Indian Point 3 Nuclear Power Plant P.O. Box 215 Buchanan, New York 10511

914-736-8000



New York Power Authority December 7, 1992

IP3-NRC-92-098

License No. 50-286 Docket No. DPR-64

Mr. Thomas T. Martin, Regional Administrator Region 1 U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

Re: Initial SALP Report No. 50-286/91-99

Dear Mr. Martin:

The Authority recognizes and agrees with the strengths and weaknesses in the Systematic Assessment Of Licensee Performance (SALP) Report, No. 50-286/91-99, dated October In Attachment I, we present corrective actions 26, 1992. initiated or completed to address the weaknesses. We also identify in the Security Section of Attachment I, an item that we believe should be revised.

We recognize the need to provide additional attention and resources to resolve the weaknesses in human performance, the maintenance backlog and the surveillance program.

Quality performance by the staff is dependent upon proper supervision, procedures, and training. A human performance enhancement program is planned with a goal of ensuring quality in the performance of tasks. The scope of the program includes self-checking methods and enabling the staff to identify human performance problems for resolution.

We have developed a plan for reducing the maintenance backlog. Phase one of the plan began December 1, 1992, with the working of ready work packages and the planning of the remaining work. Starting in January 1993, a three month rotating work schedule will begin, and the next three month schedule will be developed. This process will be used until the non-outage corrective maintenance backlog, totaling 2118 tasks, is addressed.

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The IP3 surveillance program is being assessed for effectiveness and actions have been taken to resolve immediate concerns. These include communicating expectations for accurate data collection/review and a review of a sample of completed tests for accurate component operability determination. Interim and long term corrective actions are planned.

The Authority is developing a Performance Improvement Program for Indian Point 3, which will describe our coordinated efforts for improvement, including new initiatives for maintenance backlog reduction, surveillance program improvements and improved management effectiveness. We plan to docket the Performance Improvement Program to you in early January 1993.

Should you have any questions regarding this matter, contact J. Perrotta at 914-736-8002.

Very truly yours,

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William A, Josiger Resident Manager Indian Point 3 Nuclear Power Plant

waj:bjr:djc:rj Attachment

cc: U.S. Nuclear Regulatory Commission (original) Attn: Document Control Desk Mail Station P1-137 Washington, DC 20555

Donna Ross New York State Energy Office Empire State Plaza Agency Building #2 Albany, New York 12223

IP3 Resident Inspector Indian Point 3 U.S. Nuclear Regulatory Commission P.O. Box 337 Buchanan, New York 10511

<u>Plant Operations</u>

The Authority plans to continue the performance that led to the strengths identified in the report. These include operating the plant in a safe manner, operator performance during transients, improvements in refueling procedures/activities, the shutdown risk program, outage controls, licensed operator training, and shift supervisor competency.

The Authority shares your concern for weaknesses identified in the report. These include control of plant configuration, correcting plant material condition deficiencies, tracking required compensatory actions, performance/review of surveillance test and logkeeping. These weaknesses were indicative of ineffective management control of certain activities and inadequate communication of management's expectations. Corrective actions have been accomplished or are planned to resolve the weaknesses.

To ensure communication of high standards of performance in the operations department, a standards manual has been implemented describing management expectations.

Standards of performance will be monitored through a program that requires management to conduct plant tours with auxiliary operators. The tours will also enable communication and resolution of problems of staff members in meeting expectations.

Plant configuration control has been improved by strengthening the quality of performance of component status verification processes. Time validation studies are being conducted to ensure sufficient time is provided to perform quality system checkoff list which align systems for operations. The method for providing an independent and redundant verification of plant components was changed to improve controls for verification after system maintenance and testing.

The tracking of required compensatory actions has been upgraded. Upon entering a condition requiring compensatory actions, (i.e., sampling of a system chemical), the corrective action will be identified in a limiting condition for operation corrective action log. The senior reactor operator is responsible to verify that the compensatory actions have been taken each shift. The corrective action log also requires documenting resolution of the condition that required the compensatory action.

Logkeeping concerns have been addressed by affirming accountability for the accuracy of data collection to the staff and monthly checks on a random basis to assure accuracy.

Radiological Controls

We appreciate your recognition of the high quality we have in all aspects of radiological controls.

Some minor procedural deficiencies were identified in health physics counting laboratory, radioactive waste classification, self assessments, and classification of radiological events.

Health physics has issued a new counting laboratory program procedure and technical basis document that standardizes the processes for quality control, calculations and calibrations. Health physics is revising current counting laboratory procedures to incorporate this program improvement and this will be completed by February 1, 1993. An assessment of the radioactive waste classification process is being performed and the procedure will be revised by February 1, 1993 to address the dry waste classification deficiency. The corporate organization is developing a new self-assessment procedure to standardize self assessments for the Authority's radiological control program. The improvements in the site self assessment procedure will be completed by year end including the specifying of responsibilities and assessment frequencies. An assessment to improve the guidance for classification and documentation of radiological events will be performed by year end.

Maintenance/Surveillance

We appreciate your recognition of good performance in our maintenance and I&C departments, and the improvements in procedures and staffing. Good performance was noted in field supervision, engineering support and technicians' activities. Our trending program and failure analyses were noted as proactive. The surveillance program was generally effective and testing exceeded the minimum requirements.

Weaknesses were displayed in prioritization and completion of maintenance work, in surveillance of certain safety-related systems, and in the performance and review of surveillance tests.

The Authority is addressing the backlog of maintenance with a newly formed task force. This task force has developed a plan to reduce the maintenance backlog, and implementation has begun. The maintenance backlog is being addressed with improvements in the processes that set priority, plan and schedule work activities. The backlog reduction plan will also expedite repairs by reallocating personnel to planning and better utilization of maintenance contingency shifts. The backlog is being assessed to validate, re-prioritize and schedule the work. This assessment is emphasizing plant areas or categories that require more attention. New work control processes are being incorporated to increase the efficiency of work activities. These processes include a minor maintenance program, and system outage windows. We recently installed a new computerized work control system to improve the prioritization and planning and scheduling of corrective maintenance. We are currently evaluating this system to improve its effectiveness.

The IP3 surveillance program is being assessed for effectiveness and actions have been taken to resolve immediate concerns. Interim and long term corrective actions are planned.

Completed actions include management communication of expectations for accurate data collection and review.

A review of a sample of past surveillance tests was conducted to verify that accurate operability determination of components was performed. The review identified some weaknesses. Any deficiencies associated with operability determination were assessed to ensure component operability was not a concern.

A critique was held to identify underlying causes for surveillance test errors. Problems identified are being analyzed by a task force responsible for the development of corrective actions.

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Emergency Preparedness

We appreciate your recognition of our good emergency preparedness response to actual events. The EP program administration was strong, with noteworthy management support. The EP training program was well-defined. A strong commitment to and performance in maintaining a good relationship with the state and counties was evident.

Weaknesses in the emergency preparedness program were: no demonstration of off-hours response capabilities, some corporate support personnel were assigned emergency response office duties without training, measures to assure periodic drill participation by emergency response personnel were not evident, in proceduralizing emergency action levels initiating conditions, and in training provided to shift supervisors on protective action recommendations procedures.

The following are the corrective actions initiated or completed to address emergency preparedness weaknesses:

An off-hours unannounced drill is scheduled for early 1993 to demonstrate capabilities; this will be incorporated into future drill schedules.

Corporate emergency preparedness personnel have been trained. An improved training tracking system will be implemented for headquarters emergency response personnel.

The Authority has implemented drill participation tracking for site personnel and this will be implemented for headquarters personnel by December 31, 1992.

To proceduralize the initiating conditions to the emergency action levels, a plant-specific technical basis is being developed. The protective action recommendations procedure is being revised to clarify the flow chart and application of the protective action recommendations. Training of the emergency directors, including shift supervisors, will be conducted on the revised procedure. This training will emphasize practical demonstration of their ability to make protective action recommendations, and emphasize the requirement to continually assess the need to modify initial protective action recommendations. This training will be completed by April 30, 1993.

The improved review and approval process of the emergency plan Volume II now includes approval by PORC and the Resident Manager for current and subsequent revisions.

<u>Security</u>

We appreciate your recognition of our increased effectiveness of the security program. Progress was made in security program upgrades and enhancements and communications between security and other plant departments. Staffing improvements in the supervisory organization and training augmentation corrected previously identified weaknesses.

Weaknesses in supervisory overview caused inconsistent implementation of program requirements in some areas, and ineffective management of maintenance support for security equipment.

To address the specific weaknesses, management is ensuring Instrumentation and Control technicians assigned to equipment repairs are experienced and knowledgeable. Supervisor verification of required security officer equipment is performed before duties are assigned and during shifts. Post maintenance testing criteria have been established for the return of security equipment to service after repairs.

The Authority is requesting a correction to the Security section in the SALP report. In the SALP report on page 17, paragraph 5, it states: "The security force staff was increased by four permanent security officers late in the period to address program needs." The following statement is submitted for the revision: The Authority hired four security personnel in anticipation of permanent staff positions being vacated through attrition.

Engineering and Technical Support

We appreciate your recognition of good performance by corporate engineering during the identification, evaluation, and modification to correct deficiencies in the coordination and protection of the d-c distribution system. Adequate programs were noted to meet Appendix R safe shutdown requirements, and for erosion/corrosion. The design basis reconstitution program completed eight documents which were found to be good reference Design basis reviews of MOVs were thorough in response to tools. The quality of corporate engineering generic letter 89-10. support on licensing actions processed by the NRC was good. Technical specification amendment requests and responses for additional information were timely and technically acceptable. Site engineering was effective in implementing an interim solution to resolving a cracked cell in a station battery, in control of the fire protection program, and initiating corrective actions for blown fuses in the safety injection system.

Weaknesses in overall performance were demonstrated in the Engineering organization, which includes the on-site technical Services department and the off-site corporate engineering department. NYPA established a single design authority in the corporate engineering department, as part of an engineering This has been ineffective to date in improving reorganization. engineering performance due to management's delayed implementation of the site elements of the engineering reorganization. Significant weaknesses resulted from weak management control of engineering activities. The corporate engineering staff was not responsive in providing plant technical support to resolve recurring deficiencies. The corporate engineering performance was inconsistent, due to poor communications between corporate engineering and plant personnel. The corporate engineering demonstrated poor planning for the refueling outage. The heavy workload on the technical services department staff for daily plant operational support and plant modification support for the refueling outage, contributed to instances of poor engineering performance. Management was not effective in reducing the engineering backlog.

The Authority's engineering staff has increased their efforts to improve management of engineering. Based on an October 1990 staffing study conducted by the nuclear generation department, a five year plan was developed to reorganize the entire department during the period of 1991 through 1995. In 1991 the number of positions in Nuclear Engineering and Design was increased and the Configuration Management group was established in the corporate office. In September 1992, after the refueling outage, the site engineering group was established under the corporate project engineering department. Currently, the responsibility for all

design changes is within the control of one group, the major design changes being the responsibility of project engineering, and the minor and/or immediate design changes being the responsibility of the site engineering group, under the direction of project engineering. Prior to September 1992, the site technical services department had the two major responsibilities of performing design changes and resolving plant operational issues. Now the Technical Services Department can focus solely on its responsibility of resolving operational issues. An administrative policy was issued which defines the new responsibilities of each engineering organization within the Nuclear Generation Department.

The Authority has improved the engineering responsiveness by having the site engineering group perform on-site design engineering activities and having the Technical Services Department prioritize and coordinate engineering tasks. When fully staffed, the site engineering group will have twenty-five engineers and the technical services department system engineering section will have twenty engineers. This new engineering reorganization is expected to be fully staffed by June 1993, and will provide an additional thirty engineers at the site. The corporate office project engineering organization and its responsibilities for major modifications has not diminished with the new site organizational changes.

The Authority has improved communication between the site and corporate office personnel within the last year. Monthly engineering meetings are held at the site with representatives from the site departments and corporate and site engineering. Weekly conference calls are held between corporate engineering, site engineering and technical services to address emerging issues. Daily conference calls are held between project engineering and site engineering to address daily status of ongoing tasks. Standardization of engineering procedures for the corporate office and sites is nearing completion.

Within the Nuclear Engineering Division, a planning and scheduling group was established to ensure the overall coordination of all corporate design activities. Long range planning meetings held with site departmental participation, identify modifications for both non-outage periods and refueling outages to ensure site coordination of design activities.

The Authority will increase the engineering staff positions at the site with the new organization, disseminating the heavy work load and allowing for improved and consistent engineering performance. The system engineering group, as part of the plant organization, is responsive to plant engineering requests that pertain to daily operational concerns, and will ensure awareness of plant systems reliability.

Additional staffing and contracted engineering resources have been and will be used to minimize the backlog of engineering. To ensure coordination of the engineering backlog with plant activities, the work control program will incorporate tracking of engineering tasks.

The Authority is performing assessments to improve the entire engineering and technical support area. An independent assessment of the conduct of engineering at both sites and at the corporate office is being performed. Management is reviewing other utilities' system engineering and site engineering programs and will use industry experience for further development of these programs at Indian Point 3.

Safety Assessment/Quality Verification

The Authority will strive to improve effective safety and quality verification activities. Responses to generic letters, bulletins, and license amendment safety evaluations will continue to improve.

The report identified weaknesses in the evaluation of existing deficiencies and the implementation of effective corrective actions. Weaknesses in the proper implementation of QC holdpoints and the performance of the Operation Experience Review Group were also noted. Good self assessments were conducted in some areas but were not totally effective for all departments.

The station's senior management is committed to effective and timely corrective actions. Controls are in place to ensure problems are properly identified, analyzed, and resolved. Senior management reviews operations logs and significant occurrence reports for problems. They assess the staff's categorization, evaluations, and corrective actions to problems at daily department manager meetings.

To ensure the staff is focused on the significant emerging issues, a top five problem list is developed and status is reviewed at the managers' meeting. Status of immediate corrective actions are monitored throughout the day.

Corrective actions for the proper implementation of QC holdpoints have been completed. Training of QC and maintenance personnel has been conducted to emphasize the expectation for procedure adherence.

The Operational Experience Review Group engineers have attended component failure root cause training to enhance analytical skills. Daily group meetings provide an opportunity to monitor the depth of analysis of problem solving activities and enable group members to share operating experience.

The effectiveness of self assessment activities will be improved by tracking corrective actions and escalating untimely items. An internal appraisal program is being implemented to schedule and document management observations of tasks. The observations will monitor the quality and performance and enable communication of problems in implementing tasks.

A new corporate self assessment department is being formed to perform assessments of nuclear generation activities.