

FEB 11 1991

Docket No. 50-220

EA No. 88-186

Niagara Mohawk Power Corporation
ATTN: Mr. B. Ralph Sylvia
Executive Vice President - Nuclear
Operations
301 Plainfield Road
Syracuse, New York 13212

Gentlemen:

Subject: Release from Confirmatory Action Letter 88-17, Supplement 1

Supplement 1 to Confirmatory Action Letter No. 88-17, dated July 27, 1990, authorized the restart of Nine Mile Point Unit 1 with the understanding that certain actions would be taken by Niagara Mohawk during implementation of the power ascension program. Specifically, you were requested to conduct a self-assessment of the power ascension program, including detailed assessments at each of the three designated testing plateaus (25, 75 and 100% power) and to discuss the results of each of these detailed self-assessments with the NRC Restart Assessment Panel. Additionally, you were requested to document the results of your overall assessment of the power ascension program after its completion and to discuss those results in a management meeting with the NRC Restart Assessment Panel.

The results of your self-assessment of Phase 1 (0-25% power), Phase 2 (25-75% power), and Phase 3 (75-100% power) of the power ascension program were discussed via telecon with the NRC Restart Assessment Panel on September 10, 1990, October 23, 1990, and November 30, 1990, respectively. After a period of operation at full power, you submitted a written report to NRC on December 11, 1990, which documented the results of your overall self-assessment of the power ascension program. This report was discussed at a December 18, 1990 management meeting with the NRC Restart Assessment Panel at the Nine Mile Point site.

Based upon our review of the actions you have taken during the Nine Mile Point Unit 1 power ascension program, we have independently concluded that the commitments specified in Supplement 1 to CAL 88-17 have been appropriately completed and that there exists reasonable assurance that routine full power operation can continue safely and reliably. A summary of the basis for our conclusions is provided in the attachment to this letter.

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Therefore, the commitments in CAL 88-17, Supplement 1 have been satisfied and the CAL is hereby considered closed. Nonetheless, NRC has identified Nine Mile Point Units 1 and 2 for continued close monitoring as described in the January 22, 1991 letter to you from the NRC's Executive Director for Operations. We will continue to carefully assess your performance consistent with the January 22, 1991 letter.

Sincerely,

Original Signed By:
Thomas T. Martin

Thomas T. Martin
Regional Administrator

Attachment:
As stated

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cc w/Attachment:

W. Hansen, Manager - Corporate Quality Assurance
M. Colomb, Unit 2 Superintendent - Operations
C. Beckham, Manager - Nuclear Quality Assurance Operations
R. Abbott, Manager - Unit 2
J. Perry, Vice President - Quality Assurance
K. Dahlberg, Manager - Unit 1
R. Randall, Unit 1 Superintendent - Operations
J. Firlit, Vice President - Nuclear Generation
C. Terry, Vice President - Nuclear Engineering and Licensing
J. Warden, New York Consumer Protection Branch
G. Wilson, Senior Attorney
M. Wetterhahn, Esquire
J. Keib, Esquire
S. Wilczek, Vice President - Nuclear Support
Director, Power Division, Department of Public Service, State of New York
State of New York, Department of Law
K. Abraham, PAO-RI (2)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
State of New York, SLO Designee
NRC Resident Inspector

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- bcc w/Attachment:
- Region I Docket Room (w/concurrences)
- T. Martin, RA
- W. Kane, DRA
- W. Hehl, DRP
- J. Wiggins, DRP
- J. Linville, DRP
- D. Vito, DRP
- G. Meyer, DRP
- M. Miller, DRP
- W. Hodges, DRS
- J. Durr, DRS
- L. Bettenhausen, DRS
- M. Knapp, DRSS
- J. Joyner, DRSS
- M. Miller, SLO
- K. Brockman, EDO
- J. Partlow, NRR
- S. Varga, NRR
- E. Greenman, NRR
- R. Capra, NRR
- D. Brinkman, NRR

RI:DRP GMeyer/mjd	RI:DRP JLinville	RI:DRP JWiggins	RI:DRP WHehl
1/25/91	1/25/91	1/26/91	1/27/91
NRR EGreenman	RI:DRP WKane	RI:RA TMartin	
1/25/91	1/24/91	2/7/91	

*Discussed
w Greenman
and Partlow.*

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ATTACHMENT

Basis for Release from CAL 88-17, Supplement 1

1. Satisfaction of CAL 88-17, Supplement 1 Commitments

<u>Date</u>	<u>Action</u>
September 10, 1990	Results of Niagara Mohawk self-assessment of power ascension program Phase 1 (0-25% power) discussed with NRC Restart Assessment Panel via telecon.
October 23, 1990	Results of Niagara Mohawk self-assessment of power ascension program Phase 2 (25-75% power) discussed with NRC Restart Assessment Panel via telecon.
November 30, 1990	Results of Niagara Mohawk self-assessment of power ascension program Phase 3 (75-100% power) discussed with NRC Restart Assessment Panel via telecon.
December 11, 1990	Niagara Mohawk's overall self-assessment of power ascension program submitted to NRC.
December 18, 1990	Niagara Mohawk discussed overall self-assessment of power ascension program with NRC Restart Assessment Panel in management meeting at Nine Mile Point site.

2. Performance During Power Ascension Program

Niagara Mohawk's overall performance during the Unit 1 power ascension program was satisfactory. Problems encountered by the plant staff were appropriately handled and their self-assessment process and abilities clearly improved during the power ascension program. However, performance problems were noted during power ascension with respect to new Standards of Performance and procedural compliance, (e.g., condensate demineralizer flush spill and the November 17, 1990 reactor scram during surveillance testing). Particular emphasis has been placed by Niagara Mohawk in the areas of Standards of Performance and procedural compliance in the recent months. Although improvements in these areas have been somewhat limited, performance has been adequate.

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During the December 18, 1990, management meeting with the NRC Restart Assessment Panel, Niagara Mohawk stated that continuing emphasis has to be placed upon accountability at the worker level. Niagara Mohawk has recently begun using accountability meetings following activities in which personnel performances were significantly below management expectations for standards of performance. The purpose of these accountability meetings is to focus on determining accountability problems and what program or procedural deficiencies need to be addressed to prevent recurrence. Where warranted, disciplinary action has been taken to emphasize management's expectations regarding these performance problems.

Licensed operator response to events during the power ascension program has been good. Operator response to normal and abnormal plant conditions was proper and conservative. Operators performed their duties professionally and were found to be appropriately attentive to duty during activities observed. It should be noted here that Nine Mile Point Unit 1 licensed operator requalification program evaluations were performed in July 1990 and December 1990; and that all licensed operators given written and operating examinations (17 SROs and 12 ROs) successfully passed all portions of the examinations.

The general performance trend at Unit 1 in recent months has been one of improvement and the problems identified have been promptly addressed with thorough corrective actions.

3. **Self-Assessment and Problem Resolution**

Niagara Mohawk performed its self-assessment of the power ascension program through an integration of assessments done by four separate groups. Assessments were performed by the line management departments, quality assurance, the Independent Safety Engineering Group (ISEG), and the Independent Assessment Group (IAG). (The IAG had been developed as a result of Niagara Mohawk's self-assessment of its readiness for restart of Unit 1). These four groups agreed on a common set of criteria for evaluating the performance of the physical plant and personnel during the power ascension program, with particular focus on the effectiveness of licensee programs and personnel conformance with established standards of performance.

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Niagara Mohawk's self-assessment of the Unit 1 power ascension program was comprehensive and critical. Management was not driven by schedule or capacity factor in ensuring that the Standards of Performance were being adhered to. Examples of this were the hold placed on escalating to Phase 2 following the problems encountered during the turbine torsional test, and the hold placed on escalating to Phase 3 until the management performance expectations were again communicated to all station workers.

Recent quality assurance department involvement and findings indicate good performance-based audits are being done. The onsite and offsite review committees appear to be more efficient and effective in overseeing station activities than in the past.

Overall, the self-assessment process was employed widely and effectively by Niagara Mohawk. Niagara Mohawk appeared to become more effective in the implementation of the self-assessment process as the power ascension program progressed and made appropriate modifications to improve the process. Subsequent to the power ascension program, Niagara Mohawk's self-assessment has continued to function as a management tool.

4. **Management Organization and Oversight**

The Niagara Mohawk senior management team is still fairly new to Niagara Mohawk. Mr. Joseph Firlit (current Vice President - Nuclear Generation) replaced Mr. James Willis in July, 1990. Mr. Ralph Sylvia (current Executive Vice President - Nuclear) replaced Mr. Lawrence Burkhardt (previous Executive Vice President - Nuclear) in November, 1990. The new senior managers have demonstrated their capability to safely operate the reactors and have very clearly emphasized accountability with respect to recent disciplinary actions taken against both represented and management employees.

Niagara Mohawk senior management restructured the entire Nuclear Division in October 1990. Changes included upgraded responsibility for the plant manager, reassigning support function departments under the plant manager, and realigning corporate departments to better support the plants. The effectiveness of this change will be assessed, as (1) it is completed, and (2) it has an opportunity to function for a period of time.

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5. Conclusions

The results of NRC inspections and assessments since the restart of Nine Mile Point Unit 1 have been generally favorable. No major safety concerns were identified. The power ascension test program was completed in a satisfactory manner. Licensed operators have performed well and the results of recent licensed operator requalification program evaluations were excellent. In addition, the new senior management team has reorganized the Nuclear Division to better support plant operations.

While further staff review will be necessary to evaluate the long-term effectiveness of recent management and organizational changes, Niagara Mohawk has demonstrated sufficient capability to safely operate the units and to prevent, or to detect and correct, problems. This conclusion, coupled with the Niagara Mohawk's satisfactory completion of the commitments specified in CAL 88-17, Supplement 1, support continuation of routine full power operation and release from the CAL.

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