

#### **GPU Nuclear**

100 Interpace Parkway Parsippany, New Jersey 07054 201 263-6500 TELEX 136-482 Writer's Direct Dial Number

JEH0

November 3, 1992 C321-92-2306

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

Dear Sir:

Subject: Dyster Creek Nuclear Generating Station Docket 50-219 Response to Systematic Assessment of Licensee Performance (SALP Report No. 91-99)

We have reviewed the initial SALP Report in detail and are pleased with the NRC's recognition of the effectiveness of our programs as evidenced by the large number of strengths and positive comments identified throughout the functional areas. Programs that we have put in place recently are gaining momentum and are responsible for the significant improvement and 'erall station performance that was identified in the report. As discussed during the SALP meeting on October 13, 1992, we are focusing on the areas where improvements can be made. Specific responses are provided in the attachment.

If you should have any questions concerning this response, please contact Brenda DeMerchant, Nyster Creek Licensing Engineer at (609) 971-4642.

Very truly yours.

P.R. Clark

P.R. Clark President

PC/BDEM:jc Attachment cc: Administrator, Region 1 Senior NRC Resident Inspector Oyster Creek NRC Project Manager

> 9211090184 921103 PDR ADOCK 05000219 0 PDR

> > GPU Nuclear is a part of the General Public Utilities System

## ATTACHMENT 1

# OYSTER CREEK NUCLEAR GENERATING STATION

## SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

# LICENSEE RESPONSE

#### OPERATIONS

6.18.16.

The station is having its best performance since entering commercial service in 1969. Our Unit Capacity Factor is 92.7% year to date, collective radiation exposure currently is the lowest since 1970, and our Industrial Safety Record is not only the best in the history of the plant, but Oyster Creek has set the record for the corporation, having recently achieved 2 million safe work hours without a lost time injury.

GPU Nuclear recognizes the importance of minimizing operator errors. We have taken action to reduce the number of operator errors. Some of these actions include the Operator Concorn Program, training on individual and crew selfchecking, reducing unnece. Iry challenges to operators, and numerous meetings between management and the operating crows to ensure that operators understand management's expectations and standards.

The results of these actions are evident by the lower number of operator error incidents. During the previous SALP period from March 16, 1990 to April 15, 1991, the SALP report indicated that the number of operator errors was low, only four LER's were attributed to operator error. In addition, an average of 3.8 deviation reports per month were somehow related to human performance.

During the most recent SALP period, there were only two LER's attributed to operator error and an average of 1.8 deviation reports per month that were attributed to human performance. These statistics indicate a positive trend in the area of operator performance. We will continue our efforts to further reduce the number of operator errors by reinforcing and continuing our existing programs.

#### RADIOLOGICAL CONTROLS

We appreciate the recognition given to the continued improvement in the Radiological Controls program. A strong commitment exists at every level to continue efforts to improve this program through source term reduction, improved material condition of the plant, training and qualification of our professional staff and the general work force, reactor water chemistry control, radioactive waste minimization, plant area contamination control, and effluent monitoring and control. With regard to liquid effluents, we intend to maintain our policy of "zero" discharges.

With regard to the minor weaknesses noted in the training of Radiological Control Field Operations Technicians related to the statistical criteria for quality control of count room instrumentation, this topic was covered with all Field Operations Technicians in Cycle 92-4 of their training program. We consider this minor weakness corrected and this item closed. In response to a previously documented concern regarding individuals performing audits of radwaste and transportation activities who had been trained several years previously, but had not received any formal retraining in those areas, four individuals in the QA department at Oyster Creek have received formal training in radioactive waste packaging, transportation and disposal in the past two years. Periodic retraining for QA personnel will be considered.

### MAINTENANCE/SURVEILLANCE

We believe that substantial progress has been made in the development of our Preventive Maintenance (PM) Program. A study of corrective maintenance activities does indicate that we are less reactive than one year ago. The number of high priority corrective maintenance work requests submitted has decreased by 30% from August 1991 to September 1992. From September 1, 1991 to September 30, 1992, we have added 258 preventive maintenance tasks to the program and identified an additional 206 tasks which are in various stages of planning. This represents a 23.5% increase in the number of tasks in the PM Program. Critical component failures during this SALP period dropped to 310 as opposed to 437 during the previous SALP period.

GPU Nuclear is in the process of further strengthening our efforts by assigning a dedicated work force consisting of a manager and eight personnel to continue with the upgrade of the PM Program. This group reports to the Plant Maintenance Director. Component Maintenance Teams will concentrate on technical development of PM tasks including a stronger focus on industry/NRC experience as well as allowing more time for research of our own plant history and experience.

Recognizing that material condition management extends beyond the roles assigned to the Component Maintenance Teams, the System Engineers within the Technical Functions Division have been assigned responsibility for the overall material condition of their assigned structures systems and components.

GPU Nuclear remains committed to long-term material condition improvements at Oyster Creek. The Preventive Maintenance Program will contribute significantly to this effort. The Component Maintenance Teams will proceed with their work through the upcoming refueling outage in an effort to recognize program or material improvements as we enter the next operating cycle.

With regard to work practices, we recognize there are opportunities for us to improve in this area. We have taken aggressive actions to address both examples cited in the report. In addition, we had initiated a Maintenance Observation Program in August 1991 and have completed approximately 2000 field observations to date.

In July of 1992, an action plan was developed to improve work practices. This plan is being actively implemented and is on schedule.

1

MAINTENANCE/SURVEILLANCE (Cont'd)

As noted in the SALP report, PM tasks were discontinued on Security search equipment without the knowledge of the Security department. However, the PM tasks eliminated were for equipment that had been replaced with equipment which was more reliable and required minimal maintenance.

The substantial amount of maintenance on the vital area door occurring late in the period was later determined to be associated with a design deficiency. After the design deficiency was corrected the number of maintenance activities decreased significantly.

Maintenance has been working closely with the Security department to upgrade maintenance support provided to Security.

#### EMERGENCY PREPAREDNESS

GPUN is pleased that the NRC has recognized favorably Dyster Creek's commitment to the Emergency Preparedness Program at every level.

This SALP period was particularly challenging at Oyster Creek in that four events resulted in actual implementation of the emergency plan. We were gratified that the cooperation, dedication and expertise we knew were characteristic of both onsite and offsite members of the Emergency Response Organization was effectively demonstrated and appropriately recognized.

### ENGINEERING AND TECHNICAL SUPPORT

We note that the NRC recognizes our continued efforts to improve effectiveness of engineering and technical support and that there are far more positive than negative indicators of performance. In our view, this demonstrates success in pursuit of excellence in this area.

We believe that continued improvement in the quality and timeliness of modification designs and our strong focus on project support on site during the construction and test phases of modifications led to a major success during the 13R refueling outage and that engineering support will be strengthened and improved for the 14R outage. Essentially all of the 14R outage modifications have been designed using in-house personnel.

## ENGINEERING AND TECHNICAL SUPPORT (Conited)

There is also a strong sense of ownership and support to resolve several lingering problems with the Service Water Radiation Monitor (SWRM) and Hydrogen Water Chemistry systems. In the case of SWRM, problems with spiking and noise have been resolved by relocating sensitive electronics, and system fouling and corrosion problems have been solved by making material changes to more corrosive resistant materials and by increasing plant sensitivity to maintaining the chlorine injection system in service. The remaining problem causing low system flow is now understood and will be resolved during 14R.

In the case of Hydrogen Water Chemistry, operating time while mitigated has been improved with the plant at power. We continue to work on the flow measurement/control problem which does not impact our ability to mitigate, but does make accurate determination of injection flow more difficult. We have utilized intrumentation from several different vendors and have shared industry experience with other utilities utilizing hydrogen water chemistry in an attempt to solve this problem. Our efforts will continue until the problem is solved or until we reach the conclusion that exact flow measurement is not realistically achievable for this process.

Continued improvements in our root cause assessment effectiveness have resulted in the resolution of several long-standing plant problems. One such example is the Core Spray System water hammer problem. Careful analysis of system response and consideration of potential root causes led to the core spray booster pump bypass valve as the root cause. Following valve repair, extensive system dynamic response testing and analysis confirmed this assessment to be correct.

In addition to improving the root cause process, as noted by the NRC, we are continuing to improve our training as witnessed by the recent, extensive three-day course provided (to approximately 40 personnel - mostly engineers) by the industry's recognized leader in root cause analysis.

The good results of the aggressive system engineer performance, which the NRC recognizes, is another area in which we are actively pursuing the expansion of a now proven good program. The implementation of the full-time dedicated system engineer group will allow us to obtain the same excellent results throughout the plant that we now see in about a dozen system.

With the focus of accountability for long-term system planning and problem resolution on the system engineer, we expect additional long-standing system problems to be effectively resolved and overall improved system performance.

8 18 1 1

The assignment of more engineering support personnel on site and improving communication between site and corporate engineers also contributes to the continued improvement of engineering support effectiveness and efficiency. The demonstration over the next few years of our ability to not only maintain our excellent performance in the Engineering and Technical Support area but to further improve upon it will clearly establish us as a leader in the industry. We are committed to that goal and believe that we have the people and programs to accomplish it.

#### SECURITY

As discussed with you during the SALP meeting, there appears to be some confusion concerning the comment "missed training opportunities...still appear to be present."

The same concern appeared in the last SALP. At that time a mutual decision between Training and Security to not have Training instructors participate in on-shift Security drills was questioned. The decision was based on our desire to have a greater on-shift training ownership by site Security sergeants. NRC's concern in the last SALP was focused on the Training instructor's lack of first hand observation of potential on-shift drill weaknesses. The result of this would be missed training opportunities. When the last SALP was issued, because of NRC's concern, we immediately reinstituted the practice of having our Training instructors participate in all regularly scheduled onshift Security drills. After this SALP report was received, we reviewed all correspondence from the NRC related to Security inspections. There was no mention of this as a continuing issue.

The following is a listing of continuing initiatives:

- The Senior Site Protection Supervisor (SSPS) attends the Plan of the Day meetings and addresses existing equipment deficiencies within the department.
- The SSPS has met with the Plant Maintenance Department in efforts to establish a preventive maintenance task to address vital area door problems.
- 3. The need for preventive maintenance on the explosive detectors was reviewed by the I&C Department in lete 1991. It was determined at that time that no PM tasks were needed.

1.1.18

4. The QA Audit program matrix has been revised to reflect the required program elements in the annual audit of Security programs. In addition, specific planning elements have been established to ensure an adequate oversight of the material condition and level of maintenance support for Security equipment.

In general, the Security Department will continue to work with various departments providing maintenance support for security equipment to ensure that equipment is repaired in a timely manner.

#### SAFETY ASSESSMENT/QUALITY VERIFICATION

GPUN appreciates the acknowledgement of our QA Department's thoroughness and effectiveness in conducting our Audit activities. GPUN QA continues to enhance our program for all verification activities to provide more emphasis on performance. The Pilot Performance-Based Monitoring Program in Radiation Protection was started on 10/26/92. We plan to expand this approach into other areas in 1993. Our Audit Program is routinely incorporating performance aspects into Audits. We feel that the Performance-Based Initiative along with other GPUN Improvement Programs will positively impact Human Performance at Oyster Creek.