

# UNION OF CONCERNED SCIENTISTS

January 2, 1997

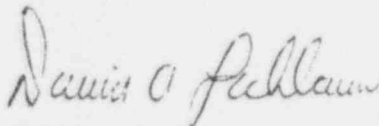
Chairman Shirley Ann Jackson  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Chairman Jackson:

By letter dated November 19, 1996, the Union of Concerned Scientists respectfully submitted technical comments following our review of the October 1996 report on the Independent Safety Assessment of Maine Yankee Atomic Power Company. We were notified by letter dated December 4, 1996, from Mr. John C. Hoyle that our comments had been received and would be answered "shortly." Since we have received no further response, we apparently misunderstood Mr. Hoyle's letter by thinking that "shortly" referred to the time frame for the response instead of the length of the answers.

At the risk of adding to the response backlog, we again respectfully submit technical comments following our review of Maine Yankee's response dated December 10, 1996, to the Independent Safety Assessment. We neither request nor expect a response to these comments. We only ask that the NRC staff consider them during their review of Maine Yankee's response.

Sincerely,



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## Comments on Maine Yankee's ISA Response Dated December 10, 1996

1. On page 3 of the cover letter, Maine Yankee stated it is "developing a program to reduce engineering and maintenance backlogs to minimal levels within the next two cycles of operation." What is the definition of "minimal?" On page 4-2 of the Response Plan, Maine Yankee described its Backlog Reduction plans, but still fails to define "minimal." In addition, Maine Yankee claimed to do a good job on high priority actions, contradicting the ISAT finding of 100 high priority work orders deferred from the recent refueling outage.
2. Starting on page 1-2 of the Response Plan, Maine Yankee identified six factors contributing to the weakness in problem identification. One factor, missing from Maine Yankee's list, that has contributed to similar problems at other nuclear power plants has been reluctance to recognize a condition as being a problem based on the age of the plant. This reluctance has manifested itself in attitudes such as, "it can't be a problem because there have been innumerable evaluations, how could they all have missed that problem?" Such reluctance directly affects the reporting threshold for potential problems and must be addressed if an appropriately low threshold is to be achieved, especially for design bases and engineering related issues.
3. On page 1-3 of the Response Plan, Maine Yankee identified worker apprehension (concerns by workers over the perceived threat of premature plant shutdown causing them to place undue emphasis on cost containment) as a contributor to the root causes identified by the NRC in the ISAT. This inherent problem warrants careful consideration of periodic assessments by external agencies (INPO, NRC, or consultants) to ensure it does not impede problem identification.
4. On page 2-3 of the Response Plan, Maine Yankee describes its response for Individual Development and specifies its goal of having 50% of its employees complete the training by December 31, 1997. This is a good example of a performance yardstick tied to a corrective action plan item. It can be used by both the NRC and the licensee to monitor progress in this area. All other areas should have comparable performance yardsticks.
5. On page 2-6 of the Response Plan, Maine Yankee describes its Corrective Action Assessment plans, including the development of specific performance indicators in its Business Plan. The Task Summaries in the Business Plan outline the specific tasks with expected start and finish dates. The Business Plan states that a Learning Bank will be used to track status of the tasks. It is not clear what performance indicators will be used to monitor the progress of Maine Yankee's corrective action efforts.
6. On page 3-8 of the Response Plan, Maine Yankee states that "vertical audits of ventilation systems will be completed in December 1996, including those systems reviewed by the ISA, as well as others associated with safety-related equipment." Have these audits been completed? What were the findings?
7. On page 5 of the Business Plan, the Union of Concerned Scientists is portrayed as having "a history of opposing nuclear power." The Union of Concerned Scientists has, and will continue to, oppose unsafe nuclear power.