



ATOMIC POWER COMPANY

EDISON DRIVE
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DESIGNATED ORIGINAL

Certified By

A handwritten signature in cursive script, likely belonging to a company representative.

October 15, 1982
MN82 - 201

United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Mr. Richard W. Starostecki, SALP Board Chairman

Subject: Comments related to Systematic Assessment of
Licensee Performance, September 24, 1982

Dear Mr. Starostecki:

We believe the assessment of our performance as outlined in the subject SALP report is accurate and fair. We appreciate the opportunity to comment.

Most of the weaknesses indicated in the report have been addressed by Maine Yankee in response to recent inspection reports. We believe the corrective actions we have taken and have committed to taking will result in a significant improvement in our performance during the current review period.

Our comments which follow will not repeat the corrective actions mentioned in previous correspondence. They are confined to additional corrective measures we intend to take and to comments on the SALP text.

Plant Operations

- We recognize that the activities of the Plant Operations Review Committee (PORC) are not as efficient as they could be. We intend to revise the scope of PORC activities, consistent with that of other licensees, and submit an enabling Technical Specification change before March 1, 1983.
- We believe the corrective actions we have taken regarding event reporting have been and will continue to be effective in correcting this weakness.

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- We agree there has been some degradation in plant staff experience levels, however this has for the most part, been confined to entry level positions. The lower average experience level is primarily attributable to a major increase in staff size to meet new requirements. We have compensated for the lower experience level with more classroom training. There has been no decrease in the amount of practical training required. In any case, we do not believe that experience level has been a significant contributing factor in personnel error related events that occurred during the period.
- We plan to upgrade our plant operating procedures during the next review cycle to reduce the likelihood of operator errors due to procedural inadequacy.
- We have instituted measures that provide greater assurance that corrective actions are complete and not lacking in depth. For example: LER's must now be reviewed and approved by two senior management persons in addition to the Plant Manager or Assistant Plant Manager. In addition, we have revised our Operations Assessment system and instituted a comprehensive Commitment Management system to provide greater assurance that corrective actions and commitments are properly addressed.

Radiological Controls

- We believe our prior commitments in this area will strengthen our radiological controls program and provide greater assurance of regulatory compliance.
- During the review period our ALARA program and enforcement of work rules have been strengthened to improve the radiation protection program effectiveness.
- We have instituted measures to assure that all design changes to radioactive waste systems undergo an adequate 10 CFR 50.59 review.
- The site Quality Assurance group now conducts surveillance of Chemistry department activities to provide greater assurance of procedural compliance.

Design Control/Quality Assurance

We have taken several corrective measures to strengthen our management controls and programs in these areas. The measures are addressed in our response to inspection report 82-05 and its related 50.54 (f) request for additional information.

Fire Protection

We intend to revise our general plant training procedures to put greater emphasis on fire protection and housekeeping by April 1, 1983.

Emergency Preparedness

- The required new post accident sampling system is currently functional and may be used if required to obtain raw or diluted post accident samples. It has not been accepted as fully operational because of an inability to verify repeatability in results of dilute samples. This inability is primarily due to the low activity level and boron concentration in the reactor coolant which constitutes the raw sample. We expect that the dilution system will be testable on startup and become operational before 12/31/82. In any case, the system does provide the required interim sampling capability.

Security and Safeguards

- We believe the word "oil" should be inserted between "fuel" and "delivery" in the second paragraph to preclude any misunderstanding.
- We are not aware of any outstanding request by the NRC for information as mentioned in the last sentence, third paragraph.

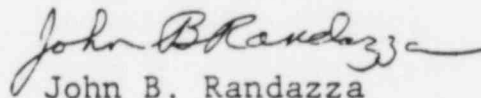
Licensing Activities

- We plan to institute measures that will improve the depth of review of technical submittals and to develop a better system to control information regarding system parameters used in safety analysis assumptions. We expect to complete these improvements by April 1, 1983.

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We think the current SALP process is a marked improvement over that previously used. It provides licensees a more balanced and meaningful review of their performance. It also more clearly identifies the areas that need attention and indicates the type of corrective actions that may be most appropriate.

Sincerely,

A handwritten signature in cursive script, reading "John B. Randazza", followed by a horizontal flourish.

John B. Randazza
Vice President