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December 6, 1982
JPN-82-88

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Mr. Ronald C. Haynes, Regional Administrator
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
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Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Dissolution of Onsite Review Committee

- References:
- 1) R.W. Starostecki (NRC) to J.P. Bayne (PASNY) dated May 19 1982 regarding Systematic Assessment of Licensee Performance (SALP) Report
 - 2) J.P. Bayne (PASNY) to R.C. Haynes (NRC) dated August 3, 1982 regarding SALP Report response (JPN-82-66)
 - 3) J.P. Bayne (PASNY) to V. Stello (NRC) dated August 28, 1981 regarding Inspection Report No. 81-07, Notice of Violation (JPN-81-63)
 - 4) J.P. Bayne (PASNY) to R.C. DeYoung (NRC) dated December 9, 1982 regarding Inspection Report No. 81-19, Notice of Violation (JPN-81-98)

Dear Sir:

In the Authority's response to your draft SALP Board Report (Reference 1), we stated that the Onsite Review Committee (ORC) would be dissolved in the near future. A description of how the Authority's existing review committees would be further improved was to be provided to you in the future. This letter describes the management improvements made within the past year that allow ORC's dissolution.

The ORC was established to prevent the recurrence of the type of incidents described in two Inspection Report violation notices (Reference 3 and 4). This was to have been accomplished through the addition of a third level of review; the ORC.

The Authority has chosen rather to dissolve the ORC and to improve the two existing review committees:

Safety Review Committee (SRC)

As the result of a recent headquarters reorganization, this committee is now chaired by the Manager of Nuclear Safety Evaluation whose primary job function is the administration and technical direction of the SRC. The SRC's review scope has been expanded to include all safety related changes, tests and experiments relating to FitzPatrick - not just those required by 10CFR 50.59 (c). An SRC subcommittee is currently preparing a safety evaluation format and content guide for use by all Authority organizations. This guide, by detailing the necessary review process, will assure that issues are consistently and thoroughly evaluated for potential safety concerns. Safety Review Committee procedures were reviewed and revised under the direction of the new Chairman. Policy statements addressing scheduled meetings, attendance, meeting minutes and open items were prepared and issued to stress the importance of these areas to SRC members and Authority management. More time is now allowed for the review of agenda items before the meeting convenes.

Plant Operations Review Committee (PORC)

As we have previously stated, (Reference 3) a revised plant maintenance and modification procedure (WACP 10.1.6) has been prepared and implemented. This revision assures that plant changes and modifications are properly reviewed, documented and approved with special consideration for their potential impact.

A second Administrative Procedure, (AP 1.2) was recently revised to more clearly define PORC's responsibilities and to require a more extensive review of major procedure changes before presentation to PORC. Licensee Event Reports (LERs) now require PORC review prior to submittal to the Commission under the new provisions of AP 1.2. This revision also provides more details on the administrative requirements for PORC meetings and record keeping. A Reactor Operator will be in attendance at relevant PORC meetings which will further broaden PORC's review scope.

In addition, FitzPatrick's Resident Manager, who is also the PORC Chairman, has taken action which will require more frequent attendance by PORC members, rather than their alternates.

Headquarters Organization

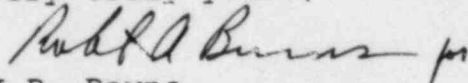
In the same headquarters reorganization which created the position of Manager Nuclear Safety Evaluation, the management structure for operations and technical support was realigned by nuclear facility and related reactor technology, rather than the former functionally aligned structure. The Nuclear Licensing, Nuclear Technical Support and Operations Divisions of the Nuclear Generation Department were replaced by BWR and PWR Nuclear Support Divisions - each headed by a Vice President. Three Directors (Nuclear Licensing, Nuclear Operations and Maintenance, and Project Engineering) report to each Vice President. The BWR and PWR Nuclear Support Divisions combine the functions and responsibilities previously held by the Nuclear Operations, Nuclear Technical Support and Nuclear Licensing Divisions. This realignment improves headquarters office support of each nuclear facility by providing a dedicated staff to service and assist each plant, and improving day-to-day communications between facility and headquarters personnel. A Vice President directing each Nuclear Support Division provides the necessary authority to allocate resources and ensure responsiveness to plant needs. Both current Vice President's hold and maintain Senior Reactor Operator licenses. This realignment further consolidates the closely related operations and technical support functions. Improved efficiency will result from better communications and coordination.

Some headquarters office personnel are being temporarily assigned to FitzPatrick to increase their cognizance of site operations. Others are studying for their reactor operators license and will bring this expertise to the headquarters office.

The Authority feels confident that these changes will adequately compensate for the ORC's dissolution thus eliminating the need for a third review tier.

If you have any questions, regarding this subject, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,


J.P. Bayne
Executive Vice President
Nuclear Generation

cc: Mr. J. Linville
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