

## 7. 2. 1.

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LICENSEE CODE						14	LICENSE NUMBER											25	LICENSE TYPE					30	57 CAT 58			

REPORT SOURCE L 6 0 5 0 0 0 3 1 6 7 0 6 1 2 7 8 8 0 7 1 1 7 8 9

60 61 DOCKET NUMBER 68 69 EVENT DATE 74 75 REPORT DATE 80

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

1 DURING NORMAL OPERATION, FOLLOWING AN ADDITION OF BORIC ACID TO THE BORATED WATER

SYSTEMS. THE BORON INJECTION TANK BORON CONCENTRATION WAS FOUND TO BE 19,780 PPM.

THIS WAS BELOW THE 20,000 PPM LIMIT OF T. S. 3.5.4.1. THE ASSOCIATED BORIC ACID

STORAGE TANK SOLUTION WAS FOUND TO CONTAIN 18,705 PPM BORON, WHICH IS BELOW THE LIMIT

SPECIFIED BY T.S. 3.1.2.8. THE ACTION REQUIREMENTS OF BOTH T.S. WERE FULFILLED.

SYSTEM CODE      CAUSE CODE      CAUSE SUBCODE      COMPONENT CODE      COMP. SUBCODE      VALVE SUBCODE

S   F   11      A   12      X   13      Z   Z   Z   Z   Z   Z   14      Z   15      Z   16

9      10      11      12      13      14      15      16      17      18      19      20

(17)	LER RO REPORT NUMBER	[7][8]	[ ]	[0][4][5]	[ ]	[0][3]	[L]	[ ]	[0]
		21	22	23	24	25	26	27	28
ACTION TAKEN	FUTURE ACTION	EFFECT ON PLANT	SHUTDOWN METHOD	HOURS	ATTACHMENT SUBMITTED	NPRD-4 FORM SUB.	PRIME COMP. SUPPLIER	COMPONENT MANUFACTURER	
[H]	[Z]	[Z]	[Z]	[0][0][0]	[N]	[N]	[Z]	[Z][9][9][9]	
33	34	35	36	37	40	41	42	43	47

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

1 INVESTIGATION REVEALED THAT A CHEMICAL TECHNICIAN HAD THE BORIC ACID EVAPORATOR

1 BOTTOMS PUMPED TO THE SOUTH BORIC ACID STORAGE TANKS(S-BAST) WITH A LOWER THAN

DESIRED BORIC ACID CONCENTRATION. THE S-BAST IS RECIRCULATED THROUGH THE BORON

INJECTION TANK, CAUSING IT'S LOW BORIC ACID CONCENTRATION.

FACILITY STATUS (28) 0 9 7 (29) NA (30) METHOD OF DISCOVERY (31) B (32) ROUTINE SAMPLES

ACTIVITY CONTENT  
RELEASED OF RELEASE

AMOUNT OF ACTIVITY (35)

NA

LOCATION OF RELEASE (36)

NA

PERSONNEL EXPOSURES			DESCRIPTION	
NUMBER	TYPE			
0	0	0	(37)	Z
			(38)	NA

PERSONNEL INJURIES			DESCRIPTION	NA	POOR	7905100324	990104
NUMBER	DESCRIPTION	NA	POOR	7905100324	990104		
0	0	0	40				

9 11 12  
LOSS OF OR DAMAGE TO FACILITY (43)  
TYPE DESCRIPTION NA ORIGINAL 790921 0489

9 10  
PUBLICITY  
ISSUED DESCRIPTION (45) NA  
N (44) \_\_\_\_\_

NRC USE ONLY

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7-920

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 (1)

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REPORT SOURCE L 6 0 5 0 0 0 3 1 5 7 0 6 0 2 7 8 8 0 9 1 8 7 8 9

60 61 DOCKET NUMBER 68 69 EVENT DATE 74 75 REPORT DATE 80

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

0 3

SYSTEM CODE S F 11		CAUSE CODE A 12		CAUSE SUBCODE B 13		COMPONENT CODE V A L V E X 14				COMP. SUBCODE Z 15		VALVE SUBCODE G 16			
EVENT YEAR 7 8		SEQUENTIAL REPORT NO. 0 5 0		OCCURRENCE CODE 0 3		REPORT TYPE L		REVISION NO. 0							
ACTION TAKEN F 18		EFFECT ON PLANT Z 20		SHUTDOWN METHOD Z 21		HOURS 0 0 0 0 22		ATTACHMENT SUBMITTED Y 23		NPRD-4 FORM SUB. N 24		PRIME COMP. SUPPLIER N 25		COMPONENT MANUFACTURER W 1 2 0 26	

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

1 0 THE ROOT CAUSE OF THE EVENT HAS BEEN ATTRIBUTED TO AN ENGINEERING ERROR WHICH

1 1 RESULTED IN THE UTILIZATION OF INCORRECT TEST ACCEPTANCE CRITERIA. UPON DISCOVERY OF

1 2 THE ERROR, THE ACTUAL POSITION OF EACH VALVE WAS DOCUMENTED, THEN RETURNED TO ITS

1 3 CORRECT POSITION. THE ACCEPTANCE CRITERIA CONTAINED IN THE TEST HAS BEEN

1 4 CORRECTED VIA TEMPORARY CHANGE SHEET. SEE SUPPLEMENT.

7 8 9  
FACILITY STATUS 1 5 F (28) % POWER 1 0 0 (29) OTHER STATUS NA (30) METHOD OF DISCOVERY C (31) DISCOVERY DESCRIPTION INTERNAL INVESTIGATION (32)

ACTIVITY CONTENT  
RELEASED OF RELEASE

1 6 7 33 2 34

AMOUNT OF ACTIVITY (35)

NA

LOCATION OF RELEASE (36)

NA

PERSONNEL EXPOSURES									
NUMBER			TYPE		DESCRIPTION				
1	2	3	4	5	6	7	8	9	10
0	0	0	37	2	38	NA			

DOPE 780928070

7	8	9	11	12	13		
PERSONNEL INJURIES			NUMBER		DESCRIPTION	(41)	
					POOR		7900190324 990105

1 4 0 0 0 40 NA  
9 11 12  
LOSS OF OR DAMAGE TO FACILITY 43  
ORIGINAL

TYPE		DESCRIPTION
1	3	2 (42)

PUBLICITY ISSUED DESCRIPTION (45) NAC USE ONLY

NAC USE ONLY

POOR  
ORIGINAL

SUPPLEMENT TO LER #

SUPPLEMENT TO CAUSE DESCRIPTION

UPON DISCOVERY OF THE VALVE POSITION ERROR, THE ACTUAL POSITION OF EACH THROTTLE VALVE WAS DOCUMENTED AND FORWARDED TO SERVICE CORPORATION ENGINEERS FOR ANALYSIS. THROUGH CORRESPONDENCE IT HAS BEEN INDICATED BY SERVICE CORPORATION ENGINEERS THAT ALTHOUGH THE VALVE POSITIONS WERE LESS THAN THAT REQUIRED TO FULFILL THE TECHNICAL SPECIFICATION FLOW REQUIREMENTS, THEY WERE CONSISTENT WITH THE SAFETY ANALYSIS.

PREVENTATIVE ACTION

AS THE EVENT WAS CAUSED BY SUPPLYING INCORRECT DATA FOR THE TEST ACCEPTANCE CRITERIA, THE ERROR HAS BEEN DISCUSSED WITH ALL ENGINEERING PERSONNEL RE-EMPHASIZING THE NECESSITY FOR PERFORMING ACCURATE AND THOROUGH RESEARCH PRIOR TO DATA SUBMISSION FOR PROCEDURE USE.

ADDITIONALLY, OPERATIONS DEPARTMENT PERSONNEL RESPONSIBLE FOR TEST REVIEW AND APPROVAL HAVE BEEN REINSTRUCTED IN THE IMPORTANCE OF REPORTING UNUSUAL TEST RESULTS FOR INVESTIGATION AND CORRECTION.

990106



**INDIANA & MICHIGAN POWER COMPANY**

DONALD C. COOK NUCLEAR PLANT

P.O. Box 458, Bridgman, Michigan 49106

*(cc.)*  
*W. J. Walsh*  
*cc. Baker*

September 18, 1978

Mr. J.G. Keppler, Regional Director  
Office of Inspection and Enforcement  
United States Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Operating License DPR-58  
Docket No. 50-315

Dear Mr. Keppler:

Pursuant to the requirements of the Appendix A Technical Specifications  
the following report is submitted:

RO 78-050/Q3L-0.

Sincerely,

D.V. Shaller  
Plant Manager

/bab

cc: J.E. Dolan  
R.W. Jurgensen  
R.F. Kruöger  
R. Kilburn  
R.J. Vollen BPI  
K.R. Baker RO:III  
R.C. Callen MPSC  
P.W. Steketee, Esq.  
R. Walsh, Esq.  
G. Charnoff, Esq.  
G. Olson  
J.M. Hennigan  
PNSRC  
J.F. Stietzel  
R.S. Keith  
T.P. Beilman/J.L. Rischling  
Dir., IE (30 copies)  
Dir., MIPC (3 copies)

*dyce*  
*# 7809280065*

SEP 21 1978

990107

## LICENSEE EVENT REPORT

CONTROL BLOCK

(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

01 MIDCC1 2000000000000000 3411111 4 5

LICENSEE CODE 14 15 LICENSE NUMBER 25 26 LICENSE TYPE 30 57 CAT 58

0 REPORT SOURCE LG 05000315 7022379 3031379 9

DOCKET NUMBER 65 69 EVENT DATE 74 75 REPORT DATE 79

## EVENT DESCRIPTION AND PROBABLE CONSEQUENCES 10

02 WHILE IN MODE 1 BOTH EMERGENCY DIESEL GENERATORS WERE INOPERABLE ON TWO SEPARATE

03 OCCASIONS CONTRARY TO TECH. SPEC. 3.8.1.1. ONE TIME FOR 1 HOUR AND THE OTHER

04 TIME FOR 7 MINUTES. ACTION REQUIRED BY TECH. SPEC. WAS MET. NO PROBABLE

05 CONSEQUENCES.

06

07

08

09 SYSTEM CODE EE 11 CAUSE CODE D 12 CAUSE SUBCODE Z 13 COMPONENT CODE Z Z Z Z Z Z Z 14 COMP SUBCODE Z 15 VALVE SUBCODE Z 16

17 LER NO. REPORT NUMBER 79 EVENT YEAR 79 SEQUENTIAL REPORT NO. 009 OCCURRENCE CODE 03 REPORT TYPE L REVISION NO. 0

ACTION TAKEN G 18 FUTURE ACTION H 19 EFFECT ON PLANT Z 20 SHUTDOWN METHOD Z 21 HOURS 0000 ATTACHMENT SUBMITTED Y 23 NPRD 4 FORM SUB N 24 PRIME COMP. SUPPLIER Z 25 COMPONENT MANUFACTURER Z 9 9 9

## CAUSE DESCRIPTION AND CORRECTIVE ACTIONS 27

10 DURING THE 1 HOUR INCIDENT THE "AB" DIESEL GENERATOR WAS RUNNING IN PARALLEL WHICH

11 REQUIRES ELIMINATION OF THE UNDER VOLTAGE BUS STRIPPING CIRCUITS. WHILE IN THIS

12 CONFIGURATION THE OTHER EMERGENCY DIESEL GENERATOR WAS MADE INOPERABLE FOR REQUIRED

13 MAINTENANCE. TO PREVENT THIS FROM REOCCURRING, THE PARALLEL OPERATION PROCEDURE

14 HAS BEEN REVISED WITH A STATEMENT THAT THE OPPOSITE ENGINE (CONTINUED PAGE 2)

15 FACILITY STATUS E 16 POWER 1100 29 OTHER STATUS NA 30 METHOD OF DISCOVERY A 31 DISCOVERY DESCRIPTION 32 OPERATOR OBSERVATION

17 ACTIVITY DURING RELEASED OR RELEASE Z 38 AMOUNT OF ACTIVITY NA 35 LOCATION OF RELEASE NA 36

18 TYPE OF RELEASE Z 39 DESCRIPTION NA 40

19 TYPE OF RELEASE Z 41 DESCRIPTION NA 42

20 TYPE OF RELEASE Z 43 DESCRIPTION NA 44

21 TYPE OF RELEASE Z 45 DESCRIPTION NA 46

22 TYPE OF RELEASE Z 47 DESCRIPTION NA 48

POOR ORIGINAL

990108

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CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (CONT.):

MUST BE OPERABLE AND REMAIN OPERABLE TO ALLOW PARALLEL OPERATION. THE REQUIREMENT TO BLOCK UNDER VOLTAGE BUS STRIPPING WILL BE ELIMINATED BY A REVISION THAT IS PLANNED TO BE INSTALLED DURING THE NEXT REFUELING OUTAGE THAT IS NOW PLANNED FOR APRIL AND MAY OF THIS YEAR.

DURING THE 7 MINUTE INCIDENT THE "CD" DIESEL GENERATOR WAS INOPERABLE FOR A MAINTENANCE ITEM. THE "AB" DIESEL GENERATOR WAS STARTED TO MEET TECH SPEC SURVEILLANCE 3.8.1.1 ACTION "a" AND THE GENERATOR FIELD FAILED TO EXCITE. WE HAVE EXPERIENCED THREE UNIT TRIPS WHEN STARTING AN EMERGENCY DIESEL GENERATOR AND ALLOWING AUTOMATIC FIELD FLASH. IT HAS BECOME OUR PRACTICE TO DEPOWER THE FIELD FLASH CIRCUIT WHEN TEST STARTING AN EMERGENCY DIESEL GENERATOR AND ALLOW THE RESIDUAL MEGNETISM WITHIN THE FIELD TO BUILD UP THE EXCITATION. THIS TIME RESIDUAL WAS SO LOW, THAT THE FIELD FAILED TO EXCITE. THE GENERATOR WAS SHUT DOWN AFTER THE 7 MINUTE RUN AND POWER ESTABLISHED TO THE FLASH CIRCUIT. AN INSTRUMENT TECHNICIAN WAS CALLED OUT AND THE GENERATOR FIELD WAS ENERGIZED PRIOR TO ENGINE START AND THEN DEPOWERED. THE ENGINE WAS TEST STARTED AND THE EXCITATION BUILT UP. SHIFT PERSONNEL HAVE BEEN TRAINED IN HOW TO EXCITE A GENERATOR FIELD PRIOR TO ENGINE START AND THE PROCEDURE HAS BEEN REVISED TO ALLOW THIS.

990109



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

Dear

The enclosed Nuclear Regulatory Commission Staff Paper, POLICY SESSION ITEM (SECY-78-554, dated October 25, 1978) with subject "Licensee Regulatory Performance Evaluation" describes three approaches tried by the NRC staff for evaluating the regulatory performance of operating nuclear power plants. These approaches were preliminary efforts toward developing a technique for evaluating the regulatory performance of NRC licensees on a nationwide basis. The staff has requested Commission approval of a two-year trial program to further develop and test an evaluation technique.

If successful, licensee regulatory performance evaluation should give NRC staff the ability, on a nationwide basis, to distinguish between levels of licensee regulatory performance. This could lead to more effective use of the agency's inspection and enforcement resources and to identification of plants that need further examination by the agency.

The NRC staff emphasizes that, while an evaluation program may be useful in focusing staff attention of the plants that depart from the performance of the majority of plants, the means of assuring adequacy of plant safety will not be changed. This assurance will continue to rest on detailed reviews of plant operations by the Office of Nuclear Reactor Regulation and plant-by-plant judgments made as a result of inspections by the Office of Inspection and Enforcement.

The three evaluation approaches which have been tried are:

1. The "statistical method," based on evaluating two measures of performance: the number of noncompliance findings and the number of events, considered directly controllable by the licensee of the total events required to be reported to the NRC. These

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Enclosure

factors then were weighed by taking into account such things as the severity of the items of noncompliance and the amount of staff inspection time required to identify individual items of noncompliance. Under the statistical method, reactors or sites were identified as being in one of three groups - A, B, C.

2. The "trend analysis method," based on a detailed review of events which licensees are required to report to the NRC. An effort then was made to identify trends, repetitive problems, or those linked to similar causes.
3. The "regional survey method," which collected expressions of opinion of facilities by NRC inspectors and regional management. For the trial effort, NRC field inspector personnel were asked to express themselves on a scale, from acceptable to exceptional, about factors concerning operating reactors.

The Staff Paper, SECY-78-554 and its enclosure including the reports describing the approaches tried by the NRC staff, are enclosed. These documents are being sent to each licensee whose facility is mentioned in the paper or reports and to other individuals expressing an interest in this matter. Copies, also, have been placed in the NRC's Public Document Room, 1717 H Street, N.W., Washington, D.C., and the Commission's Regional Offices--631 Park Avenue, King of Prussia, Pennsylvania; Suite 3100, 101 Marietta Street, Atlanta, Georgia; 799 Roosevelt Road, Glen Ellyn, Illinois; Suite 1000, 611 Ryan Plaza Drive, Arlington, Texas; and Suite 202, 1990 North California Boulevard, Walnut Creek, California.

Sincerely,

Enclosure:  
USNRC Policy Session Item,  
SECY-78-554, dtd 10/25/78,  
w/encls.

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990111



October 25, 1978

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

SECY-78-554

POLICY SESSION ITEM

For: The Commissioners

From: John G. Davis, Acting Director  
Office of Inspection and Enforcement

Thru: Executive Director for Operations *for J.G.*

Subject: LICENSEE REGULATORY PERFORMANCE EVALUATION

Purpose: The purpose of this paper is to inform the Commission regarding the status of efforts by the Office of Inspection and Enforcement in licensee regulatory performance evaluation and to obtain Commission approval of a two-year trial program.

Discussion: IE has been working to develop techniques for evaluating the regulatory performance of NRC licensees for several years, with intensified effort over the last two years. "Regulatory performance," is meant to convey the ability of the licensee to meet regulatory requirements and to avoid reportable events that appear to be directly under the control of the licensee. "Regulatory performance" does not involve reliability, availability, earnings, or other measures which may be used to measure performance.

Licensee Regulatory Performance Evaluation (LRPE) is the effort to evaluate the regulatory performance of licensees on a national basis. It has as its objectives:

- . Identification of factors that lead to different levels of regulatory performance.
- . Effective and efficient use of NRC inspection resources.

Information from the evaluation process also can be used to evaluate aspects of the NRC inspection program.

Contact:  
H. D. Thornburg, RCI  
43-28484

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# LICENSEE PERFORMANCE EVALUATION

H.E. Chakoff    D.M. Speaker  
S.R. Thompson   S.C. Cohen

TEKNEKRON, Inc.

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Prepared for  
U.S. Nuclear Regulatory Commission

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990114

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## INDIVIDUAL SITE RATINGS

From The

IE EMPLOYEE SURVEY ON EVALUATION OF LICENSEES

April 1978

Stephen K. Conner

IE Study Group

Office of Inspection and Enforcement

U. S. Nuclear Regulatory Commission

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INDIVIDUAL SITE RATINGS  
From The  
IE EMPLOYEE SURVEY ON EVALUATION OF LICENSEES

Background

This report documents the "Individual Site Rating" portion of the "IE Employee Survey on Evaluation of Licensees" that was conducted in the fall of 1977. The purpose of this survey was to solicit the views of employees of the Office of Inspection and Enforcement (IE) on a variety of subjects related to Licensee Performance Evaluation (LPE). For several years, IE has been attempting to develop a method of identifying those licensees whose level of performance (as measured principally, but not solely, by compliance) requires improvement.

A persistent IE staff criticism of early in-house efforts to develop an LPE methodology was that proposed quantitative rating schemes did not capture the subjective judgments of those Regional employees familiar with the specific licensed activities. This questionnaire was developed as one way of responding to that valid criticism. In addition to asking a number of questions on the advisability and mechanics of conducting evaluations of licensees, the questionnaire also asked each Regional respondent to evaluate each of the sites he was familiar with in terms of its overall safety and a number of other factors. This report summarizes the results of those ratings.

A survey instrument was prepared and statistical calculations were performed by Hay Associates under NRC Purchase Orders DR-77-1322 and DR-77-2631. After the questionnaire was developed with significant input from the IE staff, it was distributed by IE to all appropriate staff members directly associated with the inspection of operating power reactors,

990116





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

September 26, 1977

MEMORANDUM FOR: Ernst Volgenau, Director  
Office of Inspection and Enforcement, HQ

FROM: E. Morris Howard, Director, Region IV  
Office of Inspection and Enforcement

SUBJECT: DRAFT REPORT - LICENSEE INSPECTION AND ENFORCEMENT  
INDICATORS

The final Draft Report of Licensee Inspection and Enforcement Indicators which is intended to fulfill the assignment to establish and validate techniques for Licensee Inspection and Enforcement Indicators is submitted for your consideration. The Draft Report is a detailed statistical analysis which has been examined by an independent contractor (ORNL) and found to be mathematically and statistically valid. Suggestions made by ORNL are encompassed in the revision of this detailed statistical analysis.

I consider the detailed statistical as both desirable and necessary supportive information to any analysis of performance indicators; however, it is felt that a simplified technique, using the identical data base, but requiring considerably less analysis was in order. In the development of the simplified technique, items of noncompliance were assigned a value, summed, and the  $\bar{z}$  score calculated. Figure No. 1 is the flow diagram for these calculations. The  $\bar{z}$  scores, which are the number of standard deviations that an observation differs from the mean of its group, are shown on Figures No. 2 and No. 3. The comparisons between the simplified and detailed analysis are shown on Tables No. 1 and No. 2.

An attempt was made to separate functional areas in the Draft Report with what I consider less than roaring success due to the lack of data. It appears that a clearer relationship between total noncompliance and the functional areas is more clearly discernable by recalculating a new total  $\bar{z}$  score after subtracting the contribution of a given functional area, and then comparing the two total  $\bar{z}$  scores. Figure 4 shows the contribution of Safeguards to the total score of the several pressurized water reactor sites.

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Ernst Volgenau, Director, HQ

-2-

September 25, 1977

This simplified concept uses the same basic techniques described in the Draft Report except for pre-weighting and it would be redundant to redescribe them here.

It is recommended that this simplified technique be used and that an annual detailed statistical analysis be performed to evaluate possible emerging and presently elusive relationships.

*E. Morris Howard*  
E. Morris Howard  
Director

Enclosures:  
As stated

cc: J. G. Davis  
H. D. Thornburg

990118

Draft Report

AN EVALUATION OF THE  
NUCLEAR SAFETY-RELATED MANAGEMENT PERFORMANCE  
OF NRC OPERATING REACTOR LICENSEES  
DURING 1976

(Licensee Management Performance Indicators)

February 1977

E. Morris Howard, Project Director  
Stephen K. Conner  
Robert G. Easterling  
Walter S. Schwink

990 119

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990 120



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

October 26, 1977

MEMORANDUM FOR: Ernst Volganau, Director  
Office of Inspection & Enforcement, HQ

FROM: E. Morris Howard, Director, Region IV, IE

SUBJECT: LICENSEE INSPECTION AND ENFORCEMENT INDICATORS UPDATE

Enclosed are four figures depicting inspection and enforcement indicators, based solely on noncompliance, covering the periods January 1, 1976 through June 30, 1977 and January 1, 1977 through June 30, 1977, for both BWR's and PWR's.

It is interesting to note that unusually low or high indicators in the long term (January 1, 1976 through June 30, 1977) are not off-set by drastically improved performance in the short term. Indian Point is an excellent example of short term improvement with the long term record continuing to reflect the unusually bad record in Calendar Year 1976. The long run trend is a valuable tool in determining the improvement or degradation of a site's record when compared with a short term evaluation. These trends might also be used to determine the effect of significant enforcement action, which is what occurred at Indian Point and Zion in the second-half of 1976, with Indian Point showing marked improvement in the first-half of 1977 and Zion showing a marked down trend in the same period. It will be interesting to determine the effect of the IE enforcement activities on Zion's record in subsequent evaluations.

There are unlimited possibilities which could be investigated with a strong possibility that reasonable, statistically supportable, conclusions could be reached concerning the licensee's activities, program effectiveness, and regional inspection performance.

There may also be a hint as to how the inspectors perceive the licensee management attitudes, particularly where there is a low subjective rating and only a single deficiency for over four hundred hours of inspection effort. The converse also occurred.

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Enclosure 10