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 RUSSELL, W. T. Region 1, Office of Director

SUBJECT: Responds to SALP Rept 50-410/86-99 issued on 8700515.
 Licensing groups of Unit 1 & 2 combined to improve
 efficiency, promote cross training & improve quality of
 licensing submittals.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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June 25, 1987
(NMP2L 1060)

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

Subject: Systematic Assessment of Licensee
Performance (SALP) Report No. 50-410/86-99
For Nine Mile Point Unit 2

Dear Mr. Russell:

On June 12, 1987, Niagara Mohawk met with representatives of the Nuclear Regulatory Commission at our Training Center to discuss the latest Systematic Assessment of Licensee Performance (SALP) Report for Nine Mile Point Unit 2 issued on May 15, 1987. As requested by the NRC, this letter transmits Niagara Mohawk's response to the SALP Report on an expedited basis and includes information relating to discussions at the meeting.

As stated at the meeting, we have no overall disagreement with the evaluation set forth by the SALP review board. We have reviewed the report and have taken actions and plan to take others to improve operation of the unit, particularly those areas identified as deficiencies, including licensing activities, management oversight of operation and surveillance testing.

Licensing

We acknowledge that licensing performance during this evaluation period was adversely affected by schedule pressures. These schedules created inefficiencies in manpower resources for both the NRC and Niagara Mohawk. We are working to develop more realistic schedules as demonstrated by the successful replacement of the Main Steam Isolation Valves from the ball type valves to the wye-pattern globe valves.

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We have implemented several changes to improve internal communications and the technical quality of submittals. Licensing engineers have been assigned to each of the two Nine Mile Point Units. These individuals have the responsibility for monitoring the plant status and the day-to-day activities at the facilities. As part of their duties, they notify and keep the staff apprised of any significant activities that occur at the units so that appropriate licensing actions can be considered.

We have combined the licensing groups of Unit 1 and Unit 2 under a single manager. This consolidation improves efficiency, promotes cross training and improves the quality of licensing submittals by more effectively utilizing personnel experienced in licensing matters related to an operating station. These experienced personnel have a broad background in regulatory requirements, specifically exemption requests and license change requests.

Operations

The SALP report identified weaknesses in operation resulting from personnel errors, lack of Technical Specification understanding and Control Room conduct. To correct personnel errors, senior management has stressed in meetings and letters to our employees the necessity to follow procedures and the need for attention to detail. The Unit 2 Station Superintendent has also emphasized these same requirements and, where appropriate, has taken disciplinary action in response to these deficiencies.

Several programs are being utilized to enhance operator understanding of Technical Specifications including the assignment of a Unit Licensing Engineer, the creation of a Lessons Learned book, the addition of Technical Specification cross reference sheets and simulator training. The assignment of a Unit Licensing Engineer facilitates licensing interpretations when needed. The Lessons Learned book contains information valuable to the operating crews such as Licensee Event Reports, Occurrence Reports and Technical Specification interpretations. The Technical Specification interpretation section of the book centralizes important information used by the Control Room personnel in understanding and implementing Technical Specifications. The cross reference sheets identify the appropriate technical specification sections for a particular system or component. Utilization of the index will assure a more thorough technical specification review and improved compliance. In addition, simulator sessions will include more situational exercises requiring operators to examine Technical Specifications and then make appropriate operational decisions.

Control Room conduct during the evaluation period steadily improved as the construction effort subsided. We established a Work Group Coordinator and an Operations Support Office to reduce the administrative burden on the Station Shift Supervisor and to reduce the Control Room traffic. The Station Superintendent emphasized the necessity to restrict Control room access by letters and meetings. We also erected rope barriers and assigned a Control Room access point to further restrict access. These actions have reduced Control Room traffic. Further improvements are being evaluated.



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Senior Niagara Mohawk management will continue to oversee and evaluate Control Room activity as well as other aspects of our operation. To oversee plant operation during the initial phases of startup, we have formed two groups: The Management Oversight Committee, comprised of our senior management and the Self Appraisal Team, largely comprised of senior plant managers. The Self Appraisal Team will examine daily operations and various station activities and provide critical feedback to responsible managers and to the Management Oversight Committee. The team members will conduct their own reviews as well as utilize in-house expertise, reports and other documentation generated from existing programs.

Niagara Mohawk is confident that the specific actions, which were discussed in this letter and at our meeting, will result in improvements in the deficient areas identified by the SALP review board. In addition, Niagara Mohawk is committed to overall excellence in its operation during the forthcoming SALP review period. We recognize that the startup test program is a critical time for a utility and expect to bring our full management resources to bear to assure a safe and efficient ascent to full power operation.

Sincerely,

NIAGARA MOHAWK POWER CORPORATION



C. V. Mangano
Senior Vice President

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

