch 5
R. Krsek, Senior Resident Inspector, Point Beach
M. Morris, Resident Inspector, Point Beach

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None.

Closed

None.

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of licensee documents reviewed during the inspection, including documents prepared by others for the licensee. Inclusion of a document on this list does not imply that NRC inspectors reviewed the entire documents, but, rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. In addition, inclusion of a document on this list does not imply NRC acceptance of the document, unless specifically stated in the body of the inspection report.

CA032717; CAL STEP - Maint Use of OE During Prejob Briefs; August 12, 2003
CA061167; Translation of CAL Commitment Into Procedure Needs Improvement;
January 13, 2005
CA061332; Develop a Plan - Need to Populate the Pre-job Brief Data Base; January 26, 2005
CA063322; Need to Populate the Pre-job Brief Data Base - Select Individuals for Inputs;
June 10, 2005
CA063323; Need to Populate the Pre-job Brief Data Base - Identify Training Needs;
June 10, 2005
CA063324; Need to Populate the Pre-job Brief Data Base - Establish Work Off Curves;
June 10, 2005
CA063325; Need to Populate the Pre-job Brief Data Base - Populate With Commonly Used
Maintenance Documents; June 10, 2005
CAP031808; PBNP OE Program Has Severe Implementation Weaknesses; March 25, 2003
CAP061651; Need to Populate the Pre-Job Data Base; January 24, 2005
CAP065112; ACEs Contain Inadequate Use of OE; June 14, 2005
Nuclear Plant Memorandum NPM 2005-0307; First Quarter 2005 Human Performance
Analysis; May 10, 2005
Point Beach Nuclear Plant Business Manual NP 1.1.7; Managing Work Activity Risk;
February 16, 2005
NP 1.1.10; Human Performance Program; February 2, 2005
NP 1.6.10; Pre- and Post-Job Briefs; February 16, 2005
NP 13.6.1; Point Beach Site Observation Program; March 23, 2005
Operating Experience Guideline 007; External Operating Experience Program Guidance;
February 23, 2005
Point Beach Form PDF-9175; Job Walkdown Checklist; May 19, 2005
PBF-9175a; Job Walkdown Facilities Checklist; February 17, 2004
PBF-9205; High Risk Work Pre-job Briefing Checklist; December 16, 2004
PBF-9217; Pre-job Brief Checklist; May 12, 2005
PBF-9218; Post-job Brief Checklist; November 1, 2000
PBF-9812; Categorization and Mitigation of Risk; February 16, 2005
Training Material; NMC Excellence in Human Performance

LIST OF ACRONYMS USED

ACE	Apparent Cause Evaluation
ADAMS	Agency Wide Access Management System
AFW	Auxiliary Feedwater
CA	Corrective Action
CAL	Confirmatory Action Letter
CAP	Corrective Action Program Document
CE	Condition Evaluation
CFR	Code of Federal Regulations
DBD	Design Basis Document
DRB	Design Engineering Review Board
DRP	Division of Reactor Projects
EFR	Effectiveness Review
ESDRG	Engineering Safety and Design Review Group
ESG	Engineering Supplemental Guidelines
HPIT	Human Performance Improvement Team
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
NMC	Nuclear Management Company, LLC
NOS	Nuclear Oversight (Quality Assurance)
NP	Point Beach Nuclear Plant Business Manual Procedure
NRC	Nuclear Regulatory Commission
OD	Operability Determination
OTH	Other (Corrective Action Program Document)
PBNP	Point Beach Nuclear Plant
PHC	Plant Health Committee
QRT	Quality Review Team
RCE	Root Cause Evaluation
SDP	Significance Determination Process
TRP	Technical Review Panel
TS	Technical Specification
URI	Unresolved item
WO	Work Order