

November 5, 1999

Mr. Mark B. Bezilla
Vice President - Operations
PSEG Nuclear LLC
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Mr. Michael J. Colomb
Site Executive Officer
James A. FitzPatrick Nuclear Plant
Post Office Box 41
Lycoming, New York 13093

SUBJECT: MEETING SUMMARY ON THE NEW REACTOR OVERSIGHT PROGRAM

On October 27, 1999, the NRC staff held a meeting to receive your feedback on the new NRC reactor oversight program, including the pilot program ongoing at the Fitzpatrick, Hope Creek, and Salem sites. Also, this public meeting was attended by representatives of nearly every licensee in Region I as well as representatives from three states. We greatly appreciated the efforts of you and your staff to make this meeting a successful dialogue for improving the reactor oversight program.

Overall, you indicated that the new oversight process represented an improvement and has the ability to achieve the NRC's goals of maintaining reactor safety, reducing unnecessary regulatory burden, enhancing public confidence, and improving the effectiveness of reactor oversight. Enclosure 1 contains a summary of the specific comments received at the meeting. These comments are being forwarded to the NRR program office overseeing the implementation of the pilot program and are under consideration by Region I during the implementation of the remaining portions of the pilot program. We note that the ongoing NRC/NEI workshops on performance indicators (PIs) are already working to address many of the concerns and questions raised regarding the PIs. Enclosure 2 provides copies of the handouts distributed at the meeting.

If you have any questions regarding this matter, please contact me at (610) 337-5211.

Sincerely,

Original Signed By:

Glenn W. Meyer, Chief
Projects Branch 3
Division of Reactor Projects

- Enclosure: 1) Comments Received Regarding the Implementation of the Pilot Reactor Assessment Process in Region I
 2) PSEG/NYPA Handouts Provided at the Meeting

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PDR AD OCK

cc w/encl: PSEG Correspondence List:

L. Storz, Senior Vice President - Nuclear Operations, PSEG LLC
E. Simpson, Senior Vice President - Nuclear Engineering
A. F. Kirby, III, External Operations - Nuclear, Conectiv Energy Co.
R. Kankus, Joint Owner Affairs
A. Tapert, Program Administrator
J. J. Keenan, Esquire
M. J. Wetterhahn, Esquire
G. Salamon, Licensing Manager
Consumer Advocate, Office of Consumer Advocate
William Conklin, Public Safety Consultant, Lower Alloways Creek Township
Public Service Commission of Maryland
State of New Jersey
State of Delaware

cc w/encl: NYPA Correspondence List:

J. Knubel, Chief Nuclear Officer and Senior Vice President, NYPA
H. P. Salmon, Jr., Vice President of Engineering
W. Josiger, Vice President - Engineering and Project Management
J. Kelly, Director - Regulatory Affairs and Special Projects
R. Deasy, Vice President - Appraisal and Compliance Services
R. Patch, Director - Quality Assurance
G. C. Goldstein, Assistant General Counsel
C. D. Faison, Director, Nuclear Licensing, NYPA
G. Tasick, Licensing Manager, FitzPatrick
T. Morra, Executive Chair, Four County Nuclear Safety Committee
Supervisor, Town of Scriba
C. Donaldson, Esquire, Assistant Attorney General, New York Department of Law
P. Eddy, Electric Division, Department of Public Service, State of New York
F. William Valentino, President, New York State Energy Research
and Development Authority
J. Spath, Program Director, New York State Energy Research
and Development Authority
T. Judson, Syracuse Peace Council
F. Elmer, Sierra Club
S. Penn
B. Brown
S. Griffin, Chenango North Energy Awareness Group
T. Ellis
A. Slater, GRACE
C. Gagne
L. Downing
H. Hawkins, Syracuse Green Party
E. Smeloff

Region I Licensee Correspondence List:

C. Cruse, Vice President - Nuclear Energy, Baltimore Gas & Electric
M. Bellamy, Vice President - Nuclear, Pilgrim Station - Entergy
J. Baumstark, Vice President - Engineering, Consolidated Edison
M. Ackerman, Manager, Safety and Licensing, First Energy
G. Busch, Manager, Nuclear Safety and Licensing, GPUN - Oyster Creek
J. Wetmore, Manager, Nuclear Safety and Licensing, GPUN - TMI
D. Wolniak, Licensing Manager, Niagara Mohawk
D. Smith, Manager, Regulatory Affairs, Northeast Utilities
J. Peschel, Manager, Regulatory Compliance, NU - Seabrook Station
J. Doering, Vice President - Peach Bottom, PECO Energy
M. Gallagher, Plant Manager - Limerick, PECO Energy
G. Edwards, Director, Licensing - Chesterbrook, PECO Energy
T. Harpster, Manager, Licensing - PP&L
J. Widay, Plant Manager, RG&E - Ginna Station
R. Wanczyk, Director, Safety and Regulatory Affairs, Vermont Yankee

Distribution w/encl:
 Region I Docket Room (with concurrences)
 Nuclear Safety Information Center (NSIC)
 NRC Resident Inspector
 PUBLIC
 H. Miller, RA/J Wiggins, DRA
 G. Meyer, DRP
 J. Rogge, DRP
 R. Barkley, DRP
 C. O'Daniell, DRP
 W. Lanning, DRS Director, Region I
 B. Holian, DRS Deputy Director, Region I

Distribution w/encl: (Via E-Mail)
 M. Tschiltz, OEDO
 T. Madden, OCA
 E. Adensam, NRR
 J. Clifford, NRR
 G. Vissing, NRR
 R. Ennis, PM, NRR
 P. Milano, NRR
 C. Holden, NRR
 T. Frye, NRR
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OFFICE	RI/DRP	RI/DRP							
NAME	GMeyer	RBarkley							
DATE	11/08/99	11/05/99							

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Comments Received on 10/27/99 Regarding the Implementation of the Pilot Reactor Assessment Process in Region I

Performance Indicators

- 1) A licensee stated that considerable care must be taken in submitting performance indicator (PI) data to the NRC as data accuracy (10 CFR 50.9) is a concern. Also, the licensee urged that INPO/WANO, NEI and the NRC reconcile the differences in the PIs, particularly regarding equipment unavailability where Maintenance Rule statistics are different.
- 2) A licensee noted the need to revise the security equipment PI, as a considerable unavailability penalty (e.g., as much as 17%) is received for continuing compensatory measures as a prudent approach following security system maintenance.
- 3) The 14 day deadline for reporting PI data can be met as demonstrated during the pilot program, but prudent additional reviews to avoid material inaccuracies may make this deadline difficult to meet in the future; consideration should be given to extending the deadline to 21 days.
- 4) A licensee raised the concern that fault time and exposure hours may not be the right measure of equipment unavailability/reliability since a single event on equipment tested infrequently can cause an indicator to change significantly. Moreover, since this PI is a 3 year rolling average, one event 2 ½ years ago still significantly affects the PI and yet would not be reflective of current plant performance. Further, this approach does not seem consistent with that taken by the Maintenance Rule.
- 5) Two licensees noted that the PI on unplanned power changes per 7,000 critical hours could discourage plant management from making good decisions in certain cases such as a prudent plant downpower to support a short term equipment repair. They noted that some downpowers can be thoroughly planned in considerably less than 72 hours.
- 6) The current rules governing the calculation of the containment leak rate PI need to be altered, as the PI can be manipulated and it does not truly reflect containment performance post-accident. On the contrary, the emergency preparedness PI is one that can be properly managed as it encourages additional licensee resources be focused toward EP training if needed to improve performance.
- 7) A licensee expressed a concern that sharp increases in reactor coolant activity can occur following a reactor trip. As those activity spikes may not accurately reflect the true fuel barrier performance, the PI on reactor coolant activity may need adjustment.
- 8) A manager in the audience asked how PI information will be requested by the NRC when full implementation of the new program commences. (There was no formal NRC request for the pilot program.)

Inspections

- 1) In response to an experience with a safety system design inspection at their facility, a licensee noted the need for the NRC to share questions and data requests with the licensee as soon as possible, preferably before the start of the onsite inspection.
- 2) The two pilot plant licensees appreciated the additional dialogue that occurs with NRC inspectors concerning inspector insights which do not meet the threshold for inclusion in the inspection report, but which gives them additional insight into their performance. Both pilot plant licensees also expressed a preference for the new inspection report format and content.
- 3) A licensee noted the need for refinement of the definition of an inspection "finding."

Significance Determination Process

- 1) A licensee noted that security significance determination process (SDP) issues seem to change color and be weighted with a significance that is not commensurate with their true safety/risk significance. The reactor safety SDPs were also deemed challenging to perform.
- 2) Both pilot plant licensees expressed a general satisfaction with the SDP, as it focuses both the licensee's and the NRC's attention on the most risk significant safety issues at the plant.
- 3) All involved parties noted that only a small number of issues have been processed through the SDP during the pilot. Significant issues have involved a lot of positive cooperation between the licensee and the NRC to resolve.