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SUBJECT: Comment on proposed changes to SALP program.Util supports
 comments being filed by NUMARC & legal firm of Winston &
 Strawn.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

October 9, 1992
GO2-92-237

Docket No. 50-397

Mr. David L. Meyer, Chief,
Rules and Directives Review Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

USNRC
OFFICE OF ADMINISTRATION

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Dear Mr. Meyer:

Subject: **COMMENTS ON PROPOSED CHANGES TO SYSTEMATIC
ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
PROGRAM (57 FED. REG. 39249)**

The Washington Public Power Supply System (Supply System), an operator of a nuclear power plant licensed by the U.S. Nuclear Regulatory Commission (NRC) has reviewed the subject proposed changes to the SALP program and provides the following comments for your consideration.

The Supply System participated in the September 29, 1992 workshop held by the NRC where the proposed changes to the SALP program were presented by NRC staff and discussed at great length by those in attendance. We appreciated the opportunity to participate in a workshop of this nature and encourage continued use of this mechanism as a way to gain public comment on important issues.

A major message, which was heard at the September 29 workshop, was that the changes proposed do not go far enough in attempting to correct problems with the SALP program. All four of the working groups brought back a strong message that the NRC should eliminate the numerical rating for the SALP categories. The NRC was encouraged to reevaluate the SALP program in light of the comments and concerns raised during the NRC's Regulatory Impact Survey.

The SALP process, as it is presently being applied by the NRC, is used as a "ratchet" to continually raise the regulatory standard. While continued improvement is an industry goal and is being promoted by INPO and other industry organizations, this is an improper application of the SALP process. The purpose of the SALP program should be to provide an integrated assessment of licensee performance against regulatory requirements. Unless this is the case,

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Mr. David L. Meyer

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**COMMENTS ON PROPOSED CHANGES TO SALP PROGRAM
(57 FED. REG. 39249)**

licensees are being evaluated against subjective judgements of NRC staff. While it is generally acknowledged that the overall industry performance has improved over the past several years, this trend is not reflected by a corresponding improvement in the SALP scores.

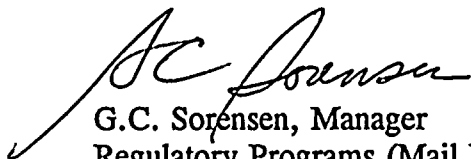
The proposed change to standardize the SALP cycle to a period of approximately eighteen (18) months is viewed as an appropriate change and should ease the burden on both the NRC and the licensees.

At the SALP workshop, the NRC staff stated that one reason for decreasing the number of functional areas was to balance the importance of the areas such that when the scores are misused by others, the average score may more accurately reflect the overall performance of the licensee. As proposed, the functional areas still do not represent equal weighing in their importance to public health and safety. Recognizing that it may not be possible to combine functional areas so that they are truly equal, the problems of misuse of the scores could be better addressed by elimination of the numerical ratings as recommended at the workshop or by increasing the number of functional areas rather than decreasing them.

In addition to the comments provided here, the Supply System has reviewed comments being submitted on this subject by the Nuclear Management and Resources Council and the legal firm of Winston & Strawn. We support the comments being filed by these two groups as representing our own views.

Should you have any questions regarding our comments, please contact me at (509) 372-5238.

Very truly yours,



G.C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

GCS:sn

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