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JERSEY CENTRAL POWER AND LIGHT COMPANY (OYSTER CREEK) - DOCKET
NO. 50-219

Enclosed is the report of our special inspection of management systems employed by the subject licensee to assure the safe operation of their Oyster Creek facility and to assure compliance with their operating license. The inspection was conducted on October 13-16, 28 and 29, and November 5 and 6, 1970.

In our view this was an important inspection - one which was unique in our program with regard to scope and thrust. Furthermore, this inspection was sufficiently revealing to permit an overview of this licensee to a degree heretofore unavailable. It was also exciting to conduct.

What was learned of Jersey Central (JC) and their operation of Oyster Creek follows:

1. There has been a basic change for the better in management's attitude;
2. Organizational changes have been implemented that are reflective of their current thinking and are responsive to Compliance's previously identified concerns;
3. As a result of the above, management is now more actively involved and is in a position to act from a knowledgeable base;
4. They are genuinely interested in improving their image with regulatory and are desirous of being responsive to Compliance's concerns.

In summary, JC has come a long way since the early days and, although there are still shortcomings evident, they have definitely turned the corner with regard to attitude and performance. Of course, only time will tell of the lasting effectiveness. The principal shortcomings identified were:

1. Performance of GORB, including specifically the audit function;
2. Performance of PORC;
3. Administration of the surveillance testing program;
4. Administration of the maintenance group operation;
5. JC's program for benefiting from experiences at other facilities;
6. The current limited involvement of GPU (technical support).

At the time of this inspection, we had the impression that definite improvements will be seen with regard to items 1, 2, 3, and 5. Item 4 may require additional special attention on our part. Item 6 is influenced in part by the current GE involvement. It remains to be seen what will happen when they are out of the picture. In any case, a followup on all of these matters will be provided by the assigned inspector.

With regard to our evaluation of individuals, the Sims and Finrock moves definitely strengthened the organization - both persons impressed us as being intent on and capable of doing a good job (speaking from Compliance's point of view). Hirst came out looking the worst. With regard to his role as Chairman of GORB, he came across as being mostly "BS" and an amateur at that. The assignment of Hetrick as Vice-Chairman of GORB partially compensates. Verrochi left us a little cold. At the site, Ross and Carroll are the main strengths. Each left us with the impression of having a genuine interest in operating the plant safely and within regulatory requirements. McCluskey is involved more in the operation of the plant than before, but is still heavily reliant upon his staff (Ross primarily) for technical guidance. Riggle is just not on top of his job and is in need of assistance, at least until he can get organized.

A general observation regarding the plant organization - they have had a turnover of personnel in all key positions except that of station superintendent. Those on the present staff for the most part have their sights set on the right objectives. What they need most now is a period of stability in personnel so as to be able to realize the benefits of continuity of coverage.

With regard to the incorporation of this type of inspection in our overall program, it is our recommendation that this be done. Furthermore, it may be appropriate to consider strengthening or elaborating

the current regulatory requirements relating to contents of FSAR's [10 CFR 50.34(b)(6)(1.i.)¹]. The details as to the timing and frequency of inspection, in conjunction with any particular utility (one or more nuclear plants at one or more sites), need to be worked out; however, consideration should be given the following:

1. Once prior to the issuance of the initial operating license;
2. Again at a point about one year into plant operation;
3. Periodically thereafter at 3 to 5 year intervals;
4. Anytime there is a major reorganization within the utility.

It is important to recognize that there are some "must" ingredients that go into the planning and conduct of an inspection of this type. One can very easily get a false picture without them. They include the following:

1. Utilization of experienced inspectors who are knowledgeable of the performance history of the organization being inspected, including the individuals therein.
2. Proper preparation both of individuals and the team. This means more than that which can be accomplished on the plane en route. As a minimum, this suggests several full days of preparation for individuals and one day for a team get-together.
3. Maintaining sight of the inspection objectives throughout the conduct of the inspection;
4. Probing of each area being inspected from all conceivable angles. Working in pairs in certain areas can be quite helpful;
5. Asking the same questions relating to any one subject of as many persons as possible having involvement with that subject;
6. Listening very carefully to what is being said and understanding what you are hearing. Oftentimes it is the composite view that tells the story;
7. Being prepared with and using specific examples to test the various systems being inspected. The more this can be employed, the better the results;
8. Recognizing at the outset that many of the areas to be inspected are subjective in nature and that there will be a need to maintain perspective with regard to the observations made;

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9. The allotment of sufficient time in which to conduct the inspection and allowance for the possible need for additional time.

We are prepared and would be pleased to discuss the above in more detail should you desire.

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