



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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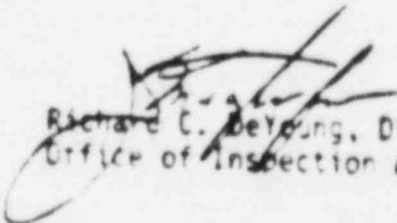
MEMORANDUM FOR: Those on Attached List

FROM: Richard C. DeYoung, Director
Office of Inspection and Enforcement

SUBJECT: REVISED SALP MANUAL CHAPTER (NRC 0516)

My March 12, 1984 memorandum forwarded a copy of the revised Systematic Assessment of Licensee Performance (SALP) NRC Manual Chapter (NRC 0516). That memorandum requested that the revised MC be put in effect as soon as possible but should not interrupt SALPs then in progress. The formal issuance of the MC was postponed pending resolution of several issues. These issues were discussed during the NRC management meeting held October 10 and 11, 1984. At that meeting the participants agreed that because the current draft of the SALP Manual Chapter reflects current policy and practice, the current version be issued as interim guidance. The enclosed version of MC NRC 0516 is forwarded for your implementation. This version is similar to the one forwarded to you by my March 12, 1984 memorandum, with the exception of changes to the supporting data and summaries section that reduce and clarify the information required to be provided. By copy of this memorandum, I am asking the Office of Resource Management to proceed with issuance of the enclosed version of the manual chapter.

At the October 10 and 11 Management meeting, IE committed to convene a review group to address further changes that may be needed to the SALP process. Also, an additional issue concerning SALP has recently surfaced. This issue is related to Commission actions with respect to licensee training programs in response to Section 306 of the Nuclear Waste Policy Act. Consideration is being given to including training as a separate area to be addressed in all SALP reports. To address new and remaining issues, we will make arrangements for a meeting of the review group in the near future. We have contacts for all the Regions and Headquarters Offices and will be talking with them to set up the meeting.


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Enclosures: NRC 0516

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IE

CHAPTER 0516 SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

0516-01 COVERAGE

This Chapter and its appendix describe the basic structure and overall procedures for implementation of the NRC program to assess licensee performance. This program applies to all power reactors with operating licenses or construction permits (hereinafter referred to as licensees).

0516-02 OBJECTIVES

- 021 To improve the NRC regulatory program.
- 022 To permit sound decisions regarding NRC resource allocations.
- 023 To improve licensee performance.
- 024 To collect available observations on a periodic basis and evaluate licensee performance based on those observations, through the Systematic Assessment of Licensee Performance (SALP), an integrated NRC staff effort. Positive and negative attributes of licensee performance are considered. Emphasis is placed upon understanding the reasons for licensee's performance in important functional areas, and sharing this understanding with the licensee. The SALP process is oriented toward furthering NRC's understanding of the manner in which: (a) the licensee management directs, guides, and provides resources for assuring plant safety; and (b) such resources are used and applied. The integrated SALP assessment is intended to be sufficiently diagnostic to provide a rational basis for allocating NRC resources to provide meaningful guidance to licensee management.

0516-03 RESPONSIBILITIES AND AUTHORITIES

- 031 The Executive Director for Operations (EDO) provides oversight for the activities described herein.

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032 The Director, Office of Inspection and Enforcement (IE):

- a. Implements the requirements of this chapter within the Office of Inspection and Enforcement.
- b. Monitors the SALP process; evaluates and develops SALP policy, criteria, and methodology; and assesses the uniformity and adequacy of the regions' implementation of the program.

033 The Directors, Offices of Nuclear Reactor Regulation (NRR), Analysis and Evaluation of Operational Data (AEOD), and Nuclear Materials Safety and Safeguards (NMSS), Implement the requirements of this chapter within their Offices.034 Regional Administrators:

- a. Implement the requirements of this chapter within the Regions.
- b. Ensure that assessments of licensee nuclear safety performance are conducted.
- c. Determine when a meeting with the licensee is necessary to assure mutual understanding of the issues discussed in the SALP Board report.
- d. Evaluate the SALP Board report and the licensee's comments; provides a characterization of overall safety performance; formally issues the NRC SALP report; follows up on licensee commitments; and reallocates region inspection resources as appropriate.
- e. Provide to the Director, Office of Inspection and Enforcement, recommendations for improvements to the SALP program and comments on proposed changes to SALP policy.

0516-04 EVALUATION CRITERIA AND FUNCTIONAL AREAS

- 041 Evaluation. Licensees will be evaluated in the functional areas listed in section 042 using the criteria provided herein and further amplified in the Appendix to this Chapter. Each functional area evaluated will be assigned a Category as defined in Section 043 and a performance trend as defined in Section 044. Not all functional areas need be covered in a given review. If a functional area appropriate to a licensee is not covered, the reasons should be given in the report. The Appendix to this Chapter lists a number of attributes for each evaluation criterion. The functional area being evaluated may have some attributes that would place the evaluation in Category 1 and others that would place it in either Category 2 or 3. The final rating for each functional area will be a composite of the attributes tempered with judgment as to significance of individual items. Departures

from this guidance may sometimes be warranted. In such cases, the rationale for such departures should be explained in the report.

042 Functional Areas. A grouping of similar activities.

a. Operating Phase Reactors

1. Plant Operations

Consists chiefly of the activities of the licensee's operational staff (e.g., licensed operators, shift technical advisors, and auxiliary operators). It is intended to be limited to operating activities such as plant startup, power operation, plant shutdown, and system lineups. Thus, it includes activities such as reading and logging plant conditions; responding to off-normal conditions; manipulating the reactor and auxiliary controls; and training/retraining of licensed operators, shift technical advisors, and auxiliary operators.

2. Radiological Controls

Includes controls for occupational radiation protection; radioactive materials and contamination controls; radiological surveys and monitoring; processing of gaseous, liquid, and solid wastes; transportation of radioactive materials; radiological effluent and environmental monitoring; and the results of the NRC's independent measurement program.

3. Maintenance

Includes all activities associated with preventive or corrective maintenance of instrumentation and control equipment and mechanical and electrical systems.

4. Surveillance

Includes all surveillance testing activities as well as all inservice inspection and testing activities. Examples of activities included are: instrument calibrations, equipment operability tests, containment leak rate tests, special tests, inservice inspection and performance tests of pumps and valves, and all other inservice inspection activities.

5. Fire Protection

Includes routine housekeeping and fire protection/prevention program activities. Thus, it includes the storage of combustible material; fire brigade staffing

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and training; fire suppression system maintenance and operation; and those fire protection features provided for structures, systems, and components important to safe shutdown.

6. Emergency Preparedness

Includes activities relating to the implementation of the emergency plan and implementing procedures. Thus, it includes such activities as licensee's performance during exercises which test the licensee, state, and local emergency plans; plan administration and implementation; notification; communications; facilities and equipment; staffing; training; assessment; emergency classification; medical treatment; radiological exposure control; recovery; protective actions; and interfaces with onsite and offsite emergency response organizations.

7. Security

Includes all activities whose purpose is to ensure the security and continued operability of the plant. Specifically it includes all aspects of the licensee's security program (e.g. access control, security checks, badging).

8. Refueling

Includes all activities associated with refueling. Thus, it includes outage management, and the manipulation of new and spent fuel.

9. Quality Programs and Administrative Controls Affecting Quality

Includes all verification and oversight activities which affect or assure the quality of plant activities, structures, systems and components. This area may be viewed as a comprehensive management system for controlling the quality of work performed as well as the quality of verification activities that confirm that the work was performed correctly. The evaluation of the effectiveness of the quality assurance system should be based on the results of management actions to ensure that necessary people, procedures, facilities and materials are provided and used during the operation of the nuclear power plant. Principal emphasis should be given to evaluating the effectiveness and involvement of management in establishing and assuring the effective implementation of the quality assurance program along with evaluating the history of licensee performance in the key areas of: committee activities, design and procurement control, control of design

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change processes, inspections, audits, corrective action systems, and records.

10. Licensing Activities

Includes the adequacy and timeliness of all licensing submittals, responsiveness to NRC licensing initiatives, and the licensee's approach to resolution of technical issues from a safety standpoint.

11. Others (As Needed)

b. Construction Phase Reactors

1. Soils and Foundation

Includes all soil and foundation activities related to the construction of the ultimate heat sink and safety-related structures. Specifically, this covers, as applicable, subgrade investigation and preparation, fill materials and compaction, embankments, foundations and associated laboratory testing, instrumentation and monitoring systems.

2. Containment, Safety-Related Structures, and Major Steel Supports

Includes all activities related to the structural concrete and steel used in the containment (including the basemat) and safety-related structures, and major steel equipment supports. It includes all aspects of structural concrete (e.g., reinforcing steel; concrete batching, delivery, placement, in-process testing, and curing; liner plate erection and fabrication; and containment post-tensioning), structural steel used in safety-related structures (welded and bolted), and major steel equipment supports (for reactor vessel, reactor coolant pumps, steam generators, pressurizer, polar crane, tanks, heat exchangers, etc.).

3. Piping Systems and Supports

Includes those safety-related piping systems described in 10 CFR 50.2(v) and R.G. 1.26, quality groups A, B and C. It is intended to be limited to the primary pressure boundary and other safety-related water, steam and radioactive waste containment piping systems. It includes those quality checks necessary to ensure compliance with the applicable codes and other requirements specified in the SAR for these systems. The primary inspection emphasis in this area is on piping systems and their supports/restraints.

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4. Safety-Related Components - Mechanical

Covers mechanical components such as pressure vessels, pumps, and valves located in, and attached to, the piping systems described in 3 above. The primary emphasis here is on components rather than piping.

5. Auxiliary Systems

Includes those safety-related auxiliary systems included in the nuclear facility which are essential for the safe shutdown of the plant or the protection of the health and safety of the public. Included here are systems such as HVAC, radwaste, fire protection and fuel storage and handling.

6. Electrical Equipment and Cables

Includes safety-related electrical components, cables and associated items used in the electrical systems of the plant, such as: motors, transformers, batteries, emergency diesel generators, motor control centers, switchgear, electric raceways, cable (power, control, and instrument), circuit breakers, relays and other interrupting and protective devices.

7. Instrumentation

Covers safety-related instrument components and systems that are designed to measure, transmit, display, record and/or control various plant variables and conditions. The Reactor Protection System and the Engineered Safety Features Actuation System are two plant systems utilizing such devices as: sensors, transmitters, signal conditioners, controllers and other actuating devices, recorders, alarms, logic devices, instrument taking, air supplies, racks and panels.

8. Quality Programs and Administrative Controls Affecting Quality

Includes all verification and oversight activities which affect or assure the quality of plant structures, systems and components. This area may be viewed as a comprehensive management system for controlling the quality of work performed as well as the quality of verification activities that confirm that the work was performed correctly. The evaluation of the effectiveness of the quality assurance system should be based on the results of management actions to ensure that necessary people, procedures, facilities and materials are provided and used during the design and construction of the nuclear power plant. Principal emphasis should be

given to evaluating the effectiveness and involvement of management in establishing and assuring the effective implementation of the quality assurance program along with evaluating the history of licensee/contractor performance in the key areas of: quality assurance program, design and procurement control, control of construction processes, inspections, audits, corrective action systems, and records.

9. Licensing Activities

Includes all activities supporting the NRC review of the application for and the issuance of the Construction Permit and Operating License, and amendments thereto. In addition, it includes the adequacy and timeliness of all licensing submittals, responsiveness to NRC licensing initiatives, and the applicant's or licensee's approach to resolution of technical issues from a safety standpoint.

10. Others (As needed)

c. Preoperational Phase Reactors

1. Preoperational Testing

Covers the preparation, conduct, and evaluation of test results for preoperational tests performed by or under the direction of the licensee's staff to demonstrate the proper functioning and conformance to design requirements of components, systems, and structures.

2. Others (As Needed)

For reactors in the preoperational phase, functional areas from the listing for either operating phase reactors or construction phase reactors should be selected as appropriate.

d. Startup Phase Reactors

1. Startup Testing

Covers the preparation, conduct, and evaluation of test results for testing conducted following the issuance of the operating license. It starts with initial fuel loading and precritical tests, and continues until the plant reaches commercial operating status at or near its licensed power rating.

2. Others (As Needed)

For reactors in the startup phase, functional areas

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from the listing for operating phase reactors should be used.

043 Performance Categories. A rating of licensee performance in a given functional area.

a. Category 1

Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used so that a high level of performance with respect to operational safety or construction is being achieved.

b. Category 2

NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and reasonably effective so that satisfactory performance with respect to operational safety or construction is being achieved.

c. Category 3

Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used so that minimally satisfactory performance with respect to operational safety or construction is being achieved.

044 Trend. The general or prevailing tendency (the performance gradient) over the course of the SALP assessment period. The determination of the trend should not be forced. In those instances where a prevailing trend can not be determined, the SALP Board Report should state that the trend was not determined, and the reason for its omission should be provided (e.g., insufficient data).

a. Improved

Licensee performance has generally improved over the course of the SALP assessment period.

b. Same

Licensee performance has remained essentially constant over the course of the SALP assessment period.

c. Declined

Licensee performance has generally declined over the course

of the SALP assessment period.

- 045 Evaluation Criteria. Elements which must be considered when assessing a licensee's performance in a functional area.
- a. The evaluation criteria are as follows:
 - 1. Management involvement in assuring quality
 - 2. Approach to resolution of technical issues from safety standpoint
 - 3. Responsiveness to NRC initiatives
 - 4. Enforcement history
 - 5. Reporting and analysis of reportable events
 - 6. Staffing (including management)
 - 7. Training effectiveness and qualification
 - b. Guidance for using these criteria to arrive at a category assignment is found in the Appendix to this Chapter.

0516-05 BASIC REQUIREMENTS

- 051 Applicability. This Chapter applies to and shall be followed by NRC Headquarters Offices and Regional Offices.
- 052 Appendix 0516. Procedures for implementation of these directives are presented in the Appendix to this Chapter.

APPENDIX

SYSTEMATIC ASSESSMENT
OF LICENSEE PERFORMANCE

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

CONTENTS

	<u>Page</u>
PART I - GENERAL	1
PART II - EVALUATION CRITERIA	3
PART III - SALP BOARD ASSESSMENT	11
PART IV - MEETING WITH LICENSEE	17
PART V - ISSUANCE OF REPORT	19
PART VI - APPENDIX TO THE SALP REPORT	21
PART VII - FORMAT FOR SALP REPORT	23

FIGURES

FIGURE 1 - SALP EVALUATION PROCESS	2
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TABLES

	<u>Page</u>
TABLE 1 - Evaluation Criteria With Attributes for Assessment of Licensee Performance	5
TABLE 2 - Evaluation Matrix for Operating Phase Reactor Functional Areas	13
TABLE 3 - Evaluation Matrix for Construction Phase Reactor Functional Areas	15

EXHIBITS

EXHIBIT 1 - Examples of Overall Safety Performance Characterizations	24
EXHIBIT 2 - SALP Board Report	25
EXHIBIT 3 - An Errata Sheet	35
EXHIBIT 4 - Original Page	36
EXHIBIT 5 - Corrected Page	37

PART I

GENERAL

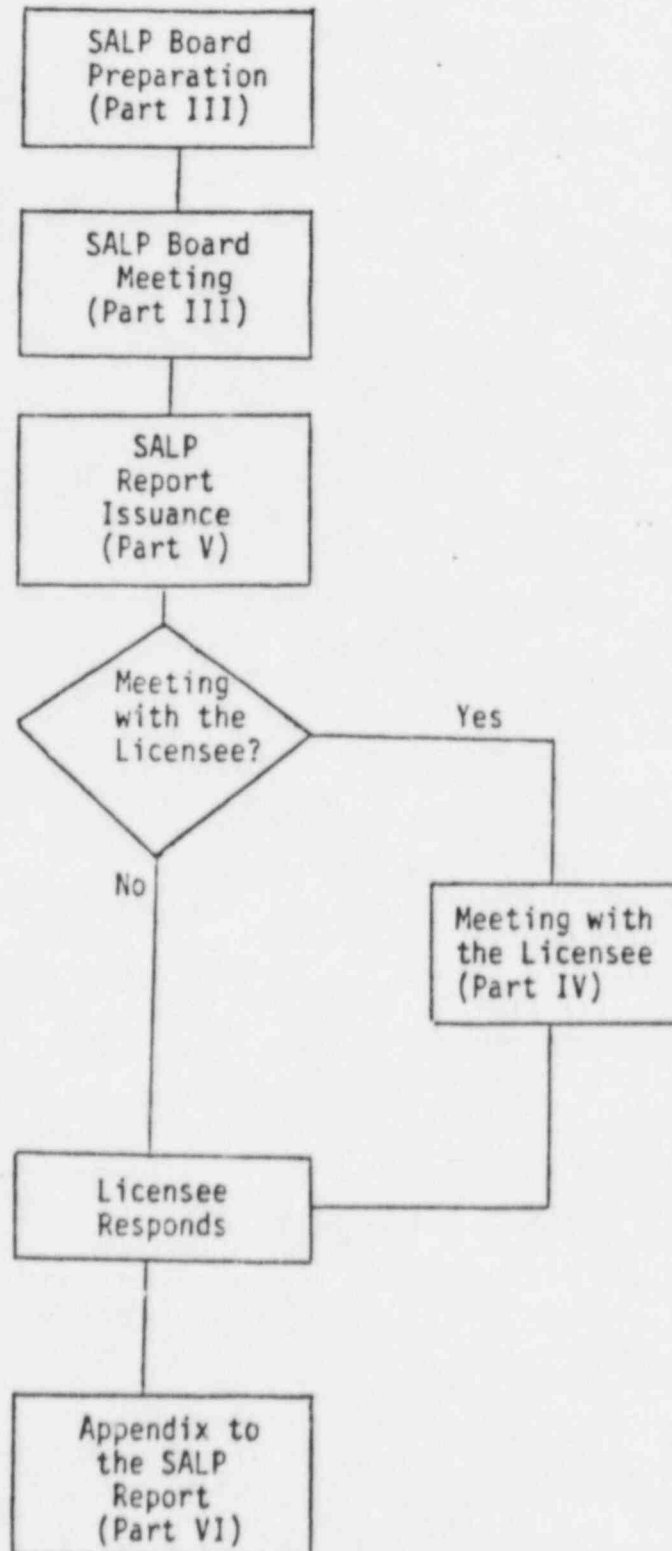
- A. The SALP program was established to improve the NRC Regulatory Program, to permit sound decisions regarding NRC resource allocations, and to better understand the reasons for the performance of each reactor licensee.
- B. The NRC will conduct a review and evaluation of each power reactor licensee possessing an operating license or construction permit every 18 months except:
 - 1. When the Regional Administrator determines that a particular utility or facility should be evaluated more frequently; or
 - 2. When a SALP Report will be used as part of an evaluation of readiness for license issuance (IE 94300), a SALP evaluation should be scheduled approximately six to nine months before the scheduled licensing date.

The individual facility assessments are intended to take place at an approximately uniform rate throughout the year within each Regional office.

- C. The evaluation process is composed of (Figure 1, Part I):
 - 1. A SALP Board assessment;
 - 2. Issuance of the SALP report;
 - 3. If requested by the licensee or if otherwise determined to be necessary by the Regional Administrator, a meeting with licensee management to discuss the assessment; and
 - 4. Consideration of any written comments received from the licensee and issuance of an appendix to the SALP report which is to include the verbatim written comments received from the licensee and the conclusions of the Regional Administrator on the basis of his consideration of the comments.

Procedures for implementing the SALP program are provided in this Appendix.

FIGURE 1.
SALP Evaluation Process



PART II

EVALUATION CRITERIA

The assessment of licensee performance is implemented through the use of seven evaluation criteria. The criteria provide standard guidance that shall be applied to each functional area for the categorization of licensee performance.

To provide consistent evaluation of licensee performance, several attributes associated with each criterion are listed to describe the characteristics applicable to the three categories.

The seven criteria discussed in Chapter NRC-0516-045 are listed in Table 1 with their associated attributes. These form the guidance which aids in understanding and evaluating licensee performance by identifying the causes and factors appropriate for categorization. It is not intended that consideration of these attributes influence established programs of the agency. For example, it is not intended that specific inspections be performed to evaluate attributes. It is expected that during the implementation of established programs, many of the attributes which describe performance will be observed. Cognizance of these attributes should assist the staff in their observation of licensee performance during routine activities.

All of the attributes of the evaluation criteria are not necessarily applicable. In some instances, the observed performance within a functional area may be insufficient to allow consideration in the evaluation. Conversely, additional attributes may be appropriate for the evaluation. Matters such as management involvement and training are criteria of each functional area and should be considered in the evaluation of the functional areas. On the other hand, if there is a problem with one of these criterion that is observed in several functional areas, it may be desirable to highlight that criterion in a separate discussion; e.g., training may be a problem in Plant Operations, Radiological Control and Surveillance. It would be appropriate to discuss training as if it were a functional area, in addition to covering the specific training problem in each functional area.

It is emphasized that all available information should be analyzed by the SALP Board, and its significance, whether it be positive or negative, should be weighed. If information is scarce or nonexistent, a decision regarding the performance category or trend as it relates to an attribute should not be forced.

TABLE 1 EVALUATION CRITERIA WITH ATTRIBUTES FOR ASSESSMENT OF LICENSEE PERFORMANCE

Category 1Category 2Category 31. Management Involvement and Control in Assuring Quality

consistent evidence of prior planning and assignment of priorities; well stated, controlled and explicit procedures for control of activities

evidence of prior planning and assignment of priorities; stated, defined procedures for control of activities

little evidence of prior planning and assignment of priorities; poorly stated or ill understood procedures for control of activities

well stated, disseminated, and understandable policies

adequately stated and understood policies

poorly stated, poorly understood or nonexistent policies

decisionmaking consistently at a level that ensures adequate management review

decisionmaking usually at a level that ensures adequate management review

decisionmaking seldom at a level that ensures adequate management review

corporate management frequently involved in site activities

corporate management usually involved in site activities

corporate management seldom involved in site activities

audits complete, timely, and thorough

audits generally complete, timely, and thorough

audits frequently not timely, incomplete, or not thorough

Category 1

Category 2

Category 3

1. Management Involvement and Control in Assuring Quality (Continued)

committees properly staffed and functioning in almost all cases

committees usually properly staffed and functioning

committees not properly staffed or functioning

reviews timely, thorough, and technically sound

reviews generally timely, thorough, and technically sound

reviews not timely, thorough, or technically sound

records complete, well maintained, and available

records generally complete, well maintained, and available

records not complete, not well maintained, or unavailable

procedures and policies strictly adhered to

procedures and policies rarely violated

procedures and policies occasionally violated

corrective action systems promptly and consistently recognize and address nonreportable concerns

corrective action systems generally recognize and address nonreportable concerns

corrective action systems rarely recognize and address nonreportable concerns

procurement well controlled and documented

procurement generally well controlled and documented

repetitive breakdown in procurement control

design well controlled and verified

rare breakdowns of minor significance in design control

repetitive breakdown in design control or verification

Category 1

Category 2

Category 3

2. Approach to Resolution of Technical Issues from a Safety Standpoint

clear understanding of issues
demonstrated

understanding of issues
generally apparent

understanding of issues
frequently lacking

conservatism routinely
exhibited when potential for
safety significance exists

conservatism generally
exhibited

meets minimum requirements

technically sound and thorough
approaches in almost all cases

viable and generally sound and
thorough approaches

often viable approaches; but
lacking in thoroughness or
depth

timely resolutions in almost
all cases

generally timely resolutions

resolutions often delayed

3. Responsiveness to NRC Initiatives

meets deadlines

generally timely responses

frequently requires extensions
of time

timely resolution of issues

few longstanding regulatory
issues attributable to licensee

longstanding regulatory issues
attributable to licensee

Category 1

Category 2

Category 3

3. Responsiveness to NRC Initiatives (Continued)

technically sound and thorough responses in almost all cases

viable and generally sound and thorough responses

often viable responses, but lacking in thoroughness or depth

acceptable resolutions proposed initially in most cases

acceptable resolutions generally proposed

considerable NRC effort or repeated submittals needed to obtain acceptable resolutions

4. Enforcement History

major violations are rare and are not indicative of programmatic breakdown

major violations are rare and may indicate minor programmatic breakdown

multiple major violations or programmatic breakdown indicated

minor violations are not repetitive and not indicative of programmatic breakdown

multiple minor violations or minor programmatic breakdown indicated

minor violations are repetitive and indicative of programmatic breakdown

corrective action is prompt and effective

corrective action is timely and effective in most cases

corrective action is delayed or not effective

Category 1

Category 2

Category 3

5. Reporting and Analysis of Reportable Events

events are promptly and completely reported

events are reported in a timely manner, some information may be lacking

event reporting is frequently late or incomplete

events are properly identified and analyzed

events are accurately identified, some analyses are marginal

events are poorly identified or analyses are marginal, events are associated with programmatic weaknesses

corrective action is effective, as indicated by lack of repetition

corrective action is usually taken but may not be effective, as indicated by occasional repetition

corrective action is not timely nor effective, events are repetitive

6. Staffing (Including Management)

positions are identified, authorities and responsibilities are well defined

key positions are identified, and authorities and responsibilities are defined

positions are poorly identified, or authorities and responsibilities are ill-defined

Category 1

Category 2

Category 3

6. Staffing (Including Management)

vacant key positions are filled on priority basis

key positions usually filled in a reasonable time

key positions are left vacant for extended periods of time

staffing is ample as indicated by control over backlog and overtime

staffing is adequate, occasional difficulties with backlog or overtime

staffing is weak or minimal as indicated by excessive backlog and overtime.

7. Training and Qualification Effectiveness

training and qualification program makes a positive contribution, commensurate with procedures and staffing, to understanding of work and adherence to procedures with few personnel errors

training and qualification program contributes to an adequate understanding of work and fair adherence to procedure with a modest number of personnel errors

training and qualification program is found to be the major contributing factor to poor understanding of work, as indicated by numerous procedure violations or personnel errors

training program is well defined and implemented with dedicated resources and a means for feedback experience; program is applied to nearly all staff

a defined program is implemented for a large portion of the staff

program may be either lacking, poorly defined, or ineffectively applied for a significant segment of the staff

PART III

SALP BOARD ASSESSMENT

A. SALP Board Preparation

1. Each Region shall issue a memorandum establishing the assessment period, SALP Board input due date, SALP Board meeting date, and date of licensee meeting, if necessary, for all facilities within the Region for all SALP meetings to occur in the calendar year. This memorandum shall be sent to NRR, IE, NMSS, AEOD, and the EDO by the end of the preceding calendar year. SALP Board members will be notified promptly of any unavoidable changes.
2. Prepare the SALP Board Report in a preliminary form.
 - a. Obtain SALP Board inputs. NRR, IE, AEOD, and NMSS shall provide a written input. If the Office does not have sufficient basis for an input, the Office shall state that fact to the Region by memorandum.
 - b. Prepare the Supporting Data Summary section of the report. (See Part VII, Exhibit 2 for format.)
 - c. Prepare a performance analysis for each of the functional areas identified in NRC 0516-042. (See Part VII, Exhibit 2 for format.)

B. SALP Board Meeting

1. The SALP Board meeting should be conducted within 45 days after the end of the assessment period.
2. The SALP Board shall be composed of:
 - a. SALP Board Chairman (Branch Chief or above)
 - b. NRR Project Manager
 - c. NRR management representative (participation is further described in NRR Office Letter 44, January 3, 1984)
 - d. Senior Resident Inspector
 - e. Representatives from IE, AEOD, and NMSS as determined by the respective Office Director.
 - f. Other individuals as determined by the Regional Administrator

3. During the SALP Board meeting, the SALP Board shall:
 - a. Review and discuss the draft SALP Board Assessment report. Ensure that sufficient information has been provided in each functional area analysis to form a conclusion regarding licensee performance or alternatively confirm that sufficient information is not available to support a conclusion regarding licensee performance.
 - b. Rate licensee performance in each functional area after considering the evaluation criteria with their associated attributes listed in Table 1 of Part II of this appendix. Tables 2 and 3 may be used by the SALP Board members to assist them in their rating of a licensee.
 - c. Recommend changes to the inspection program emphasis, as necessary.

TABLE 2

EVALUATION MATRIX FOR OPERATING
PHASE FUNCTIONAL AREAS

	Management Involvement in Assuring Quality	Approach to Resolution of Technical Issues from a Safety Standpoint	Responsiveness to NRC Initiatives	Enforcement History	Reporting and Analysis of Reportable Events	Staffing (including Management)	Training and Qualification Effectiveness
Plant Operations							
Radiological Controls							
Maintenance							
Surveillance							
Fire Protection							
Emergency Preparedness							
Security							
Refueling							
Quality Programs and Administrative Controls							
Licensing Activities							

TABLE 3

EVALUATION MATRIX FOR CONSTRUCTION
PHASE FUNCTIONAL AREAS

	Management Involvement in Assuring Quality	Approach to Resolution of Technical Issues from a Safety Standpoint	Responsiveness to NRC Initiatives	Enforcement History	Reporting and Analysis of Reportable Events	Staffing (Including Management)	Training and Qualification Effectiveness
Soils and Foundation							
Containment and Other Safety-Related Structures							
Piping Systems and Supports							
Safety-Related Components							
Support Systems							
Electrical Power Supply and Distribution							
Instruments and Control Systems							
Quality Assurance and Administrative Controls							
Licensing Activities							

PART IV

MEETING WITH LICENSEE

- A. General. If requested by the licensee or if otherwise determined to be necessary by the Regional Administrator, a meeting with licensee management to discuss the assessment will be held.
- B. Meeting Preparation
 - 1. Notification of the meeting (if held) should be made by the Region at least one month in advance. Notification should be made to the licensee, the resident inspectors at the involved facilities, the NRR Project Managers for the involved facilities, and cognizant NRC managers.
 - 2. The licensee should be encouraged to have the following management representatives participate in the meeting.
 - a. Senior corporate management representative
 - b. Management officials responsible for the major functions wherein problem areas have been identified (e.g., health physics, security, engineering)
 - c. Site Manager
- C. Meeting with Licensee
 - 1. The meeting (if held) should be conducted within 90 days after the end of the assessment period.
 - 2. NRC representatives for this meeting should include the following:
 - a. Either the Regional Administrator, Deputy Administrator, or Division Director
 - b. Responsible Regional Division Director(s), Branch Chiefs, or Section Chiefs, as appropriate
 - c. NRR Project Manager and designated NRR manager
 - d. Resident Inspector and/or assigned inspectors
 - e. Public Affairs Officer, when media interest is anticipated
 - 3. The Regional Administrator, Deputy Administrator, or Division Director will chair the meeting and discussions of the adequacy of the licensee's management controls. These meetings are intended to provide a forum for candid discussion of issues relating to the licensee's performance. Those aspects of the licensee's operation that need improvement will be identified.

The licensee will also be given the opportunity to make comments on the report in writing within 30 days after the meeting or receipt of the SALP Board report if no meeting is held. Only written comments from the licensee must be addressed by the Regional Administrators.

4. SALP management meetings with the licensee should be conducted as open meetings, with the exception of those portions of the meetings that involve discussion of matters not required to be mandatorily placed in the public domain pursuant to 10 CFR 2.790 which must be closed. Members of the public should be treated as observers. Adequate notification of the SALP meeting can be accomplished by PDR distribution of the letter to the licensee which schedules the meeting, with copies to the service list for the appropriate docket.

PART V

ISSUANCE OF REPORT

A. Issuance of Report

The SALP Board Report (Exhibit 2, Part VII) shall be transmitted by the Regional Administrator to the licensee with copies to NRR and IE. The transmittal letter should include:

1. A request for licensee's written comments and amplification, as appropriate, on these comments within 30 days after the meeting (if held) or receipt of the SALP Board report. The licensee's response should include, as a minimum, corrective actions to be taken in functional areas rated Category Three.
2. Amplification of the findings of the SALP Board as appropriate. This includes, as a minimum, functional areas rated Category One, Category Three and those functional areas which have declined since the last SALP evaluation period (examples are shown in Exhibit 1, Part VII); and
3. A characterization of overall safety performance.

This letter, enclosing the SALP Report, will receive standard docket distribution including the NRC Public Document Room and the local Public Document Room, and INPO (Record Center, INPO; 1100 Circle 75 Parkway; Suite 1500; Atlanta, GA 30339). Each report will be assigned an Inspection Report number.

B. Changing the SALP Report

Any changes made to the report as originally transmitted to the licensee shall be done using the following procedure (an example is shown in Exhibits 3, 4, and 5, Part VII).

- a. Include an errata sheet (Exhibit 3, Part VII) as a separate enclosure to a Regional Administrator's cover letter denoting the change and the basis for the change.
- b. Add the corrected page (Exhibit 5, Part VII) to the report, leaving the original page (Exhibit 4, Part VII) in the report.
- c. Make a diagonal line through the original page, referencing the Errata sheet.

PART VI.

APPENDIX TO THE SALP REPORT

A. General

After receiving the licensee's written comments, the Regional Administrator shall issue an appendix to the SALP report within 30 days. This appendix will receive standard docket distribution including the NRC Public Document Room, the local Public Document Room and INPO.

B. Appendix to the SALP Report

The appendix to the SALP report shall consist of:

1. The verbatim written comments received from the licensee;
2. A summary of any meetings held with the licensee concerning the SALP report; and
3. The conclusions of the Regional Administrator on the basis of his consideration of the licensee's comments.

PART VII

SALP REPORT

FORMAT AND CONTENT

A. General

The SALP Board report is considered to be a final report upon approval by the Board and dispatch to the licensee.

B. Multiple Facility Licensees

In cases such as Duke and Commonwealth Edison, the SALP package may address more than one site. However, each site should have a separate SALP Board Report (Exhibit 2, Part VII).

C. Report Format and Content

The SALP Board report shall be prepared in general conformance to the guidelines provided in Exhibit 2. The standard entries described in this Exhibit should be used to the extent possible.

EXHIBIT 1

Samples of Overall Safety Performance Characterizations

Example 1

Overall, we find that your performance of licensed activities generally is acceptable and directed toward safe facility operation. In addition, your overall performance has showed only moderate improvement since the last SALP evaluation period. Your performance in the area of Plant Modifications with contractors having limited experience was found to be in need of increased management attention.

Example 2

In addition to the assessments and recommendations made by the SALP Board in the enclosed SALP Report, it is my view that your overall regulatory performance continued at a high level during the assessment period. It is evident that safe operation and compliance with regulatory requirements are priority considerations at your facility. I concur, however, with the SALP Board findings that management attention is required to correct problems in the area of Radiological Controls and the long standing problems associated with the existing perimeter alarm system.

Example 3

The overall performance of your facility was acceptable but exhibited a declining trend since the last SALP evaluation period. Resources were strained or not effectively used such that minimally satisfactory performance with respect to operational safety was achieved. The SALP Board identified weaknesses in the areas of plant operations, radiological controls, maintenance, security and safeguards, and the quality assurance program. Your performance in these areas will be closely monitored and discussed in the next SALP Board Assessment for your facility. A major strength was noted in the area of refueling.

Example 4

Overall, we found your performance acceptable and directed toward safe facility operation. In addition, we found your overall performance improved since the last SALP evaluation period. We found aggressive management attention and a high level of performance in the following areas: Radiological Controls, Surveillance, Fire Protection and Housekeeping, Emergency Preparedness, and Refueling. Your performance in assuring that equipment and procedural changes and adequately controlled was found to need increased attention on your part and we will pay particular attention to this area during our subsequent inspections.

EXHIBIT 2
SALP BOARD REPORT

U.S. NUCLEAR REGULATORY COMMISSION
REGION [region]

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

[Inspection Report Number]

[Name of Licensee]

[Name of Facility]

[Assessment Period]

EXHIBIT 2 (Cont'd)

I. INTRODUCTION

The Systematic Assessment of Licensee Performance (SALP) program is an integrated NRC staff effort to collect available observations and data on a periodic basis and to evaluate licensee performance based upon this information. SALP is supplemental to normal regulatory processes used to ensure compliance to NRC rules and regulations. SALP is intended to be sufficiently diagnostic to provide a rational basis for allocating NRC resources and to provide meaningful guidance to the licensee's management to promote quality and safety of plant construction and operation.

A NRC SALP Board, composed of the staff members listed below, met on [date], to review the collection of performance observations and data to assess the licensee performance in accordance with the guidance in NRC Manual Chapter 0516, "Systematic Assessment of Licensee Performance." A summary of the guidance and evaluation criteria is provided in Section II of this report.

This report is the SALP Board's assessment of the licensee's safety performance at [name of facility] for the period [date] through [date].

SALP Board for [name of facility]:

[List SALP Board Members]

EXHIBIT 2 (Cont'd)

II. CRITERIA

Licensee performance is assessed in selected functional areas, depending whether the facility is in a construction, preoperational, or operating phase. Each functional area normally represents areas significant to nuclear safety and the environment, and are normal programmatic areas. Some functional areas may not be assessed because of little or no licensee activities or lack of meaningful observations. Special areas may be added to highlight significant observations.

One or more of the following evaluation criteria were used to assess each functional area.

1. Management involvement and control in assuring quality
2. Approach to resolution of technical issues from a safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

However, the SALP Board is not limited to these criteria and others may have been used where appropriate.

Based upon the SALP Board assessment each functional area evaluated is classified into one of three performance categories. The definition of these performance categories is:

Category 1. Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used so that a high level of performance with respect to operational safety or construction is being achieved.

Category 2. NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective so that satisfactory performance with respect to operational safety or construction is being achieved.

EXHIBIT 2 (Cont'd)

Category 3. Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used so that minimally satisfactory performance with respect to operational safety or construction is being achieved.

III. SUMMARY OF RESULTS

[Provide a narrative summary of the licensee's overall significant strengths and weaknesses. It should be similar to the overall performance narrative used in the letter to the licensee.]

<u>Functional Area</u>	<u>[last period]</u>	<u>[this period]</u>	<u>Trend</u>
[functional area]	[rating last period]	[rating this period]	[trend]

IV. PERFORMANCE ANALYSIS

A. [Functional Area being discussed]

1. Analysis

[The analysis of the licensee's performance in an area should include pertinent facts and observations to highlight the specific strong and weak aspects of the licensee's performance. These facts and observations shall be presented in a manner to place matters in perspective and to allow the reader to understand the rationale for stated conclusions. This analysis should concentrate on the adequacy of the licensee's management control systems, adequacy of resources, training of personnel, etc., and the effectiveness of these efforts. Upon presentation of the analyses, the attributes associated with the specified criteria are to be referred to for purposes of both completeness and to compare the conclusions reached with the attributes of each category. The attributes listed in Part II are specifically oriented toward this

EXHIBIT 2 (Cont'd)

and should be utilized. In no event, however, are the examples of licensee performance for specific attributes to be used as stand-alone assessments; they represent a sampling of possible conclusions which must be supported by appropriate facts, observations or analysis. Each analysis should be written to avoid either 10 CFR 2.790 or safeguards information.

The analysis section is composed of three major subsections:

- . A brief account of the inspection activity which occurred in this area.
- . A brief summary of the previous year's evaluation if there has been a significant change or if there should have been significant improvement but there was not.
- . A summary of the strengths, weaknesses, and other significant observations made by the NRC staff during the evaluation period.]

2. Conclusion

[Provide the performance assessment (Category 1, 2, or 3) and trend (Improved, Same, Declined) for each functional area considered and if appropriate, a summary assessment.]

3. Board Recommendations

[Recommend NRC actions to be taken, if any are required. A basis for changes in the NRC program must be provided. Note that even in the absence of a recommendation to vary inspection levels, the Regional Office may do so based on the assessment as discussed in appropriate chapters of the IE manual.]

EXHIBIT 2 (Cont'd)

V. SUPPORTING DATA AND SUMMARIES

A. Licensee Activities

[Provide an outline of major licensee activities, such as major outages, power limitations, important licensee amendments, and significant modifications.]

B. Inspection Activities

[Provide a summary of major inspection activities in each functional area. This is not intended to be a summary of each routine inspection performed, but rather a summary of major inspection activities such as team inspections. Include Table I.]

C. Investigations and Allegations Review

[Provide a summary of major investigative activities and their results.]

D. Escalated Enforcement Actions

a. Civil Penalties [Provide a summary]

b. Orders (only those relating to enforcement) [Provide a summary]

E. Management Conferences Held During Appraisal Period

a. Conferences [Discuss conferences that dealt with regulatory performance or enforcement.]

b. Confirmation of Action Letters [Provide a summary]

[Other]

[Discuss any other issues at the discretion of the SALP Board.]

F. Review of Licensee Event Reports, Construction Deficiency Reports, and 10 CFR 21 Reports Submitted by the Licensee

[Provide a brief summary of significant findings and trends resulting from a review of these reports. If this information is contained in another section of the report, this item may be omitted.]

TABLE 1

FUNCTIONAL AREA	NO. OF VIOLATIONS IN EACH SEVERITY LEVEL				
	V	IV	III	II	I
1. Aesthetics					
2. Air Quality					
3. Biological Resources					
4. Cultural Resources					
5. Cumulative Impacts					
6. Geology/Seismicity					
7. Greenhouse Gas Emissions					
8. Land Use Planning					
9. Noise and Vibration					
10. Paleontology					
11. Public Utilities					
12. Recreation					
13. Safety					
14. Socioeconomics					
15. Special Use					
16. Transportation					
17. Uniqueness					
18. Visual Resources					
19. Water Resources					
20. Wetlands					

31

EXHIBIT 3

AN ERRATA SHEET

SALP BOARD REPORT ERRATA SHEET

PAGE	LINE	NOW READS	SHOULD READ
5	24	operator's <u>cognitive</u> decision	operator's decision

Basis: The word cognitive was deleted to avoid further problems in interpreting its meaning. As used the work was intended to mean that the operator as the cognizant individual on shift knew the operating requirements of the Technical Specification but made a conscious decision to operate the plant in a manner which he felt was equivalent to the requirements. It was not intended to mean that the operator took actions in total disregard of the Technical Specification objectives.

EXHIBIT 4

ORIGINAL PAGE

- (10) Severity Level IV - Failure to take timely and proper corrective action following the failure of a cold leg RTD (50-000/81-24).
- (11) Severity Level VI - Failure to make a 30 day report on a degraded bus voltage relay (50-000/81-26).

Six of the noncompliances were for failure to make required reports or to make timely reports, four for failure to follow procedures, and one for incomplete documentation. One noncompliance for failure to properly report a breach in containment, Item (9) above, is part of an escalated enforcement action with Civil Penalty. The actual event, is described in Section 4, Surveillance.

Nine LER's relating to this area were caused by personnel errors, six at Unit 1 and three at Unit 2. Sixty percent of these occurred in the last half of the period and thirty percent in the last quarter indicating an increasing occurrence rate in the period. Six of the nine were for incorrect valve or breaker alignments and three were for failure to follow operating procedures.

Two events (LER's 50-000/81-67 and 50-000/81-52) were of particular concern since they reflected a licensed operator's cognitive decision to operate a system (charging and letting down and containment isolation, respectively) in a manner not allowed by the Technical Specifications.

Unit 1 experienced nine automatic trips during the evaluation period, four caused by operator error and five by equipment failure. Of the four caused by errors, two were due to incorrectly conducted instrument surveillance tests, one to an incorrect valve lineup on the steam side, and the last to unfamiliarity with turbine controls.

Unit 2 experienced nine reactor trips, one being a manually initiated turbine trip. Four of the trips were related to personnel errors; two by loss of vacuum in the main condenser, one resulted from a low steam generator level, and one resulted from a turbine valve misalignment.

No significant safety concern is associated with these trips and each was reviewed to verify proper safety system operation and operator actions.

Various operating problems and events identified during the period resulted in an enforcement meeting on August 4, 1981, with followup meeting on August 4, 1981, with followup meetings on November 2, 1981

EXHIBIT 5

CORRECTED PAGE

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~~FREEDOM OF INFORMATION~~
~~ACT REQUEST~~

May 3, 1985

FOIA-85-336

rec'd 5/10/85

US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL. 60137

To Whom It May Concern:

Under the Freedom of Information Act I am requesting documents that pertain to Region III USNRC Business for 1985. Please supply the following:

- A. One copy of the USNRC Region III Operating Plan
- B. One copy of the USNRC SALP Rating Guide for Operating Reactors-
that Region III will use for doing 1985-86 evaluations

The address to which this material may be sent is:

LJKenaga
09937 Kassian Ct.
South Haven, MI. 49090

Your cooperation is appreciated.

Sincerely,

LJKenaga

DPE #508/20104