

June 30, 1986  
(NMP2L 0760)

Dr. Thomas E. Murley  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Dr. Murley:

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

This letter provides Niagara Mohawk Power Corporation's written comments on the May 14, 1986 NRC Systematic Assessment of Licensee Performance for Nine Mile Point Unit 2 to supplement our discussion during the May 30, 1986 meeting. The attachment addresses the Recommendations to the Licensee which were contained in the Performance Analysis section of the Board Report.

In general, we found the recommendations from the recent SALP report to be positive and constructive. In fact, most of our actions, as described in the attachment, were already initiated and, in some cases, completed prior to receipt of the Board Report. We would be pleased to discuss these actions further during your pre-licensing visit or any other time at your convenience.

Very truly yours,

*C. V. Mangan*

C. V. Mangan  
Senior Vice President

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Attachment

xc: M. Haughey, NRC Project Manager  
R. A. Gramm, NRC Resident Inspector  
Project File (2)

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## B. Radiological Controls

### Licensee Action

"Thoroughly apply published NRC guidance to development of operational procedures and training program."

### Response:

A Special Projects Group reporting to the Project Director was established to assure that all NRC Bulletins (since 1971), Information Notices (since 1979), Generic Letters (since 1976), and Circulars (since 1977) are reviewed for applicability to Nine Mile Point Unit 2. Those NRC documents that may affect operating procedures or training programs are sent to the Technical Support Group in the Operations Department for review and appropriate disposition. The procedures which govern the Operating Department's review are AP-3.4.2, "Operational Experience Assessment;" TDP-5, "Administration of Operational Engineering Assessment Items;" and TDP-9, "Independent Safety Engineering Group." These procedures form a program to help assure that appropriate information is incorporated into procedures and training programs. Disposition of each of these NRC issuances, as well as similar types of information from INPO and vendors of safety related equipment, is reviewed by the Site Operations Review Committee and the Safety Review and Audit Board. This activity has been occurring for some time and will continue throughout the life of the plant.

In response to the Analysis section, a new Radiation Protection and Chemistry Personnel Training Program, in particular, has been established consisting of a number of specific task training modules. The effectiveness of these modules will be monitored through Nuclear Training Instruction - 4.5, "Evaluation of Training Programs," which includes the use of post-training surveys.

## C. Surveillance

### Licensee Action

"Institute program to assure development, approval and implementation of technically adequate surveillance procedures."

### Response:

The program for the development, approval and implementation of Unit 2 surveillance procedures includes extensive review and other appropriate measures to help assure technical adequacy. Although Niagara Mohawk has contracted with Nuclear Energy Services (NES) to provide assistance in developing surveillance procedures, each procedure will be extensively reviewed by Niagara Mohawk. In addition to review by the departments responsible for implementation of the procedure, reviews will also be performed by support departments, departments required to evaluate data, and the Technical Support Department. These reviews are conducted in

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*Journal of Management Studies*, 19(1), 67-80.

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accordance with the Site Administrative Procedures. A matrix has been developed which delineates which Technical Specification requirements are satisfied by each procedure. Additionally, a computerized surveillance tracking system has been developed to ensure timely completion of each procedure with regard to Technical Specification operational conditions and frequency. The position of Surveillance Coordinator has been created to oversee this process.

#### D. Preoperational Testing

##### Licensee Action

"\_\_\_\_\_ the licensee should evaluate the methods in place to verify the accuracy and adequacy of test results reviews to ensure compliance with FSAR commitments.

##### Response:

Several changes to the review program in the Startup and Test Department have been implemented to preclude the problems discussed in the SALP report and which occurred in 1985.

A Special Projects group was created in the Startup and Test Department. One of the primary responsibilities of this group is to provide the Test Engineer (Procedure Author) and all reviewers with the applicable FSAR page printouts from the Documaster Computer Program. This group also reviews all amendments and Licensing Document Change Notices (LDCNs) that have not been incorporated into the FSAR to ensure this information is also available to the Test Engineer.

Additionally, to assist in the technical review of Preoperational Test Procedures, a special independent review group was formed in Startup and Test. This group is comprised of individuals, all certified as Level III senior experienced Test Engineers. They are lead by a senior Level III Test Engineer with BWR Senior Reactor Operator Certification. Comments from this review are transmitted through the Startup Special Projects group to the Test Engineer for resolution. This program helps to ensure accurate technical content during the test preparation period.

To verify the accuracy and adequacy of test results and assure compliance with the FSAR commitments, Preoperational Tests are subjected to a multilayered review process. Initial review is accomplished by the Lead Test Engineer (Level III), then by one of three Test Group Managers (Level III). The results are then reviewed by the special independent review group described above. Next, the test results are reviewed and approved by the Joint Test Group (JTG). After the Joint Test Group approval and assignment of action items, the test is reviewed and approved by the Site Operations Review Committee (SORC).



To supplement and accelerate this formal test review process established by Site Administrative Procedures, a second independent review group within the Operating organization has been formed. This review team is composed of two senior managers, both possessing extensive experience in plant operation and preoperational testing programs. The function of this review is to ensure adherence to administrative controls imposed by the Startup Program as well as the technical acceptability of test exceptions, test summary descriptions, and test results. Additionally, open test items are identified and are followed on the Master Tracking System. The Operations Department reviewer schedules the Test Engineer presentation of test results to the Site Operations Review Committee. The Site Operations Review Committee approves the Preoperational Test/Acceptance Test when the members are satisfied that the tests' acceptance criteria have been achieved. As of June 23, 1986, 80 Preoperational Test/Acceptance Tests have been reviewed and accepted by the Site Operations Review Committee.

