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SUBJECT: Forwards comments re NRC 920825 SALP rept for period 910401-920523,including response to feedback received from NRC at 920916 public meeting at plant training ctr.Corrective actions for noted weaknesses also provided.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/NINE MILE POINT, P.O. BOX 63, LYCOMING, NY 13093/TELEPHONE (315) 349-2882

B. Ralph Sylvia
Executive Vice President
Nuclear

October 6, 1992
NMP1L 0702

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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:

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) RESPONSE

Niagara Mohawk hereby transmits comments regarding the Nuclear Regulatory Commission's (NRC) initial SALP report dated August 25, 1992. These comments also respond to feedback received from the NRC at the September 16, 1992 public meeting at the Nine Mile Point Nuclear Training Center.

As discussed at this meeting, Niagara Mohawk agrees with the NRC's overall assessment results for each of the functional areas. We recognize the areas that need additional attention, and that we must continually stress adherence to procedures, attention-to-detail and a questioning attitude. A high priority will be placed on solving equipment problems and improving reliability. The corrective steps we are taking are outlined in the attached report. We believe that the implementation of our Business Plan which includes requirements for self assessment and a scram frequency reduction program will improve our performance in all SALP functional areas.

We appreciate the NRC's acknowledgment of the trend of improvement recognized in this SALP report. However, Niagara Mohawk can not be complacent. Continuing effort at all levels is necessary to sustain and build upon our performance.

Very truly yours,

B. Ralph Sylvia
Exec. Vice President-Nuclear

NAS/mls
003169GG
Attachment
xc: Regional Administrator, Region I
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. R. A. Capra, Director, Project Directorate I-1, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. J. E. Menning, Project Manager, NRR
Records Management

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNITS 1 AND 2

LICENSEE'S RESPONSE TO SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

[APRIL 1, 1991 THROUGH MAY 23, 1992]

PLANT OPERATIONS - UNIT 1

Niagara Mohawk provided detailed and prompt corrective actions in response to the temporary loss of heat sink event and the turbine first stage bowl pressure event. Niagara Mohawk has plans in place for additional coaching and monitoring by supervisors in the field. In addition, clear expectations and greater personal accountability are now being stressed by line management.

Operations has completed a shutdown safety review and will develop a shutdown safety guideline for the 1993 refueling outage. This guideline will provide Operations increased control over work activities including equipment release, and backup system availability.

Additionally, strong management improvement initiatives are being pursued by Operations' management. To improve performance, Operations evaluated its shift management and reorganized crews by placing the strongest Station Shift Supervisors (SSS's) on-shift. Unit 1 Operations also placed the Assistant Station Shift Supervisor (ASSS) in the control room along with the incorporation of the Shift Technical Advisor (STA) into shifts to provide more management oversight of control room activities, permitting the SSS to assume the roll of overall shift management. In addition, special simulator scenarios are being developed to capture the weaknesses identified as a result of the loss of ultimate heat sink and the turbine first stage bowl pressure events in order to provide a broadened scope of training for such non-routine evolutions.

Operations has begun a control room deficiency tracking program which focuses on the total number of deficiencies and also sets goals for eliminating specific types of deficiencies (e.g., chart recorders, meters, annunciators). This initiative will provide better management attention to improve material conditions in the control room.

The Operation Manager has provided specific expectations for the Shift Supervisors regarding shift performance. The fact that these expectations are now explicit hold the Station Shift Supervisors more accountable for supervising shift activities.

PLANT OPERATIONS - UNIT 2

Unit 2 Operations reorganized the operating shifts in January 1992. This allowed Operations' management to equalize and balance performance of the operating shifts. Operations' management placed strong supervision in charge of all shifts. This reorganization has been effective, although improvements are still needed to achieve the desired level of performance.

The placement of the ASSS in the control room along with the incorporation of the STA into the shifts as a functional entity will provide more management oversight of control room activities while permitting the SSS to assume the roll of overall shift management.

"Back to Basics" training of all Operations' personnel has reinforced the need for procedure adherence with regard to operation within our license and licensing basis documentation.

Unit 2 Operations is also pursuing initiatives described for Unit 1 Operations such as tracking control room deficiencies and empowering the Station Shift Supervisors as the manager of his shift. These enhancements, along with improvements to the Operations' self-assessment program, will provide better Operations' management overview of day-to-day activities.

Additionally, a combined Unit 1 and Unit 2 daily plant status meeting is now being held to provide a forum for management oversight, as well as to exchange information between the units.

As will be discussed in the Maintenance/Surveillance functional area, Niagara Mohawk is also initiating improvements to the Turbine Controls System, Feedwater System (pump seals), Reactor Water Cleanup System and the Uninterruptible Power Supply system to reduce challenges to plant reliability.

RADIOLOGICAL CONTROLS

The Radiation Protection Program has been effective, with additional attention required to continue performance improvement. Self-assessments by the Radiation Protection (RP) staff and the Quality Assurance staff are integral parts of the plan for overall program improvement. The Business Plan provides the strategies for achieving specific improvement objectives and a means of measuring progress. The following discussion provides specific measures taken or planned to address those areas that were identified in the SALP report as requiring further attention.

The following programmatic changes have been made that are expected to improve control for both High Radiation Area (HRA) entries and personnel monitoring:

1. Minirads that had been used and controlled by personnel to provide continuous indication while in HRAs, have been placed under the control of the Radiation Protection department. RP is now responsible for performing the daily source and operability checks. In addition, each minirad is accounted for on a daily basis.

2. The long term issuance of Master H keys to individuals has been eliminated. All H keys to HRAs are now controlled by RP and must be signed out and returned to that office. The cores to the locks for each area were changed to ensure that there were no unaccounted keys that could be used for unauthorized HRA entries. (Master-Master keys are kept under the direct control of the SSS for emergency use only). This enhanced HRA key control improves RP awareness of personnel entering HRAs. This ensures that expected radiological conditions or monitoring requirements are discussed with such personnel.

3. The use of digital electronic integrating alarming dosimeters is being implemented. Operations personnel began using these devices in place of the minirads for HRA monitoring control in late July 1992. The electronic dosimeters have the ability to provide integrated dose continuously. Initial operator response to these devices has been good.

4. A revised Radiation Work Permit (RWP) program that requires all entries to the Radiologically Controlled Area (RCA) be under a RWP was implemented on

August 29, 1992. This improves radiological control of personnel entering areas of the station controlled for radiation purposes.

Programmatic changes have been made regarding personnel frisking performance at Unit 2.

1. With the exception of the Unit 2 stack, all authorized exits from the RCA have whole body contamination monitors (Friskalls) which eliminate the use of hand frisking at RCA exit points.

2. Two Friskalls and a Betamax contamination monitor have been placed in the GET training area as training aids to improve personnel monitoring performance.

Poor housekeeping practices is a generic concern. Actions being taken to address housekeeping include:

1. Emphasis from the Plant Managers down through the chain of command on the importance of good housekeeping and radiological control practices.

2. Increased emphasis by senior managers on housekeeping items during routine plant supervisory tours.

Immediate corrective actions taken in response to the improper assessment of alarming airborne monitors included a lessons learned transmittal to RP personnel to emphasize proper monitoring assessment, coaching at departmental staff meetings, verification that alarm response was covered in GET training, and a reevaluation of alarm setpoints to minimize spurious alarms. RP Supervisors are now contacted when the alarms occur and are responsible for ensuring that proper actions have been taken.

A review of the alarm response was included in the routine quarterly RP self-assessment and the results showed that the actions taken had been effective. RP supervisors routinely audit the airborne alarm setpoints as part of their plant tours.

Finally, to ensure the accuracy of personnel radiation exposure records, Niagara Mohawk developed an action plan to audit its exposure records. Since May, 1992 monthly status updates have been provided to the Resident Inspector.

MAINTENANCE/SURVEILLANCE

Niagara Mohawk recognizes that while performance in most Maintenance/Surveillance areas was good, there is a need to improve performance in areas as outlined in the SALP report. Management is taking a number of actions to address the weaknesses cited in the Maintenance/Surveillance functional area, many of which are already in place.

Niagara Mohawk has included in its 1993 - 1996 Business Plan the development and implementation of a Scram Frequency Reduction Program. This program is aimed at reducing instances of maintenance related scrams and events which occurred at both units. Action plans for the Unit 1 Neutron Monitoring and the Turbine Control systems have been implemented and are already correcting problems that have contributed to or caused a majority of the 1991/1992 scrams. Also, additions are being made to the Unit 1 Preventative Maintenance (PM) Program for the Turbine Control System, Generator Runback System, and Feedwater Heater System in order to increase the overall effectiveness of these systems.

At Unit 2, efforts are also ongoing to correct long standing equipment problems. Turbine Control system improvements, feedwater pump seal design improvements, and reliability improvements for the Reactor Water Cleanup System are presently in progress. Improvements to the Uninterruptible Power Supply (UPS) units are also ongoing. This is being accomplished by performing selected unit replacements, logic power supply upgrades and preventative maintenance practice upgrades.

In this regard, Niagara Mohawk arranged separate INPO assist visits for Unit 1 and Unit 2 in September 1992, allowing INPO to review our Scram Frequency Reduction Program with regards to the Turbine Control system. INPO provided Niagara Mohawk confidence that the Scram Frequency Reduction Program is moving in the right direction and provided recommendations that we are presently evaluating.

The Business Plan contains a plan for development and implementation of a Reliability Centered Maintenance Program, which is aimed at improving system availability. The Business Plan also continues to emphasize attention to the Plant Managers' Top Ten List for each station to resolve equipment performance issues, which is the key to reducing the equipment failures that have caused past plant transients.

Niagara Mohawk is addressing the attention-to-detail weaknesses in the Maintenance/Surveillance functional area through its self-assessment activities within the Maintenance Department and through the Work Control Monitoring program. Supervisors are required to increase direct overview of work, reinforcing expectations and providing more coaching to correct deficiencies. In addition, in accordance with the Business Plan, performance reviews for represented employees are being performed by first line supervisors, in order that management expectations of personnel performance are emphasized to all workers. The "Back to Basics" training emphasized the need for attention-to-detail while working in a nuclear environment and the necessity to work within our license and licensing basis documentation. This training was provided by line management and presented to all maintenance workers.

The Maintenance Department is committed to developing an excellent maintenance and surveillance program. Industry resources are being utilized through INPO assist visits and peer evaluations at other facilities. Maintenance will continue to build on individual accountability, business planning, program/process improvements and deficiency identification to ensure the program continues to improve.

EMERGENCY PREPAREDNESS

Niagara Mohawk agrees with the SALP report that implementation of the Site Emergency Plan (SEP) was effective and that emergency response facilities, equipment, and supplies were very well maintained. The NRC SALP report stated

that weaknesses in the drill/exercise program were evident, and that Niagara Mohawk did not adequately review repetitive problems for common cause factors. Each of the three notification items outlined in the report have been evaluated and corrected in a timely manner using the root cause process.

The SALP report noted that participation of Emergency Response Organization (ERO) personnel in drills and exercises is voluntary. Niagara Mohawk agrees with the observation that ERO drill participation is not procedurally required; however, participation of all ERO designees is encouraged for drills and exercises. Niagara Mohawk has mechanisms in place to track ERO drill/exercise participation, including entering the names of drill participants into the training computer database as a permanent record of the individual's emergency training. Occasionally, ERO members fulfill roles of observers and controllers when not actively participating in a drill. To enhance the opportunity to participate in drills, we are reviewing the need to reduce our ERO. This may result in a reduced number of ERO designees; however, adequate training will be maintained.

Niagara Mohawk is committed to continually enhance our Emergency Preparedness programs. An upgrade to the Radiological Dose Assessment model is currently in progress. This will assure our continued compliance with the new 10 CFR Part 20 and the EPA-400 document. Niagara Mohawk has taken the lead among the New York State nuclear plant licensees on the Federal Emergency Management Agency (FEMA) required Ingestion Pathway Exercise scheduled for June 1993. This includes ensuring that all FEMA requirements for the exercise are being addressed, as well as developing the comprehensive scenario that will be used for this three-day exercise. Additionally, we are continuing to develop and enhance hands-on training in the form of on-the-job training, job performance measures, table top drills and simulator walkthroughs.

Other projects include reverification of the Prompt Notification System (sirens) sound propagation study and a comparison study of Nine Mile Point's present Emergency Action Levels (EAL's) to the NUMARC EAL's. This study may provide Niagara Mohawk with a more accurate representation of plant conditions and a consistent system of classification of emergency action levels. This may also result in a decrease in the number of Unusual Events declared. Additionally, we are maintaining the schedule for implementation of the Emergency Response Data System (ERDS). As we have in the past, we will continue to perform internal assessments in an effort to identify opportunities for improvement in the Emergency Preparedness program to assure it remains in the SALP 1 category.

SECURITY

The Nuclear Security Department's mission is to provide a secure and safe environment for the operation of the Units at Nine Mile Point. This mission is accomplished on a continuous basis through teamwork and self-assessment by highly professional and dedicated Security personnel. With regard to the identified concern, Niagara Mohawk concurs with the SALP report that this concern was addressed promptly in an effort to prevent reoccurrence.

The Security Department remains committed to excellence in the Nuclear Security industry.

ENGINEERING/TECHNICAL SUPPORT

The improvements noted in the NRC SALP report were a result of planned initiatives undertaken to enhance performance. These initiatives include the establishment of branch Business Plans to delineate specific goals, the Nine Mile Point Unit 1 Design Basis Reconstitution program, the Nine Mile Point Unit 2 System Design Basis Upgrade, internal assessments and surveillances, development and implementation of a technical training program, "focus" meetings including Generation/Engineering Branch Managers to identify strengths and opportunities for improvement, and the development of a performance monitoring program to improve quality and schedule adherence. These, and other continuing initiatives, provide the framework for further improvement and correction of the deficiencies identified in the SALP report. Specific actions taken or planned to address areas needing improvement are discussed below.

During the past SALP period, both Units have experienced some difficulties with the implementation of Temporary Modifications. For example, there were several instances where temporary gauges, hoses, and blowers were installed in the station without consideration of Temporary Modification impacts. Immediate corrective actions included plant walkdowns to identify undocumented Temporary Modifications, DER initiations and dispositions, training via Lessons Learned Transmittals and Awareness Training. More recently, "Back to Basics" training was conducted to emphasize the importance of maintaining the design and licensing basis of the plant. This training underscored the relationship between approved plant configurations and safe operation. Continued awareness of the "Back to Basics" philosophy will ensure that plant changes are properly executed. The process and implementation of Temporary Modifications continues to be monitored by management during Station Housekeeping Tours, Work Control Monitoring Assessments, the Annual Temporary Modification Audit and Quality Assurance Surveillances. Deficiencies are corrected as they are identified. Recent assessments indicate that control of Temporary Modifications has improved. Continued management oversight will help to ensure the Temporary Modification Program is properly implemented.

The reduction of backlog DER's, Plant Change Requests, and Temporary Modifications is the goal of several actions which will be included in our 1993 Branch Business Plan to ensure continued management attention and focus. Backlog reduction is one element of our efforts to improve workload management.
The NRC noted inconsistencies in the quality of engineering submittals. Niagara Mohawk has discussed this concern with the NRC Project Managers who have provided clear expectations with regard to the no significant hazards consideration analyses for license amendment requests. Feedback from the NRC Project Managers has noted improvements in recent applications.

Niagara Mohawk believes we were able to address each of the technical concerns pertaining to the Emergency Condenser repair issue. We recognize the significance and sensitivity associated with non-code repairs and the precedent setting nature of such repairs.

Niagara Mohawk believes that the actions currently being pursued will result in further performance improvements. As noted above, these actions are included in our Business Plans and will be pursued according to that plan.

SAFETY ASSESSMENT/QUALITY VERIFICATION

In early July 1992, the Senior Management Team conducted a Business Planning workshop and identified similar deficiencies as identified by the NRC in the SALP report. We have programs in place and made changes to the 1993 - 1996 Business Plan to address these concerns.

The final draft of the 1993 - 1996 Nuclear Strategic Business Unit (SBU) Business Plan was approved in September 1992. Under the commercial objective, Niagara Mohawk will develop and implement a Scram Frequency Reduction program for the Nine Mile Point Nuclear Stations during 1993. Action plans for the Nine Mile Point Unit 1 neutron monitoring and the turbine control systems have been implemented and are already correcting equipment problems that have contributed or caused a majority of the 1991/1992 scrams. A long term effort is underway to improve equipment performance and reliability through the Reliability Centered Maintenance Program. In addition, we will continue to focus our attention on the Plant Managers' Top Ten List for each unit to resolve equipment performance issues. Improving equipment reliability is the key to reducing the number of automatic scrams attributed to equipment failures.

In May 1992, we began a training course entitled, "Back to Basics". This course emphasized regulatory requirements for work in a nuclear environment, training on licensing basis documents and operation within our license and licensing basis documentation. This course addressed several issues surrounding events that occurred at Unit 1 and Unit 2 during this SALP period. Each Branch Manager attending the course trained his/her respective organization through August 1992.

Through the Work Control Monitoring Program, we have noted improvements in the quality and completeness of work packages. We have undertaken actions to streamline and simplify the process and procedures which implement the Work Control Monitoring Program. These changes will continue to strengthen our overall work control process activities, thereby reducing personnel errors and improving procedure adherence.

Enhancements made to simplify and train employees on the Nuclear Division Problem Identification and Corrective Action Program (Deviation/Event Reporting System) have enabled us to better identify precursors to potential problems, as well as develop and utilize such data to monitor performance. This program will continue to provide valuable insights as we acquire more data to improve the trend.

We continue to simplify our processes and procedures via our Procedure Rewrite Program. The Senior Management Team has completed all 45 directives, the upper tier documents in the procedure hierarchy. We have completed an update of approximately 80% of our administrative and interfacing procedures and we are approximately 85% complete in rewriting technical implementing procedures in a format consistent with INPO guidelines. The number of procedures is being reduced by more than one-third as we go through this rewrite process. This rewrite process is focused on simplification and reduction of the number of procedures, as well as improving the technical accuracy of procedures.

Recently, Niagara Mohawk began a program requiring each Branch Manager to identify barriers impacting the achievement of top performance in each Nuclear Division Branch. These barriers were reviewed by each branch Senior Manager and presented to the Senior Management Team for review and discussion. Actions necessary to remove these barriers are being reviewed for appropriate implementation.

In an effort to improve performance, Niagara Mohawk instituted a program to reduce personnel errors through self-assessment. This self-check program, STAAR (stop, think, ask, act, review) is a process of ensuring that correct actions are being taken in accordance with job functions. Training was provided to Nuclear Division personnel via video tapes and discussion sessions. The program implementation began July 1992 and was completed in September 1992. This program complements the Nuclear Division Standards of Performance.

The Nuclear Division will continue to self-assess its regulatory performance against the criteria and guidelines established by the NRC and INPO. Three major initiatives involve the Nuclear SBU Business Plan, the Internal SALP-Type Assessment (ISTA) and the analysis/trending of regulatory-related DERs. Corrective actions from these assessments will help focus our efforts to improve our performance.

Our Quality Assurance (QA) Department has examined its methods of presenting audit and surveillance findings, so that seemingly unrelated issues can be presented in a broader perspective to the line organizations. Recent discussions between QA and the line organizations are resulting in improved communication of audit and surveillance results. The trending programs to improve the relevance of information being reported are also under review. In addition, progress is being made in timely and effective completion of DER corrective actions.

While Niagara Mohawk has made progress in the overall performance in this functional area, we believe excellent performance is achievable and therefore are committed to continue the positive trends recognized in the SALP report.

ENCLOSURE 4

List of Attendees

U.S. Nuclear Regulatory Commission

C. Beardslee, Reactor Engineer, DRS
D. Brinkeman, Project Manager, NRR
R. Capra, Director, Project Directorate I-1, NRR
C. Cowgill, Chief, Projects Branch 1, DRP
R. Laura, Resident Inspector
J. Menning, Project Manager, NRR
L. Nicholson, Chief, Reactor Projects Section No.1A, DRP
W. Schmidt, Senior Resident Inspector
J. Wiggins, Deputy Director, Division of Reactor Projects

Niagara Mohawk Power Corporation

N. Carns, VP-Nuclear Generation
J. Conway, acting unit 2 Plant Manager
K. Dahlberg, unit 1 Plant Manager
J. Firlet, VP-Nuclear Support
J. Perry, VP-Quality Assurance
R. Sylvia, Executive VP-Nuclear

and others....

ENCLOSURE 5

Final SALP Report Revision Sheet

Page	Location	Change
19	III.D.1, Analysis	Deleted "voluntary"
20	III.D.3, Board Comment	Deleted "voluntary"

Basis: Word was inappropriately used.