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ENCLOSURE 4

New York Power Authority

John C. Brons
Executive Vice President
Nuclear Generation

August 19, 1988
JPN-88-042

U. S. Nuclear Regulatory Commission
Attention: Regional Administrator
475 Allendale Road
King of Prussia, Pennsylvania 19406

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Systematic Assessment of Licensee Performance
(SALP) Report No. 50-333/86-99

References: 1. NRC letter, W. T. Russell to J. P. Bayne, dated July 7, 1988 regarding the same subject.

Dear Sir:

On July 7, 1988, the Nuclear Regulatory Commission (NRC) issued the Systematic Assessment of Licensee Performance (SALP) report for the James A. FitzPatrick Nuclear Power Plant (Reference 1). A meeting to discuss this assessment was held in the NRC Region I offices on July 21, 1988.

Attachment 1 to this letter provides the Authority's comments on each of the functional areas evaluated in the SALP report. These comments describe present or planned activities to further improve the Authority's performance at the FitzPatrick plant. In some cases, the comments provide additional information which is needed for a more accurate assessment of the functional area.

The Authority appreciates the opportunity afforded by the SALP process for improved understanding of these issues as they relate to the FitzPatrick plant. The SALP report has been carefully reviewed and the observations will be used as a basis for improvements in the operation and support of the plant.

Should you or your staff have any questions regarding this SALP response, please contact me or Mr. J. A. Gray, Jr. of my staff.

Very truly yours,

John C. Brons
Executive Vice President
Nuclear Generation

cc: U. S. Nuclear Regulatory Commission
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Attachment 1 to JPN-88-042

New York Power Authority
James A. FitzPatrick Nuclear Power Plant

RESPONSE TO NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
ASSESSMENT PERIOD: DECEMBER 1, 1986 TO APRIL 30, 1988

A. Operations

In this SALP evaluation period, the NRC rated the functional area of operations as a Category 1. The NRC evaluation concluded that the plant continues to operated in a safe and conservative manner. The NRC noted that the Authority has made a marked improvement in operations and that this functional area is a strength for the Authority.

The Authority has been expending significant resources to improve plant operations and to strengthen performance in this SALP functional area. The programmatic efforts to improve control room professionalism are largely responsible for the improvements that have been noted. Operator awareness of their responsibilities and the consequences of their actions has resulted in no plant transients caused by operator error, and improved start-ups and other plant evolutions.

The Authority has implemented other programmatic changes to improve operations. The Work Control Center was created to improve the organization and control of work in the plant. Numerous modifications have been made or are planned for human factors improvements in the control room. Development of revisions to the Emergency Operating Procedures (EOPs) to implement Revision 4 of the BWR Owner's Group Emergency Procedure Guidelines is underway and will be completed in 1989.

As part of the Authority's commitment to operating excellence we are nearing completion of the new $20 million FitzPatrick training center. It will be used to provide training for all plant personnel. The facility also includes a full-scope plant reference simulator which will be used for operator training and EOP development and verification.

B. Radiological Controls and Chemistry

This functional area received a rating of Category 2 in the SALP report. The report noted that the Authority's staff is well qualified and has been increasingly responsive to NRC concerns. The programmatic changes and equipment difficulties identified by the NRC early in the SALP period and in prior periods have generally been resolved. At the SALP meeting the NRC staff also indicated that an improving trend had been noted towards the end

of the SALP period.

The Authority has continued to increase our efforts to improve performance in Radiological Controls and Chemistry. Maintaining a strong training program for radiation protection staff, a good ALARA program, a high quality respiratory protection program, and thorough audits of the radiation protection program continue to be emphasized. The Authority has also established an aggressive person-rem exposure goal and is in the process of an extensive plant chemistry program upgrade, including a primary system decontamination and hydrogen injection.

The Authority has also taken steps to resolve NRC concerns regarding the radiological survey instrument control and calibration facility adequacy during outage periods. The old training building is being renovated to include a new calibration facility. The new facility will be adequate to handle outage demands. Construction will be complete and the facility in operation by December 1988.

C. Maintenance

In rating the functional area of maintenance as Category 2, the SALP report noted that the Authority is implementing extensive improvements in various maintenance programs, but that progress is somewhat slow in certain areas. The four year apprentice training program, INPO accreditation and management involvement in and control of quality were cited as strengths.

The Authority is committed to implementing a high quality, comprehensive Planned Maintenance Program (PMP). In response to NRC concerns regarding the speed with which the program is being implemented, the Authority is reviewing our total resource allocation to the FitzPatrick plant. Both manpower and dollars will be reviewed during development of the 1989 budget which is now in progress. Implementation of the Planned Maintenance Program will be accelerated to the extent that the existing resources can be cost effectively reallocated.

The current status of the program is as follows. The Master Equipment List was completed during this SALP evaluation period at a cost of approximately 1.9 million dollars and 90,000 man-hours. At the same time, a program has been under way to validate all vendor technical manuals. The program to validate all safety-related manuals is scheduled for completion in December 1988. The program to validate non-safety related manuals with equipment vendors is expected to be complete by December 1990.

For the past several years, the Authority has been actively working to prepare a comprehensive maintenance procedure including a plant-wide writers guide. A spare parts program

exists and is currently being upgraded. Work is being done on an equipment history and evaluation program. Tool control and personnel training programs have been completed.

D. Surveillance

The NRC gave the Authority a rating of Category 2 in the functional area of surveillance. The SALP report noted that the program is technically adequate and sufficiently controlled. Training of Instrumentation and Control technicians was cited as a strength and improvements in the scheduling and tracking of surveillance tests were noted.

Weaknesses were mentioned in the implementation of the In-service Testing (IST) Program. It remains our goal to have no scrams, transients or Engineered Safety Feature actuations as a result of surveillance activities. It remains a goal to achieve a record of no missed surveillances which are required by plant technical specifications. The Authority will continue to strive for additional improvement in this area.

The Authority's IST Program is currently undergoing a complete and thorough review. Following this review, the program will be revised as required to correct the deficiencies. This effort is presently underway and will be completed before the end of the year. At the appropriate time, the Authority will meet with the NRC staff to review our program and justify any differences that may exist. Following the meeting, the finalized program will be formally submitted for NRC review and approval.

E. Engineering and Technical Support

This functional area received a rating of Category 2 in the SALP report. The report concluded that engineering support generally performed well regarding the technical adequacy of modifications but that performance was somewhat inconsistent.

The Authority identified the need for improvements in this functional area as a result of internal evaluations of our past performance. Following these evaluations, several changes were made to the Nuclear Generation Department organization, and the FitzPatrick plant staff organization, and improvements resulted. Finally, a major Authority wide reorganization took place in January 1988. This reorganization located all Authority engineering activities performed on behalf of the nuclear plants, in the Nuclear Generation Department. The benefits of this are: dedicated engineering and design resources; more involvement and greater utilization of Authority engineers; and, greater accountability.

A field engineering group, consisting of five engineers reporting to the headquarters office, was established at the

FitzPatrick plant. As a result, the on-site Technical Services staff will be able to concentrate on supporting day-to-day plant operations following the refueling outage. These organizational changes have already improved engineering support and are expected to result in even further improvement as the new organization matures. A second group, also staffed with five engineers, is responsible for major site construction and also reports to the headquarters office.

The Authority has also embarked on a Configuration Management Program (CMP). The CMP will compile the FitzPatrick plant design basis for selected systems. The CMP will be governed by the following manuals: Modification Control; Design Control; Standards; Configuration Management Procedures; and, Design Basis Documents. The Design Basis Documents Manual will include generic documents and documents specific to individual systems. The Modification Control Manual will provide improved and consolidated procedures to replace existing Nuclear Generation and FitzPatrick procedures for controlling all aspects of modifications. The Design Control Manual will provide improved and consolidated procedures for control of the design process.

A pilot program is currently underway to prepare design basis documents for the High Pressure Coolant Injection (HPCI) and Condensate and Feedwater (C & FW) systems. The HPCI document is under review and will be complete in December 1988. The C & FW document will be complete by March 1989. Following completion of the pilot program, a schedule will be developed for the completion of approximately 12 to 15 systems. The Authority expects to complete the project by the end of 1993.

The SALP report criticized the Authority's EQ (Environmental Qualification) program, citing a lack of self-sufficiency and inability to resolve EQ issues. The Authority strongly disagrees with this portion of the SALP assessment. Although there was substantial reliance on contractor help to meet the schedule imposed by the EQ Rule, the Authority has always exercised adequate oversight and maintained technical expertise in the area. The evolution of environmental qualification issues and compliance requirements during the implementation phase was accompanied by a substantial increase in emphasis on EQ files. The Authority believes this is the principal reason for the NRC's difficulties with the EQ files. The NRC's EQ inspection of the plant supports this view since the problems identified during the inspection related to the files rather than the qualification of the equipment itself.

F. Security and Safeguards

This functional area was rated as Category 1 in this and all previous SALP evaluation periods. The NRC concluded that the's security program is effective, of high quality and exceeds

regulatory requirements and the Authority's security commitments.

The Authority is proud of the sustained high level of performance in this area. Our commitment to continued excellence in this area is unchanged.

G. Emergency Preparedness

Emergency preparedness was given a SALP rating of Category 1. The report stated that the Emergency Response Facilities are adequate and that 85% of all full time on-site personnel were qualified for one or more positions within the emergency response organization. The SALP report noted that the operators were well trained and capable of carrying out Emergency Director duties correctly. However, the NRC noted a declining trend in the report.

While the Authority is pleased that this functional area was again rated as a Category 1, we are concerned with the declining trend noted by the NRC. In discussing this situation with the Region I staff, we focused on the required audits and reviews of the program. Although this is an important aspect of the Emergency Preparedness programs, the fundamental concern and primary cause for a declining trend is the process of accident dose assessment and development of protective actions recommendations that has been evident at FitzPatrick. The Authority will take vigorous action to resolve this area of concern.

The total number of on-site Emergency Preparedness staff members has not changed. Levels have remained constant at three with two technical and one clerical member. The position that was eliminated had been vacant for several years and found to be unnecessary when it was finally eliminated. The Authority also provides the site staff with support by an experienced emergency planning staff from headquarters. This support and the extensive site staff involvement will continue and is consistent with the level of Emergency Preparedness provided in the past several years.

H. Licensing

In the SALP report, the NRC rated the Authority's licensing activities as Category 2 with an Improving trend. The staff noted significant improvement over the last SALP review period.

The Authority is pleased that the NRC has recognized the aggressive efforts which have been made to improve licensing activities for the FitzPatrick plant. These efforts, many of which were cited by the staff in the SALP report, include the more active participation of corporate management in licensing activities, particularly in communication with the NRC. The

Authority has initiated an expanded automated commitment tracking system to facilitate management oversight of ongoing licensing activities.

The NRC has also recognized that the Authority procedure for submittals to the NRC has been completely revised. This revision has given the licensing staff increased authority resulting in more control over engineering and analytical work being done to resolve licensing issues and support submittals to the NRC. The recent reorganization of the Authority has resulted in all engineering being under the direct control of the Nuclear Generation Department which provides additional support and facilitates its adequacy and timely completion.

The NRC has also cited the Authority's notable improvement in responsiveness to, and cooperation with, the NRC. The Authority has expended considerable efforts to be more sensitive to the NRC's need for schedules and for prompt responses to informal requests for information. A good example of this is our recent response to the NRC request for plant specific information on severe accident issues.

In the SALP report, the NRC noted that improvements were needed in the plant technical specifications. In response to the NRC's recent increased concern in this area, the Authority promptly submitted a proposed technical specification amendment to correct miscellaneous errors in the technical specifications. The Authority also assigned a licensing engineer virtually full time to updating the list of containment isolation valves in the technical specifications. A proposed technical specification amendment will be submitted to the NRC by December 1988.

The Authority also plans to employ the services of two contract licensing engineers to develop proposed technical specification amendments for the remaining open technical specification changes. This effort will begin during the last quarter of 1988 and is expected to require approximately one man year of resources. Finally, the Authority has assigned a plant engineer to assist in a page-by-page review of the technical specifications to identify any other errors which require correction or improvements which can be made. This individual will begin work on this task by September 1, 1988.

I. Assurance of Quality

In evaluating the functional area of Quality Assurance (QA) as Category 2, an improving trend was noted. In particular, strengths were noted in the QA department's ability to assure quality at the plant and an aggressive attitude. It is the objective of both plant and headquarters management to continue to seek excellence and foster improvements in performance throughout the organization.

ENCLOSURE 5

SALP BOARD REPORT ERRATA SHEET

Page	Line	Board Report
30	32-36	During this assessment period, the licensee reduced staffing support in the EP area by one technical position. The site emergency planning coordinator is supported by one professional and one administrative assistant. This reduction has the potential to negatively impact performance and coordination in this area.

Amended Report

Deleted

Basis

Although changes have been made to the Emergency Preparedness staffing just prior to and during this assessment period, the manning has not changed significantly for several years. In addition, the SALP report did not recognize active support from site and headquarters personnel. Therefore it is not appropriate to identify this as a potential to negatively impact the Emergency Preparedness area. The NRC will continue to assess the adequacy of the plant staffing during routine inspections of the Emergency Preparedness program.