

## NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK300 ERIE BOULEVARD WEST  
SYRACUSE, N Y 13202

March 8, 1977

Mr. James P. O'Reilly  
Director  
United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA. 19406

RE: Docket No. 50-220 and Docket No. 50-333  
I.E. Circular 76-07

Dear Mr. O'Reilly:

*This report is in response to your request of December 17, 1976 concerning I.E. Circular 76-07 which stated:*

"Conduct a review of your plans or programs which are to provide positive assurance that members of your operating and support staff are, in fact, complying with the safety procedures you have in effect and that they are aware of safety related incidents that have occurred at your facility or similar facilities."

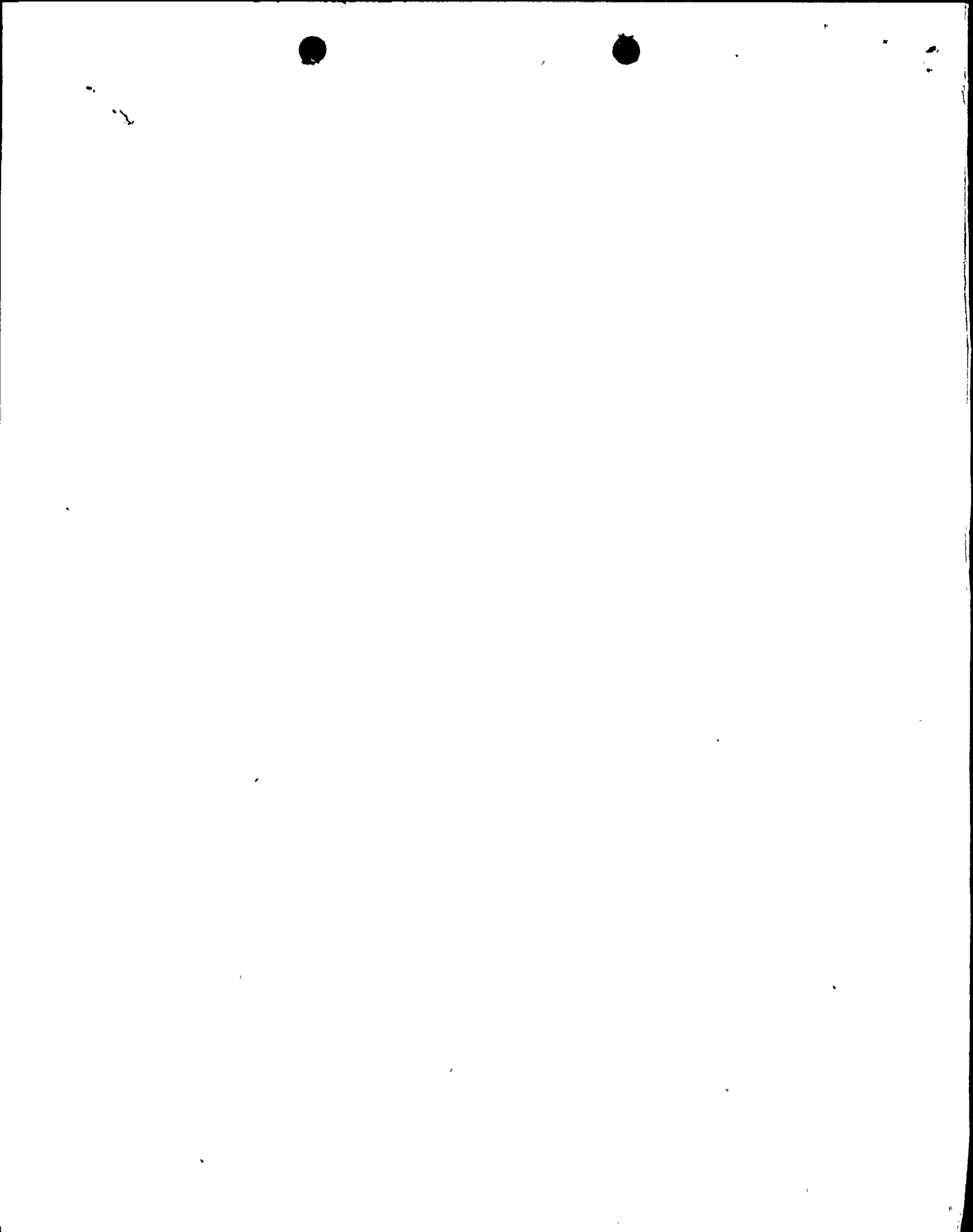
1. "Program for periodic shift and operator training whereby incidents which occur at your facility as well as at other licensed reactors, including all significant personnel errors, will be reviewed with the objective of identifying "the lessons to be learned"."

## RESPONSE

*At both the Nine Mile Point Unit #1 and the James A. FitzPatrick Nuclear Power Plants, a detailed, pre-programmed requalification program is conducted for all Senior Licensed Operators and Licensed Operators. This program is conducted on a two-year cycle in compliance with 10 CFR 50.54(i-1) and meets the requirements of Appendix A 10 CFR 55 to assure operator qualification for periodic license renewal. Meetings are scheduled as a part of this program such that in addition to other items, all licensed operators and senior licensed operators will be present in a training session at regular intervals at which variations from normal plant operations are discussed.*

T

810309 0378



## RESPONSE TO ITEM #1 (continued)

Niagara Mohawk has established a procedure and format at both operating plants which involves reporting variations from normal plant operations. These Occurrence Reports (OR's) include but are not limited to those incidents which may become the subject of a Licensee Event Report (LER). Reports are regularly reviewed by knowledgeable members of the station staffs and by the Site Operating Review Committee (SORC) in accordance with established procedures.

Occurrence Reports and Licensee Event Reports which were generated at the site since the previous review meeting of licensed personnel are regularly reviewed as part of the requalification training program. The review covers the scope of the event, the ramifications of the event and the corrective action required to preclude the re-occurrence of a similar event. A distribution of LER's and digests of events occurring at other sites is delivered to the stations on a regular basis. The Training Supervisors and Site Management Staff review these reports and present selected events from outside licensed facilities for similar discussion and review by all on-site licensed personnel.

2. "Procedure routinely implemented by knowledgeable individuals to qualitatively assess the performance of the operating and support staff in such areas as adherence to operating procedures, use of system checklists, and implementation of component and system tag-outs. This should include review of the degree to which operating procedures, tagout procedures, and checklists require signoff, i.e., signature or initials to verify proper completion and to identify the responsible personnel."

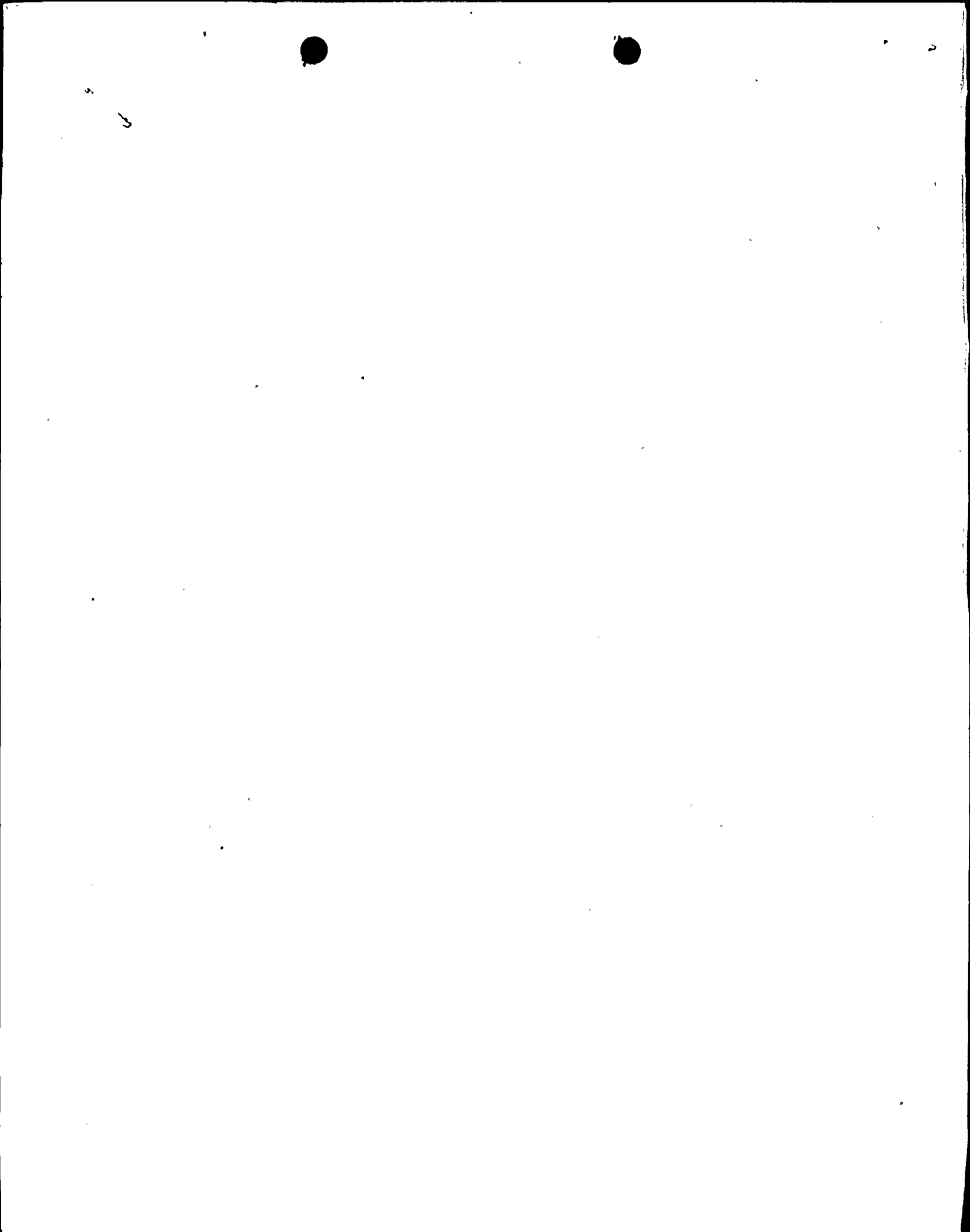
## RESPONSE

Administrative Procedures for Operation, Maintenance, Inspection and Testing include detailed provisions for sign-off on check lists and for signatures or initials of persons reviewing and/or approving completed actions. Administrative Procedures and the Niagara Mohawk Power Corporation Safety Rules establish tag-out procedures including provisions for identifying the persons responsible for implementation. Administrative Procedures require the review of the Site Operations Review Committee, the concurrence of the Manager Quality Assurance and the approval of the General Superintendent Nuclear Generation, prior to implementation.

Review of operating, testing, inspection, and maintenance is a regular part of the supervisory function at all levels. In particular, surveillance and maintenance operations require the approval of an appropriate group supervisor by signature on the completed record form.

Three independent organizations within Niagara Mohawk or the Power Authority provide surveillance and audit on the performance of the operating and support staff for the Nine Mile Point Nuclear Station and the James A. FitzPatrick Nuclear Power Plant.

- a. Quality Control Operations personnel are regularly present at the site. This organization constitutes a group of knowledgeable individuals who exercise continuous surveillance on all aspects of operations, maintenance and administration at the site which might affect nuclear safety.



RESPONSE TO ITEM #2 (continued)

a. (continued)

Quality Control Operations personnel perform their duties in accordance with written procedures approved by Niagara Mohawk management and established in accordance with Appendix B 10 CFR 50 and the applicable Regulatory Guides and as detailed in the Final Safety Analysis Reports for Nine Mile Point and FitzPatrick Plants.

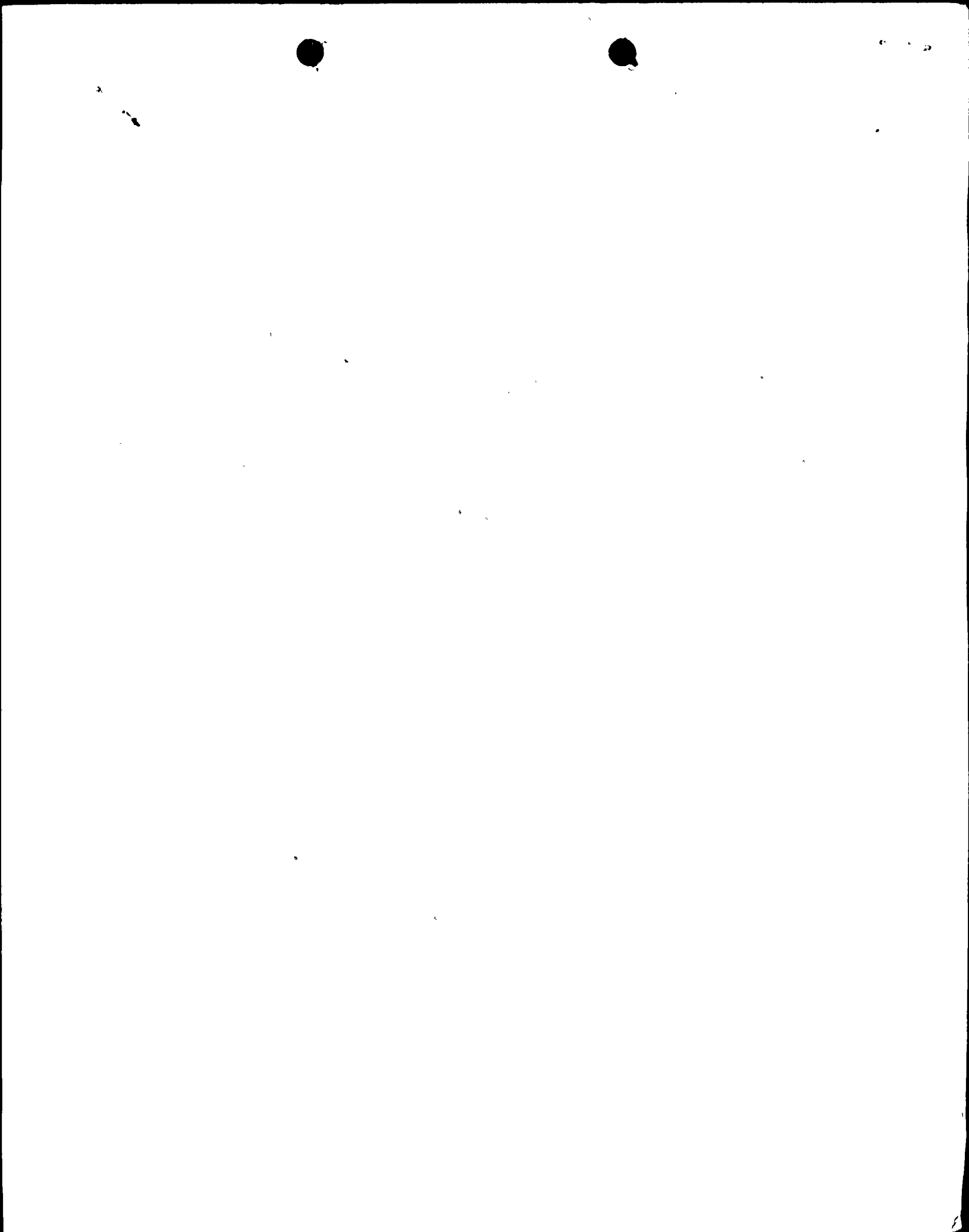
Concurrence of quality control is required in the procurement of material for safety related systems and in the acceptance of safety related components for operation following maintenance. Surveillance and audit by Quality Control Operations includes inspection for implementation of component and system check lists, tag-outs, signoffs and the maintenance of required records and reports. Regular reports of this surveillance and audit activity are made to the site management and to the Manager Quality Assurance. Procedures for corrective action include the ability to resort to whatever authority may be necessary to assure satisfactory resolution of all items.

b. Quality Assurance personnel for Niagara Mohawk operate out of corporate headquarters in Syracuse. At the James A. FitzPatrick Plant, Power Authority Quality Assurance personnel are stationed at the plant.

Quality Assurance provides an audit back-up to Quality Control Operations and also includes audit of procedures for adherence to Technical Specifications and applicable Regulations and Guides. In this manner, the Quality Assurance organization provides additional assurance to management that procedures include adequate provision for check list verification; that review and approval signatures are entered where required; and that procedures are being properly followed.

c. The Safety Review and Audit Board (as defined in the Technical Specifications) is comprised of outside consultants and knowledgeable personnel in NMPC headquarters. Regular audits are also conducted by members of this Board. These audits encompass an over-view of the quality of site operations but are also conducted in sufficient depth to detect deficiencies in procedures involving inadequate requirements for check-off and approval.

3. "Procedure for random backshift and weekend visits by management and supervision to the facilities, to monitor and assess operations including crew manning and performance, equipment status and plant conditions."



RESPONSE TO ITEM #3


Niagara Mohawk Power Corporation has full-time management representatives on-site at both the Nine Mile Point Unit #1 and J.A. FitzPatrick Nuclear Power Plants twenty-four hours per day, seven days per week whether or not the plants are on the line or shutdown. In addition, there are at least two management representatives on-call at all times including nights and week-ends. Supervisors responsible for maintenance, modifications, and testing routinely provide planning and direction as necessary and required for all work in their area of responsibility.

The full time management representatives are assigned as Shift Supervisors. All Shift Supervisors are senior licensed operators. The on-call management representatives are either NRC licensed operators or supervisors with extensive training and experience in nuclear power technology. This management arrangement assures the General Superintendent and Station Superintendents that competent management personnel are at all times informed about crew manning and performance, equipment status and plant conditions. Since continuous management surveillance is maintained at all times, there is no need for pre-planned random visits to the facilities by other management and supervisors. General Management and supervisors do visit the facilities on back shift and on weekends in the course of their regular supervisor or management duties or when circumstances may justify their personal observation, supervision or direction.

CONCLUSION

It is evident from the management review outlined in this report that the administrative controls at the Nine Mile Point Nuclear Station Unit #1 and the James A. FitzPatrick Nuclear Power Plant are sufficient to assure management that there will be satisfactory performance by reactor operating and support staff members. Routine surveillance presently in effect by management and quality groups provide reasonable assurance that any inadequacies will be detected and corrected in a timely manner.

Very truly yours,

  
R.R. Schneider  
Vice President -  
Electric Production

MAS/mtm



Handwritten scribbles or marks in the upper right quadrant.





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

March 4, 1977

Docket Nos.: 50-220  
50-333

Niagara Mohawk Power Corporation  
ATTN: Mr. R. R. Schneider  
Vice President  
Electric Operations  
300 Erie Boulevard West  
Syracuse, New York 13202

Gentlemen:

The enclosed IE Circular, 77-03 is forwarded to you for your information. No written response is required.

Should you have any questions concerning this matter, please contact this office.

Sincerely,

  
James P. O'Reilly  
Director

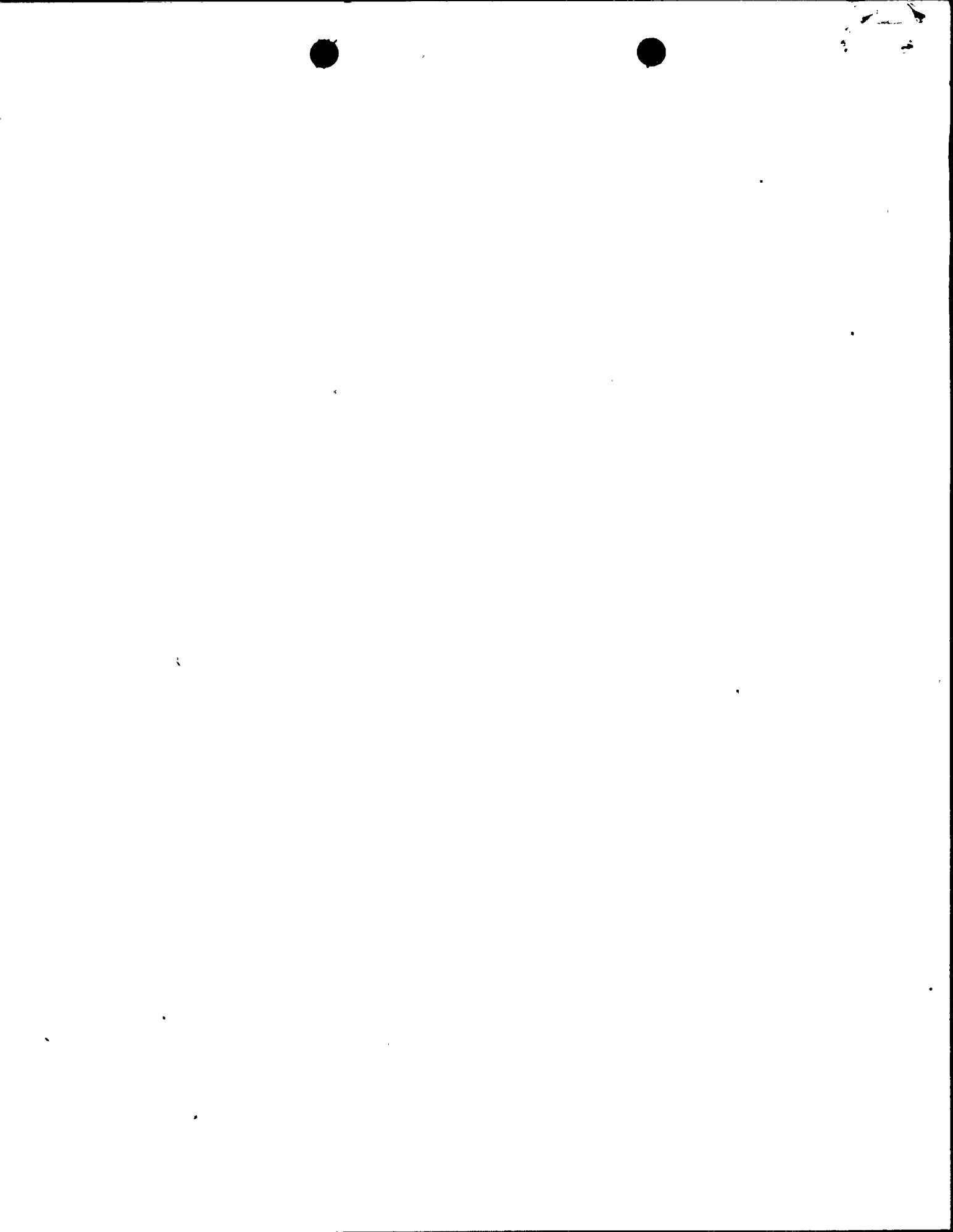
Enclosure: IE Circular No. 77-03

cc w/encl:

George T. Berry, General Manager and Chief Engineer (PASNY)  
Z. E. Chilazi, Manager of Projects, Thermal Power Generation (PASNY)  
M. W. Hultgren, Manager, Nuclear Operations (PASNY)  
A. Klausman, Manager, Quality Assurance (PASNY)  
T. E. Lempges, General Superintendent, Nuclear Generation (NMPC)  
R. W. Smith, Plant Superintendent (NMPC)  
J. D. Leonard, Jr., Power Authority Resident Manager  
T. Roman, Operations Supervisor (NMPC)  
M. C. Cosgrove, Quality Assurance Supervisor (PASNY)  
T. J. Perkins, Station Superintendent  
C. L. Stuart, Operations Supervisor  
E. B. Thomas, Jr., Esquire  
A. Z. Roisman, Counsel for Citizens Committee for  
Protection of the Environment

220  
102

60



Niagara Mohawk Power  
Corporation

2

bcc w/encl:

IE Mail & Files (For Appropriate Distribution)

← Central Files

Public Document Room (PDR)

Local Public Document Room (LPDR)

Nuclear Safety Information Center (NSIC)

Technical Information Center (TIC)

REG:I Reading Room

State of New York

