

APPENDIX

SALP BOARD REPORT

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

50-409/85001
Inspection Report No.

Dairyland Power Cooperative
Name of Licensee

La Crosse Boiling Water Reactor
Name of Facility

July 1, 1983 - December 31, 1984
Assessment Period

8508050280 850731
PDR ADDCK 05000409
G PDR

A. Summary of Meeting with Dairyland Power Company on March 28, 1985

The findings and conclusions of the SALP Board documented in Inspection Report No. 50-409/85001 were discussed with the licensee on March 28, 1985, at the NRC Region III office in Glen Ellyn, Illinois. The licensee's regulatory performance was presented and found to be acceptable in each functional area. Following the NRC presentation, Mr. John Parkyn, Plant Superintendent, made several comments and observations. Generally, he did not disagree with most of the NRC findings but stated he would provide written comments in two areas, radiological controls and security. This was done by letter of April 18, 1985. The NRC consideration of those comments is contained in Section B.

The following licensee and NRC personnel attended the meeting.

Dairyland Power Cooperative

J. Parkyn, Plant Superintendent
R. Wery, Quality Assurance Supervisor
G. Boyd, Operations Supervisor
L. Goodman, Operations Engineer

U.S. Nuclear Regulatory Commission

J. Keppler, Regional Administrator
A. B. Davis, Deputy Regional Administrator
C. Norelius, Director, Division of Reactor Projects
D. Boyd, Chief, Reactor Projects Section 2D
R. DeFayette, Inspection Project Manager
J. Wiebe, Former Senior Resident Inspector
N. Villalva, Pending Senior Resident Inspector
R. Dudley, Licensing Project Manager, NRR

B. Comments Received from Licensee

By letter of April 18, 1985, the licensee provided written comments on the SALP Report in which they requested that corrections be made in the section on radiological controls, and in which they objected to the rating in security. The NRC resolution of these comments follows.

1. Radiological Controls

1.1 Licensee Comment

The licensee pointed out that on page 10 of the report a statement is made (following the observation that radiation exposure is 20% lower than 1983) that there were no major outages in 1984. They pointed out that the refueling outage of 1983 was not completed until January 1984, and that also in 1984 a control rod drive assembly failure to operate caused additional exposure during the investigation of the reason for the failure. The licensee commented that they consider the 20% reduction a significant accomplishment.

1.2 NRC Comment

The NRC acknowledges the correction concerning the maintenance outage contributions to the 1984 personal radiation exposures, but does not agree with the contention that the reduction in personal radiation exposures for 1984 is a significant accomplishment. This disagreement is based on the annual personal radiation exposure history which indicates that with the exception of 1983, the 1984 total exceeded the annual totals since commercial operation of the plant began in 1970. Furthermore, the outage exposures for 1984 were not higher than normal and therefore were not responsible for the high 1984 annual exposure.

1.3 Conclusion

A correction has been made to the SALP Report (see Errata Sheet).

2. Security

The licensee stated five reasons why it did not agree with the category rating of 2 in security.

2.1 Licensee Comment

"No items of noncompliance were identified. This represents a decrease in the number of violations identified in the previous SALP period in which three items of noncompliance were identified."

NRC Comment

While the number of violations are considered in arriving at the overall SALP rating, they are not the only criteria used, nor does the absence of violations necessarily indicate Category 1 performance.

2.2 Licensee Comment

"Security at LACBWR has performed very well and many compliments have been given us by NRC personnel doing inspections, particularly on the quality of our guard force and the excellence of its records in training."

NRC Comment

The quality of the guard force and their training records are strong parts of the LACBWR security program. These strengths, however, do not fully compensate for the concern regarding the adequacy of security shift manning for back-shift periods. The security forces' ability to compensate for equipment outages and maintain the required response force is still unresolved. The minimum manning level on back shift resulted in an inadequate number of armed responders being available on one occasion.

2.3 Licensee Comment

"The corrective actions taken when events occur are very rapid and this was also referenced on page 10."

NRC Comment

Page 19 states: "Corrective action was taken in a timely manner." There is no mention of "very rapid" corrective action however.

2.4 Licensee Comment

"The only observation at all, which was less than positive, was that on the top of page 20 stating that the licensee's resources have not provided for procurement of current state of the art security equipment. This is not true. The licensee has provided the state of the art security equipment. As matter of fact, the licensee has gone beyond the regulatory requirements significantly in the phasing in a back up tie to the security computer so that its responsibilities may be picked up by another computer should it go down. This shortens the amount of time in which automatic surveillance is out of service."

NRC Comment

While NRC agrees that the security computer has been upgraded, the remainder of the security equipment consists primarily of equipment procured and in use since initial implementation of the 10 CFR 73 program several years ago. Package search and explosives detection methodology, although adequate, cannot be considered as state-of-the-art equipment.

2.5 Licensee Comment

"The licensee has also taken strongly a recommendation by one of the NRC inspection personnel who suggested several years ago that it would be wise to begin purchasing spares and establishing periodic replacement of certain electronic and surveillance

components. Dairyland Power has committed money to this program and has routinely replaced security components to increase the reliability."

NRC Comments

The licensee's security system is an aging system. Purchasing spares and establishing periodic replacement of certain electronic and surveillance components is a necessity to keep the system functioning adequately.

2.6 Conclusion

The security program at LACBWR is adequate with several strong points as identified in the SALP report. However, several concerns remain which should be addressed. Adequacy of security force shift manning to compensate for equipment failure and provide the required response force capability is a concern which has not yet been resolved. Security resources and equipment are maintained at the minimum level required by the Security Plan and further consideration should be given to this area.

The program is a SALP 2 category.

C. Regional Administrator's Conclusions Based on Consideration of Licensee Comments

While the NRC acknowledges and appreciates the comments the licensee has submitted on the SALP Report, for the reasons given above, we do not believe a change is warranted in any SALP rating. I have concluded that your ratings for the period (six "2's" and three "1's") are positive indicators, especially with six of the nine functional areas showing an upward trend in performance. You are to be commended for this effort and I trust that this trend will continue.