

James A. FitzPatrick
Nuclear Power Plant
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**New York Power
Authority**

Radford J. Converse
Resident Manager

October 1, 1985
JAFF 85-0781

Mr. Stewart D. Ebner, Director
Division of Reactor Safety
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Inspection Report No. 50-333/85-13

Reference: NRC Operational Assessment Team Inspection
(No. 50-333/82-24)

Dear Sir:

In response to your request in the subject inspection, the Authority is providing a status of the actions initiated in response to concerns identified in the referenced NRC Assessment. As noted in Item 4.4 of Inspection 85-13, a Quality Assurance Department Audit was performed to review each action item. This audit (Surveillance Audit No. 1029, dated July 22, 1985) provided a status of all responses to concerns identified in the referenced inspection and provided management with an updated status and recommendations to complete any open items. A copy of the QA Audit was also provided to the NRC Resident Inspector.

Attachment I of this letter shows the current status of all items which were identified in Appendix B of the referenced inspection. Detailed observations which were utilized to derive the status shown in Attachment I are contained in QA Surveillance Audit No. 1029.

In addition to items specifically identified in Appendix B of the referenced inspection, this response also addresses the status of two other concerns addressed in open item 85-13-02 of the subject inspection. These items were also addressed in QA Surveillance Audit No. 1029. The present status of these items is addressed in Attachment II of this letter.

Very truly yours,

RADFORD J. CONVERSE

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Mr. Stewart D. Ebnetter, Director
U. S. Nuclear Regulatory Commission
From: Radford J. Converse
Subject: Inspection Report 50-333/85-13

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JAFP 85-0781
Page 2 of 2

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

ATTACHMENT I

NO.	INSPECTION FINDING	ITEM	STATUS
1	A.1.a	Revise D&A procedures 3.11 and 3.18.	Complete
2	A.1.b	Provide design verification for modification FI-31-2G.	Complete
3	A.1.b	Issue new set of Revision 1 calculations as required by EDP-2.	Complete
4	A.1.b	Provide training to PE section on 10 CFR 50 App. B and ANSI 45.2.11.	Complete
5	A.1.c	Provide correct design verification for modification FI-80-20.	Complete
6	A.1.d	Provide forms and procedures for recording phone calls and meetings.	Complete
7	A.1.d	Issue procedures to cover activities of Project Engineering - BWR.	Complete
8	B	Review and mark up NuAPs and NGPs.	Complete
9	B	Issue final revised NuAPs, NGPs and new procedures.	Complete
10	C.1.a	Write Maintenance Department procedures and policies, and issue administrative manual.	Closed in Inspection 84-08.
11	C.1.b	Complete Maintenance Department hiring to fill open positions.	Closed in Inspection 84-08.
12	C.1.c	Issue and implement ITP procedure for training of maintenance contractor personnel.	Closed in Inspection 84-08.
13	C.1.d	Hire Contract Services Engr.	Closed in Inspection 84-08.
14	C.2.a	Obtain or create computerized PM scheduling program.	Complete

ATTACHMENT I

NO.	INSPECTION FINDING	ITEM	STATUS
15	C.2.b	Develop a procedure to administer PM program.	Complete
16	C.2.c	Incorporate plant components into PM program.	See Response Update A.
17	C.2.d	Assure that 40% of Maintenance activities are preventive.	See Response Update A.
18	D.1.a	Supplement present site QA audit program.	Complete
19	D.1.b	Coordinate audit of site fire protection activities.	Complete
20	D.1.b	Expand utilization of technical expertise from other organizations.	Complete
21	D.2	Revise QA procedures manual.	Complete
22	D.2	Develop and implement QA procedures for Design Control.	Complete
23	D.3	Develop internal audit schedule.	Complete
24	E.1, E.2	Revise plant and HQ administrative records management procedures.	Complete
25	E.2	Complete records retention index for HQ and plant.	Complete
26	E.2	Issue final version of nuclear records retention schedule.	Complete
27	E.3	Complete archival records vault.	Complete
28	E.3	Complete archival records retention program.	See Response Update B.
29	F.1	Develop lesson plan for Tech. Services personnel.	See Response Update C.
30	F.1	Revise I&T procedures to meet INPO guidelines.	Closed in Inspection 84-12.

ATTACHMENT I

NO.	INSPECTION FINDING	ITEM	STATUS
31	F.1	Revise training procedure for HQ personnel.	Closed in Inspection 84-12.
32	F.1	Complete qualification standards and cards for maintenance personnel.	See Response Update D.
33	F.1	Commence skill and plant-specific training.	Closed in Inspection 84-12.

ATTACHMENT I

RESPONSE UPDATE - A

As noted in C.2.a and C.2.b of this attachment, a computerized P.M. Scheduling Program has been developed and an administrative P.M. program procedure has been approved and implemented.

In 1984 a Task Force, including site and corporate personnel, was constituted to develop the basis for a comprehensive planned maintenance program. This effort was completed and a short term and long term plan has been developed for implementation. Currently, plant procedures are being upgraded to provide detailed direction for the maintenance of safety-related components. Formalized preventive maintenance is currently scheduled and being performed on safety-related breakers, motor control centers, switchgear and safety-related limitorque operators which can be taken out of service during plant operation. A schedule for the maintenance of safety-related limitorques requiring an outage is being developed. When completed, an estimate of resources necessary to support that schedule will be made and action taken to procure these resources. A program and schedule for repacking important safety-related valves is also being developed for completion by the end of the year. The formalization of the lubrication program will be completed by 1/31/86 for important plant equipment. The PM program will be expanded from this scope in accordance with our long term plan and budgetary restraints.

A contract award to institute a computerized vibration monitoring program has just recently been issued, and implementation is scheduled throughout 1986.

While the goals established in C.2.c and C.2.d have not been completely met, the Authority believes that sufficient progress has been made to close out these items of Inspection 84-24.

RESPONSE UPDATE - B

The records storage facility has been complete and is in full operation. However, at the present time, the records being maintained in the vault are being reviewed to determine which records can be purged and what the proper retention schedule is for the remaining records. A contractor has been hired to assist in this effort.

RESPONSE UPDATE - C

Formal training in the areas of design verification, technical review of procurement documents, equipment qualification and other technical areas has been provided. The Authority, however, does recognize the need for a structured program which addresses the continuing training of Technical Services Engineers and a JAF Indoctrination and Training Procedure for Technical Services Department personnel (ITP-17) will be implemented by January 1, 1986.

ATTACHMENT I

RESPONSE UPDATE - D

Implementation of the last phase of the apprentice program will commence by February, 1986. All phases with the exception of on-the-job training are presently being implemented.

ATTACHMENT II

Concern: NRC Inspection 85-13, open item 85-13-02, states "In response to another OAT concern, the licensee provided a draft revision to the Plant Standing Order (PSO) No. 5 for the NRC review. This draft revision contained measures to provide better on-site control for the drawings and records. However, this draft was never formally issued."

Response: Two plant procedures will be issued to replace PSO No. 5. These procedures for Plant Drawing Control and for the Control of Vendor Technical Manuals, will be issued by October 31, 1985.

Concern: Page 8 of Inspection 85-13, Item 85-13-02 states: The inspector verified the status of resolution for the drawing revision back log reported in NRC Operational Assessment Team (OAT) Inspection Report (No. 50-333/82-24). The licensee's corrective action was to reduce the back log using a plan reported in JAFP Letter 82-0869 dated August 6, 1982. However, as of May 3, 1985, the licensee has completed less than sixty percent of the drawings scheduled for update in 1984. If the present trend continues, the licensee will not be able to meet the 1985 schedule. This back log is further increased by the 1985 outage, which required more than three thousand drawings to be revised. The White Plains Office Support to the drawing revision efforts appeared to have lost the initial level of attention. Additional corporate management attention is required to meet the drawing revision goal.

Response: A meeting was held on site between Design & Analysis, Project Engineering and the Site Technical Services Department to address the noted problem. The drawing update procedure has been modified to remove delays and to reduce time to update a revised drawing.

The attached list represents the status of the Drawing Update Program as of 8/31/85. A review of all modifications by the Site Technical Services Department shows that as of 9/16/85, approximately 82% of all installed modifications have completed drawing updates.

ATTACHMENT II

DRAWING UPDATE PROGRAM SCOPE

	<u>MODS SCHEDUL- ED FOR DWG. UPDATE</u>	<u>MODS WITH DWG UPDATE COMPLETED OR VERIFIED AS NOT INSTALLED</u>	<u>NO. OF DRAWINGS SCHEDULED FOR UPDATE</u>	<u>NO. OF DRAWINGS COMPLETED</u>
1983	130	130	1694	1694
1984	70	70	1086	1086
1985	35	25	724	480
	—	—	—	—
TOTAL:	235	225	3504	3260
	% Complete:	<u>95%</u>	% Complete:	<u>93%</u>

ADDITIONAL WORK NOT IN ORIGINAL DRAWING UPDATE PROGRAM

	<u>MODS SCHEDUL- ED FOR DWG. UPDATE</u>	<u>MODS WITH DWG UPDATE COMPLETED OR VERIFIED AS NOT INSTALLED</u>	<u>NO. OF DRAWINGS SCHEDULED FOR UPDATE</u>	<u>NO. OF DRAWINGS COMPLETED</u>
1983	0	0	0	0
1984	27	27	82	82
1985	<u>108</u>	<u>60</u>	<u>1439</u>	<u>754</u>
TOTAL:	135	87	1521	836

	<u>MODS SCHEDUL- ED FOR DWG. UPDATE</u>	<u>MODS WITH DWG. UPDATE COMPLETED OR VERIFIED AS NOT INSTALLED</u>	<u>NO. OF DRAWINGS SCHEDULED FOR UPDATE</u>	<u>NO. OF DRAWINGS COMPLETED</u>
GRAND TOTALS:	370	312	5025	4096
	% Complete:	<u>84%</u>	% Complete:	<u>81%</u>