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 AUTH.NAME AUTHOR AFFILIATION
 BAILEY,J.N. Arizona Public Service Co. (formerly Arizona Nuclear Power
 RECIP.NAME RECIPIENT AFFILIATION
 MARTIN,J.B. Region 5, Ofc of the Director

SUBJECT: Comments on regulatory commitment tracking sys & timeliness
 of util actions to close NRC open items.

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November 14, 1989

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JACK N. BAILEY
VICE PRESIDENT
NUCLEAR SAFETY AND LICENSING

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Dear Sir:

Subject: Regulatory Commitment Tracking System
File: 89-002.419.06; 89-056-026

During the discussions held in your offices on October 10, 1989, I advised you of my concerns regarding the Regulatory Commitment Tracking system and, in particular, regarding the timeliness of APS's actions to close NRC open items. As a result, I directed that a review of commitments be performed to determine if the open items listed as being overdue were: (1) completed and the closure documentation not yet submitted to update the tracking system, (2) entered into the tracking system with an inappropriate completion date, or (3) not completed within the committed time frame.

The sample evaluated was the computer listing of overdue commitments as of October 13, 1989. The results of the review are as follows. Thirty-three items ("hard") were identified as being overdue. Of the 33 items identified as overdue, 17 were found to have been completed. Of the 16 remaining items 10 were considered to have inappropriate completion dates in the tracking system (e.g., the commitments provided for completion before achieving specified conditions in Units 1 and 3 and the tracking system was using outdated estimates of achieving those conditions) two (2) were typographical errors and did not represent overdue commitments and four (4) were overdue without adequate justification.

Appropriate submittals have been or will be made; as necessary, to provide the NRC updated completion dates for the overdue commitments. A plan of action has been developed to provide increased assurance that the revised commitment dates will be met and that other regulatory commitments are fulfilled by the commitment dates. The plan is described in the attached memorandum. An overall implementation schedule for this plan will be developed and forwarded to you by December 1, 1989. If you have any questions or require additional information, please contact me.

Very truly yours,



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Letter to Mr. John B. Martin
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JNB/TDS/kj

Attachments

cc: NRC Document Control Desk
M. J. Davis
T. L. Chan
T. J. Polich
A. C. Gehr

Arizona Public Service Company
COMPANY CORRESPONDENCE

ID #: 102-01433-TDS
DATE: September 28, 1989
TO: J. N. Bailey
Sta. #: 7040
Ext.: 4789
FROM: T. D. Shriver 
Sta. # 6148
Ext. 2521
FILE: 89-056-026
SUBJECT: Overdue NRC Commitments

As I discussed with you earlier this week, I have been developing an action plan to eliminate the backlog of actions required to resolve NRC concerns. You will note that this plan is designed as a "stop gap" measure to address the current problem. Upon successful completion, additional actions will be required to prevent recurrence. I recommend the immediate implementation of the following plan:

Step 1

- A. Develop an overall implementation schedule.
- B. -- Assemble data on all open NRC action items by functional area.
- C. Assign a specific Compliance Engineer (CE) to each functional area (see attached).
- D. Assign an individual from the line organization to be a single point of contact for the CE.

Step 2

- A. The CE will be assigned to review each open item with the line organization contact.
- B. Consolidate required actions where possible to minimize actual work required and eliminate duplication.
- C. If necessary or advantageous the commitment should be revised if the same corrective action can be achieved in a more expeditious manner.

Memo to J. N. Bailey
Overdue NRC Commitments
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- D. Develop a definitive schedule for item completion providing measurable milestones.
- E. Develop supplement/revisions to the committing documents based upon actions taken in the preceding items if required.

Step 3

- A. Develop a simple, easy-to-read statusing document to be provided to senior management and the NRC.
- B. Schedule an initial meeting with NRC Regional Management to explain the program.
- C. Schedule periodic meetings with the NRC Senior Resident and middle-level regional management to update status.

As discussed, this plan is designed to address a current issue and is intended to be managed similar to a task force effort. You will note that all the responsible licensing personnel are from my department. That was done intentionally to facilitate the assignment of priorities, control of overtime and minimize the need for direct management involvement. I have begun implementation of this program within my department, but will wait for your approval before approaching line management.

TDS/kj

cc: Compliance Personnel

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RESPONSIBILITY ASSIGNMENTS

1.	Unit 1	S. Jones
2.	Unit 2	R. Roehler
3.	Unit 3	A. Johnson
4.	EED	R. Rouse
5.	NED	D. Larkin
6.	Central/Plant Services	J. Malik
7.	RP	S. Karimi
8.	Miscellaneous	P. Coffin
9.	RCTS Coordination	B. Brown
10.	Project Overview	T. Bradish

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