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Attn: Docketing and Service Branch  
 United States Nuclear Regulatory Commission  
 Office of the Secretary  
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Commissioners:

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This is in response to the petition of Vina K. Colley and the petition of Mark Donham and Kristi Hanson.

The NRC clearly has set down directives for the safe operation of nuclear facilities. For example, 10 CFR 76.95 requires "A training program must be established, implemented, and maintained for individuals relied upon to operate, maintain, or modify the GPDs in a safe manner." Information needs of the NRC on the "systems approach" to training was outlined by the NRC in June, 1995.

SAR-PGDP Rev.1, Vol 2, p.6.6-16 admits SAT programs have not been developed in all areas, and, thus, they have not been implemented or maintained. This is also documented in Compliance Plan Issue 24, PGDP Rev.1. If indeed these programs are integral to the safe operation of a plant, the training needs to be implemented before a certificate of compliance is granted. This would assure a higher level of integrity in the day-to-day operation.

A second example is found in the development of a Quality Assurance Program. 10 CFR 76.93 requires "The Corporation shall establish, maintain, and execute a quality assurance program satisfying each of the applicable requirements of ASME NQA-1 1989, 'Quality Assurance Program Requirements for Nuclear Facilities' or satisfying acceptable alternatives to the applicable requirements. The Corporation shall execute the criteria in a graded approach to an extent that is commensurate with the importance of safety."

PGDP has not established, maintained, and executed a Quality Assurance Program. This is documented in Rev.1 Quality Assurance Program - GDPs, pp. 49-54, and Compliance Plan Issue 29.

A third area of concern is the significant and repeated weaknesses cited by K. G. O'Brien and the NRC team in the observation reports (Observation Reports 70-7001/94002, /94003, /95001, /95003, to name a few). A reading of these reports yields continuing performance weaknesses in several areas:

1. management development, role definition, oversight and assessment of safety-related issues including the plant safety review committee, PORC, the Plant Chemical Safety program and operability assessment
2. process- and procedure-related weakness including "inadequate or unavailable alarm response procedures and an apparent 'production over safety' approach to the development review, and use of temporary operating checklists and immediate action changes." (/95003);
3. management acceptance of incomplete corrective action; weaknesses in some engineering staff's understanding, use, and communication of design bases information and incomplete programmatic structure

These recurring weaknesses underscore PGDP's lack of understanding and implementation of important NRC issues.

Finally, no record could be found to document that an NRC on-site comprehensive field report has been conducted. If indeed this report is standard for a nuclear facility being regulated by the NRC, there should be no exception for PGDP.

For the above reasons, the certificate of compliance should not be granted to PGDP at this time.

Sincerely,

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