

# YANKEE ATOMIC ELECTRIC COMPANY

Telephone (508) 779-6711  
TWX 710-380-7619



580 Main Street, Bolton, Massachusetts 01740-1398

November 10, 1989  
BYR 89-171

Mr. William T. Russell  
Regional Administrator  
United States Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

- REFERENCES: (a) License No. DPR-3 (Docket No. 50-29)  
(b) USNRC Letter to YAEC dated October 16, 1989 Systematic Assessment of Licensee Performance (SALP) Report No. 50-29/88-99  
(c) YAEC Letter to USNRC, BYR 89-117, dated July 21, 1989, Vendor Technical Information Program Status

SUBJECT: Comments on the Systematic Assessment of Licensee Performance (SALP) Report

Dear Sir:

Reference (b) transmitted the Systematic Assessment of Licensee Performance (SALP) Report. We have completed our review of the SALP report and conclude it properly reflects the assessed areas during the SALP period with one minor exception. We wish to clarify one item within the SALP report. On page 26 of the report it is stated "Yankee has essentially completed plant modifications related to the seismic upgrade program..." Please note, that although Yankee has completed most of the structured modifications, additional piping modifications remain and have been scheduled.

A meeting was held October 23, 1989 at the Yankee Nuclear Power Station to discuss the report. At that time, we outlined our plans to continue to improve our strong performance in all areas with particular emphasis on plant operation, radiological controls, maintenance/surveillance, security and safety assessment/quality verification. Planned improvements in these areas are noted below.

Within the area of Plant Operations, Yankee has embarked on a series of initiatives which include:

- Designation of an Operation Support Group (OSG) at the station staffed with senior level plant personnel with resource capability from the Nuclear Services Division.
- Establishing a cohesive action plan for the group with appropriate actions and milestones.
- Focusing the initial efforts of the OSG on improving the quality of operations procedures through improved procedure walk through leading to accurate and consistent guidance. Poor and confusing wording will be corrected.

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Radiological controls performance will be enhanced by:

- Continuing to improve the assessments of radiological incidents through the use of a recently improved Radiological Occurrence Report (ROR) procedure, implementation of a plant wide root cause analysis methodology and management review of RORs focusing on the adequacy of root cause determinations and the appropriateness of corrective actions.
- Increasing the focus on implementation of Radiation Protection programs through increased radiation protection supervisory awareness of work in progress, the use of Yankee Nuclear Services Division Radiation Protection Engineers in supervisory support roles during planned outages and through anticipation of rather than reaction to radiological events and
- Improving ALARA goal setting methods through earlier involvement of ALARA planners in engineering planning, routine evaluation of ALARA goals with modifications for changes in workscope and interactive meetings with plant departments to cooperatively set department ALARA goals.

Improvements in the Maintenance/Surveillance area will continue through:

- Expansion of preventative and predictive maintenance programs in the areas of vibration monitoring, lubricating oil analysis, thermography and trending of critical plant component performance.
- Enhancement of the plant Maintenance Department and Yankee Rowe Projects (YRP) group interface by continuing the YRP review of plant systems and initiating a YRP review of existing maintenance practices leading to establishment of new preventive maintenance programs and development of new procedures and
- Embarking on a Maintenance procedure review effort focused on technical content enhancements and human factor improvement.

The Security area will continue their strong performance and improve by:

- Upgrading access control equipment and weapons.
- Enhancing badge control practices and
- Expanding proprietary supervisory training to include some tactical training.

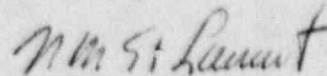
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In the area of Safety Assessment/Quality Verification the primary focus of improvements will be

- Ensuring the completion of Yankee commitments on vendor manuals made in Reference c
- Establishing a vendor technical information program coordinator and
- Evaluating and implementing methods to improve the level of security expertise involved in the in-plant audit program.

These actions combined with the concerted effort of plant and corporate personnel should lead to improved performance within all areas.

Sincerely,



N.N. St. Laurent  
Acting Manager of Operations

cc: A.C. Kadak  
T.K. Henderson  
J.K. Thayer  
G. Papanic  
YNPS Department Managers