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August 3, 1982  
JPN-82-66

Mr. Ronald C. Haynes, Regional Administrator  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Systematic Assessment of Licensee Performance (SALP)

Reference: R. W. Starostecki (NRC) to J.P. Bayne (PASNY)  
dated May 19, 1982; Same subject.

Dear Sir:

The reference letter transmitted a draft SALP Board report which summarized the findings of a May 2, 1982 review of the Authority's James A. FitzPatrick Nuclear Power Plant. Attached to this letter are our comments on this draft report. Many of the concerns or findings that have been identified in the draft SALP Board report have been resolved; others are in the process of being resolved.

If you have any questions on this subject, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,

*Handwritten signature of J.P. Bayne*

J.P. Bayne  
Executive Vice President  
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cc: Mr. J. Linville  
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Comments on NRC Draft  
Systematic Assessment of Licensee  
Performance (SALP) Board Report  
Dated May 3, 1982

James A. FitzPatrick Nuclear Power Plant  
Power Authority of the State of New York

Docket No. 50-333

August 3, 1982

Attachment to JPN-82-65

## SALP Board Report Comments

### Onsite Review Committee

The Onsite Review Committee, established to prevent safety oversights through an independent review, will be dissolved in the near future. Alternately, the process by which existing Authority committees (Plant Operating Review Committee and Safety Review Committee) provide an oversight review has been, and will continue to be improved to assure a thorough review. Details on how this will be accomplished will be provided to the NRC in the near future. The Authority has elected to follow this course of action rather than to retain this additional level of review.

### Plant Modification Control

The plant procedure for initiating design changes and modifications has recently been revised. This procedure now provides greater control over modification activities and ensures that future modifications will be properly closed out. It provides greater assurance that changes to design documents, including drawings and the FSAR, resulting from modifications, will be completed on a timely basis.

Control of plant modifications has also been strengthened by added staffing in the Technical Services Department and improved technical support from the headquarters office. This has been accomplished by the reorganization described elsewhere in these comments.

The Authority is developing a large scale program to update vital drawings to reflect the as-built condition of the plant. This program, which will be described in our response to Inspection No. 82-06, is expected to significantly reduce the backlog of open modifications.

#### Management Control

The recent reorganization of the Authority's Nuclear Generation Department is expected to provide better control of the process of design changes and modifications.

Under this change, the management structure for operations and technical support was realigned by nuclear facility and related reactor technology, rather than the former functionally aligned structure. The Nuclear Licensing, Nuclear Technical Support and Operations Divisions of the Nuclear Generation Department are replaced by BWR and PWR Technical Support Divisions - each headed by a Vice President. Three Directors (Nuclear Licensing, Nuclear Operations and Maintenance, and Project Engineering) report to each of these Vice Presidents. The BWR and PWR Nuclear Support Divisions will combine the functions and responsibilities previously held by the Nuclear Operations, Nuclear Technical Support and Nuclear Licensing Divisions.

This realignment will improve headquarters office support for each nuclear facility by providing a dedicated staff to service and assist each plant, and improve day-to-day communications between facility and headquarters office personnel. A Vice President directing each Nuclear Support Division will provide the necessary

authority. This realignment will further consolidate the already closely related operations and technical support functions. Improved efficiency will result from better communications and closer coordination of activities by this reorganization by facility.

While several vacancies currently exist for headquarters positions, the Authority is actively attempting to fill these positions. In addition, several new positions are in the planning stages.

#### Licensee Event Reports

In order to improve the LERs submitted for the FitzPatrick plant, the process for their development is being significantly improved. In the immediate future, the Plant Operating Review Committee (PORC) will assign the preparation of an LER to the cognizant Department Superintendent. This individual will draft the LER utilizing the guidelines of NUREG-0161. A staff individual will review all LERs for consistency and conformance to the guidelines.

The Superintendent will present the draft LER to PORC for review. As a minimum, the draft LER will identify the cause (whenever possible) and will detail both short and long term corrective actions. The Superintendent's corrective action(s) will be approved by PORC. Long term corrective action will be documented and logged as a formal PORC commitment. These commitments will be tracked via the PORC commitment system, until it is satisfied and the LER closed out.

### Licensed Operator Staffing

The Authority is in the process of implementing the minimum shift crew requirements of Items I.A.1.3.2 (Minimum Shift Crew) and III.A.1.2 (Staffing Levels for Emergency Situations) of NUREG-0737. Schedules and implementation details were provided by two Authority letters: (1) J.P. Bayne to D.B. Vassallo Dated July 6, 1982 (JPN-82-60) regarding additional information in response to Generic Letter No. 82-10; and, (2) J.P. Bayne to D.B. Vassallo dated June 9, 1982 (JPN-82-50) regarding post-TMI requirements. The Authority expects to place a second SRO on shift by June 1, 1983 through an expedited operator replacement training program.

### Radiological Controls

A special inspection of the FitzPatrick plant was conducted November 10-21, 1980 by the NRC's Health Physics Appraisal Team. A report summarizing the findings of this intensive review was provided to the Authority in a January 20, 1982 letter. Appendix A to that letter listed significant findings in eight areas requiring corrective action. In an April 30, 1982 response, the Authority described those actions which had or will be taken to address each of the report's findings, including a schedule for their implementation. Since this appraisal, an intensive effort focusing on health physics has been made. The concerns voiced in the draft SALP report have been largely resolved by the actions identified in our April 30, 1982 response. The Authority will continue to make improvements to the FitzPatrick Health Physics program.

## Radiation Protection-Organization

The Staff of the Radiological and Environmental Services (RES) Department has been increased since the Nuclear Regulatory Commission conducted its Radiation Protection Appraisal in November of 1980. Three new supervisory or management positions, nine technical and one clerical position were added to the organization. The following is the status of those vacancies in the RES Department as of June 21, 1982.

- o The Radiation Protection and Radiochemistry Supervisor position was vacated in April of 1980 as the result of promotions. An individual has been hired to fill this vacancy.
  
- o The positions of Emergency Planning Coordinator and Training and Quality Control Supervisor were filled in the spring of 1981.
  
- o The position of Dosimetry/ALARA Supervisor remains vacant. Candidates are presently not being interviewed because filling this position would create a conflict in a new proposed reorganization of the RES Department.

- o A clerk has been added to the department, to assist the senior RES Technician in charge of the Radiation Exposure Management System. The clerk is primarily responsible for maintaining the files in that system.
  
- o Turnover and the general lack of qualified and experienced technicians, along with the requirement to place technicians on shift July 1, 1982, account for the fact that three vacancies exist. It is expected that these positions will be filled in the next three months.
  
- o In the absence of other Dosimetry/ALARA Supervisors, a contract engineer has been retained since the beginning of the 1981/1982 refueling outage to fulfill the ALARA functions of this position until the planned reorganization is implemented.

A planned reorganization of the RES Department will provide additional first line supervisors and technicians. This additional staffing will permit the RES supervisor to delegate responsibilities so that each aspect of the departments' responsibilities are assigned to a single individual.

The Authority is actively attempting to fill the remaining vacant positions.

#### Radwaste Management, Transportation

The Authority has discontinued the use of urea formaldehyde spent resin solidification and has switched to an approved



solidification process which will prevent recurrence of this generic problem. This switch in solidification material and the associated process was done at considerable expense to the Authority.

#### ALARA Program

Steps have been taken toward establishing a formal ALARA program. Nuclear Generation Department procedures were issued by the headquarters staff. These procedures provide for audit and evaluation of the plant program and require that certain facets of job review be performed by headquarters staff. Goals and objectives are established and reviewed by the Radiation Safety Committee. The complete development and implementation of an ALARA program is ongoing. Both headquarters and plant management are committed to maintaining radiation exposure to workers and the public ALARA. Development and implementation of a complete ALARA program is expected to require approximately three years, but major aspects of the program (i.e., those having the greatest effect on exposure control reduction) are expected to be accomplished prior to the May 1983 refueling outage.

#### Fire Protection

The Authority has initiated a revision to the FitzPatrick Technical Specifications which will clarify fire pump testing and performance requirements.

Numerous plant modifications to further enhance the ability of the FitzPatrick plant to withstand the possible effects of fire were committed to in our July 13, 1982 response to the provisions of Appendix R to 10 CFR 50.

The Authority is committed to maintaining, or further improving, the levels of fire brigade training and housekeeping noted in the draft SALP report.

Fire Brigade Leader

Senior Nuclear Operators (licensed reactor operators) will be trained in the fire brigade leaders duties and responsibilities. Effective November 30, 1982, the shift Senior Nuclear Operator will assume the duties of fire brigade leader previously held by the Shift Supervisor.