

FEB 28 1992

Docket No. 50-333

Mr. Ralph E. Beedle
Executive Vice President - Nuclear Generation
New York Power Authority
123 Main Street
White Plains, New York 10601

Dear Mr. Beedle:

**Subject: Questions and Comments Regarding the Results Improvement Program -
James A. FitzPatrick Nuclear Power Plant**

On December 16, 1991, a meeting was held between the NRC staff and the New York Power Authority (NYPA) to discuss the James A. FitzPatrick Nuclear Power Plant Results Improvement Program (RIP). During that meeting, NYPA committed to provide the detailed RIP to the NRC. A copy of the RIP was subsequently transmitted to the NRC by letter dated December 19, 1991, from Mr. Radford J. Converse to Mr. Thomas T. Martin.

As stated in Mr. James M. Taylor's February 4, 1992 letter to Mr. John C. Brons, the NRC has established a FitzPatrick Assessment Panel (FAP). The principal purpose of the panel is to assist Region I and NRR in the coordination of NRC resources for the performance monitoring and assessment of the James A. FitzPatrick Nuclear Power Plant. Some of the functions of the panel are to evaluate the adequacy of your improvement plans, to monitor your progress and success in implementing those plans and to provide oversight for follow-up inspection activities.

The FitzPatrick Assessment Panel has completed its initial review of the Results Improvement Program. As a result, the panel has identified a number of questions and comments concerning the RIP that are attached as Enclosure 1. To facilitate our further review, we would like to meet at the FitzPatrick site in the very near future to discuss the RIP in more detail. The agenda for this meeting should focus on the topics listed in Enclosure 2. Within 30 days following the meeting, we request that you respond in writing to the questions and comments in Enclosure 1.

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If you have any questions regarding this matter, we would be pleased to discuss them with you.

Sincerely,

Original Signed By:
Charles W. Hehl, Director
Division of Reactor Projects

Enclosures:

1. Comments on FitzPatrick Results Improvement Program
2. Proposed Topics for NRC/NYPA Meeting on RIP

cc w/encls:

J. Brons, President
R. Converse, Resident Manager
G. Goldstein, Assistant General Counsel
J. Gray, Jr., Director, Nuclear Licensing - BWR
Supervisor, Town of Scriba
C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law
Director, Power Division, Department of Public Service, State of New York
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NRC Resident Inspector
State of New York, SLO Designee

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bcc w/encs:

Region I Docket Room (with concurrences)

T. Murley, NRR

F. Miraglia, NRR

J. Partlow, NRR

S. Varga, NRR

J. Calvo, NRR

R. Capra, NRR

B. McCabe, NRR

E. Jordan, AEOD

S. Rubin, AEOD

R. Lobel, OEDJ

T. Martin, RA

W. Kane, DRA

W. Lanning, DRS

L. Bettenhausen, DRS

C. Cowgill, DRP

D. Haverkamp, DRP

R. Summers, DRP

W. Cook, SRI - FitzPatrick

G. Tracy, SRI - IP-3

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ENCLOSURE 1

Comments on FitzPatrick Results Improvement Program

Q/C	Page	Item	Comment
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GENERAL:

1	4, 6, 10	----	Explain the process used to develop NYPA's initial and enhanced root causes.
2	13	----	The Results Improvement Program Basis states that the RIP will be reviewed semi-annually and that progress toward completing the action items will be assessed by a group designated by the Nuclear Leadership Team. Please explain what criteria will be used for this assessment.
3	14	----	The Plant Improvement Benchmarks are intangible. Does NYPA have benchmarks of a more tangible nature to measure plant improvement?
4	15	----	Under "Results Improvement Program Development," it states that necessary resources will be applied to ensure that the schedule can be met. Identify the extent of resources (personnel and financial) that have been identified and provided to date to ensure success of the RIP. What is the effect on personnel and job quality of performing RIP tasks in parallel with safety-related refueling outage and plant operation activities?
5	18	----	Previous QA audits were not effective in preventing NYPA's decline in performance. What changes have been or are being made to ensure that these audits will be effective?
6	18	----	Under "Evaluation and Feedback," it states that the RIP will be evaluated through a number of mechanisms. What criteria have been or will be established for measuring the effectiveness of the RIP? How will employee feedback be managed and evaluated?

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Q/C	Page	Item	Comment
7	18	----	Please describe the department self-assessment program. Include in this description the frequency of and the criteria used for these assessments.
8	19	----	Under "Implementation Objectives," it states that Phase II, Continued Long-Term Phase (1993, 1994, 1995, ...) will develop the cultural changes which foster continuous improvement. Based upon recent performance, does NYPA consider that cultural changes need to be made and emphasized as part of Phase I?
9	--	----	Many of the Action Plans in the RIP are single tasks that result in the development of new tasks and schedules for accomplishing the new tasks. How will the new tasks be monitored and tracked? Will they become part of the RIP?

MANAGEMENT AND ORGANIZATION:

10	23	MO1.3	What corrective action systems are currently being used pending development of the improved corrective action program that is due 12/31/92? How will actions that are currently assigned (or that have been closed) be integrated into the improved system? Will the deficiency identification systems described in MO6.5.1 be incorporated into the corrective action system outlined in MO1.3 and MO9.1? Given the target schedule to implement these improvements, does NYPA have any reservations that the results will not be timely.
	58	MO12.5	
	39	MO6.5.1	
	47	MO9.1	
11	24	MO1.6	What are NYPA's current plans for using an independent outside organization to conduct an assessment of the effectiveness of engineering and technical support functions?
12	30	MO4.1	Please explain the NYPA integrated scheduling program and its relationship to the plant priority scheme that was developed to provide guidance to managers for assigning tasks.
	23	MO1.2.5	

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13	41	MO7.1	Many Action Plans discuss procedure upgrades and rewrite. Many utilities that have embarked on procedure upgrade programs have found them to be extremely time consuming and resource intensive. Does NYPA have an overall Action Plan that integrates all aspects of procedure upgrade? Who is responsible for procedure upgrades at FitzPatrick and the White Plains Office?
14	42	MO7.6	Please explain the purpose and function of "ROME" (Reliable On-line Maintenance Environment).
15	43	MO8	One of the weaknesses pointed out in the DET was manager's/supervisor's lack of knowledge of the status of completed/overdue training. Action Plan O6.3 addresses this issue for the Operations Department only. Please discuss whether MO8, "Training," will address this issue for other departments.
16	43	MO8.1.1	To be consistent with the Training Coordinator's schedule, it appears that the due date for "Appointment of Coordinators" should be 12/31/91 vice 12/31/92.
17	47	MO9.2	Several Action Plans in the RIP address various aspects of "Root Cause" evaluations and training. What group or department at JAF has or will have overall responsibility for performing root cause analyses?
	48	MO9.4	
	48	MO9.5	
	58	MO12.5	
	66	O3.2	
	80	TS3.7.2	
18	47	MO9.1.2	The identification and screening process does not appear to address notification of the Shift Supervisor for potential impact on Technical Specification requirements.
19	47	MO9.3	Describe the planned scope, including the extent of retrofitting, of the Nuclear Generation commitment tracking system.
	54	MO12.1	
	58	MO12.5	

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20	55	MO12.2	How does the configuration management program relate to the Design Basis Document program? Describe the process for promptly resolving operability issues.
21	59 31 132 165	MO13.1 MO4.3 IC2 C1	These Action Plans address Work Control systems and processes. Are the Action Plans coordinated?
22	--	-----	Please explain the process for development and approval of the Department Improvement Plans. With respect to scope and schedule, are these plans fully integrated with the Management and Organization Action Plans in the RIP? How do the Departmental Improvement Plans address specific DET observations?

OPERATIONS:

23	68	O5.1	The Issue Statement says that systems used to label and identify equipment are cumbersome and less than adequate when compared to industry standards. Action Plan O5.1 directs completion of the plant labeling program. This Action Plan does not appear to address the Issue Statement.
24	69	O6.1	The schedule for implementing Training Coordinators appears protracted and in conflict with the schedule established in MO8.1 on page 43.
25	70	O7	The Issue Statement says that many surveillance tests and operating procedures contain technical errors. None of the three Action Plans appear to address this issue.
26	71	O8	The Issue Statement says that operability determination and reporting requirements are sometimes confusing and vague. Operability concerns do not appear to be addressed in a comprehensive way and reporting requirements are not addressed by any of the three Action Plans.

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27	71	O8	How are Action Plans O8.2 "Operability Issue" and O8.3
	55	MO12.2	"Technical Specification Upgrade" related to Action Plans MO12.2.5 "Technical Specification Improvement" and MO12.2.6 "Operability"?

TECHNICAL SERVICES:

28	77	TS2.1	How are the resources identified in Action Plan TS 2.1 "Staffing"
	78	TS2.7	different from the staffing plan developed under TS 2.7 "Plant Thermal Performance"? Why is the staffing plan for CY 1992 identified in Action Plan TS 2.7 not due until near the end of CY 1992 (i.e., 09/01/92)?
29	82	TS4.2	In many cases, NYPA's review of industry experience items has been ineffective and untimely. The Action Plans address timeliness but do not address the effectiveness of the reviews. Please provide NYPA's provisions to ensure effective reviews are performed. Also, should the item "DTS 4.2" referenced in Action Plan TS 4.2 actually be Action Plan TS 4.1?

RADIOLOGICAL AND ENVIRONMENTAL SERVICES:

30	85	RES2	In part, issue statement RES2 states that additional supervisory resources are needed for the operational radiation protection function, both during normal operations and outage situations. Action Plan RES 2.1 addresses hiring 45 senior technicians and 30-35 junior technicians prior to the 1992 refueling outage. How do these extra resources address the problem of needing additional supervisory resources?
31	88	RES5	This Issue Statement addresses means to improve the effectiveness and efficiency of the ALARA and Work Planning programs, yet none of the Action Plans address up-front engineering ALARA reviews in the conceptual design phase.

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32	101	RES 17.3	This Action Plan discusses program changes for the RES Improvement Plan. Why is this Action Plan necessary? Why aren't program changes covered in AP-1.15 "Control of Results Improvement Program." Currently AP-1.15 only addresses a process for getting schedule changes approved.
33	102	RES 18	Action Plans under RES 18 discuss Assessments, Annual Review and Updating of the RES Improvement Plan based upon assessment. This type of process seems appropriate for the entire RIP. Why is this process called out separately for the RES Improvement Plan?

PLANNING DEPARTMENT:

34	108	P1	This issue addresses Work Request Prioritization. How has this effort been coordinated with Action Plans developed under MO4 "Planning and Prioritization," P5 "Modification Priorities," and SE7 "Work Prioritization."
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MAINTENANCE DEPARTMENT:

35	114	M1.1	Action Plan M1.1 discusses completing the revision of remaining safety-related procedures prior to the 1992 Refueling Outage. Why is the due date 06/30/92 when the outage started 01/11/92?
36	117 133	M4 IC3	Issue M4 identifies that some work practices used during maintenance are improper. Why do the Action Plans associated with this issue only address the Maintenance Observation Program? If some improper work practices are known already, why isn't this addressed as part of an integrated retraining effort. Such an approach is identified in the I&C Improvement Plan under Action Plan IC3.2.

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Q/C	Page	Item	Comment
37	121	M8.1	The related Issue Statement addresses the need for improved monitoring and assessment of maintenance activities. How does an improved monthly status report improve management's assessment of maintenance activities?
38	123	M10.3 M10.5	Discuss the processes described in Action Plans M10.3 and M10.5

CONTRACT SERVICES DEPARTMENT:

39	127	CS1	This Issue Statement addresses ineffective communication and enforcement of management expectations and standards regarding craft personnel, yet the Action Plans only address housekeeping issues. Please provide an explanation of the apparent discrepancy.
40	130	CS4	Issue CS4 states that the industrial accident rate at F is exceedingly high for the Contract Services Department. Should this problem be addressed by a site-wide action plan?

INSTRUMENT AND CONTROL DEPARTMENT:

41	137 123	IC6 M10	Issues IC6 and M10 address Preventative Maintenance. Is Preventative Maintenance integrated with any site-wide action plan or are improvements being made separately on a department-wide basis? Provide the basis for the completion schedule of IC6.3.
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MATERIAL CONTROL:

42	142	MC4	Explain the function of the Shelf Life Report. Explain the basis for this improvement program and the timeliness of actions.
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COMPUTER DEPARTMENT:

43	166 198	C2.4 F5	Action Plan C2.4 and Issue F5 discuss the computer program PARI', (Power Authority Reporting and Information Systems). Please explain the function of PARI'S.
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CONFIGURATION CONTROL DEPARTMENT:

44	170- 180	CC1- CC11	Please explain the responsibilities of the Configuration Control Department. Also, several of these Action Plans (CC3 Document Deficiencies, CC4 Standardization, CC5 Training, CC6 Master Equipment List, CC8 Document Control, CC10 Record Management, and CC11 Labeling Program) are vague and general.
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OPERATIONS REVIEW GROUP:

45	184	ORG3	This Issue Statement states in part that the TS contain numerous errors and omissions. None of the three Action Plans appears to address this issue. If NYPA is aware of errors and omissions in the TS, they should be resolved in a timely manner.
46	185	ORG4	The Action Plans under ORG4, "Industry Operating Experience," have OE Resources being identified by 12/31/92 and a OE Review Program implemented by 12/31/93. Since lack of timely review and implementation of corrective actions from plant and industry operating experience has led to several plant events and equipment failures at FitzPatrick, what measures are being taken in this area until the revised program is implemented?

SECURITY/SAFETY DEPARTMENT:

47	87	SS2.1	Who is responsible for tracking programmatic problems in the area of security? How are these problems communicated to the necessary support organizations?
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QUALITY ASSURANCE DEPARTMENT:

48	208	QA3	This issue discusses the need to integrate the QA Program Activities into a comprehensive program that utilizes more effectively and efficiently the information generated by those individual programs. The action plans do not appear to integrate individual activities into a comprehensive program.
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49	209	QA4	This issue discusses the need to reorganize the QA Department to more efficiently deal with the current and future workloads. Why does the Action Plan for this issue only discuss resource monitoring to assure resources are available to perform all work?

SITE ENGINEERING DEPARTMENT:

50	---	----	Many of the weaknesses identified in the DET related to engineering involved Corporate Engineering. How are needed Corporate Engineering changes being identified and coordinated with Site Engineering Changes at FitzPatrick?
51	220	SE7	This issue addresses Work Prioritization. Are the Action Plans developed for this task coordinated with several other issues addressing Work Prioritization (e.g., MO4 Planning and Prioritization, P1 Work Request Priority System and P5 Modification Priorities)? What engineering tasks will be included in the central prioritization plan?
52	221	SE8.5	This Action Plan addresses starting to reduce the backlog of modifications close-outs, jumpers, and pipe support program items. Have backlog reduction goals been established?
53	224 170- 180	SE11 CC1- CC11	How is issue SE11 Configuration Management and associated Action Plans related to Issues and Action Plans developed in the Configuration Control Department Improvement Plan?

AP-1.15 CONTROL OF RESULTS IMPROVEMENT PROGRAM

54	3	4.1	A Management and Organization Issue is defined as a condition which affects more than one department or organization and is considered to be an area where performance improvements are considered necessary. Please explain why many of the Departmental Improvement Plans contain items that appear to affect more than one department but are not cross-referenced to a M&O issue.
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55	5	7.2	When a new issue is identified, the initiator completes a RI Program Action Item Initiation Form. The Resident Manager will review the proposed item and determine if it is appropriate for inclusion in the RIP or whether it should be included in another corrective action system. What criteria have been established for determining what type of actions will be entered into the RIP?
56	7	7.6	AP-1.15 does not specifically address reporting on the status of Action Items in progress, and it appears that Quarterly and Monthly Status Reports will contain only a listing of Completed, Overdue and Scheduled Action Items. Is there a mechanism for determining status prior to the due date?
57	7	7.6	Will the NRC be sent copies of Monthly or Quarterly Status Reports? If not, NYPA should consider developing a periodic status report that it considers appropriate for submittal to the NRC.
58	7	7.7	How will semiannual assessments be performed? What criteria will be used for determining effectiveness?
59	7	7.7	Is there a formal process established to obtain employee feedback on the effectiveness of the RIP?
60	7	7.7	What organization and/or individuals are responsible for evaluating inspections, evaluations, and assessments by outside organizations to measure the effectiveness of the RIP? How will this evaluation be accomplished? Has the process for performing this evaluation been formalized?
61	8	7.8	Section 7.8 states that there is no intention to submit subsequent revisions of the RI Program to the NRC; however, they will be available for inspection and review by the NRC at the site. The NRC requests that NYPA provide revisions to the plan to facilitate our review. It is requested that NYPA reconsider its position on this matter.

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Q/C	Page	Item	Comment
62	8	7.9	Section 7.9 discusses periodic compliance and performance-based audits of RIP implementation. Has the procedure, criteria and schedule for performing these audits been formalized.

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ENCLOSURE 2

Proposed Topics for NRC/NYPA Meeting on RIP

1. The process used to develop the root causes and contributing causes;
2. The process used to develop both the Management and Organization and Departmental Action Plans to address the root causes and contributing causes;
3. The process used to prioritize and schedule the corrective actions identified in the action plans;
4. The process used to track and monitor progress on the RIP;
5. The process and criteria being used to evaluate the completion of corrective actions;
6. The process and criteria being used to assess the effectiveness of the corrective actions;
7. The process that will be used to update the RIP;
8. The status of the Nuclear Generation Business Plan-Oversite Program; and,
9. The status of the programmatic, organizational, and staffing changes being made to improve engineering and technical support staffs.

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