



# State of New Jersey

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U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Ladies and Gentlemen:

Subject: Pilot Plant Program Feedback

This letter provides our first feedback from observation of an NRC inspection under the pilot nuclear power plant inspection program. We will continue to provide you our feedback from other inspection observations as they are developed. It is our intention to participate in 23 resident and regional based inspections at Artificial Island prior to November 30, 1999. In addition, we will independently review all Performance Indicators (PI) for Hope Creek and Salem, review and comment on Nuclear Energy Institute's 99-02 PI guidance document, and review and comment on the Significance Determination Process.

### Inspection Observed

The New Jersey Department of Environmental Protection recently observed an NRC Region 1 team inspection at the Salem Nuclear Generating Station. The inspection followed Attachment 21 of Pilot Procedure 71111, Safety System Design and Performance Capability. The same inspection team also performed a Performance Indicator Verification (Procedure 71151) of several indicators which we also observed. The inspection team was onsite from July 19 through 23, 1999 and from August 2 through 6, 1999.

### Overall Assessment

The pilot process, as well as the NRC enforcement process, relies heavily on a licensee maintaining an effective corrective action program (CAP). It would seem appropriate that the NRC inspect the CAP early in the pilot program. This is one of the only inspections of a licensee process. It would lay the ground work for future inspections since most, if not all, inspection procedures require some interface with the CAP. The NRC's risk based inspection philosophy

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relies heavily on an effective CAP. In addition, if licensees modify their CAP, it would seem appropriate that the NRC re-inspect this area since it may adversely impact the resolution of previously NRC-identified nonconformances.

Overall, we believe the level of effort utilized in these inspections was appropriate but it clearly was in excess of the man-hour estimates contained in the inspection procedures. These estimates appear unrealistic and do not take into account inspection options that are identified within the procedure. For example, the use of an inspector to review the operations area is an option in the engineering and design inspection but the man-hours for this individual are not included in the estimate within in the procedure. In addition, a two unit plant should take more resources than a one unit plant because the units may be similar but not 100% identical and it will take more time to perform system walkdowns, review differences in design bases, differences in modifications, differences in equipment performance etc. For two units, there are more opportunities to review modifications, tests and maintenance on a real time basis which we feel is a key component of the inspection.

The safety system inspection is focussed on plant systems in the mitigating cornerstone. Supporting systems such as instrument and control air and ventilation systems are included on a limited basis in the inspection scope. Where in the inspection program would a thorough inspection of one of these support systems take place? Additionally, a system like Control Room ventilation supports mitigating systems in an indirect way, but it appears to be unlikely that it would be included in the scope of an Attachment 21 inspection.

#### Specific Comments

Attached are our completed inspection feedback forms for Procedure 71111 Attachment 21 and Procedure 71151.

We appreciate the opportunity to provide our input and look forward to a continuing dialogue on the pilot process. If you have any questions, please contact Dennis Zannoni at (609) 984-7440.

Sincerely,

A handwritten signature in cursive script that reads "Dennis Zannoni for".

Kent Tosch, Manager  
Bureau of Nuclear Engineering

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