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 LEMPGES, T.E. Niagara Mohawk Power Corp.  
 RECIPIENT NAME RECIPIENT AFFILIATION  
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards addl info re site operations review committee & safety review & audit board compliance w/ANSI N18.7-1976. Description of operation assessment committee duties encl. Attached info will be included in next FSAR amend.

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Add: R. Benedict - LQ B

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October 25, 1984  
(NMP2L 0216)

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555


Dear Mr. Schwencer:

Re: Nine Mile Point Unit 2  
Docket No. 50-410

Attached is additional information requested by Mr. Benedict on the compliance of Site Operations Review Committee and Safety Review and Audit Board to ANSI N18.7-1976. Additionally, a description of the duties of the Operation Assessment Committee and the Operation Assessment Coordinator are provided to aid your review of the Unit 2 license application.

The attached information will be included in the next Final Safety Analysis Report Amendment.

Very truly yours,



T. E. Lempges  
Vice President  
Nuclear Generation

TEL/DS:ja  
Attachment  
xc: R. Gramm, NRC Resident Inspector  
Project File (2)

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PDR ADDCK 05000410  
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1/1 Add: R. Benedict-LQB Ltr Encl



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
Niagara Mohawk Power Corporation )  
(Nine Mile Point Unit 2) )

Docket No. 50-410

AFFIDAVIT

T. E. Lempges, being duly sworn, states that he is Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

Thomas E. Lempges

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Orangetown, this 25 day of October, 1984.

Janis M. Macro  
Notary Public in and for  
Orangetown County, New York

My Commission expires:

JANIS M. MACRO

Notary Public in the State of New York  
Qualified in Onondaga County No. 4784555  
My Commission Expires March 30, 1982



13.4 OPERATION REVIEW AND AUDIT

13.4.1 Administrative Controls

Administrative controls are written rules, orders, instructions, procedures, policies, practices, and designation of authority and responsibility by management to ensure safety and quality of operation and maintenance of Nine Mile Point Nuclear Station Units 1 and 2. The Site Administrative Procedures describe the controls over all station procedures.

The General Superintendent Nuclear Generation is directly responsible for the safe, orderly, and efficient operation of both units onsite. The functional operation of each station is the responsibility of the respective Station Superintendents. In addition, the Station Superintendents are charged with responsibility for keeping the General Superintendent fully informed on all significant matters of station operation.

13.4.2 Safety Review and Audit of Operations

The two review bodies already in existence for the Nine Mile Point Unit 1 site, the Site Operations Review Committee (SORC) and Safety Review and Audit Board (SRAB), will also function for Unit 2. These organizations are shown on Figure 13.4-1. The SORC and SRAB committees' methods, procedures and practices comply with Sections 4.4 and 4.3 of ANSI N18.7-1976, respectively. Functions served by both of these committees are the same as those performed by committees for Nine Mile Point Unit 1 and are shown in Tables 13.4-1 and 13.4-2.

13.4.2.1 Site Operations Review Committee

Members of the SORC are managers or supervisors in the site organization. Qualifications for these positions relate to the discipline or position held by the members in the organization and are described in Section 13.1.1.2.

The SORC, associated with all phases of operation, originates changes to procedures and recommends modifications to system design involving safety and compliance on a regular basis. Records and minutes of meetings are kept on file at the site and are available upon request. Recommendations for changes to licenses and design of systems as well as reports of abnormal operation or requests for technical assistance are forwarded to the Safety Review and Audit Board (SRAB) for review as



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appropriate. SORC procedures are described in the Site Administrative Procedures.

The SORC meetings include an operations assessment subcommittee, which meets at least once every 2 months with SORC.

The Operations Assessment Coordinator (OAC) is the Supervisor Technical Support Nuclear or designee. An OAC designee is also in the ISEG.

The function of the Operations Assessment Committee will be to evaluate plant operations from a safety point of view.

1. Engineering evaluation of the operating history of the plant (equipment failures, design problems, operations errors, etc.) and Licensee Event Reports from other plants of similar design, with suitable dissemination of the results of such evaluations to other members of the plant staff.
2. Engineering evaluation of plant conditions required for maintenance and testing.
3. Engineering evaluation of the adequacy of utility policy for maintenance, testing, equipment procurement, etc.
4. Engineering evaluation of continuing adequacy of plant operations quality assurance; and
5. Engineering evaluation of adequacy of plant emergency and operating procedures.

Those involved in the assessment of operating experience will review information from a variety of sources, including operating information from the licensee's own plant(s), publications such as IE bulletins, circulars, and notices and pertinent NRC or industrial assessments of operating experience. In some cases, information may be of sufficient importance that it will be dealt with promptly (through instruction changes to operating and emergency procedures, issuance of special precautions, etc) and will be handled in such a manner to assure that operations management personnel would be directly involved in the process. In many other cases, however, important information will become available and be brought to the attention of operators and other personnel for their general information to assure continued safe plant operation.



The OAC will prepare a draft report for presentation at a SORC meeting and a final report following the meeting. The purpose of the report will be to summarize the operations experience applicable to the station accumulated since the last meeting and to document the action taken at the station as a result of this operating experience. A suggested outline is as follows:

1. Review of significant information received from outside the station applicable to station operation, maintenance, testing or modification. Report action taken and pending.
2. Safety significant equipment malfunctions at the station, corrective action taken and pending and long term corrective action taken and pending.
3. Trends developed from testing or operational surveillance short and long term action taken and pending.
4. Summary of nuclear reactor core operations including flux monitoring, instrumentation, control blade operating experience, off gas and water contamination trends. Analysis of operations and action pending.
5. Summary of operating problems which were or might be resolved by procedure change or addition; equipment, instrumentation or control change or addition; or organization change. Resolution and/or proposed resolution.

The final operating experience assessment report shall be contained in the minutes of SORC for review by the SRAB and members of the station staff.

Action items from the OAC final report will be tracked on the SORC unfinished business items list. This list is followed up at later SORC meetings to ensure implementation.

#### 13.4.2.2 Safety Review and Audit Board

The SRAB is composed of engineers with extensive experience in the design of generating plants and knowledge in various disciplines affecting plant safety. They do not have responsibility for day-to-day operation. The General Superintendent Nuclear Generation is included as a board member providing liaison and direct information to board members and ensuring that board recommendations are implemented.

The SRAB is charged with the responsibility for reviewing change requests originating in the SORC and recommending action where appropriate. When a license change is required, the SRAB reviews necessary documents for submission to the NRC. The SRAB also reviews all abnormal situations that may arise in plant operation. Periodic audits of operation are made by board members knowledgeable in the operating process, but without responsibility for daily plant operation. Functions served by these committees are the same as those performed by the Nine Mile Point Unit 1 committees shown in Tables 13.4-1 and 13.4-2. Education and experience qualifications required for members of the SRAB are as follows:

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## Nine Mile Point Unit 2 FSAR

### Staff Engineer - Mechanical and Electrical

Education: Four-year college graduate, engineering or equivalent.

Experience: Five years of experience in mechanical or electrical engineering components and control systems for thermal power stations or similar facilities.

### Staff Engineer - Environmental

Education: Four-year college graduate or equivalent.

Experience: Three years of experience in analysis of radiological effects on the environment.

### Consultants

Consultants shall be utilized as determined by the SRAB Chairman.

#### 13.4.3 Audit Program

The SRAB provides independent review and audit of various operating activities, administrative controls and compliance to NRC regulations, technical specifications, and quality assurance. The following audits are conducted by SRAB in accordance with the Technical Specifications (Chapter 16).

1. Conformance to Technical Specifications and license conditions.
2. Training and qualifications of the operating staff.
3. Actions to correct deficiencies.
4. Quality assurance.
5. Emergency Plan and Procedures.
6. Security Plan and procedures.
7. Fire protection program.
8. Other audits directed by the Chairman of the SRAB.

Additional audits are performed by the Quality Assurance Department as described in Chapter 17.

