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United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Dear Sir:

Attached is the New York Power Authority response to the James A. Fitzpatrick Systematic Assessment of Licensee Performance (SALP) Report (No. 50-333/91-99).

The Power Authority agrees with the NRC assessment of performance. Considerable effort and resources have been devoted to development and implementation of the Results Improvement Program (RIP) which is intended to correct the root causes of the decline in performance. The Authority believes the improvements seen near the end of the SALP period are indicative of the effectiveness of the Results Improvement Program and many other initiatives. The Authority is committed to improve performance at James A. FitzPatrick through capital improvements, management changes, engineering organizational changes, the Nuclear Generation Business Plan and the Results Improvement Program.

HARRY P. SALMON, JR.

HPS:MJC:cmc

Attachment

cc: U.S. Nuclear Regulatory Commission
Region I

Office of the Resident Inspector

Mr. Brian C. McCabe

Cert No P 295427775

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OPERATIONS

The Power Authority agrees with the Operations section of the SALP Report. The observations discuss similar strengths and weaknesses as those documented in the FitzPatrick Plant Self Assessment. The FitzPatrick Self Assessment, in conjunction with the Diagnostic Evaluation Team Report, formed the basis for the James A. FitzPatrick Results Improvement Program (RIP). The weaknesses and deficiencies mentioned in the diagnostic report are being corrected by actions tracked in either the RIP or the Nuclear Generation Business Plan.

Control Room Operator performance continues to be a strength. The Control Room teams responded well to plant events. Recognizing limited operating time, there were no automatic scrams during the SALP Period. Events were well documented with appropriate lessons learned and corrective actions as a result of improved critiques.

The procedure improvement committee has developed a writers guide, which has been approved and implemented. This guide will add clarification and consistency to all plant procedures. Additionally, administrative procedures that guide plant personnel on the use of procedures were approved and implemented.

Operations staffing has been increased by the addition of nine engineers to provide on shift support and Shift Technical Advisor (STA) qualification. Additional non-licensed operators have been added to the staff to support the next license class. A license class is currently in progress that is expected to provide an additional six SROs and six ROs to operations after the October examination. The next license class will start January, 1993 and will include eight SROs and eight ROs, this will provide the additional licenses needed to staff the rotating positions discussed in the report.

During this SALP Period, personnel errors resulted in several events. Attention to detail has been, and is, continuing to be emphasized to operations personnel. Critiques of operational events are being initiated at lower thresholds. Lessons learned are presented to department personnel to reduce the probability of reoccurrence. There is increased attention on procedure use. All Operations Department procedures have been reviewed and expected level of use has been identified. Shift management and plant management have included procedure use in their observations and oversight.

Control Room and plant deficiencies are being reduced in number. The Nuclear Generation Business Plan and Results Improvement Program include tracking methods and goals to increase awareness and reduce the number of deficiencies.

Additional guidance and training on expected standards of shift turnovers, log keeping, and shift communication has been provided to the operating crews. Improvement has been noted and increased management oversight through management observations is expected to maintain this area on an improving trend.

The report noted that several deficiencies were insufficiently investigated or inadequately tracked which caused delays in timely resolution. A formal method of LCO tracking has been initiated. The Results Improvement Program includes actions to improve equipment status control. This action is being investigated and will include a troubleshooting log of actions taken, an improved method of equipment status information available to the Shift Supervisor, and a method of clearly identifying Maintenance items with a high Operations priority.

The Licensed Operator Requalification Training Program was judged to be unsatisfactory following the administration of requalification examinations in April 1991. Subsequently, the ability to successfully develop, validate and administer the written examinations was demonstrated in June, 1991 in a special examination which was passed by all twelve operators who participated. Additional training and evaluation in the use of emergency operating procedures, upgrade of the existing examination bank used for the annual examinations and more frequent use of NRC style examinations during routine training were initiated. Additional contract instructional support has been obtained for the operator training programs. Detailed staffing studies are in progress to determine the long term steady manpower requirements.

During the first several months of 1992, significant emphasis was placed on formal evaluations of the crews. In addition to the training staff, evaluators from operations management, upper plant management, and other utilities were used. Teamwork and communications were stressed and operator performance was tracked and reported. Significant improvement in operator performance was noted in all areas. All operators passed the NRC administered requalification examinations. Of the remaining operators, the only recorded failure was for one reactor operator in the simulator portion of the examination. This individual was remediated and successfully re-evaluated.

During the diagnostic evaluation and a subsequent inspection of the Operator Training Program, problems were noted with missed training or failure to maintain watchstanding proficiency. The root cause of these problems was a lack of management oversight and insufficient procedural controls.

All training and watchstanding records were reviewed to determine the extent of the problems. Operators who were delinquent in watchstanding proficiency were restricted from licensed duties until the required watches under instruction were completed. All training attendance deficiencies were identified and missed training was completed by the end of 1991. An Operations Department procedure has been implemented to control the maintenance, deactivation, and reactivation of licenses. Procedural controls for tracking and reporting operator attendance and absence have been strengthened.

Training attendance and absences are tracked and reported on a weekly basis, with updates at the end of each training cycle. Attendance is tracked and reported through use of an automated database. Many of the training attendance deficiencies were for staff licenses who were not assigned to a shift and were thus not scheduled to attend training at a particular time. Staff license training in the simulator is now conducted in separate sessions for which the individuals' attendance is scheduled. As of June 22, no Licensed Operator Training attendance deficiencies exist.

RADIOLOGICAL CONTROLS

The Power Authority agrees with the Radiological Control section of the SALP Report. Radiological controls will continue to improve using the plan put in place in 1991. The original Radiological Upgrade Program, the Nuclear Generation Business Plan, and the Rad Health and Chemistry Assessment Program have been, and will continue to be included in improving station performance. The Power Authority's radiological oversight and assistance program is managed out of the White Plains Office and uses radiological personnel from Headquarters, IP-3, and JAF, as well as experienced professionals from outside the Authority.

The existing evaluation process for radiological performance has been enhanced by root cause training for radiological personnel using the site corrective action process to focus management attention to this area and performance trending and analysis. The radiological incident reporting process continues to identify program improvement opportunities.

The Power Authority has been encouraged by improvements in worker and technician performance in the radiological area. This improved performance is attributed to the Training Department's Enhanced Radiological Workers Training Program, the Operations, Maintenance, and Instrument and Control Department's effective use of the ALARA Planners, the worker feedback mechanisms provided by the ALARA Suggestion Program, and tailgate training sessions. These programs continue to be monitored for further improvement.

The station ALARA program has been improved with the Engineering Department's use of the Design Review Manual. The manual was developed by the Rad Health and Chemistry group using successful industry experience as a model. Modifications are being developed today that incorporate features that will reduce exposures during plant operations.

The Cobalt Reduction Program has been updated; source term reduction has been included on the Headquarters/Site Working groups routine agenda. The ALARA Planning role has been expanded by assigning an ALARA Planner to the scheduling group. This provides an opportunity to schedule ALARA initiatives to a particular system window in addition to those initiatives assigned on a job specific basis. Programs used at other utilities are being reviewed for additional opportunities to improve.

The Chemistry Group continues to perform effective support of station operations. The Headquarters/Site Chemistry Working group effectively coordinates the chemistry and effluent control program improvements by coordinating activities of JAF and Headquarters Office personnel as well as external support. The Chemistry Working Group has been used as the model for the Radiological Working Group which started meeting in May of this year. There is every reason to expect the same success with the Radiological Working Group that has been experienced with the Chemistry Working Group.

The Chemistry group has done extensive work with the Electric Power Research Institute for using the Enhanced Zinc Injection process to further reduce plant radiation level for maintenance activities.

The Radiological Environmental Services (RES) Department's report format was changed to require that changes to the Process Control Program (PCP) be included with the semi-annual effluent report. This requirement was added to AP-1.10, Process Control Program.

Power Authority Procedures (RPP-15, RPP-17, and RPP-18) mentioned in the Process Control Program are now Plant Operations Review Committee (PORC) approved documents. Contractor procedures addressed in the Process Control Program are now all PORC approved.

A formal upgrade of the Radwaste Systems Training Program will be in place prior to Cycle 7 of the current year. The Radwaste Shipping and Handling Training Program is still under development. It will be completed and implemented by October 19, 1992.

The Power Authority appreciates the recognition of improvements in radiological controls and will continue to aggressively pursue further improvements to achieve superior performance at FitzPatrick.

MAINTENANCE/SURVEILLANCE

The Power Authority agrees with the SALP Report in the area of Maintenance/Surveillance, and are encouraged an improving trend is noted.

In the area of Technical Support of Maintenance, staffing has been increased so that we may better assess equipment failures and improve root cause analysis of those failures.

To improve Root Cause Analysis an Operations Review Group has been established to track the review and corrective actions for in-house events. In addition an Operating Experience Improvement Plan has been developed to improve necessary initiatives resulting from industry events.

A Maintenance Engineering Staff was established, primarily to review equipment failures so that actions will be taken to prevent recurrent plant deficiencies. Improved training in root cause analysis has been provided, especially in assessing causes of equipment failures.

In order to improve our Preventative Maintenance Program (PMP), the staff devoted to expanding the scope of our PM program has been increased (tripled). Items to be added include air operated valves, solenoid valves, fans, compressors, heat exchangers, important manual valves, and Instrument & Control equipment.

Incorporating feedback from corrective maintenance activities into the PM program is a primary responsibility of the previously mentioned Maintenance Engineering Staff.

The Power Authority is committed to improving maintenance planning activities, which will help us reduce our backlog of work. During the 1992 Refuel Outage we have centralized our scheduling function. This has improved coordination of work groups. Similarly, we are working on centralizing our work planning [illegible]ion to improve work package development so that planned wo[illegible]p ckages are ready to work and can be efficiently accomplished.

During this outage many plant equipment improvements have been made, including the overhaul of all remaining safety related motor operated valve (MOV) operators and many non-safety MOVs.

A plan to reduce oil leaks was developed and has been worked throughout the outage.

Controls of combustible material in the plant has been improved and monitoring increased to ensure these controls are maintained.

The Power Authority has begun a long term plant preservation program, as you noted.

A procedure (PSO-60) exists which defines the current Plant Labeling Program. The present goal is to label plant components such as pumps, motors, valves, control and electrical panels, transformers, breakers, instruments, instrument racks, and other major equipment in accordance with standards recommended by the Institute for Nuclear Power Operation by the end of 1992. This would involve about 35,000 labels.

Currently, a little more than 10,000 labels have been purchased or manufactured on site and distributed for installation. About 6,000 labels have been installed.

The present emphasis is on labeling components in normally inaccessible areas, such as drywell, steam tunnel, and various condenser and heater bay areas.

A contracted organization with labeling experience has been selected to assist in the labeling effort.

The Power Authority agrees that the Inservice Testing Program continues to function well. A critical input to the success of the program is a coordinated effort of the Operations and Technical Services Departments. The overall strength of the Program also reflects the quality of the Authority-initiated independent assessment performed in 1990.

Additional program enhancements have been identified, since this self-assessment, which are targeted to:

1. <u>Improve Program Consistency and Effectiveness</u>

   - Develop an IST Basis Document
   - ECCS Pump Curve Verification
   - Surveillance Test Bases Calculation/Matrix
   - Addition of Non-ASME Components to the Performance Engineering's Planned Component and System Monitoring Program

2. <u>Simplify Work Process to Improve Productivity for Both Technical Services and Operations Departments</u>

   - Develop a Post-Work Test Matrix for IST Components for the Work Center
   - Power-Operated Valve Study Implementation (Reduce Procedure Changes for Operations)
   - IST Monitoring Point Labeling Enhancement (More Clearly Identify all IST Vibration Points for Surveillance Testing)

As observed, the overall quality of our procedures continues to improve, as well as our practices regarding procedure use and adherence. These are continuing areas of emphasis with our maintenance personnel.

The Power Authority agrees with the positive comments regarding the overall knowledge, experience, and professionalism of our maintenance personnel and involvement of our First-Line Supervisors.

The improvements described are designed to provide these professionals with the program support that's needed to continue to improve Maintenance results at James A. FitzPatrick.

In the area of surveillance, the Power Authority acknowledges the NRC's recognition that the surveillance testing program contributed to the safe operation of the plant during the assessment period. It is realized that continued improvement is necessary in this area.

The Instrument & Control Department is committed to improving procedures and making necessary changes when they are identified. Approximately 300 procedures have been improved in the Instrument & Control Department during 1992. These changes include: developing new procedures, correcting procedures, procedure enhancements, revisions, and human factors improvements. A Senior Technician and an engineer review new procedures and revisions prior to issuance. Many of the procedure enhancements are being identified by technicians during pre-job planning.

The Instrument & Control Department and Corporate Instrument & Control Engineering are developing a setpoint/tolerance control program. The foundation for this program is the 24 month refuel cycle project. Calculations for 60 safety-related instrument loops have been completed and Instrument & Control procedures are being updated as necessary.

An upgraded periodic surveillance testing program is being implemented to response time test the necessary system channels. This testing is in accordance with the proposed Technical Specification change recently submitted to the NRC.

EMERGENCY PREPAREDNESS

The James A. FitzPatrick Nuclear Power Plant has and will continue to maintain a superior and effective Emergency Preparedness program. Management's strong involvement both onsite and offsite, especially with Oswego County officials, will be unabated. Program implementation and development will continue with strong leadership and clearly directed by Authority management.

Improvements are planned for this program that include use of the simulator, upgraded EALs, additional training, and Joint News Center changes. These improvements are being done both to improve FitzPatrick's program and to respond to concerns addressed by the NRC.

The Power Authority reaffirms its commitment to improve and to maintain a superior and effective program.

SECURITY

The Power Authority appreciates the NRC recognition of the Security Program's continued superior performance. The Authority has strived to provide the best possible Nuclear Security to James A. FitzPatrick, as well as the general public.

The Authority agrees with the comments regarding the Security Department's excellent enforcement history, aggressive Fitness for Duty Program, close cooperation with outside agencies, excellent Maintenance and Instrument and Control support, dedicated Security personnel who firmly believe in the team concept, and pride in our organization.

The Security Department maintains a pro-active attitude in identifying small problems and solving them before they become significant.

The department self-assessment program, has enabled us to take a critical look at ourselves and to find ways to continually improve our performance.

The NRC's recognition of our efforts in improving training, access control, equipment maintenance and assessment aids is appreciated.

The Power Authority and the Security Department are totally committed to improving program performance.

ENGINEERING/TECHNICAL SUPPORT

The Power Authority recognizes the need to improve performance in the engineering and technical support area. The desirability of performing an independent assessment of engineering was identified prior to the Diagnostic Evaluation Team and incorporated in Engineering Improvement Plans, i.e. at the time of the reorganization of the Technical Services Department and the creation of the Site Engineering Department. These improvement plans represented a consensus of the Technical Services Department, the Site Engineering Department, and the White Plains Nuclear Engineering Division.

The physical reorganization of the Technical Services Department and the creation of the Site Engineering Department became effective on the 8th of August 1991. As with any reorganization of that magnitude, a finite time period to fully complete the reorganization is required.

The SALP report notes concerns evident in the resolution of the (# classification for the Safety Pump Room ventilation fans. The fans were returned to Category 1 status in 1991 based on engineering review of the original plant design.

The Power Authority concurs with the SALP report that a number of the high-profile technical issues currently being addressed date back to the original plant design. The Power Authority also agrees that a portion of today's technical issues should have been addressed and resolved in a more timely manner through proper implementation of a quality Operating Experience Review Program. A comprehensive program plan has been developed and is being implemented to upgrade the JAF industry Operating Experience Program. The plan, which includes both short and long term aspects, will insure timely and effective use of industry experience, as well as management oversight and awareness of the effectiveness of the Program. Key elements of the Program are as follows:

- elimination of backlog of Operating Experience documents
- review of previously dispositioned high priority items
- identification of departmental points of contact
- elevation of overdue reviews and corrective actions to higher levels of management (similar to the AQCR process)

A thorough performance-based audit of the Operating Experience Program (by an independent contractor working with the JAF Quality Assurance Department) was initiated. The findings of that audit have been factored into the overall Operating Experience Improvement Plan.

An independent assessment of our Appendix J Program was initiated. Based on past success with the IST Program, it is our belief the on-going independent assessment will result in the enhancement of the Appendix J Program.

This Appendix J self-initiated assessment will be followed by development of a program basis document. This basis document will provide our staff with a tool to ensure continued compliance with the regulation.

Similar efforts are also being undertaken to improve usage and effectiveness of our NPRDS Program. A self-assessment has also been performed and an action plan is being formulated to improve program usage, timeliness and increase productivity. This work encompassed corporate responsibilities in this area.

Engineering has also initiated "Organizational and Programmatic Root Cause" training for key managers. Senior management (i.e. EVP, VP's and Resident Manager) has already attended a seminar on this subject given by Dr. Chong Chiu. Similar training on this subject was just completed for selected JAF supervisors.

The SALP Report on Engineering/Technical Support covers many areas and organizations that provide support of the James A. FitzPatrick Plant. The last 12 to 18 months has been a very difficult and challenging time for engineering. The communications between engineering organizations at James A. FitzPatrick (JAF) and White Plains Office (WPO) have greatly improved and further improvements are underway. The effort by engineering to support both originally planned work and emergent work during this time frame has been and continues to be enormous.

As discussed in the SALP Report, communication and coordination between the various Engineering and Technical Support groups shows weaknesses. Provided below are the initiatives undertaken to improve the communications and coordination of the engineering and technical support of JAF.

An engineering meeting is held on a monthly basis to discuss engineering issues pertaining to JAF. Representatives of Corporate Engineering, Technical Support and Licensing groups are present at the meeting. The format of this meeting is being changed to ensure that all engineering inputs to licensing issues are discussed. In addition to the engineering meeting, twice a

week the engineering supervisors from the site and corporate office discuss (via telecons), major issues which affect JAF and coordinate the actions of each organization. This has resulted in more timely resolutions of problems and improved cooperation between the groups.

A description of the project team concept for modifications has been issued and reviewed and is in the process of being formatted into a Nuclear Engineering Administrative Procedure. The use of project teams has been very successful in the review and approval of the emergent modifications in the area of fire protection and other modifications required for startup.

The refinement of the definition of engineering and technical support responsibilities has been initiated and a Nuclear Administrative procedure has been drafted. A working group has been formed to input specifics into the responsibilities of the various organizations. This group has met numerous times. The output of this effort will be clearly defined roles for organizations providing technical support to FitzPatrick.

The Power Authority has commenced an assessment of the corporate engineering organizations and the interface with engineering organizations at the site. This effort will build on the completed assessment of the Technical Services Department.

Significant progress in Engineering has been made in the control of the existing engineering backlog. Additional resources (dedication of NYPA staff with contractors and Architect/ Engineers) have been applied to reducing the backlog. An Architect/Engineer has been contracted to reduce the Design Equivalent Modification (DEM) backlog to a level that is manageable by the permanent NYPA staff. A plan and schedule has been developed and work is progressing very well. The effort to close out modifications is ahead of schedule and proceeding in an excellent manner. We have also dedicated personnel to reduce the temporary modifications.

For the remaining engineering backlog items and other engineering work tasks (work requests, document change requests, Operating Experience Reports, major and minor modifications), a monthly report is issued to track the outstanding items and the trend.

Increases in the staffing levels of both corporate and site engineering groups, previously approved by Authority management, have been expedited and in many cases already implemented.

The staffing increases have allowed the strengthening of expertise in specialized areas including electrical analysis, seismic analysis, HVAC, fire protection and Appendix R. A new group has been added to the Corporate Engineering organization

which has programmatic responsibility for fire protection and Appendix R .

An independent assessment of the drawing control process was performed. Based on this report, improvements to the drawing process will be implemented.

To assist in the implementation of the modifications required contracts have been established with five Architect/Engineers (A/E) and increased support from the original design A/E, Stone & Webster. This allows our Nuclear Engineering and Design (NED) staff to concentrate on engineering issues including development of conceptual designs for modifications. To support the review of the modifications being prepared by the A/E's, we have provided additional space and established project teams to review the mods. This process has improved the quality and timeliness of reviews.

Nuclear Engineering and Design has been given the responsibility of reviewing and accepting on behalf of the Authority, design documents generated by the outside organizations. This ensures the work generated by others meets Authority standards and is consistent with the design basis of the plants.

Another area that is being improved to supply management support and overview is the implementation of the prioritization process for engineering work. A process for review of work has been established and a working group has been meeting approximately twice a week for the last six months. This group, in addition to prioritizing the backlog, is working on the prioritizing of newly identified issues. The prioritization group consists of representatives from various site departments including Site Engineering and Technical Services.

The Training Departments at both James A. FitzPatrick and White Plains Office have developed training requirements for engineering support personnel in accordance with Institute of Nuclear Power Operations guidelines. This will improve the qualifications of both James A. FitzPatrick and White Plains Office engineering staff.

A planning group has been established with Nuclear Engineering consisting of a NYPA Planning Manager and four planners (presently contractors). This group has the responsibility of planning and scheduling engineering activities assigned to the Nuclear Engineering Division and ensuring integrated and coordinated support to both Nuclear Facilities.

SAFETY ASSESSMENT/QUALITY VERIFICATION

The Power Authority has implemented, and is improving, a self assessment process. The process includes management observations of ongoing work, training, and plant tours. In addition, individual departments have or are implementing self assessment procedures.

An integrated assessment program has been developed and is being implemented by the White Plains Operations and Maintenance Department.

The Operations Review Group has been established to review plant internal deviations, conditions, and events. Each morning the Operation Review Group reviews deficiencies from the various reporting systems, determines significance, and present findings to the plant leadership team (i.e. Resident Manager and General Managers). This assures the plant leadership team is aware of problems and issues so that resources can be appropriately directed.

The Operational Review Group oversees and assists in critiques and root cause evaluations. The group reviews proposed corrective action to assess effectiveness. Corrective actions are entered in the action tracking system and tracked to completion.

Causal factors are being tracked, and will be evaluated for adverse trends and program related problems. NYPA requested, and received an assist visit from the Institute of Nuclear Power Operations to evaluate this program. Recommendations from that visit are being incorporated.

The Power Authority is committed to improve the review of and response to operating experience, both internal by the Operational Review Group, and external by Technical Services (as described earlier).

The Power Authority agrees with the NRC observations concerning licensing. The Authority is committed to achieving a superior level of performance in this area.

At the beginning of the SALP period, there were seven licensing engineering positions in the White Plains Office which were dedicated to the FitzPatrick Plant. Five new licensing engineer positions have been approved and one has been filled. Of the five new positions, two will be at the supervisory engineer level. The addition of these supervisory positions will reduce the Director's over-involvement in day-to-day activities. This

will allow him to spend more time on improving licensing activities and processes. It will also help to make his review of submittals to the NRC more independent.

In addition to these new positions, two interns have been added to the staff and an additional intern may be added in the near future. Four full time contract engineers have been added to the staff. Three of these engineers are dedicated to the technical specification backlog. One is dedicated to fire protection issues.

The total licensing staff for the FitzPatrick Plant now includes eight permanent Power Authority engineers and four contractors. Four permanent vacancies will be filled in the near term with contractors. This will bring the total number of licensing engineers to sixteen. In addition, the staffing includes the Director, Nuclear Licensing - BWR and interns.

The professional qualifications of the nuclear licensing staff are also being improved. The licensing staff now includes one senior engineer who is a former SRO at the Fitzpatrick Plant, one engineer who is SRO certified at FitzPatrick, and one engineer who recently completed Reactor Operator Systems Training. Three of the eight permanent Authority engineers now have systems training equivalent to that required for an operators license. In addition, the Director, Nuclear Licensing - BWR was SRO certified at Fitzpatrick.

Additional training is being given to the licensing staff. One licensing engineer will attend a two week training course on FitzPatrick administrative procedures and work control processes at the plant. In addition, this engineer plus three others will attend a four week systems training course at the FitzPatrick Plant in July and August of this year.

The Authority is taking several actions to improve the quality of licensing documents transmitted to the NRC. First, a root cause evaluation will be performed of licensing submittals which were sent to the NRC and which contained inaccurate information. This root cause will be performed independently by a contractor or the Authority's Quality Assurance Department. This root cause evaluation will identify the underlying reasons for the inaccuracies and determine what are the appropriate actions that need to be taken to improve licensing submittals.

The Authority is also taking action in related areas which will improve the quality of our submittals. First, the additional licensing staffing will reduce the workload of the individual engineers and thereby improve the quality of their work. The Authority is also increasing the plant specific training being given to the licensing engineers.

The Authority is making numerous improvements in the Engineering Department. These efforts will improve the overall quality of engineering work and will also improve the quality of engineering done in support of licensing submittals.

The Authority is also improving the concurrence cycle used to review and approve submittals to the NRC. The list of reviewers is being focused on those individuals who have expertise that they can bring to bear on the subject, or who have a stake in the commitments being made to the NRC. The list of reviewers will be shortened if possible. Individual responsibilities for review and verification of information being provided to the NRC will be designated. Reviews will be conducted in parallel to give the reviewers more time to evaluate the document. Standards will be established for documentation required to support input into licensing submittals. The Authority will also check with other utilities to see how the concurrence cycle may be improved. Lessons learned from this effort will also be included in revisions to the concurrence cycle. When this effort is complete, the formal procedure for the concurrence cycle will be revised and the appropriate personnel will receive training.

Additional changes are being considered for the onsite concurrence cycle for licensing submittals developed in the headquarters office. The Authority also plans to have complex proposed technical specification changes presented to PORC by the licensing engineer who prepares them. This will reduce the possibility of misunderstandings and miscommunications which could effect the quality of the proposed technical specification change.

Nuclear Licensing is currently developing a mission statement. Although not complete, the mission statement formally recognizes Nuclear Licensing's responsibility to ensure that information provided by the Authority to the NRC is complete and accurate. Performance plans for Licensing engineers will be updated to contain the key elements of the mission statement when it is completed.

The Authority is adding a verification function to the licensing section, which will be performed by one licensing engineer on a full time basis. This engineer will be responsible for reviewing selected licensing submittals and performing the following tasks:

1. Verifying the accuracy and quality of the information provided; and,

2. Verifying that the commitments are satisfied.

A working group has been established to better define the role of engineering and technical support. The Director, Nuclear Licensing - BWR is a member of this working group.

Licensing is improving communications with the plant and with engineering. One of the new licensing engineer positions will be permanently stationed at the FitzPatrick Plant. This engineer will report to the Director, Nuclear Licensing - BWR in the White Plains Office and will attend daily meetings, planning meetings, and key staff meetings at the plant on a regular basis. He will keep the Director, Nuclear Licensing - BWR apprised of emergent issues as they arise. In addition, headquarters licensing engineers may rotate up to the FitzPatrick plant in one or two week intervals. Licensing is participating on an active basis in project teams created in the engineering division.

Licensing is also represented at the monthly engineering meetings which take place at the FitzPatrick Plant. Monthly licensing meetings will be part of the monthly engineering meeting or a separate meeting scheduled the same day. Licensing will also be participating in the twice weekly conference calls between the engineering organizations at FitzPatrick and the White Plains Office.

In the past, a weekly directors meeting was held in the White Plains Office. This meeting will be reinstituted, but on a more formal basis to make it more productive.

Licensing also attends the monthly Project Meeting held at the FitzPatrick Plant and the White Plains Office Morning Meeting. This meeting is used to highlight the daily or weekly support needed by licensing from other parts of the organization.

Licensing has completed a review of all outstanding licensing issues and has identified those whose resolution is required prior to plant startup. In addition, all outstanding proposed technical specification changes have been formally reviewed and prioritized. Several proposed technical specification changes have been identified as required prior to startup. The NRC has been notified of these.

Formal guidance has been provided to the licensing staff concerning the need to promptly review and resolve licensing issues. All licensing staff have been required to read this guidance and it has been discussed at a licensing staff meeting.

A new Action Item Tracking System has been developed for use in the Nuclear Generation Department. Nuclear licensing will assume responsibility for this system and use it to assure timely resolution of licensing issues. In addition, licensing will develop a computerized commitment tracking system to be used for

the recording and tracking of permanent commitments to the NRC and other outside organizations. The combination of these two systems will improve licensing's ability to identify and resolve issues in a timely manner.

The Quality Assurance Department has made the commitment to continuous improvement. Ongoing improvements include performance monitoring in all SALP functional areas through performance based audits and surveillance.

QA of engineering programs has been completed by industry authorities.

There has been increased performance based surveillances of maintenance activities and surveillance testing.

Enhanced operations monitoring is being performed by a former FitzPatrick Operator (audits and surveillances). Also, a Quality Assurance Engineer has been attending Senior Reactor Operator training for the past year. Upon returning from training, this person will develop and implement a comprehensive plant operations monitoring program.

The use of an industry authority for assessing radiological controls has been very effective and continues. A Senior Quality Assurance Engineer with extensive supervisory experience in radiation protection and chemistry has been added to the Quality Assurance Department. This person will develop and implement a comprehensive radiological controls monitoring program.

Monitoring the performance of Emergency Preparedness and Security continues through surveillance and audits. Industry authorities are used to thoroughly evaluate and further enhance these already superior areas.

The Power Authority commitment to identifying and resolving deficiencies is clear. The implementation of the Business Plan, Results Improvement Program, Departmental Self Assessments, Nuclear Generation Department Action Item Tracking system and the FitzPatrick Operations Review Group were all initiated late in the SALP period.

Training of plant personnel in root cause analysis, creation of the Operations Review Group, and plant leadership team daily review of emerging issues provide a rigorous review of issues and more effective corrective actions to preclude recurrence.

There has been improvement in the process for escalating issues to appropriate levels of management by the Quality Assurance Department. Management support and dedication of resources to identify and resolve deficiencies and more in depth technical

review by Quality Assurance has resulted in more effective and timely corrective action.

Management involvement in the corrective action process has improved. The Senior Vice President of Appraisals and Compliance Services and the Executive Vice President of Nuclear Generation meet monthly to discuss corrective action. Weekly Management meetings of the Resident Manager, General Managers, and Department Heads with the Quality Assurance Manager are held to discuss the status of corrective actions. Bi-weekly reports to management indicating the status of correcting action are distributed.

The improvements evident to the NRC late in the assessment period are indicative of Power Authority commitment to improve overall performance.