



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

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JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

AUG 26 1986

SNRC-1277

Dr. Thomas E. Murley
Regional Administrator
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Station Corrective Actions Discussed During
the SALP Meeting Conducted July 29, 1986
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

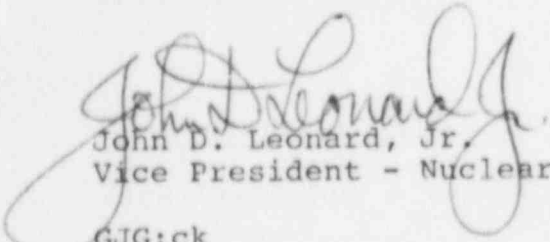
Reference: NRC letter (T. E. Murley) entitled Systematic
Assessment of Licensee Performance (SALP) Report,
No. 50-322/85-99, to LILCO (J. D. Leonard, Jr.)

Dear Dr. Murley:

In our meeting on July 29, 1986, we informed you of the
corrective actions and measures instituted to address the noted
weak areas of performance as described in the referenced letter.
My staff and I have met several times prior and subsequent to our
July 29, 1986 meeting to ensure ourselves that we were addressing
all items identified in the SALP report. Attachment 1 to this
letter documents LILCO's actions and is intended to fulfill the
request contained in your letter forwarding the SALP Report.

Should you or any of your staff have questions concerning the
actions described in this letter, please do not hesitate to call
my office.

Very truly yours,


John D. Leonard, Jr.
Vice President - Nuclear Operations

GJG:ck

Attachment

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PDR ADOCK 05000322
G PDR

cc: R. Lo
J. A. Berry

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STATION CORRECTIVE ACTIONS AND
MEASURES INSTITUTED ADDRESSING NOTED
WEAK AREAS OF PERFORMANCE (SALP REPORT)

The objective of LILCO's corrective actions is to strengthen performance and eliminate those weaknesses identified in the functional areas rated by the SALP Board. LILCO's senior management considers the SALP report to consist of important constructive criticism. The actions subsequently described below are either complete or in progress.

I. VICE PRESIDENT - OFFICE OF NUCLEAR

A. Assurance of Quality

LILCO recognizes the fundamental importance of achieving a high standard of excellence from each individual employee and contractor in the Office of Nuclear Operations. At our meeting, we discussed three functional topics and the actions we are taking within each to strive for quality excellence throughout the Office of Nuclear Operations. Those functional topics are quality of work, personnel staffing, and senior management overview. As we reported to you in our letter dated April 18, 1986 (SNRC-1249), several meetings were held within the Office of Nuclear Operations wherein we stressed the importance we place on the concept of personal responsibility and safe operations. These meetings were with plant managerial personnel, union stewards, all plant personnel and all Office of Nuclear Operations personnel. At these meetings we also described and encouraged the use of our Quality Hotline Program.

In order to increase daily interaction and contact between management and employees we have taken the following actions. As part of their normal duties and responsibilities, division managers and section heads are now spending several hours a week conducting physical plant inspections and observing work activities to monitor the quality of work being performed. We have also taken steps to relieve some of the administrative burden from the Plant Manager by strengthening our Operations Staff Division with the addition of an individual with significant operating experience. Additionally, we are providing administrative assistance to our Plant Staff division managers by assigning an assistant to the Maintenance Manager, providing two watch engineers on the day shift and working to fulfill our commitment to fully staff our radiochemistry

section with qualified personnel. We continue to seek ways of providing additional administrative assistance for our division managers to enable them to increase their presence in the plant and directly oversee their respective operations.

In the area of personnel staffing, we discussed the steps we were taking to decrease attrition and to hire qualified individuals to fill critical vacancies.

To assure you that LILCO is truly committed to improve in this and all functional categories of the SALP Report, we discussed the strong support by senior management to complete the actions described at the meeting. LILCO's Nuclear Oversight Committee is very interested in the adequacy of these actions and is charged with the responsibility for reviewing and assessing all of the nuclear activities of the Company. The Committee is comprised of three members of the Company's Board of Directors, has met ten times in 1985 and a number of times in 1986, and vigorously pursues its responsibilities. In addition to the Nuclear Oversight Committee's frequent presence at Shoreham, we discussed the active support given to the Office of Nuclear Operations by our Executive Vice President who will also pursue the completion of these actions and will spend part of his time at the Shoreham Nuclear Power Station.

II. OPERATIONS DEPARTMENT

A. Plant Operations and Startup Testing

LILCO recognizes the relative importance of this category as evidenced by the large percentage of total NRC time (approximately 60%) applied to inspections of plant operations. Primarily, three subjects were discussed in this performance category: lessons learned from our 5% power test period, control room environment, and attention to detail in the form of procedure adherence. Of these three issues, procedural adherence is receiving the greatest amount of LILCO's attention. To improve operations and ensure greater attention is given to following procedures, station management is continuously stressing the importance of this issue through night orders and during operator requalification training; section staff meetings have been held to discuss events resulting from inattention to detail;

an Operations Division Self Audit Program has been instituted; administrative procedures in the area of lifted leads and jumpers and station equipment clearance permits have been revised; and startup test procedure training to uncover potential problems, improve procedural compliance, and familiarize test and operating personnel with the tests has been conducted.

Additionally, plant management personnel instituted an Incident Review Board that consists of plant section heads and is responsible to determine root causes of station incidents. To accomplish this, the board receives personnel statements and conducts interviews, assimilates facts, prepares reports, obtains division manager review and plant manager approval of recommendations. Finally, station management personnel (division managers /Review of Operations Committee) conduct quarterly reviews of reports of abnormal conditions and licensee event reports.

To improve our control room environment, LILCO conducted a detailed review of watch engineer responsibilities and utilizes two day shift watch engineers. Also, personnel access to the control room has been restricted and procedures revised to require "repeat back" of instructions to minimize misunderstandings. As a result of a human factors review of the control room work area, LILCO plans to rearrange control room furniture, relocate the watch supervisor to the control area, and relocate the secondary alarm station from the control room. Additionally, to enhance the atmosphere of professionalism, new uniforms for control room operators were ordered and received.

At the SALP meeting, our Plant Manager discussed several of the lessons learned from our 5% startup test period. To instill a team concept between power ascension test personnel and operating crews, test personnel are on six shift rotation and rotate with their respective operating crews. Station management expanded LILCO involvement within the power ascension test group by assigning assistant test directors and test coordinators to actively participate in what was historically a NSSS vendor dominated function. A day shift support engineer was assigned to oversee test reviews and QC personnel became involved earlier in the test review process.

Finally, as a result of lessons learned, LILCO streamlined test summary reports; reviewed and revised startup test procedures; and initiated formal training of test personnel in accordance with developed lesson plans.

B. Radiological Controls

LILCO's overall station corrective action in the area of radiological controls is described in our letters SNRC-1245 and SNRC-1249, dated April 3 and 18, 1986, respectively. At the SALP meeting, our Plant Manager provided you with a progress report of the station's corrective actions in the area of staffing, technician training and qualification, laboratory quality assurance and general laboratory practices.

In these functional areas, we informed you that we have made significant progress towards our staffing objectives; a sufficient number of technicians were qualified for backshift coverage to support plant operations; procedures were being revised in the area of laboratory quality control and that oversight of this functional area would transfer from the task force to the section in September 1986; and that the implementation of good laboratory practices was being pursued on a daily basis.

An inspection of this area to determine the adequacy of our corrective actions was conducted during the week of July 28, 1986. The exit meeting for Inspection 50-322/86-11 occurred on Friday, August 1, 1986, and LILCO was satisfied to learn that the inspection team found our corrective actions to be effective. This inspection team indicated that they would recommend closure of all but one open item from special inspection 86-03. It is our understanding that one item remains open and that the item will close when the transfer of responsibility for the Radiation Monitoring System from the Radiochemistry Section to the Computer Engineering Section is complete.

III. NUCLEAR OPERATIONS SUPPORT DEPARTMENT

A. Maintenance and Surveillance

In this performance category, the SALP Report identifies two apparent weaknesses pertaining to our spare parts program: procurement and availability. To address LILCO's corrective steps, the Manager, Nuclear Operations Support Department, described several actions that have been taken to improve our spare parts program.

LILCO initiated a biweekly report card on spare parts and consumables to enable management to identify and trend the relative success of the issuance of these items. Also, a spare parts catalogue arranged with a key word sort format is now available for use on site. This catalogue will enable the user to quickly obtain SNPS spare parts information concerning items such as gaskets, bolts, etc. Additionally, LILCO expects to complete the construction material transfer program by August 30, 1986. Finally, we briefly discussed the priority ordering system and tracking of requisitions as measures taken to improve our procurement cycle.

The Manager, Nuclear Operations Support Department also discussed two actions that were planned to strengthen the SNPS spare parts program. First, a full inventory of the SNPS warehouse is to be conducted. Its targeted completion date is December 31, 1986. Second, there will be a complete reevaluation of the material control program including its organization and staffing. This reevaluation is expected to be completed by the end of October 1986.

B. Licensing Activities

To improve our responsiveness to NRC initiatives that do not directly affect the licensing schedule, the Nuclear Licensing and Regulatory Affairs Division has initiated several actions. The authorized complement of this division was increased and is now currently staffed with a Licensing Section of four engineers. Additionally, we have initiated a monthly meeting between the Nuclear Licensing and Regulatory Affairs Division Manager and the NRC Project Manager in Bethesda to assure that LILCO is being responsive to all NRC concerns. Internally, the Licensing staff has been directed to inform the Manager, Nuclear Operations Support Department of issues that cannot be promptly resolved. The Department Manager will assure that the Vice President - Nuclear Operations is fully apprised on such matters. Finally, licensing personnel are directed to ensure that all analyses supporting our significant hazards consideration findings which accompany license change requests are performed in accordance with the guidance of NRC Generic Letter 86-03.

IV. Training

A. Training and Qualification Effectiveness

LILCO's newly appointed Director of Training discussed the actions LILCO has taken to direct management attention to establish good training practices in all plant areas. As discussed, LILCO has recognized the need for increased management attention and other concerns raised by the NRC in this SALP Report as evidenced by the expansion of our authorized training complement from nine (9) in 1982 to forty-five (45) in May of 1986; the issuance of a purchase order for the Shoreham simulator in 1984; the approval of the LILCO Training Facility in 1985; and the appointment of a Director of Training on April 1, 1986.

Since the appointment of a Director of Training, LILCO has taken several specific training related actions. An extensive audit (1,000 hours) of personnel training and qualification was conducted and corrective actions have been established for all findings. A task force effort to define a generic program for training and qualification status and record keeping was initiated and completed. Recommendations resulting from this effort are expected to be implemented by November 1986. A monthly review of training and qualification personnel files is conducted by training and user organization personnel. These files are certified monthly by the Nuclear Training Division Manager as complete or actions are taken to correct deficiencies. LILCO initiated a new accreditation level training program for newly employed radiochemistry technicians, and doubled the frequency of offering for BWR Familiarization training for Office of Nuclear Operations personnel. Finally, we reported that the new 110,000 sq. ft. training facility in Hauppauge, which will house the Shoreham simulator, includes laboratories, classrooms, skill shops and office facilities for over ninety (90) Office of Training personnel, is scheduled to be ready for occupancy in November 1986. The Shoreham simulator is scheduled to begin factory acceptance testing in September 1986 and should be ready for training purposes in May 1987.

LILCO has noted and welcomes the implementation of the SALP Board recommendations for a management meeting and special inspection of training and qualification.

V. QUALITY ASSURANCE

At the SALP meeting our Quality Assurance Department Manager discussed the results of numerous actions that were accomplished. The QA Department initiated and completed programmatic changes as described in SNRC-1249; enhanced its auditing capabilities by providing QA auditors with training in the areas of plant operations, radwaste, health physics, and radiochemistry; changed its auditing program schedule and team composition as described in SNRC-1249; and provided promotional enhancement of its Quality Hotline Program.

A. Radiological Controls

The SALP Report noted a weakness in that individuals performing audit activities in the area of radioactive waste management and transportation had not received adequate training. As discussed by our QA Department Manager, we acknowledged that finding and immediately took and implemented corrective steps. Additionally, as described above, our QA Department conducted and completed an extensive training effort in the areas of health physics, radiochemistry, operations and audit effectiveness as described in SNRC-1249.

The QA Department initiated an audit of the radiochemistry section on July 17, 1986 and we are confident that, as a result of all the actions described above, an effective audit was performed. This audit and its results were evaluated during the NRC followup inspection of Shoreham's radiochemistry section which took place the week of July 28, 1986. At the exit meeting for inspection 50-322/86-11 we were encouraged by the inspection team's verbal report that the audit was very comprehensive.

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