

**From:** "Connolly, James W." <James.Connolly@nmcco.com>  
**To:** <hkc@nrc.gov>, <rmm3@nrc.gov>  
**Date:** Sun, Jun 20, 2004 11:40 AM  
**Subject:** PBNP CAP 057487 Pertaining to PBNP Submittal Quality

Harold, Mike,

Attached is a copy of CAP that I have written to address PBNP submittal quality issues. If you have any questions regarding this matter, feel free to contact me.

Jim Connolly  
PBNP Regulatory Affairs Manager

<<CAP057487.pdf>>

B-50

## State Change History

Initiate  
by CONNOLLY, JAMES

AR Pre-Screen  
6/19/2004 10:13:04 AM  
Owner (None)

## Section 1

Activity Request Id: CAP057487  
Activity Type: CAP Submit Date: 6/19/2004 10:13:04 AM  
One Line Description: PBNP Submittal Quality to NRC Requires Improvement  
Detailed Description: 6/19/2004 10:13:04 AM - CONNOLLY, JAMES:  
There has been a recent downward trend of submittal quality issues associated with correspondence being forwarded to the NRC. There have been repeated problems associated with the accuracy of information provided in the Monthly Operating Reports. There were also quality issues identified by NOS in the Annual Environmental Quality Report (CAP 057448). Additionally, the NRC has identified quality, timeliness, and accuracy issues associated with recent submittals pertaining to the RPV Head Order relaxation and relief requests. This has resulted in the need to submit unnecessary supplements to the NRC.

Initiator: CONNOLLY, JAMES Initiator Department: SRC Regulatory Compliance  
Date/Time of Discovery: 6/19/2004 9:56:40 AM Date/Time of Occurrence: 6/19/2004 9:56:40 AM  
Identified By: NRC System: (None)  
Equipment # (1st): (None) Equipment Type (1st): (None)  
Equipment # (2nd): (None) Equipment Type (2nd): (None)  
Equipment # (3rd): (None) Equipment Type (3rd): (None)  
Site/Unit: Point Beach - Common  
Why did this occur?: 6/19/2004 10:13:04 AM - CONNOLLY, JAMES:  
The actual causes appear to be human performance related and inconsistent use of the established validation process for outgoing submittals.

Immediate Action Taken: 6/19/2004 10:13:04 AM - CONNOLLY, JAMES:  
None

Recommendations: 6/19/2004 10:13:04 AM - CONNOLLY, JAMES:  
1. It is recommended that an apparent cause evaluation be assigned to Regulatory Affairs to determine the cause and extent of condition.  
2. It is recommended that CE014212 pertaining to Incomplete and Conflicting Information in the 2003 Annual monitoring Report be closed to this AR.

Notify Me During Eval?: N SRO Review Required?: N

## Section 2

Operability Status: (None) Compensatory Actions: N  
Basis for Operability:  
Unplanned TSAC Entry: N External Notification: N

## Section 3

Screened?: N Significance Level: (None)  
INPO OE Req'd?: N Potential MRFF?: N  
QA/Nuclear Oversight?: N Licensing Review?: N  
Good Catch/Well Doc'd?: NA

## Section 4

Inappropriate Action:  
Process: (None) Activity: (None)  
Human Error Type: (None) Human Perf Fail Mode: (None)  
Equip Failure Mode: (None) Process Fail Mode: (None)  
Org/Mgt Failure Mode: (None) Group Causing Prob: (None)  
Hot Buttons: (None)

## Section 5

CAP Admin: PBNP CAP Admin Prescreener: (None)  
Project: Corrective Actn Program (CAP) AR State: AR Pre-Screen  
Active/Inactive: Active Submitter: CONNOLLY, JAMES  
Owner: (None) Last Modified Date: 6/19/2004 10:13:04 AM

Last Modifier: CONNOLLY, JAMES

Last State Change Date: 6/19/2004 10:13:04 AM

Last State Changer: CONNOLLY, JAMES

Close Date:

NUTRK ID:

# of Children: 0

References:

Update:

Prescreen Comments:

Import Memo Field:

OPR Completed?: N

OLD\_ACTION\_NUM:

sub\_tsid: 0

original\_project\_id: 0

original\_issue\_id:

Site: Point Beach

Cartridge and Frame: