Public Service
Electric and Gas
Company

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JAN 12 1996

LR-N96010

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

STARTUP OF HOPE CREEK
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NO. NPF-57
DOCKET NO. 50-354

In a letter dated December 1, 1995, the Nuclear Regulatory Commission (NRC) provided Public Service Electric and Gas Company (PSE&G) with the results of the most recent plant performance review for Hope Creek and requested a meeting to discuss the conduct of the current refueling outage and readiness for startup of the unit. In a subsequent letter dated December 15, 1995, the NRC requested that PSE&G provide a letter to articulate the "basis for concluding that adequate performance improvement will be effected at Hope Creek prior to resumption of operation from your current outage." In particular, the NRC requested that the letter include "a discussion of the process you used to develop your outage scope" and "the methods you are using or intend to use to verify that adequate actions have been taken for equipment, process, and personnel deficiencies prior to restart."

This letter provides the information requested in the December 15, 1995 letter. Additional information will be provided at the management meeting scheduled for January 18, 1996. It should be noted that changes to the plan described in this letter may need to be made from time to time and PSE&G management reserves the right to change this plan as necessary.

Discussion of the process used to develop the outage scope

The process for determining the outage scope is described in detail in the Hope Creek Outage Completion Plan (OCP). The plan includes creation of an Outage Review Committee (ORC) and criteria for determining work to be included in the outage scope. The OCP is included as Enclosure 2 with the ORC Charter and Scope Criteria being Attachments A and B to the OCP, respectively. An overview of the OCP is included as Enclosure 1.

The ORC reviewed both open work items and the Hope Creek IMPACT

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Plan against the scope criteria to ensure an appropriate outage scope. The IMPACT Plan is a working action plan developed to enhance performance in the areas that were identified during a thorough performance assessment completed in September 1995. The plan is a living document being used by Hope Creek management to manage the enhancements. The IMPACT Plan was updated to incorporate appropriate items from the Salem restart plan prior to ORC outage scope review.

Discussion of the methods being used to verify that adequate actions have been taken for equipment, process, and personnel deficiencies prior to restart

The methods being used to verify that appropriate actions have been taken for equipment, process, and personnel deficiencies prior to startup are also described in the OCP. The OCP requires that an Operational Readiness Self Assessment (ORSA) be completed prior to startup. The ORSA consists of a readiness assessment of plant systems and of station or station support departments. The ORSA is further discussed in Enclosures 1 and 2.

Inherent in the outage scope validation process and the ORSA, which are integral parts of the OCP, is an affirmation by specified department managers that the integrated set of plant equipment, human resources, and work processes under their cognizance support safe and reliable power operation. The procedure that provides the details of this process is included as Enclosure 3. Enhanced performance will be effected prior to the resumption of operation through completion of the actions required by the OCP.

Improvement will continue after the resumption of plant operation through implementation of IMPACT plan actions that are not required prior to startup.

Should you have any questions or need additional information, please do not hesitate to contact us.

Sincerely,

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ENCLOSURE 1 TO LR-N96010

OUTAGE COMPLETION PLAN OVERVIEW

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An outage completion plan (OCP) has been developed for the Hope Creek sixth refueling outage (RF06). This plan describes the activities and controls that are being implemented to ensure: (1) successful completion of refueling operations and other critical outage work, (2) identification and completion of the physical and programmatic work necessary to achieve a safe and reliable post-RF06 operating cycle, and (3) a safe and uneventful unit startup and power ascension to 100% power.

The major activities required by the OCP are as follows:

- RF06 work scope validation
- Operational readiness self-assessment
- Augmented startup process

Work Scope Validation

The RF06 work scope has been reviewed by the outage review committee (ORC) through a rigorous review of open work lists against defined criteria to determine which items should be added to the scope of RF06. Emergent work items will continue to be reviewed throughout the implementation period. The ORC charter and the defined criteria are provided respectively in Attachments A and B of Enclosure 2. The focus of the validation effort is on items that may potentially challenge plant operators.

The work scope is also being modified to incorporate appropriate items from the Hope Creek IMPACT plan. The IMPACT plan is the product of a thorough assessment that identified issues at Hope Creek that were impeding station improvement and affecting its capability to achieve goals for safety, production, and cost. The assessment, which was completed in September 1995, used a combination of department workshop sessions and document reviews (e.g., Systematic Assessment of Licensee Performance reports, inspection reports, notice of violation responses, Licensee Event Reports, Salem Special Inspection Team report, Quality Assurance/Safety Review Group audit reports, Nuclear Review Board meeting minutes, performance indicators, etc.). Action plans were developed to address the identified issues and were assembled to form the Hope Creek IMPACT plan.

In December 1995, the plan was reviewed against the Salem restart plan, and actions were incorporated from the Salem plan. The actions in the IMPACT plan were subsequently reviewed and a list of those items required prior to startup was developed.

Operational Readiness Self-Assessment

The objective of the operational readiness self-assessment (ORSA) is to validate that the integrated set of plant equipment, human resources, and work processes is capable of supporting plant startup and subsequent operation. The ORSA will focus on department readiness, system readiness, and operational readiness.

Departmental Readiness Assessments

Department managers are responsible for performing a self-assessment of their department's readiness to support unit startup and continued safe and reliable power operation. Section 3.4 of the OCP provides guidance for performing the department readiness assessments. Corrective actions will be taken if problems contrary to this objective are found during the self assessment. Following completion of the assessment and the necessary corrective actions, the department manager will be required to provide affirmation to the ORC of his (or her) department's readiness.

System Readiness Assessments

Each system manager (system engineer) is responsible for performing an assessment of their respective systems' readiness to support unit startup and operation through the next cycle. The system manager is responsible for confirming that system work activities will be completed prior to startup. The appropriate system readiness reviews will be a subset of the System Engineering department readiness evaluation and affirmation. Readiness assessments for the twenty specified systems listed in Attachment C of the OCP will be presented to ORC for review and approval.

Operational Readiness Assessment

Determination of operational readiness is the responsibility of the Operations Manager and includes verification of operator training and assurance that operations performance expectations have been effectively communicated. Operational readiness is also an affirmation by each SNSS and operating crew that operating shifts are satisfied with plant materiel condition and that they are ready to operate the station in a safe and reliable manner through the next operating cycle.

Leadership skills are being enhanced and clear roles and responsibilities for operating crews are being established. Self assessments of operating crew performance have been conducted. The role of the Operations Department as the leader of plant activities has been communicated to station personnel. Standards for operating the plant and controlling plant activities have been raised. A supervisory field presence has also been established to reinforce expectations.

An Operations Standards document is being developed and will be made available to personnel. Expectations for adherence to these standards will be communicated and adherence to standards will be measured. An Operations observation program has been established and is ensuring that established standards are being met and that areas of improvement are being identified. Performance plans for all Operations Department supervisors are being established which include measurable goals.

The operability determination procedure is being enhanced. Work Control Center roles and responsibilities are being developed and management expectations relative to schedule adherence will be communicated.

Communication, both within the Operations Department and with other departments, is occurring that will improve teamwork and establish a common understanding of Operation's expectations. Expectations relative to Operations role in resolving plant problems are being communicated to station personnel. An enhanced means of operator identification of problems with a prompt feedback mechanism will also be provided. Shift turnovers and pre-job briefings have been and continue to be enhanced and are improving.

An attitude in Operations to self identify problems and to use the corrective action program for improving performance has been developed. A plan is being implemented to make a significant reduction in the procedure revision backlog. Procedure readiness to support a safe, controlled startup will be verified.

Integrated Review by SORC

The Station Operations Review Committee (SORC) will perform an integrated review of all affirmations to determine readiness for unit startup. Upon completion of the SORC review and their determination of satisfactory implementation of the outage plan, they will make a recommendation to senior management who will then provide final approval to startup the unit.

Startup and Power Ascension

Startup and power ascension will follow a deliberate and controlled approach that ensures operational and personnel safety. The normal startup process will be supplemented with additional management oversight and support from engineering and maintenance such that issues or concerns are promptly addressed. The additional management oversight will consist of a shift plant manager, a shift engineering manager, and a shift maintenance manager. The responsibilities of these individuals are described in Section 4.1 of the OCP. Startup and power ascension hold points will also be established and are described in Section 4.2 of the OCP.

ENCLOSURE 2 TO LR-N96010

OUTAGE COMPLETION PLAN