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SUBJECT: Forwards plant, "Restart Action Plan," Dec 1988, per  
 Conditions 1 & 2 of Confirmatory Action Ltr 88-17 dtd 880724

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NIAGARA MOHAWK POWER CORPORATION

NIAGARA MOHAWK

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WILLIAM J. DONLON  
CHAIRMAN AND  
CHIEF EXECUTIVE OFFICER

December 21, 1988  
NMP1L 0334

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Re: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

Gentlemen:

The attached Restart Action Plan is submitted in fulfillment of conditions 1 and 2 of Confirmatory Action Letter 88-17 dated July 24, 1988. As a condition to the restart of Nine Mile Point Unit 1, the letter directed Niagara Mohawk to determine and document its assessment of the root causes of why Niagara Mohawk line management has not been effective in recognizing certain problems and to prepare a proposed restart action plan for submission to the Nuclear Regulatory Commission for review and approval.

The Restart Action Plan was developed in a deliberate and systematic way to utilize and build on the existing strengths of the nuclear program of Niagara Mohawk. It has used broad-based input to determine, analyze and propose corrective actions in programmatic and technical areas where problems have been encountered and weaknesses experienced. The Plan has been enhanced by input and feedback from various levels of personnel within the Nuclear Division and support organizations. As part of the review process, the Plan was explained and discussed at a number of meetings within the Nuclear Division to assure understanding and acceptance at all levels. It has also been reviewed by the Institute of Nuclear Power Operations (INPO). As the final step, Niagara Mohawk senior management, which had been involved in the restart effort from the outset, reviewed this plan and approves its submission.

Although the process has been lengthy and painstaking, it is the Company's belief that this participatory approach to the identification and resolution of management concerns has resulted in the identification of corrective actions that will significantly enhance management's ability to identify and resolve problems. Moreover, because of line management's day-to-day involvement in this process and their understanding of the problems and agreement on the appropriate corrective actions, a first step toward the changing of an organizational culture has been achieved. There is now an acknowledgment and acceptance that the resolution of problems is more than a concern of a small task force -- that all levels of the nuclear organization must accept responsibility for and participate in the resolution of the problems.

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The Restart Action Plan is only part of the overall effort to improve performance at Nine Mile Point Unit 1. Niagara Mohawk is also formulating a Nuclear Improvement Program to address concerns in our nuclear operations. Among other things, this program will implement long-term strategies identified during development of the Restart Action Plan to further strengthen Niagara Mohawk's nuclear program.

I am confident that the completion of those actions identified in the Restart Action Plan will lead to Niagara Mohawk's readiness to safely restart and operate Nine Mile Point Unit 1. Meanwhile, we are prepared to discuss the contents of the Plan with you and the Nuclear Regulatory Commission staff, and we are prepared to respond to any questions so that your review may be expedited.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



William J. Donlon  
Chairman and  
Chief Executive Officer

MP/pns  
6424G  
Attachment

xc: Regional Administrator, Region I  
Mr. W. Kane, Director, Division of Reactor Projects (DRP), Region I  
Mr. W. Johnston, Deputy Director, DRS  
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Mr. R. A. Capra, Director, Project Director I-1, NRR  
Mr. E. Wenzinger, Chief, Branch 2, DRP  
Mr. J. Johnson, Chief, Projects Section 2C, DRP  
Ms. M. F. Haughey, Project Manager, NRR  
Mr. W. A. Cook, Senior Resident Inspector, Nine Mile Point Units 1 and 2  
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