

April 22, 1987
(NMPIL 0147)

Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: Systematic Assessment of Licensee Performance
(SALP); Report No. 50-220/85-98

Dear Mr. Russell:

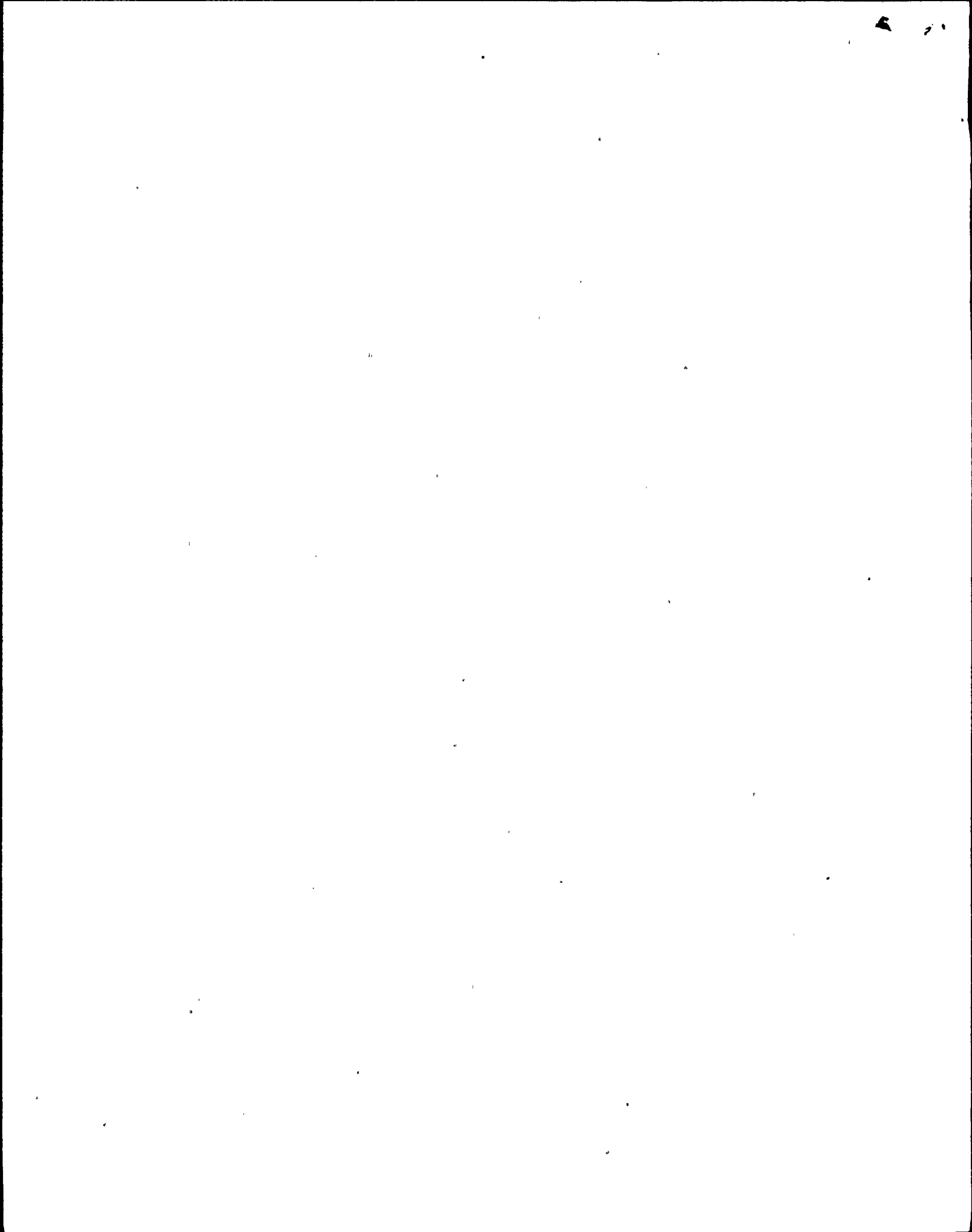
On March 26, 1987, Niagara Mohawk and Nuclear Regulatory Commission representatives met to discuss the latest Systematic Assessment of Licensee Performance (SALP) Report for Nine Mile Point Unit 1. This letter transmits Niagara Mohawk's response to the SALP report and includes information on discussions held at the meeting.

At the SALP meeting we indicated our general agreement with the conclusions reached by the SALP review board. We identified several minor report discrepancies, as listed on Attachment 1, and we explained many of our programs and approaches to correcting weaknesses in the functional areas, as listed in Attachment 2.

The areas of Maintenance and Assurance of Quality were identified by the SALP board as requiring the greatest attention and accordingly are discussed in detail below.

Weaknesses were identified in our ability to identify problems, and to obtain the root cause of equipment failures, you also identified a tendency to handle problems at too low a level. To correct these weaknesses Niagara Mohawk has implemented several new reports and programs.

Our Problem Report provides a mechanism for anyone to identify a problem and it assures that management attention is focused on the problem with feedback provided to the initiator. The reports are working and several have resulted in planned modifications. Our Root Cause Procedure establishes a disciplined approach to identifying root causes of problems. The procedure has improved the thoroughness of problem resolution and has helped foster an attitude of self-criticism at the station. Further improvements in problem identification are expected with changes in our Trending Program. Our newly instituted Supervisor's Work Inspection Report assures supervisory involvement in the plant and critical observation of work activities. Our Radiological Performance Monitoring Report is a new report that is designed to provide improved management oversight for many aspects of the radiological controls program.



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Additional weaknesses were identified in management involvement and control in assuring the quality of work. Improvements will be made in these areas through several methods, including: effective use of our new reports, various programs discussed during our meeting and highlighted in Attachment 2, and enhanced training.

Niagara Mohawk attaches great importance to training and sees it as a means for improvement. Therefore, we have initiated changes in several training areas. These changes include greater emphasis on administrative controls, supervisory training for our senior represented personnel, Quality Assurance indoctrination training and cross discipline training for our maintenance personnel.

Our supervisory training for senior represented personnel, 'chiefs' program, is an opportunity for improvements in management by having stronger supervision at the job site and permitting more time for first-line supervision to oversee work activities. Our cross discipline training for mechanics and electricians will instill a greater appreciation for the safety significance of systems and components.

Niagara Mohawk is confident that the specific actions discussed in this letter and in Attachment 2 will enable us to demonstrate our commitment to excellence in nuclear operations. During this assessment period we plan to meet periodically with the Resident Inspectors and your staff to review the status of these and related activities.

Finally, the SALP report suggests, and we concur, that the added stress of completing Nine Mile Point 2 may have affected Niagara Mohawk's performance during this assessment period. Niagara Mohawk believes that this phase is now behind us, and we do not believe that Unit 2 activities will adversely affect the operation of Unit 1 in the future. Niagara Mohawk has a long record of high quality in nuclear operations, which we believe indicates an underlying organizational and management competence. As we move into a period of steady state operation with two units, we expect this underlying capability to manifest itself with continued operating excellence.

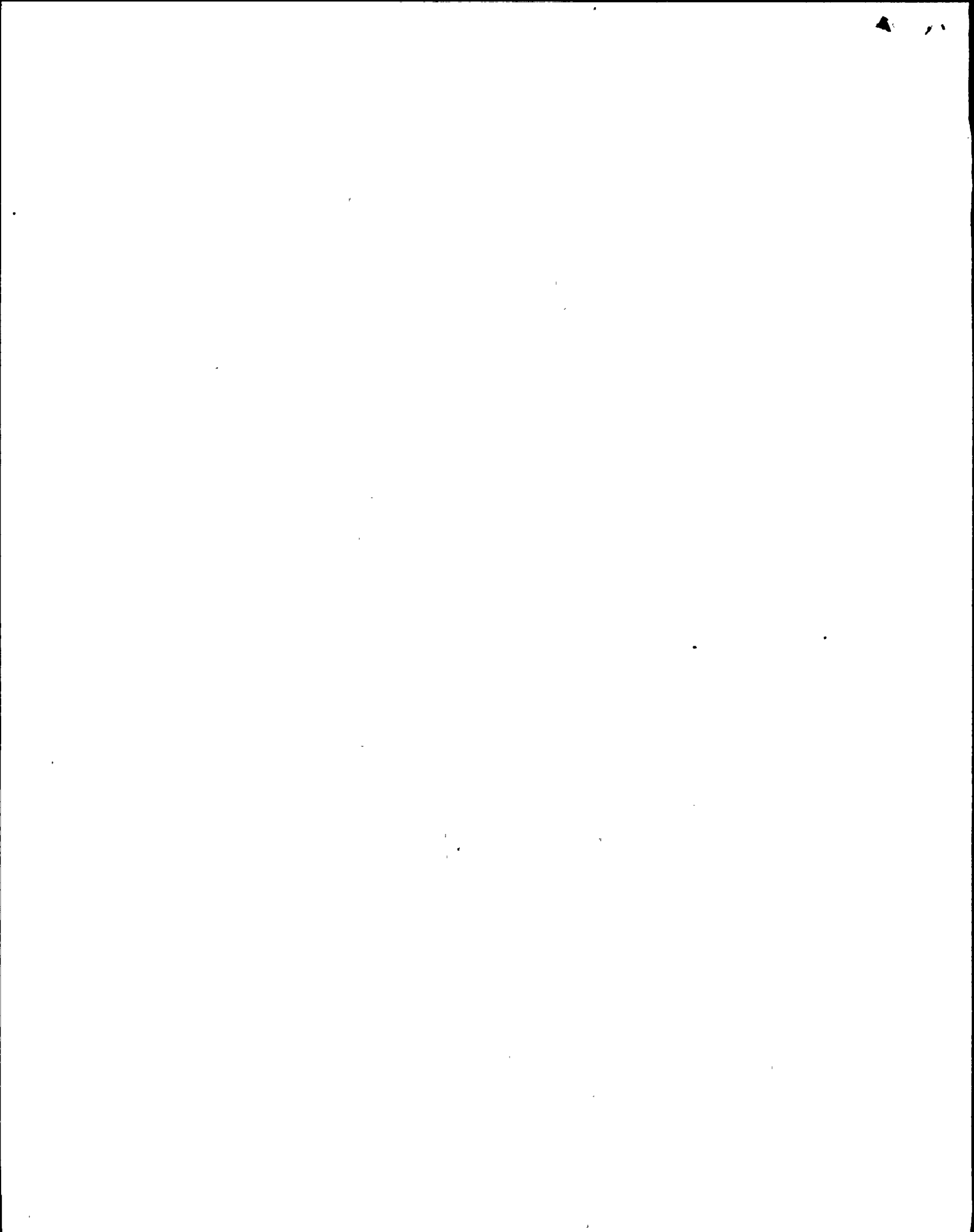
Sincerely,

NIAGARA MOHAWK POWER CORPORATION


C. V. Mangano
Senior Vice President

CVM/RGS/eid
0128t
Attachments

cc: Mr. R. A. Capra, Project Director
Mr. W. A. Cook, Resident Inspector



ATTACHMENT 1

Corrections to SALP Report

Page 2, 1st paragraph, 2nd sentence, 1985 vs. 1986

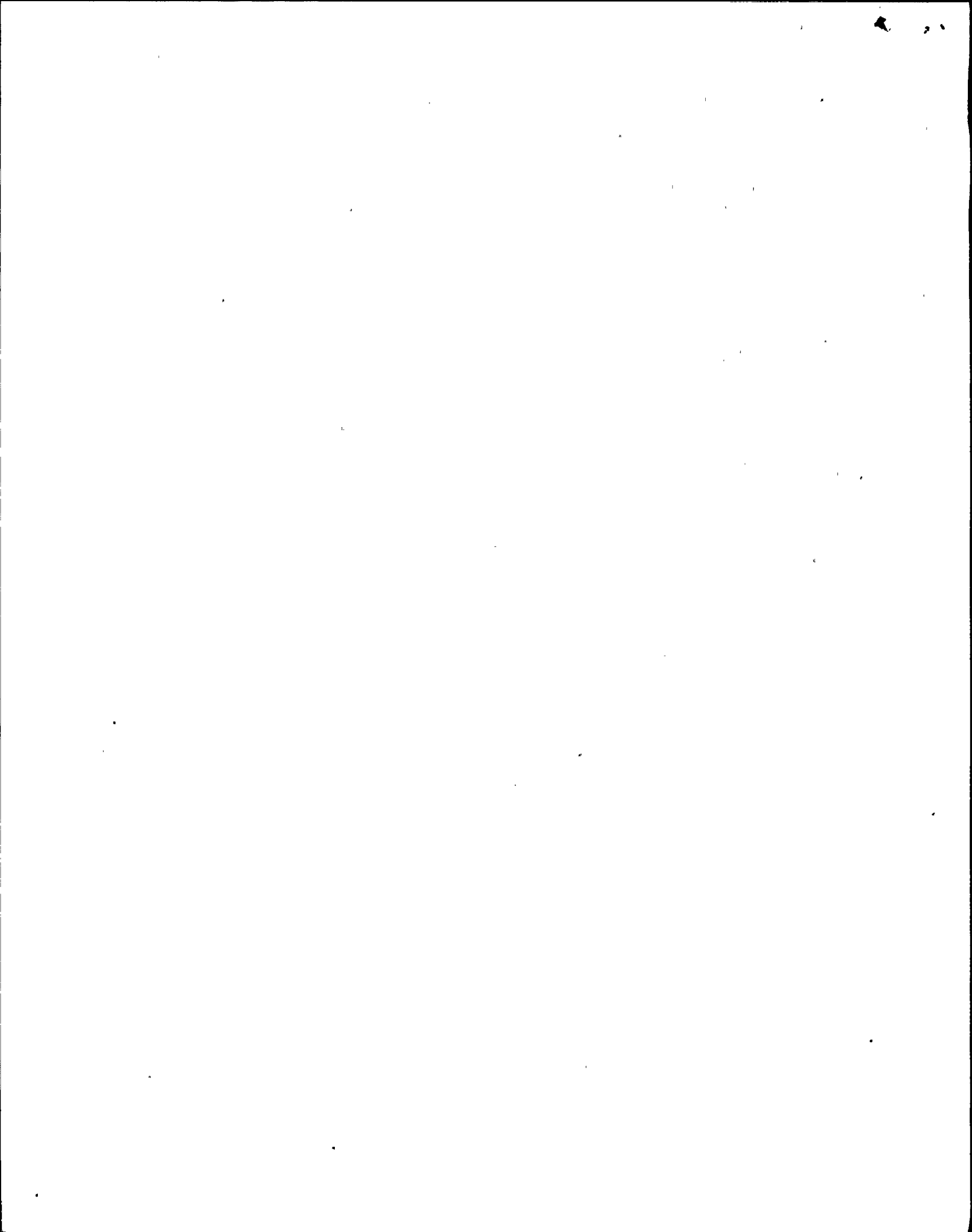
Page 2, 5th paragraph, some vs. all and inside vs. outside

Page 17, 2nd paragraph, last sentence, eliminate "and too narrow in scope"

Page 30, 3rd paragraph, 3rd sentence some vs. all

Page 31, 3rd paragraph, last sentence should be eliminated

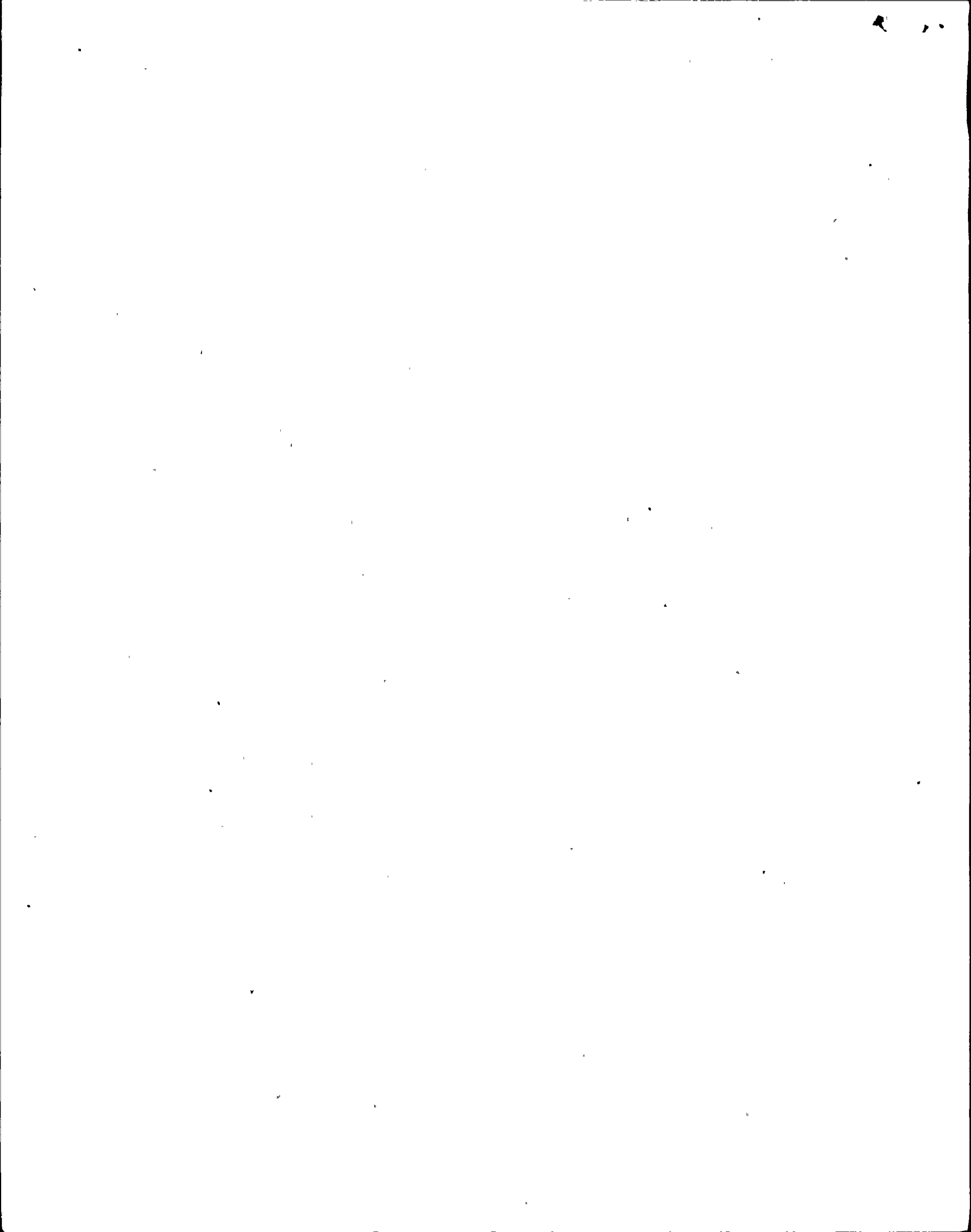
Page 35, 4th paragraph, last two sentences. The statements made in this paragraph are incorrect since NMPC completes LERs per NUREG 1022. Sentences should be eliminated or rewritten.



ATTACHMENT 2

Improvements at Nine Mile Point

- Radiological Performance Monitoring Report: New report to be used by both the Radiation Department and Site Management to monitor and trend many aspects of the radiation protection program.
- Organizational Improvements: Chemistry and Radiation Management Department has been reorganized under an experienced manager. The reorganization was designed to improve accountability and technical performance. Other site department changes have been made including additional managers and senior represented positions to improve management oversight.
- Radiological Control Plan: Job control checkoff sheet that is a part of the Radiation Work Permit that establishes additional control requirements for the more complicated jobs.
- C-2 Committee: The committee, comprised of site and engineering managers, have safety and financial responsibilities regarding station modifications. They provide oversight to station problems and review, approve and prioritize modifications. Modifications are planned with an increased awareness of schedule, personnel productivity and quality.
- Greater Engineering Involvement: Establishment of an onsite engineering organization has improved communication and oversight of station problems. The onsite group has been instrumental in root cause, problem reports, material control and modifications.
- Training:
 - Supervisory Skill Training for Chiefs: A program that began in April 1987 designed to educate our senior represented personnel on management skills and how to best perform as a front line supervisor. This will improve communication, job execution and management effectiveness.
 - Administrative Control Training: There will be additional coverage during qualification and requalification training on administrative controls to provide greater worker understanding of the necessary controls to ensure operability and safety.



ATTACHMENT 2
(Continued)

o Training (Cont.)

Cross discipline training: Maintenance personnel are receiving system style training to establish an appreciation for the operational implications of their work.

o Root Cause Procedure:

A detailed procedure designed to systematically examine a problem to determine the root cause of a problem. The procedure includes an ability to trend causes for future evaluation.

o Problem Report:

A formal report that provides a mechanism for any person to bring to management attention any problem occurring at the station. Report receives senior station management and engineering department review and resolution.

o Supervisor Work
Inspection Report

Regular reports required by the Station Superintendent to establish a minimum level of field observation by unit supervisors. Areas of surveillance include procedures, radiation protection, safety, chemical controls, housekeeping and others.

o QA Department Improvements:

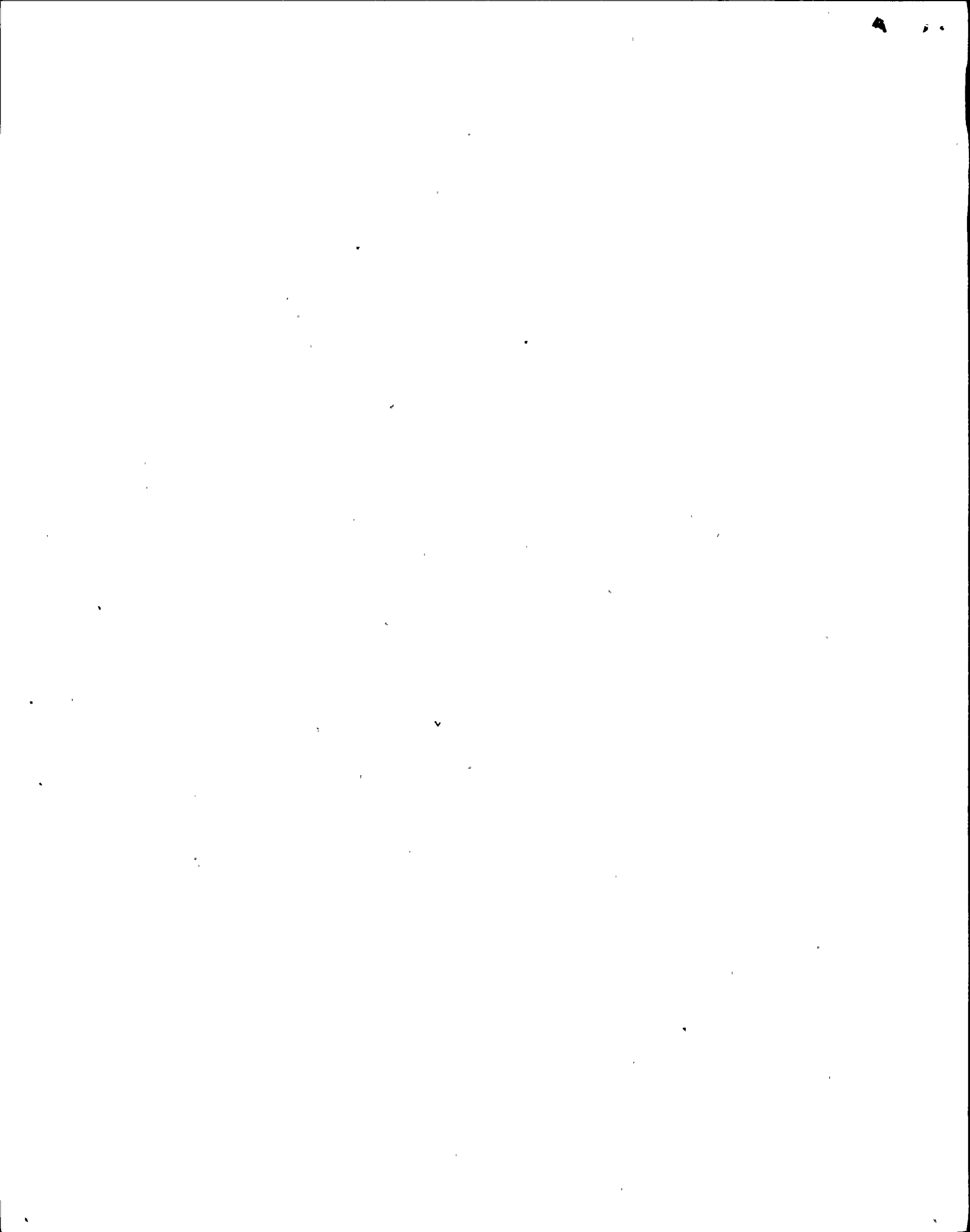
Strengthened QA Management by filling positions of Program Managers, Surveillance Supervisor and Quality Engineering Supervisors:

Improved QA Department involvement in areas of projects, inspection planning, trending, quality engineerings, and surveillance/audits of ongoing work activities.

Implementing improvements by expanding computer based QA surveillance system, intensify random monitoring of field activities, expanding QC inspection hold point attributes.

Performed QA indoctrination training sessions for QA department personnel.

Intensify field monitoring of modification contractor activities. Identify deficiencies directly via CARs/NCRs.



ATTACHMENT 2
(Continued)

Performance indicators are currently being considered and evaluated in the areas of; activities performed within QA department and activities performed by Nuclear Generation.

- o Other Planned Improvements: Establish an Outage Management Organization. Improve outage planning and outage work.

Trending. Part of our long-term program to improve trending. Data is presently available in many departments. Improvements can be made to provide early detection of problems and also serve as a management tool in oversight.

