

April 18, 1985

In reply, please  
refer to LAC-10764

DOCKET NO. 50-409

James G. Keppler, Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, ILL 60137

SUBJECT: COMMENTS ON THE SYSTEMATIC ASSESSMENT OF  
LICENSEE PERFORMANCE (SALP 5)

Dear Mr. Keppler:

We have the following comments to make regarding the SALP 5 Report. We wish to thank you for your time in meeting with us and explaining the report and we also wish to thank you for the many fine comments and observations that you made of our personnel in this report as well as the overall rating you gave them.

There are a few corrections we wish to point out. On page 10 of the report, the statement that there were no major outages in 1984 is made following the observation that radiation exposure is 20% lower than 1983. It should be pointed out that indeed there were two outages in 1984. The refueling outage of 1983 did, in fact, come to completion in January of 1984. Also during 1984, a control rod drive assembly failure to operate had to be assessed. The investigation of control rod drives required 27 man rem of personnel exposure. This compares to the estimate for a refueling outage (without ISI) of 45 rem. Therefore 1984 was a very typical year so far as the full range of maintenance activities. Therefore the reduction of 20% in radiation exposure is a significant accomplishment.

On page 12, the maintenance tests which were referenced there as subjects of violations, were initial testing in response to new commitments made to the NRC. The 480 volt breakers were added to a PM program and during this first testing, the procedure was found to need strengthening. The failure to do post-maintenance testing on two motor control centers involved something which occurred in 1970. The failure to conduct what was determined to be the proper post-maintenance testing on the Alternate Core Spray check valves was also a brand new requirement. This was the first in-service testing which required the disassembly of the Alternate Core Spray Valves. A test deemed proper by the staff at  $\geq 175$  psig of water pressure was conducted. The NRC inspector felt it was more appropriate that a 52 psig air test be conducted therefore,

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there exist two extenuations; a first time performance of a new requirement and the clear fact that LACBWR personnel recognized the need to perform a test.

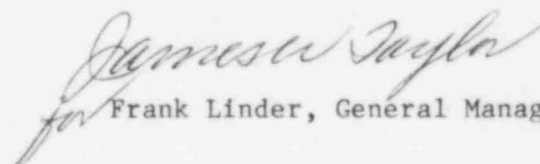
The rating in security is, in our opinion, an incorrect one. We feel we have one of the outstanding security programs in Region III and that it should be rated Category I. One of the best explanations of this feeling is that "no items of noncompliance were identified. "This represents a decrease in the number of violations identified in the previous SALP period in which three items of noncompliance were identified." 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. The corrective actions taken when events occur are very rapid and this was also referenced on page 19. The only observation at all, which was less than positive, was that at 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 backup 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. 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. We feel that these factors strongly back up our contention that our security program at La Crosse Boiling Water Reactor is in Category I.

Again, I wish to thank the NRC staff for taking the time to explain all the points in the regulatory summaries and the Regional Administrator and his deputy for being personally involved in this SALP Meeting.

If you have any question, please feel free to contact me.

Sincerely,

DAIRYLAND POWER COOPERATIVE

  
for Frank Linder, General Manager

FL:JDP:sks

cc: Document Control Desk  
NRC Resident Inspector  
Richard Dudley, LACBWR Project Manager