



J. Phillip Bayne
Executive Vice President
Nuclear Generation

October 10, 1984
JPN-84-66

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

Attention: Mr. Richard W. Starostecki
SALP Board Chairman
Director, Division of
Project and Resident Programs

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Response to Systematic Assessment
of Licensee Performance (SALP)
Report No. 50-333/84-17

References: 1. NRC September 4, 1984 letter, R.W. Starostecki to
J.P. Bayne, regarding SALP Report No. 50-333/84-17.
2. NRC November 14, 1983 letter, T.T. Martin to C.A.
McNeill, Jr., regarding Inspection No. 50-333/83-23.

Dear Sir:

This response addresses the assessment results of the SALP Board's evaluation of activities at the James A. FitzPatrick Nuclear Power Plant (JAFNPP) and is intended to clarify and provide additional information with respect to the discussion at the assessment meeting of September 13, 1984.

The SALP assessment (Reference 1) in the Emergency Preparedness area presented a category 2 with an associated declining trend. This assessment is a downgrading from the previous SALP assessment of a performance category 1. It is the position of the New York Power Authority that the Emergency Preparedness Program at the JAFNPP has not been reduced in effectiveness.

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The assessment states in part:

"There was evidence of a decline in prior planning and assignment of priorities in that the exercise scenario was not finalized until the day of the exercise. This may be attributed to the past practice of relying on one full-time on-site individual to coordinate all site Emergency Preparedness activities. An additional staff member has recently been assigned full-time to assist in this area. Licensee initiatives to increase onsite staff support are commendable. The licensee, however, clearly understands technical issues from a safety standpoint, as indicated by his conduct of the exercise.

On May 21-25, 1984, an unannounced routine emergency preparedness inspection (50-333/84-10) was performed. Reviews indicated that training records and audits generally were complete, available and sufficiently maintained. However, a review of IR 83-23 identified items noted that only one of four NRC initiatives had been fully resolved.

During the early part of the assessment period, adequate licensee performance in emergency preparedness was evident. During the latter part of the assessment period, licensee response to NRC initiatives declined."

This assessment of declining performance appears to be based primarily upon administrative functions associated with preparation for exercises and the timely correction of minor deficiencies resulting from the exercise. The real test of emergency preparedness is in fact the exercise results. By all indications, these results have been and remain excellent. This has been the case despite the fact that during the recent 1984 exercise many of the positions (including the Emergency Director position) were deliberately filled by alternates.

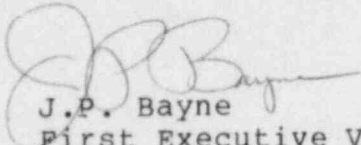
Additionally, the assessment does not appear to have taken into consideration the following information:

1. As noted in Inspection Report 84-17 (Reference 1), the emergency preparedness staff at JAFNPP was increased by an additional staff member during the assessment period. It should be further noted that the corporate NYPA emergency preparedness staff was increased by two people who assist JAFNPP planners.
2. Inspection Report 83-23 (Reference 2) identified four open items that had remained open 6 months from the presentation of the 1983 JAFNPP exercise findings. Of the 4 items identified in Inspection Report 83-23, one item was completed, two items were presented to the inspection team during the inspection in final draft form, and one item was not scheduled for completion until December, 1984. The item scheduled for December, 1984 involved total population dose estimates which include a complex model and extensive calculations.

3. The assessment, while identifying its findings, did not mention several positive efforts and improvements for the betterment of the JAFNPP Emergency Plan. These improvements include: the development and construction of a new Emergency Offsite Facility (EOF) and associated systems; the development and implementation of a dedicated dose assessment computer and associated software; a major map revision program for the plant, county and state; follow through for formal acceptance of the New York State and Oswego County plans (first in the state); and Authority efforts to be first in the Region to have a FEMA qualified prompt notification system.

It is our belief that this additional information will clarify the items discussed. The Authority requests that further consideration should be given to the performance category and trend assigned to the JAFNPP Emergency Preparedness Program.

Very truly yours,



J.P. Bayne
First Executive Vice President
Chief Operations Officer

cc: Office of the Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093