



**New York Power
Authority**

J. Phillip Bayne
Executive Vice President
Nuclear Generation

July 12, 1984
JPN-84-44

Mr. Thomas E. Murley, Regional Administrator
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
Operational Assessment Team Inspection
No. 50-333/82-24

- Reference:
1. NRC Office of Inspection and Enforcement
Inspection Report No. 82-24 dated
January 28, 1983.
 2. NYPA letter, J.P. Bayne to T.E. Murley,
dated November 10, 1983 regarding same
subject (JPN-83-93).

Dear Sir:

In response to the NRC's Operational Assessment Team Inspection Report (Reference 1), the Authority committed to complete thirty-one specific action items. A schedule was included for each of these items in our initial response.

Since then, we have completed more than eighty percent of those commitments. Despite our efforts to meet our commitment schedule, we find it necessary to reschedule six of these dates:

Inspection Finding A.1.d - Provide forms and procedures for recording phone calls and meetings. Forms have been prepared and distributed for use. Formal procedures will be implemented by July 31, 1984.

Inspection Finding F.1 - Complete qualification standards and cards for maintenance personnel. Draft standards and cards have been completed and are awaiting implementation. The program will be implemented as part of an apprenticeship program which is being negotiated with the union's local bargaining unit. We expect to fully implement the program by December 31, 1984.

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Inspection Finding C.1.C. - Issue and implement ITP for training of maintenance contractor personnel. The ITP has been issued. Implementation and scheduling of maintenance contractor personnel for training will start during the summer of 1984. Complete implementation has been rescheduled for January 15, 1985.

Inspection Finding C.2.C - Incorporate plant components into Preventative Maintenance Program. Our initial estimate of the manhours required to develop and implement a preventative maintenance program proved low. Therefore, we have rescheduled this commitment to December 31, 1985.

Inspection Finding B - Issue final revised and new Nuclear Administrative Policies and Nuclear Generation Department Procedures (NuAPs and NGPs). New procedures have been prepared, approved and issued for the Nuclear Generation Department's Nuclear Licensing, Project Engineering, and Nuclear Operations and Maintenance Sections. Revised NuAPs have been prepared and are currently in our internal review and concurrence cycle. These will be issued for implementation by October 3, 1984.

Inspection Finding E.3 - Complete archival records storage vault. Construction has started on this new facility. However, progress has fallen behind schedule due to minor engineering problems. Efforts to accelerate progress are currently underway. Current plans are to complete the storage vault by August 15, 1984 and have quality assurance records stored there by October 31, 1984. This schedule is consistent with earlier commitments to the NRC staff.

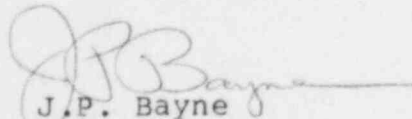
The Authority has revised administrative records management policy for both our headquarters office and the FitzPatrick plant, completed a records retention index for our headquarters and FitzPatrick plant and, has issued a final nuclear records and retention schedule (see attachment). However, our Quality Assurance and Reliability Department is currently conducting an audit of the Headquarters Records Management Program pertaining to nuclear records. As a result, we expect to improve and refine the program. In addition, several short-term improvements have been planned for the near future.

A schedule for the implementation of new and revised procedures will be complete by October 31, 1984. A policy on the coordination of plant and headquarters Records Management practices will be formally adopted by September 15, 1984. We will also establish a Records Retention Committee by September 30, 1984. Further revision of the Records Retention Manual to include additional program elements will be completed by September 30, 1984.

The schedule for the remaining commitments is unchanged. For your information, we have attached a summary of the current status on these action items. We will continue to keep you informed of our progress.

If you have any questions or require additional information, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,



J.P. Bayne
Executive Vice President
Nuclear Generation

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

ATTACHMENT TO JPN-84-44

Status Summary of Commitment
in Response to NRC OATS Inspection No. 82-84
(as of June 1, 1984)

<u>Inspector Finding</u>	<u>Item</u>	<u>Status/Schedule</u>
A.1.a	Revise Design and Analysis Dept. procedures 3.11 and 3.18.	Complete
A.1.b	Issue new set of Revision 1 calculations as required by EDP-2.	Complete
A.1.b	Provide design verification for modification Fl-31-26.	Complete
A.1.b	Provide training to Project Engineering Division-BWR staff on 10 CFR 50 App. B and ANSI 45.2.11	Complete
A.1.d	Provide forms and procedures for recording phone calls and meetings.	7/31/84
A.1.d	Issue procedures to cover activities of Project Engineering Division - BWR.	Complete
B	Issue final revised NUAPS, NGPs and new procedures.	10/3/84
C.1.a	Write Maintenance Department procedures and policies, and issue administrative manual.	Complete
C.1.b	Complete Maintenance Department hiring to fill open positions.	Complete
C.1.c	Issue and implement ITP procedure for training of maintenance contractor personnel.	1/15/85
C.1.d	Hire Contract Services Engineer.	Complete
C.2.a	Obtain or create computerized preventative maintenance scheduling program.	Complete
C.2.b	Develop a procedure to administer preventative maintenance program.	Complete

<u>Inspector Finding</u>	<u>Item</u>	<u>Status/Schedule</u>
C.2.c	Incorporate plant components into preventative maintenance program.	12/31/85
C.2.d	Assure that 40% of maintenance activities are preventive.	12/31/85
D.1.a	Supplement present site Quality Assurance audit program.	Complete
D.1.b	Expand utilization of technical expertise from other organizations.	Complete
D.1.b	Coordinate audit of site fire protection activities.	Complete
D.2	Develop and implement Quality Assurance procedures for design control.	Complete
D.2	Revise Quality Assurance Procedures Manual.	Complete
D.3.	Develop internal audit schedule	Complete
E.1, E.2	Revise plant and headquarters administrative records management procedures.	Complete
E.2	Complete records retention index for headquarters and plant.	Complete
E.2	Issue final version of nuclear records and retention schedule.	Complete
E.3	Complete archival records storage vault.	8/15/84
F.1	Commence skill and plant-specific training.	Complete
F.1	Complete qualification standards and cards for maintenance personnel.	12/31/84
F.1	Revise training procedure for headquarters personnel.	Complete
F.1	Revise I&T procedures to meet NPO guidelines.	Complete
F.1	Develop lesson plan for Technical Services personnel.	Complete