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Information & Records Management Branch (Post 890827)

SUBJECT: Forwards response to regulatory impact survey,per Generic Ltr 90-01.

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NIAGARA MOHAWK

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Lawrence Burkhardt, III
Executive Vice President
Nuclear Operations

Information and Records Management Branch
Division of Information Support Services
Office of Information and Resources Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re:	Nine Mile Point Unit 1	Nine Mile Point Unit 2
	Docket No. 50-220	Docket No. 50-410
	DPR-63	NPF-69

Gentlemen:

Enclosed is our response to your Regulatory Impact Survey (Generic Letter No. 90-01). The additional clarification provided to us by NUMARC in their letter dated February 16, 1990 was used to assist us in preparing our response.

We hope that this information will be valuable in helping you improve the regulatory process.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

L. Burkhardt, III
Executive Vice President
Nuclear Operations

JMM/mjd
8330G

Enclosure

xc: J. F. Colvin, NUMARC

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A001
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NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: Insurers (ANI, NEIL)

2. Based on actual experience over the past several years, about how often is this activity conducted? 4 Times Per Year

3. Operations/Construction areas covered: Fire Protection, Machinery History, PM/ST, Training

4. Extent of the activity (how many people, for how long).

1 to 4 people for 2 to 4 days per inspection.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	31	(number involved)	5
b.	Plant Manager	7		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents	30	(number involved)	1
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	308	(number involved)	30

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: INPO Evaluations/Visits 1988 & 1989

2. Based on actual experience over the past several years, about how often is this activity conducted? Twice Per Year

3. Operations/Construction areas covered: Various

4. Extent of the activity (how many people, for how long).

   3 to 25 people, for 1 to 2 weeks per inspection

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	986	(number involved)	9
b.	Plant Manager	202		
c.	Corporate Department Heads	930	(number involved)	16
d.	Corporate Vice Presidents	100	(number involved)	2
e.	Chief Nuclear Officer	96		
f.	Managers/Supervisors	4070	(number involved)	57

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: 1988 & 1989 Routine Region, Residents, Safety, Radiation Protection, SALP, License Exams, Special Safety

2. Based on actual experience over the past several years, about how often is this activity conducted? 34 during 1988
24 during 1989

3. Operations/Construction areas covered: Various

4. Extent of the activity (how many people, for how long).

1 to 8 people per inspection for 3 to 10 days per inspection.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	440	(number involved)	3
b.	Plant Manager	282		
c.	Corporate Department Heads	1612	(number involved)	22
d.	Corporate Vice Presidents	40	(number involved)	1
e.	Chief Nuclear Officer	40		
f.	Managers/Supervisors	2344	(number involved)	43

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: 1988 & 1989 NRC Team Inspections

2. Based on actual experience over the past several years, about how often is this activity conducted? 3 times during 1988
7 times during 1989

3. Operations/Construction areas covered: Various (Maintenance, Reg. Guides, ISI)

4. Extent of the activity (how many people, for how long).

6 to 15 people, one to two weeks per inspection.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	232	(number involved)	5
b.	Plant Manager	60		
c.	Corporate Department Heads	535	(number involved)	12
d.	Corporate Vice Presidents	20	(number involved)	1
e.	Chief Nuclear Officer	40		
f.	Managers/Supervisors	1344	(number involved)	44

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: ISEG review of plant activities.

2. Based on actual experience over the past several years, about how often is this activity conducted? Approximately 150 evaluations per year.

3. Operations/Construction areas covered: Operations, Technical Support, Engineering and Licensing.

4. Extent of the activity (how many people, for how long).

Ten full time engineers.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	134	(number involved)	7
b.	Plant Manager	170		
c.	Corporate Department Heads	110	(number involved)	5
d.	Corporate Vice Presidents	100	(number involved)	1
e.	Chief Nuclear Officer	24		
f.	Managers/Supervisors	389	(number involved)	34

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: Regional Inspection (NRC)

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per year.

3. Operations/Construction areas covered: Rad. Env. Monitoring Pgrm.

4. Extent of the activity (how many people, for how long).

1 person (approximately 16 manhours)

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	66.5	(number involved)	3
b.	Plant Manager	1		
c.	Corporate Department Heads	24	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer			
f.	Managers/Supervisors	507	(number involved)	18

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: NRC Special Investigations

2. Based on actual experience over the past several years, about how often is this activity conducted? Once every two/three years.

3. Operations/Construction areas covered: Rad. Env. Monitoring Pgrm.

4. Extent of the activity (how many people, for how long).

   1 person (approximately 24 manhours)

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	8	(number involved)	2
b.	Plant Manager	2		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents	.	(number involved)	
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	203	(number involved)	28

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: ANI Environmental Inspection

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per two years.

3. Operations/Construction areas covered: Rad. Env. Monitoring Pgrm. Off-Site Dose Calculations, Procedures Review, Non-Rad. Environmental Monitoring.

4. Extent of the activity (how many people, for how long).

1 person (approximately 12 manhours)

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	15.5	(number involved)	3
b.	Plant Manager	2		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer			
f.	Managers/Supervisors	107	(number involved)	12

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: EPI Inspection of Oil Spill Plan.

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per five years.

3. Operations/Construction areas covered: Review of Oil Spill Plan, Procedures, and Containment Facilities.

4. Extent of the activity (how many people, for how long).

1 person (approximately 8 manhours)

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	3	(number involved)	2
b.	Plant Manager	1		
c.	Corporate Department Heads	4	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	68	(number involved)	6

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: NYS Department of Env. Conservation.

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per calendar quarter.

3. Operations/Construction areas covered: The Station's Discharge Permit, Sample data, Reports, Procedures, and Sample Outfall Tours.

4. Extent of the activity (how many people, for how long).

1 person (approximately 8 manhours)

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	2.5	(number involved)	1
b.	Plant Manager	2		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	70	(number involved)	6

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: NYS Department of Health

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per year.

3. Operations/Construction areas covered: Rad. Env. Monitoring Program and SPDES Discharge Permit QC Program.

4. Extent of the activity (how many people, for how long).

   1 person (approximately 8 manhours)

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	12	(number involved)	2
b.	Plant Manager	.5		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	90	(number involved)	11

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: SRAB Audit.

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per year.

3. Operations/Construction areas covered: Rad. Env. Monitoring Program and Meterological Program.

4. Extent of the activity (how many people, for how long).

   3 people for a total of 80 hours.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	405	(number involved)	2
b.	Plant Manager	8		
c.	Corporate Department Heads	36	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	887	(number involved)	28

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: QA/QC Dept. Audits.

2. Based on actual experience over the past several years, about how often is this activity conducted? Once per 2 months.

3. Operations/Construction areas covered: Rad. Env. Monitoring Program, Non-Rad. Env. Monitoring Program, Meteorological Pgrm.

4. Extent of the activity (how many people, for how long).

   1 person 8 hours (per audit).

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	56.5	(number involved)	2
b.	Plant Manager	13		
c.	Corporate Department Heads	96	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	3		
f.	Managers/Supervisors	1018	(number involved)	23

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: ANI Environmental Effectiveness Audit (by outside contractor).

2. Based on actual experience over the past several years, about how often is this activity conducted? Once every 5 years.

3. Operations/Construction areas covered: Rad. Env. Monitoring Program

4. Extent of the activity (how many people, for how long).

   1 person approximately 80 hours.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	4	(number involved)	2
b.	Plant Manager	1		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	1		
f.	Managers/Supervisors	75	(number involved)	9

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: Department Self Assessments.

2. Based on actual experience over the past several years, about how often is this activity conducted? Once every 2 weeks.

3. Operations/Construction areas covered: All env. areas and interfaces with other departments.

4. Extent of the activity (how many people, for how long).

9 people for 1 hour each (9 manhours every two weeks).

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	501.5	(number involved)	4
b.	Plant Manager	100		
c.	Corporate Department Heads	564	(number involved)	7
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer	25		
f.	Managers/Supervisors	4409	(number involved)	42

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: OSHA

2. Based on actual experience over the past several years, about how often is this activity conducted? No regular visits- surveyor explosion, employee complaint asbestos (2-3 years ago) general inspection at U2 during constr. phase (1985).

3. Operations/Construction areas covered: None in particular.

4. Extent of the activity (how many people, for how long).

Surveyor Explosion - 1 person x 3 hours.
Asbestos Complaint - 1 person x 4 hours.
Construction Phase Insp. - 3 persons 2 months.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	7	(number involved)	2
b.	Plant Manager	1		
c.	Corporate Department Heads	12	(number involved)	1
d.	Corporate Vice Presidents		(number involved)	
e.	Chief Nuclear Officer			
f.	Managers/Supervisors	32	(number involved)	9

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: DOT

2. Based on actual experience over the past several years, about how often is this activity conducted? Seldom if ever - we may have had 1 since 1978.

3. Operations/Construction areas covered: _____

4. Extent of the activity (how many people, for how long). _____

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a. Plant Department Heads _____ (number involved) _____

b. Plant Manager 1

c. Corporate Department Heads _____ (number involved) _____

d. Corporate Vice Presidents _____ (number involved) _____

e. Chief Nuclear Officer _____

f. Managers/Supervisors _____ (number involved) _____

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: Internal Audits, primarily budget functions.

2. Based on actual experience over the past several years, about how often is this activity conducted? Once every 2 to 3 years.

3. Operations/Construction areas covered: Financial aspect associated with day to day operations and training, as well as contract review.

4. Extent of the activity (how many people, for how long).

   2 auditors for 15 work days.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

   a. Plant Department Heads _____ (number involved) _____

   b. Plant Manager _____

   c. Corporate Department Heads _____ (number involved) _____

   d. Corporate Vice Presidents _____ (number involved) _____

   e. Chief Nuclear Officer _____

   f. Managers/Supervisors 100 (number involved) 3

NRC Regulatory Impact Survey
Questionnaire Sheet

1. Type of Inspection, audit or evaluation: NRC Required QA Audits.

2. Based on actual experience over the past several years, about how often is this activity conducted? 20-25 internal audits/year.

3. Operations/Construction areas covered: All functional areas associated with plant operations, maintenance, modifications, and support.

4. Extent of the activity (how many people, for how long).

Each audit typically takes 2-3 weeks to conduct (not including planning & report writing), and typical team size is 4 people including team leader.

5. Approximate manhours (on an annual basis) which the following managers must spend in direct involvement before, during, and in response to the activity described in Item #1.

a.	Plant Department Heads	168	(number involved)	5
b.	Plant Manager	45		
c.	Corporate Department Heads	380	(number involved)	6
d.	Corporate Vice Presidents	100	(number involved)	1
e.	Chief Nuclear Officer	12		
f.	Managers/Supervisors	1886	(number involved)	31

NOTE: This info includes Tech. Spec. audits done for the SRAB as well as QA program audits.