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September 17, 1984

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations
FROM: James G. Keppler, Regional Administrator, Region III
SUBJECT: FY 1985 REGION III OPERATING PLAN

In accordance with your memorandum of July 10, 1984, attached is the FY 1985 Operating Plan for Region III. This plan will be the basis for defining major planned accomplishments, directing the use of allocated resources, coordinating management decisions with the Program Offices to accommodate unanticipated or unbudgeted work, and evaluating regional performance by the Program Offices.

We believe that this Operating Plan meets the guidance provided in your July 10, 1984, memorandum. Modifications to the proposed format and performance standards have been coordinated with the Program Offices. Each involved Program Office has reviewed the Plan, their comments have been incorporated, and they have concurred.

Two significant changes from the FY 1984 Operating Plan are the deletion of the specific methodology for tracking resources and work units, and the tailoring of the Plan to our specific region. As noted in the Introduction to the Plan we have committed to work with each Program Office to establish their needs for tracking. In the attachment to the Plan we have provided a sample of a proposed Resource and Work Action Tracking (RWAT) document. Such a format or equivalent would be established for each Program Office. These should be available in early FY-85, but could be modified later as further refinements to our tracking systems are made. It is our intention to provide each Program Office and the EDO more detailed periodic status reports on regional resource utilization and program completion during the fiscal year.

William J. Dircks

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September 17, 1984

While we have tailored this plan to Region III, we believe the performance standards that the Program Offices will use to evaluate the Region are consistent with the other Regions. The differences relate primarily to the inherent uniqueness of an individual Region.

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Attachment: As stated

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REGION III

REGIONAL OPERATING PLAN

FY 1985

I. Introduction

The Regional Operating Plan is a statement of the major program objectives of Region III for FY 85. This plan implements the guidance included in the Policy and Planning Guide (PPG), EDO Program Guidance, and program office guidance. These guidance documents are an integral part of the Regional Operating Plan. This plan also reflects the decisions of the EDO and the Commission during the FY 1986-1987 budget review cycle.

The Operating Plan specifically identifies the Regional Programmatic Decision Units and the related resources allotted to meet them as designated in the budget. The allocated resources are in the C-35 schedule. The goals and performance standards, which the Program Offices will use to evaluate the adequacy of Regional performances, are contained in the body of the Operating Plan. The performance standards, which the EDO will use to evaluate the Regional Administrator, are those specifically identified in the SES contracts. The Plan will provide a basis for mid-year and end-of-year resource and program reviews.

Major Program Planned Accomplishments are in accordance with guidance provided by and requirements set by the Program Offices for each Decision Unit and are defined in the budget. These Major Program Planned Accomplishments are annotated as single line items under each Decision Unit in the body of the Plan.

Performance of the referenced Program Planned Accomplishments within the time frames and resources allotted assumes normal or planned workload requirements. Unexpected shifts in workload requirements, which require a reallocation of resources within Program Planned Accomplishments, as related to such things as problem facilities or unique activities, and result in significant (greater than 10% FTE in a decision unit) impact on routine programs, will be coordinated and resolved with the responsible Program Office. These changes will be reflected in updates of the Operating Plan.*

In carrying out the Programs prescribed by the Program Office, the Region will implement to the extent consistent with program guidance and general applicability, those EDO Program Guides paraphrased in Part II of the Plan.

The tracking of resources and work actions by the Region as they relate to the Planned Accomplishments will utilize the resource and programmatic tracking capabilities of the Regulatory Information Tracking System (RITS), Operator Licensing Tracking System (OLTS), the Licensing Management System (LMS), 766, and other such systems. Some are expected to undergo refinements during FY85. These refinements will be coordinated with the various Program Offices to assure that the reporting capabilities of the systems are adequate for Program Office oversight needs. For those cases where these systems may not provide sufficient information, the Region will work with the Program Offices to supplement them. An example of the type of methodology that may be employed to provide detailed tracking of resource expenditures and workload accomplishments in support of the Operating Plan is the Resource and Work Action Tracking (RWAT) document (Attachment I). Because of the general nature of the EDO Program Guides and the fact that they may not be directly trackable by these systems, the Region will highlight significant application of the guides on a case-by-case basis at the mid-year and end-of-year program reviews.

*Ref: Mr. Dircks' memoranda of 11/3/83 and 12/19/83, subject "Interoffice Coordination - Managing Regional Resources."

II. EDO Program Guide

EDO Program Guidance for FY 1984-1987 was issued on May 22, 1984. Policy Guidance applicable to Regional operations is paraphrased below.

EDO Program Guidance Paragraph

- II. Policy 1. Give highest priority to the safety of operating facilities.
- II. Guidance 1. Use AEOD and SALP reviews to help focus inspection activities, to allocate Regional resources, and to assess licensee management of operating facilities. Give priority to poorly performing licensees. Find innovative approaches to inspecting operating reactor facilities.
- II. Guidance 9. When directed by IE, focus operating reactor inspections on maintenance (including preventive) and surveillance activities. Increase direct observation. Recommend to IE the elimination of marginal inspection activities. Where sufficient documentation and guidance is available, use PRA in establishing inspection priorities, where appropriate. (See VIII.C Guidance 3)
- III. Policy 1. Support NRC activities and initiatives that affect the quality of nuclear plants.
- III. Policy 2. Understand the cause of problems at facilities under construction and in operation, and bring to the attention of NRC Management for development of new or modified guidelines to improve the quality of construction and operations.
- III. Policy 3. Pursue aggressively: The utilities' management efforts for safe operation and maintenance of nuclear plants; quality in utility operations, procedures, systems, and components; and better guidance for treatment of plant systems, components and equipment that can adversely affect safe operation.
- III. Policy 4. Highlight the necessity for highly trained and qualified professionals to manage licensee, contractor, and vendor functions related to safety.
- III. Guidance 3. Assist IE in IDI inspections.
- III. Guidance 4. Assist IE in IDVP reviews.
- III. Guidance 5. Assist IE in CAT inspections.

- IV.A. Guidance 2. Implement the Commission's policies on plant-specific backfitting, as described in 48 FR 44173, September 28, 1983; in SECY 83-321; and in SECY 83-505 as approved and modified by the Commission.
- IV.A. Guidance 4. Assist NRR, as necessary, in establishing and maintaining implementation schedules for new and existing regulatory requirements for power reactor licensees.
- IV.D. Policy 1. Continue to implement the decentralization policy goals approved by the Commission in October 1981.
- IV.D. Guidance 1. Keep licensees informed of the nature and extent of decentralization.
- IV.E. Guidance 2. Provide technical support to OI as appropriate.
- IV.E. Guidance 4. Assure that the results of investigations are followed up by appropriate action.
- IV.F. Policy 1. Apply the enforcement program effectively, uniformly, firmly, and fairly to ensure compliance with NRC safety and safeguards requirements.
- IV.F. Policy 2. When enforcement action is taken ensure appropriate corrective actions by licensees. For licensees that do not comply, prompt and vigorous action will be taken.
- IV.F. Policy 3. Perform thorough inspections to identify the cause of noncompliance.
- IV.F. Policy 4. Encourage aggressive safety approach by licensees. Give credit for prompt reporting and for prompt, thorough, and whole-hearted corrective action.
- IV.F. Guidance 2. To support the agency goal of issuing proposed civil penalty actions within 8 weeks, provide proposed civil penalty packages to IE within 6 weeks after the completion of the inspection or investigation. Promptly and vigorously implement the published (49 FR 8583, March 8, 1984) enforcement policy.
- IV.G. Guidance 1. Ensure that Regional activities do not delay reactor startup unnecessarily.
- V.A₂ Guidance 2. Assist NMSS as necessary with RERs.
- VIII.C. Guidance 3. Where sufficient documentation and guidance is available, use PRA in setting reactor inspection priorities, where appropriate. (See II Guidance 9.) Keep IE informed through reports and recommendations on PRA use in the inspection program.

III. Inspection and Enforcement Programs

A. Overview

The purpose of the Inspection and Enforcement (IE) program is: (1) to determine through inspection whether licensees comply with NRC regulations and whether licensees adequately protect the public health and safety and the environment; and (2) to maintain effective and uniform enforcement. The IE Regional workload consists mainly of: (1) reactors under construction; (2) reactors in operation; (3) vendors and quality assurance; (4) enforcement, technical support, and incident response; and (5) fuel cycle and materials. Regional offices inspect licensees, initiate (and largely complete) enforcement actions, systematically assess licensee performance, respond to incidents, and provide inspection related support to IE, OI, and other offices.

Resources to complete these activities are provided in the individual decision units. In some instances, resource expenditures are expected to exceed allocations. This is due primarily to FY84 backlogs and carryovers, closeout support to Midland and Zimmer, and the continued support to reactor facilities not included in the regional caseload. The FY84 backlogs and carryovers are due, in part, to the high priority support to Diablo Canyon, Waterford, Comanche Peak, and Wolf Creek, that diverted regional resources in FY84 from other programs. To support the anticipated resource requirements, the Region will utilize overages created as a result of successful hiring to the preliminary FY85 budget mark and subsequent facility cancellations. Overtime achievement is also expected to contribute to meeting these requirements.

B. Decision Unit 1 - Reactors Under Construction

The Reactors Under Construction inspection program consists of independent, routine (scheduled), and reactive (unscheduled) inspections by resident and region-based inspectors. Residents assume a portion of the inspection activity previously conducted by region-based inspectors, substantially increasing direct verification of licensee performance through direct observation and independent measurements. Resources for CAT inspections are budgeted primarily to IE in FY1985. Regional resources will be used to coordinate and assist CAT inspections, and to followup on licensee issues associated with the CAT inspections. Other special efforts associated with previous new initiatives have been folded into the overall resources and IE programs.

Anticipated Workload

	<u>RIII</u>
Pre-CP Units	0
Early Stage Units	0

Mid Stage Units	0
Late Stage Units	2.0
Total	2.0

Program Planned Accomplishment, Resource Allotment and Goal

**** Inspections of Power Reactors Under Construction ****

- ° Resources Allocated - FTE - 5.0
Program Support - None
- ° Goals - Perform inspections in accordance with IE Manual Chapter 2512 utilizing those EDO Program Guidances applicable to this Decision Unit. Increase the level of review and inspection at Braidwood 2 with special emphasis on the licensee's construction improvement program consistent with the additional 0.5 FTE budgeted for this purpose.

Performance Standards

Quality implementation of inspection programs, generally within the time limits specified by applicable Manual Chapters and agreed upon by the Regional and Program Offices, is considered fully successful performance. Quality implementation of inspection programs, completion of all planned activities within the agreed time limits, and demonstration of an in-depth, evaluative inspection program constitute outstanding performance.

C. Decision Unit 2 - Reactors in Operation

Resources associated with the Reactors in Operation program are primarily utilized for independent, routine (scheduled), and reactive (unscheduled) inspections. Specific resources have been designated for staff support in contested hearings, for special inspection of training programs, and for additional reviews during outages. Other special efforts associated with previous new initiatives have been folded into the overall resources and IE programs. Nuclear reactors inspected are: power reactors in preoperational and startup testing, and power operation; and nonpower (test and research) reactors. The inspection program will continue to place emphasis on direct observation of plant operations at each nuclear reactor unit. A measurable portion of this effort is performed by resident inspectors. Inspection program emphasis for the resident inspectors is placed on observation of licensee practices and on operational safety verification. Region-based inspectors inspect in specialized areas and otherwise supplement the inspection program performed by the Resident Inspectors.

Program support funding will provide independent measurements of radiation levels in the environments around licensed activities and assure the validity of licensee TLD derived direct radiation measurements. In addition, technical assistance through the employment of DOE Lab Agreements

will obtain specialized evaluative support in such areas as Safety Analysis Reports, QA Programs, and In-Service and Testing Programs.

Anticipated Workload

	<u>RIII</u>
Power Reactors	29
Nonpower Reactors	14

Program Planned Accomplishments, Resource Allotments and Goals

**** Inspections of Power Reactors in the Pre-Operations Phase ****

- Resources Allocated - FTE - 23.32
Program Support - None
- Goals - Perform inspections in accordance with IE Manual Chapter 2513 utilizing those EDO Program Guidances applicable to this Decision Unit. Increase the level of review and inspection at Braidwood 1 and Clinton with special emphasis on the licensee's construction improvement programs consistent with the additional 1.5 FTE budgeted for this purpose.

**** Inspections of Power Reactors in the Start-up Phase ****

- Resources Allocated - FTE - 6.74
Program Support - None
- Goals - Perform Inspections in accordance with IE Manual Chapter 2514 utilizing those EDO Program Guidances applicable to this Decision Unit.

**** Inspections of Power Reactors in the Operations Phase ****

- Resources Allocated - FTE - 56.44
Program Support - \$195K
- Goals - Perform inspections in accordance with IE Manual Chapter 2515 utilizing those EDO Program Guidances applicable to this Decision Unit. In addition, perform an augmented inspection program at the Callaway site to assess the licensee's early operations performance.

**** Inspections at Selected Sites ****

- Resources Allocated - FTE - 1.52
Program Support - None

- ° Goals - Perform inspections and provide inspection assistance at selected sites (Wolf Creek, Comanche Peak, Waterford and Diablo Canyon) not included in the Region III caseload, in accordance with requests from the Program Office and other regions. Based upon FY84 experience, it is anticipated that FTE usage will be higher than budgeted (in the order of 4 to 5 FTE total). The region will attempt to accommodate these needs through the use of overtime and overages. If this effort is not sufficient, program modifications will be negotiated with the Program Office.

**** Emergency Preparedness Licensing Actions ****

- ° Resources Allocated - FTE - 0.79
Program Support - None
- ° Goals - Complete approximately 25 licensing actions, each within an average completion time of 90 calendar days.

**** Inspections at Non-Power Reactors ****

- ° Resources Allocated - FTE - .8
Program Support - None
- ° Goals - Perform inspections in accordance with IE Manual Chapter 2545 utilizing those EDO Program Guidances applicable to this Decision Unit.

Performance Standards

Quality implementation of inspection programs, including completion of the minimum inspection program, substantial completion of the basic program, and completion of supplemental inspections as needed within the time limits specified by applicable Manual Chapters and agreed upon by the Regional and the Program Offices, is considered fully successful performance. Quality implementation of inspection programs, as described for fully successful performance, that are well managed as indicated by full utilization of SALP findings and that demonstrate an in-depth, evaluative inspection approach constitutes outstanding performance.

D. Decision Unit 3 - Vendors and Quality Assurance

Resources for Vendor Inspection are budgeted to IE in FY 1985. Regional resources in other decision units will be used to coordinate and followup on licensee issues associated with IE vendor inspections. Resources for Quality Assurance are budgeted primarily to IE, but some Regional staffing will be required for licensing changes to already licensed QA programs. Regional resources for QA program inspections are provided in Decision Units 1 & 2. There also will be some Regional participation in the IDI program.

Anticipated Workload

The amount of actual work performed on this decision unit will be dependent upon the QA Licensing changes received in FY85, the backlog carryover from the previous years, and the number of IDI inspections performed. The extent of Region III participation in this decision unit will not exceed the resources allocated unless prior arrangements are agreed to between Region III and the Program Office.

Planned Accomplishment, Resource Allotment and Goals

**** Perform QA Change Reviews and Participate in IDI Inspections ****

- ° Resources Allocated - FTE - 1.17
Program Support - None
- ° Goals - Complete the backlog of QA reviews and process new ones to the extent they are received. It is anticipated that resource expenditures for QA reviews may exceed resources allotted by 0.4 FTE. Use of general program support funds in Decision Unit 2 (Operating Reactors) will be pursued with the Program Office to alleviate the QA review backlog.

Participate in IDI inspections to the extent work is received or until allotted resources are expended.

Performance Standards

Quality implementation of assigned QA licensing and IDI activities, generally within the time limits specified by applicable Manual Chapters and agreed upon by the Regional and Program Offices, is considered fully successful performance. Quality implementation, completion of all planned activities within the agreed time limits, and demonstration of Regional commitment to assigned QA licensing and IDI activities constitute outstanding performance.

E. Decision Unit 4 - Enforcement, Technical Support, and Incident Response

Regional resources associated with the Enforcement, Technical Support and Incident Response programs include staff and funds for enforcement coordination, SALP, laboratory/technical support, Regional incident response, technical equipment (\$78K), technical support to investigations and allegation follow-up (reactor and material licensees).

Planned Accomplishments, Resources Allotments and Goals

**** Enforcement Coordination ****

- ° Resources Allocated - FTE - 2.0
Program Support - None

- Goals - Implement the Enforcement Program in accordance with IE Manual Chapter 0400 and EDO Guidance. Complete regional Civil Penalty actions, on the average, within six weeks such that the agency action may be completed within eight weeks.
- ** Systematic Assessment of Licensee Performance (SALP) **
- Resources Allocated - FTE - 2.88
Program Support - None
- Goals - Implement the SALP Program in accordance with IE Manual Chapter 0516 and appropriate EDO Guidance. Planned expenditures are expected to be approximately 4 FTE. The region will attempt to accommodate these additional resources through the application of SALP ratings (to reduce inspection effort in Decision Unit 2) and through use of overtime. If this effort is not sufficient, program modifications will be negotiated with the Program Office.
- ** Van and Labs (Lab Technician) **
- Resources Allocated - FTE - 1.0
Program Support - \$14K
- Goals - Maintain the mobile and in-house laboratories for incident response readiness and perform in-depth analysis of inspection samples resulting from the routine/reactive confirmatory measurements program.
- ** Incident Response **
- Resources Allocated - FTE - 1.40
Program Support - None
- Goals - Implement the Incident Response Program in accordance with NUREG 0845 and its published supplements, and appropriate EDO Guidance.
- ** Technical Support to Investigations **
- Resources Allocated - FTE - 5.12
Program Support - None
- Goals - Provide prompt and effective technical support to OI as specified in OI Policy Statement No. 12 and utilizing appropriate EDO Guidance.
- ** Allegation Followup **
- Resources Allocated - FTE - 4.5
Program Support - None*

*The utilization of a new or existing program support efforts to contribute to the effectiveness of this activity will be pursued with IE in FY85.

- Goals - Implement a high quality allegations tracking and followup program and close out the majority of allegations, on the average, within six calendar months.

Performance Standards

Quality implementation of programs within this Decision Unit, generally in accordance with applicable NRC and Program Office policies and procedures, constitutes fully successful performance. Quality implementation of programs in accordance with applicable policies and procedures, submittal of enforcement actions on the average within six weeks, and maintenance of a highly capable emergency response program constitute outstanding performance.

F. Decision Unit 5 - Fuel Cycle and Materials

Resources associated with Fuel Cycle and Materials programs are utilized for independent, routine (scheduled), and reactive (unscheduled) inspections in the areas of radiation safety, material control and accountability, and physical security.

Anticipated Workload

Uranium Fuel Fabrication Facilities	2
Advanced Fuel R&D and Pilot Facilities	2
UF-6 Facility	1
Spent Fuel Storage Facility	1
Materials Licenses	1013
Decommissioning/Closeout Actions	100

Program Planned Accomplishments, Resource Allotments and Goals

**** Perform Inspections at Fuel Facilities ****

- Resources Allocated - FTE - 2.19
Program Support - None
- Goals - Perform inspections in accordance with IE Manual Chapter 2600 utilizing those EDO Program Guidances applicable to this Decision Unit.

**** Perform Materials Inspections ****

- Resources Allocated - FTE - 11.97
Program Support - None
- Goals - Perform inspections in accordance with IE Manual Chapter 2800 utilizing those EDO Program Guidances applicable to this Decision Unit.

**** Decommissioning/Closeout Actions ****

- Resources Allocated - FTE - 1.18
Program Support - None
- Goals - Implement a High Quality Decommissioning/Closeout Inspection Program in accordance with the appropriate IE and EDO guidance.

**** 10 CFR Part 61 Inspections ****

- Resources Allocated - FTE - 0.3
Program Support - None
- Goals - Perform 10 CFR Part 61 inspections in accordance with Inspection Procedure 84850 of IE Manual Chapters 2600 and 2800 and appropriate EDO guidances.

Performance Standards

Implementation of an evaluative, independent inspection effort that generally completes the applicable inspection modules is considered fully successful performance. Implementation of an aggressive, independent, evaluative inspection program, along with a relatively substantial completion of the applicable inspection modules, constitutes outstanding performance.

G. Decision Unit 5 - Specialized Technical Training

Resource Allotments and Goals

- Resources Allocated - FTE - 0
- Program Support - None
- Goals - Complete the training of three "Grow-Your-Own" candidates at the NRC Training Center and commence on-the-job training at resident sites. Resources for this program will be derived from other decision units and utilizations of overages.

IV. Nuclear Materials Safety and Safeguards

A. Overview

The purpose of the Nuclear Materials Safety and Safeguards (NMSS) program is to ensure adequate protection of the public health and safety and the environment in the design, siting, construction, and operation of nuclear fuel cycle facilities, including nuclear waste storage and disposal facilities, and in the utilization and transportation of nuclear materials. Region III is responsible for performing certain safety, environmental, and safeguards reviews as related to: (1) fuel cycle facility and nuclear material safety, and (2) safeguards.

B. Decision Unit 1 - Fuel Cycle Facility and Nuclear Material Safety

Resources associated with Fuel Cycle Facility and Nuclear Material Safety are utilized for policy and regulation implementation and for licensing casework.

<u>Workload</u>	<u>Baseline Projected Receipts</u>	<u>Budgeted Completions (Cumulative)</u>	
		<u>6/30/85</u>	<u>9/30/85</u>
Fuel Facility Licensing Cases	5	3	4
Materials Licensing Cases	2556	1712	2283

Program Planned Accomplishments, Resource Allotments and Goals

** Fuel Cycle and Nuclear Material Casework Program **

o Resources Allotted (in FTE)

a. Policy and Regulation Implementation

Licensing Site Visits*	.56
National Program Management (includes National Program Review and Continuing Regional oversight)	<u>.15</u>
Subtotal	<u>.71</u>

b. Licensing Casework and Technical Assistance

Fuel Facility Licensing Casework	.56
Material Licensing Casework	6.39
Information Requests	<u>.30</u>
Subtotal	<u>7.25</u>

*Site Visits will be in accordance with NMSS Policy and Guidance Directive 84-9 dated 7/20/84.

Total Direct Staff (FTE)	7.96
Total Program Support (PS\$)	None

- ° Goals - Utilizing appropriate NMSS and EDO Guidances, complete each licensing case, on the average, within 60 working days from the date of receipt of each new and amendment application. No timeliness goal is established for Renewals due to extensive number of late cases transferred from NMSS and 50% budgeted backlog of receipts for FY85.

Performance Standards

Timely, technically adequate, and consistent implementation of the programs within this Decision Unit, including completion of the budgeted workload of licensing cases, coupled with a favorable evaluation on the National Program Review by NMSS, is considered fully successful performance. Completing significantly greater than the number of budgeted licensing cases, coupled with a highly favorable evaluation on the National Program Review by NMSS, is considered outstanding performance.

Actual receipts as compared with baseline projected receipts will be taken into consideration when determining success against these standards. No performance standards for timely completion of renewals is established due to budgeted backlog.

C. Decision Unit 2 - Safeguards

Resources associated with safeguards are utilized for policy and regulation implementation, other technical activities, and licensing casework and technical assistance.

<u>Workload</u>	<u>Baseline Projected Receipts</u>	<u>Budgeted Completions (Cumulative)</u>	
		<u>6/30/85</u>	<u>9/30/85</u>
Part 50.54 Amendments - (Physical Security)	71	57	76
Part 70.32 Amendments - (Physical Security/MC&A)	6	1	2

Program Planned Accomplishments, Resource Allotments and Goals

**** Safeguards Licensing Casework Program ****

- ° Resources Allotted (in FTE)

a. Policy and Regulation Implementation

Conduct RERS/VAVS .12

National Program Management (includes
National Program Review and
Continuing Regional Oversight) .07

Subtotal .19

b. Other Technical Programs

Route Surveys/Contingency Planning .15

c. Licensing Casework and Tech Assistance

Part 50.54 Amendments 1.23

Part 70.32 Amendments .04

Subtotal 1.27

Total Direct Staff (FTE) 1.61

Total Program Support (PS\$) None

- ° Goal - Complete anticipated cases received in an average time of 60 days, utilizing appropriate NMSS and EDO Guidances.

Performance Standards

Timely, technically adequate, and consistent implementation of the programs within this Decision Unit, including completion of all budgeted workload in an average of 60 days coupled with a favorable evaluation on the National Program Review by NMSS, is considered fully successful performance. Completing significantly greater than the number of budgeted workload, coupled with a highly favorable evaluation on the National Program Review by NMSS, is considered outstanding performance.

Actual receipts as compared with baseline projected receipts will be taken into consideration when determining success against these standards.

V. Nuclear Reactor Regulation

A. Overview

The purpose of the Nuclear Reactor Regulation (NRR) program is to ensure adequate protection of public health and safety and the environment in the design, siting, construction, and operation of nuclear reactors. Regional Offices are responsible for certain review and licensing activities related to: (1) operating reactors, (2) systematic safety evaluation of operating reactors, and (3) operator licensing.

B. Decision Unit 1 - Operating Reactors

Resources allotted for Operating Reactors provide for regional technical reviews of both multiplant and plant-specific operating reactor licensing actions, as assigned by the Program Office.

<u>Budgeted Workload</u>	<u>Licensing Actions</u>
Plant Specific	32
Multiplant (0660/0737)	0
Multiplant, A-E	<u>11</u>
Total	43

Program Planned Accomplishment, Resource Allotment and Goal

**** Perform Operating Reactor Licensing Actions ****

- ° Resources Allocated - FTE - 3.7
Program Support - None
- ° Goal - Complete all assigned licensing actions within the due dates agreed to by Region III and NRR, utilizing appropriate NRR and EDO Guidances.

The number of licensing actions, type of licensing action, delivery date from NRR, and scheduled completion date will be jointly negotiated and agreed upon between Region III and NRR. To the extent that these negotiations affect the anticipated workload and allocated resources they will be included in updates of the Operating Plan. The above will hold if Regional Office responsibility consists of either a completed SER or partial technical input to an SER. Uncontrollable delays (e.g., poor quality of licensee submittals) may require revisions of completion dates for the associated action.

Performance Standards

Fully successful performance will be completion of 90% of the assigned actions received on schedule from NRR by the agreed upon due date and within the above delineated resources, coupled with a favorable

evaluation of program management by NRR. Outstanding performance can be accomplished by completing all actions on or ahead of the agreed-upon schedule coupled with a highly favorable evaluation of program management by NRR.

Uncontrollable delays, such as the failure of the licensees to provide necessary information, or issues requiring prior NRR resolution, are not considered to be a failure to meet these standards.

C. Decision Unit 2 - Systematic Safety Evaluation of Operating Reactors (SSEOR)

Resources associated with the SSEOR program are utilized for regional participation in the implementation of the pilot Integrated Safety Assessment Program (ISAP, Secy 84-133).

Program Planned Accomplishment, Resource Allotment and Goal

**** Integrated Safety Assessment Program ****

° Resources Allocated - FTE - .1

Program Support - None

° Goal - Participate in the ISAP pilot program to the extent work is received or until allocated resources are expended, utilizing appropriate NRR and EDO Guidances.

Performance Standards

Quality participation in the program within this Decision Unit, generally in accordance with applicable NRC and Program Office policies and procedures, constitutes fully successful performance. Quality participation in this program, in a timely manner agreed upon to by NRR and the Region, in accordance with the applicable policies and procedures constitute outstanding performance.

D. Decision Unit 3 - Operator Licensing

On October 1, 1983, under the oversight of NRR, all regions were transferred the responsibility for conducting operator license examinations. Responsibility for administration of the operator licensing technical assistance program will remain with NRR in FY 1985. Regional staff will serve as technical monitors for all contracts under the program.

<u>Budgeted Workload</u>	<u>Site Visits</u>	<u>Exams</u>
Initial Exams	2	100
Replacement Exams	43	344
Requalification Exams	4	20

Certification Exams	11	55
Nonpower Exams	<u>9</u>	<u>27</u>
Total	69	546

Within the level of resources provided for Initial, Replacement and Requalification examinations, priority will be given to Initials and Replacements; however, to the extent that the number of anticipated Initial and Replacement exams do not materialize, additional requalification exams will be given up to a maximum of 1 site visit for 50% of the operating facilities.

Program Planned Accomplishment, Resource Allotments and Goals

**** Administer Reactor Operator Licensing Examination Program ****

- ° Resources Allocated - FTE - 7.8
Program Support - None
- ° Goals - Implement a high quality program that results in minimal impact on plant licensing actions and plant operations, utilizing appropriate NRR and EDO Guidances with these planned accomplishments:
 1. Conduct examinations in accordance with the Planned Workload Table above and in accordance with the Examiner Standards (NUREG-1021).
 2. Schedule examination at least 90 days in advance to ensure availability (if required) of contract examiners.
 3. Provide feedback on all contract examiner performance to Headquarters OLB.
 4. Request hardware for and commence use of the computerized Examination Question Bank.

The number of examinations to be administered is dependent upon the staffing requirements of the utilities and, therefore, is subject to change. Since changes, which are beyond the Region's control, may occur, the workload and allocated resources may have to be adjusted, and these changes will be reflected in updates of the Operating Plan.

Performance Standards

For fully successful performance, 85 percent of the estimated site visits are conducted (unless cancelled by the utility) within the allotted in-house resources and expected NRR-provided contract support. Examinations are conducted in accordance with the Delegation of Operator Licensing Authority and NUREG-1021, "Operator Licensing Examiner Standards." Examinations are

(scheduled sufficiently in advance such that licensee schedules are accommodated with minimum delay in OL decisions. For operating reactors, examinations are scheduled to ensure that the licensee can meet all NRC imposed staffing requirements provided that the licensee proposes examinations in advance. Evaluation of program management is favorable by NRR.

Outstanding performance is conducting greater than 95% of the estimated site visits (unless cancelled by the utility) at operating reactors, including requalification audit examinations, coupled with highly favorable evaluation of program management by NRR.

The impact on facility schedules or operations due to high failure rates that are sustained by Headquarters OLB on request for regrade or appeal is not considered to be a failure to meet these standards.

The actual number of trips or examinations required by licensees as compared to the number of budgeted workload will be taken into consideration when determining success against these standards.

10

DECISION UNIT 3: Fuel Facilities, Safeguards, Materials and Waste Management

PLANNED ACCOMPLISHMENT: Perform Decommissioning/Closeout Surveys: Materials

ACTIONS

Perform Decommissioning/Closeout Surveys such as J. C. Haynes, Monsanto Research, Chemetron.

PERFORMANCE STANDARDS/EXPECTED RESULTS

[illegible]

MAJOR PROGRAM 2: Office of Nuclear Reactor Regulation
 DECISION UNIT 1: Operating Reactors

PLANNED ACCOMPLISHMENT: Perform Operating Reactor Licensing Actions: Health Physics

<u>STAFF YEARS (FTE)</u>			<u>PROGRAM SUPPORT (X\$1,000)</u>			
Current Budget	Actual Expended To Date	Projected Expended To Date	Current Budget	Committed To Date	Obligated To Date	Costed as of
0.49 (DIR)						

	<u>Budget Target No.</u>	<u>Actual No. Received to Date</u>	<u>Actual No. of Planned Actions</u>	<u>Actual No. Completed</u>	<u>Percent of Planned Actions Completed</u>
a. Perform Plant Specific Actions					
b. Perform Multi-Plant (A-E) Actions					
c. Perform Multi-Plant (0737/0660) Actions					

PERFORMANCE STANDARDS/EXPECTED RESULTS

MAJOR PROGRAM 3: Office of Nuclear Material Safety and Safeguards
 DECISION UNIT 3: Safeguards

PLANNED ACCOMPLISHMENT: Complete Non-Power Reactor Reviews: Safeguards

STAFF YEARS (FTE)			PROGRAM SUPPORT (X\$1,000)				DIRECT INSPECTION PERFORMANCE		
Current Budget	Actual Expended To Date	Projected Expended To Date	Current Budget	Committed To Date	Obligated To Date	Costed As Of	Independent (Man-Hours)	Reactive (Man-Hours)	Preventative (Man-Hours)
0.06(DIR)									

STATISTICS

	O	N	D	J	F	M	A	M	J	J	A	S	Current Cumulative	Projections Base Cases	Curr.Cases
Case Receipts														3	
Cases Compitd															
Back Log															
Ave.Time														90	

ACTIONS

Perform Safeguards reviews and documentation of changes submitted to licensees' Security Plans, Guard Training and Qualification Plans and Contingency Plans as applicable at operating non-power reactors as described in guidance provided by the Director, Division of Safeguards, NMSS.

PERFORMANCE STANDARDS/EXPECTED RESULTS

REGION III MANUAL

REGIONAL PROCEDURE 0516A

REGION III SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Scope

This procedure outlines the Regional policy for implementation of NRC Manual Chapter 0516, "Systematic Assessment of Licensee Performance (SALP)," for Region III licensed facilities, and serves as a supplement to the instructions provided therein. Specific details are provided to further enhance administrative requirements and clearly define assigned responsibilities. This procedure provides guidance to promote sound decisions in NRC inspection resource allocations, to improve the regulatory performance of licensees, and to further improve the NRC's regulatory program.

Procedures

The SALP Program is a series of assessments conducted at prescribed intervals to systematically evaluate licensee performance in all facets of facility construction and operation to ensure the public health and safety is not compromised. Each power reactor licensee will have an assessment of performance according to established NRC requirements.

The assessment period will normally be set at eighteen month intervals. Deviations in scheduling will be based upon the following:

1. When Regional management feels, based on prevailing circumstances, that a particular facility should be evaluated more frequently.
2. When the SALP Report will be used as a partial basis of the finding of readiness for license issuance (IE 94300). The evaluation may be advanced, as needed, or possibly delayed. If delayed for more than 18 months, the Director, IE, must be notified.
3. To provide continuity in scheduling individual facility assessments.

Annually, or as further warranted, DRP, will issue a schedule establishing the milestones for the next SALP rating period listed by facility (Assessment Period, Input Due Date, Initial Draft Report Due to Board Members, Scheduled Board Meeting Date, Report Issuance Date, and Date of Scheduled Licensee Meeting. A "Remarks" column

will be included to provide any pertinent data). This schedule, or revisions thereto, shall be sent to all Branches within Region III, and the offices of NRR, IE, NMSS, AEOD, and EDO.

Within 5 days after the end of the assessment period, and as a followup to the annual schedule; a memo requesting SALP Report Inputs and a reiteration of due dates, will be prepared and submitted to those individuals who are required to participate in the program. Inputs are due approximately 19 days after the end of the assessment period. Inputs will be logged by date of receipt, a copy made for the official files, and the original provided to the Project Inspector for report preparation.

The DRP Project Inspector will prepare the initial draft Board Report compiled from the inputs received following the guidance for report content found in Attachment 4. After typing, and at least two weeks prior to the Board Meeting, the report will be forwarded for comment to SALP Board Members. Board Members will be requested to review the initial draft carefully and return specific comments to the Project Inspector within five days. A second draft will be prepared incorporating all comments received and distributed to Board Members at the Board Meeting.

A SALP Board, consisting of the following membership, will be established: a SALP Board Chairman; NRR management representative; NRR Project Manager; Senior Resident Inspector; Regional Division Directors; Regional Section Chiefs; representation, as appropriate, from IE, AEOD, NMSS; and cognizant Regional specialist inspection staff and Project Inspectors. The Board will meet approximately 45 days after the end of the assessment period to review and discuss in detail the contents of the draft SALP Assessment Report to ensure completeness of information and appropriate support of conclusions. The Board will rate licensee performance in each of the prescribed functional areas conforming to the evaluation criteria. Recommendations for revisions to the inspection program may be made as a result of the Board Meeting and inspection frequency and scope may be increased or decreased as part of the Board's recommendations.

The transmittal letter, enclosing the final SALP Report, will be forwarded under the signature of the Regional Administrator, and will include as a minimum a characterization of the licensee's overall safety performance; a narrative amplification of the SALP Board findings covering areas rated as Categories one and three; and a discussion of areas in which performance has declined since the previous SALP evaluation. The licensee will be requested to provide written comments on the report within 30 days of the date of the meeting. The report will receive standard docket distribution with copies provided to IE, NRR, INPO, State Officials, and the news media. In addition to providing comments on the report, licensees may also be requested to address special problem areas, corrective actions to be taken, and completion dates of all actions.

Although NRC MC 0516 deems licensee meetings as optional, Region III will normally conduct such meetings to discuss the SALP report. Meetings will be announced, one month in advance, through confirmation letter to the licensee with normal docket distribution. All meetings will be considered "open meetings" and should provide for possible attendance by persons outside the licensee and NRC staffs. A Significant Licensee Meeting Notice will be prepared and forwarded concurrent with the mailing of the meeting confirmation letter.

Whenever practicable, meetings with licensees having multi-sites, will be consolidated into one; however, each facility discussed will be covered by a separate report and number.

The finalized report package will include, as an appendix, the regional response addressing verbatim comments received from the licensees, a summary of any meeting with the licensee concerning the SALP report, and any conclusions reached by the Regional Administrator after consideration of the licensee's comments. An Errata Sheet should also be included to identify the specific changes to the report and their bases, should changes become necessary. The original page to which changes have been made should be lined through referencing the Errata Sheet and a new page, incorporating the changes, placed in the transmittal package to the licensee. Distribution of the finalized report package remains unchanged from the original submittal.

Responsibilities

Each member of Regional management and their staffs have certain responsibilities toward the successful implementation of the SALP Program. The following assignments of responsibility will ensure that the SALP Program in Region III will meet the program objectives of NRC Manual Chapter 0516.

Regional Administrator's Office

The Regional Administrator bears overall responsibility in ensuring licensed operations at nuclear facilities are being properly managed to provide adequate protection of public health and safety. Through his direction, the SALP Program is implemented and carried out by members of his staff. The Regional Administrator serves as the key member at licensee meetings and is the guiding force for presenting findings and conclusions of the SALP Board. Under his signature, the reports and significant findings are forwarded to licensee corporate management and only through his concurrence are decisions affecting the SALP Report made. In his absence, the Deputy Regional Administrator assumes this role.

A. Director, DRSS

As presently designated, the Director, DRSS, serves as the SALP Board Chairman and serves as the spokesman at briefings

presented to the Regional Administrator's Office during the final stages of the SALP process. Assures staff participation in the implementation of the SALP Program and coordinates Division input to assure complete and accurate information is provided according to established schedules. In his absence, appoints a Branch Chief to represent the Division at SALP Board Meetings, and requests another Division Director to act as SALP Board Chairman. On occasion, may chair licensee meetings in the absence of other key management.

B. Director, DRS

Serves as a permanent member of the Regional SALP Board and alternate chairman. Assures staff participation in the implementation of the SALP Program and coordinates Division input to assure complete and accurate information is provided according to established schedules. In his absence, appoints a Branch Chief to represent the Division at SALP Board Meetings. On occasion, may chair licensee meetings in the absence of other key management.

C. Director, DRP

Serves as a permanent member of the Regional SALP Board. Has direct responsibility in assuring that the administrative aspects of the SALP Program are carried out through direct assignments to staff members. Through his concurrence, assures the quality of all SALP documentation. When warranted, participates in the SALP licensee meetings. On occasion, may chair such meetings in the absence of the other key regional management. In his absence, and that of his Deputy, appoints a Branch Chief to represent the Division at SALP Board Meetings.

D. Director, Division of Resource Management and Administration (DRMA)

Responsible for providing support staff to assist DRP in the processing of draft and final SALP reports, transmittal letters, and schedules.

E. Branch Chiefs, DRP

Branch Chiefs responsibilities in DRP differ slightly from those of other technical divisions. While the requirements of timeliness and technical accuracy are of importance, supportive efforts of the staff to attain a consensus of opinion on the handling of significant problem areas must be dealt with prior to the issuance of a draft SALP report or attendance at scheduled board meetings.

As a matter of practice, Branch Chiefs will conduct pre-SALP discussions with their staff, including the designated Resident

Inspector, to identify any significant areas where resolutions must be made to assure that sound decisions are reached and agreed upon by all in attendance. These judgments should be appropriately reflected in the draft report and brought forward collectively at the SALP Board Meeting.

The DRP Branch Chiefs concur in all Draft SALP Reports prior to submittal to the Technical Support Staff for issuance.

DRP Branch Chiefs may, on occasion, represent the entire division, in the absence of the Division or Deputy Division Director.

F. Section Chiefs, DRP

Assigns responsibility for report preparation and ensures timely report completion. Reviews draft report for technical comprehensiveness and assures that any critical issues previously identified and their proposed resolution are appropriately reflected in the report package. Serves as a member of the Regional SALP Board to provide support to his staff on recommendations for improved licensee performance. Assures availability of staff for attendance at Board Meetings and licensee meetings or is personally prepared to represent them as key issues arise.

Schedules meetings with licensees approximately five days after the Board Meeting to present the SALP Board findings to key licensee management representatives. Relays schedule to Licensing Assistant for preparation of confirmation letter and meeting notice, as required.

G. Project Inspectors (DRP)

Overall responsibility for the coordination efforts in preparing the draft SALP Report and ensuring the technical quality of all such reports. Monitors SALP inputs, resolved inconsistencies, if necessary, and incorporates inputs into a final product. Serves as a member of the Regional SALP Board and resolves discrepancies in the application of inputs as incorporated into the draft report, should questions arise.

Serves as the SALP Board recorder and captures consensus of opinion of SALP Board Members on technical content of report. Revises report, as appropriate; contacts Board Members directly to obtain clarification, if necessary. Submits revised report to Licensing Assistant for administrative processing and review by Board Members prior to submittal to licensee.

H. Branch Chiefs, DRS and DRSS

Coordinates Branch activities relating to the SALP Program. Assures timely inputs from Sections under his supervision, and reviews any such inputs for technical accuracy and content as related to inspection and operator licensing activities performed by Branch members. Forwards SALP data to DRP according to established deadlines. Branch Chiefs, on occasion, represent the entire Division in the absence of the Division Director. Provides background information to support possible variance to the routine inspection program and relates activities of operator licensing staff for inclusion into the SALP Board Report, if applicable.

I. Section Chiefs, DRS and DRSS

Assures timely inputs and comprehensiveness in documenting observations and findings of staff members. Provides inspection-related data to DRP not yet entered into Management Information Systems which have pertinence in report preparation. Makes recommendations for improved licensee performance in assigned functional areas to Branch Chief for possible factoring into the SALP Board Report. Assures inspection staff availability for board meetings to present or reiterate inspection findings should questions arise. If applicable, assures any activities performed relating to issuance or denial of operator licenses are included in the Section SALP inputs. Serves as a member of the Regional SALP Board to provide support of inspection-related activities for his section, and presents the management overview for the appropriate functional area.

J. Inspection Staff

The Regional inspection staff have ultimate responsibility toward introducing clear, concise, and comprehensive inspection findings and observations into the SALP Program. Inputs into the SALP report should provide an overview of each functional area inspected during the the assessment period, noting specific strengths and weakness of the licensee, comments and concerns pertaining to violations, and emphasis on problem areas identified requiring greater NRC attention or inspection effort.

The inspection staff should be available for Board Meetings to fully support their findings should questions arise.

K. Technical Support Section, DRP

1. Section Chief

Reviews all draft SALP reports for format and content prior to issuance to ensure conformance to NRC 0516 requirements.

Represents Region III in dealing with Headquarters on (1) discussions/revisions of MC 0516 and (2) replying to HQ audits of RIII and is the lead RIII representative on all SALP matters. Directs support staff in the execution of the SALP program.

2. Licensing Assistant

Has overall responsibility for the administrative management of the Regional SALP Program. Serves as the principal interface contact on all SALP matters. Develops master schedule of facility SALP milestones and adjusts schedules appropriately to meet existing plant conditions. Is instrumental in ensuring milestones are met within Region III.

Assists in the administrative implementation and management of the SALP Program. Monitors all SALP inputs for consistency and timeliness of submissions. Initiates routine correspondence to either secure or provide information to cognizant staff members which may impact on the processing of the SALP report. Assembles all data necessary to report preparation and forwards to appropriate DPRP Section Chief.

Processes all SALP-related correspondence and distributes, as required.

Maintains facility SALP files and serves as the interface contact with the Data Management Unit on all administrative matters.

3. Licensee Performance Evaluation Assistant

Assures timely availability of statistical data and charts on noncompliances, LER's, 50.55(e) reports and facility operating histories pertinent to the SALP requirements.

Attachments:

1. SALP Flow Chart
2. SALP Board
3. Guidance on Report Format
4. Guidance in Support of Regional
SALP Program

ATTACHMENT 1
SALP FLOW CHART

APPROX TIME
FROM END OF
ASSESS'T PERIOD
DAYS

MILESTONE

-30	Initial Preparation by P.I. for Report Writing
5	Request for SALP Inputs (TSS)
19	Inputs Provided to TSS (DRS, DRSS, NRR, Others)
22	Develop SALP Report Strategy (Cognizant DRP Branch)
23	Preparation Begins for Draft Report Writing (DRP PI)
31	Send Initial Draft Report to SALP Board for Comment (TSS)
36	Comments Due From SALP Board Members for Incorpor- ation into Second Draft of Report
45	SALP Board Meeting (DRP, DRS, DRSS, NRR, RA or DRA)
50	Firmup Meeting Date with Licensee and Send Confirming Letter (DRP/TSS)
60	Prepare Final SALP Report & Transmittal Letter (DPR/TSS)
70	Send Final Draft to Review (TSS)
76	Issue SALP Report to Licensee (RA)
85	Prepare Agenda for Meeting and Brief RA or DRA (DRP)
90	Licensee Meeting (RA or DRA, DRP, NRR & Others)
120	Licensee Comments Due
121	Coordinate Review of Licensee Response
134	Issue Appendix to SALP Report (RA). Response to Comments. Prepare Action Plan.

ATTACHMENT 2
SALP BOARD

A. Nominal Membership

Chairman, Director, DRSS
 Director, DRS (1st Alternate Chairman)
 Director, DRP (2nd Alternate Chairman)
 SRI
 DRP Section Chief
 NRR Project Manager
 NRR Branch Chief
 DRS and DRSS representatives as designated by the Chairman
 Chief, Technical Support Staff or alternate
 Regional Administrator's Office representative (observer)

B. Duties

1. The Chairman shall designate a member of the Board to record the Board findings and conclusions for inclusion in the final report.
2. Using the Draft SALP Report as a basis, review and discuss the analysis, supporting data and conclusions. Ensure that sufficient information has been provided to form a conclusion regarding licensee performance or that there is not enough to form a basis for a rating. As appropriate, request the presence of staff members to discuss the bases of their findings and conclusions.
 - a. As a general rule, only information developed in the assessment period should be in the analysis. However, significant information developed subsequent to the assessment period that can affect the rating and can be determined to have existed during the assessment period is to be considered in evaluating the licensee's performance during the assessment period. Such information can result from inspections, investigations, and meetings with the licensee.
 - b. Findings should not be left open-ended. If a finding cannot be addressed in the analysis, the Board should make a recommendation or note that action is being taken.

- c. In general, findings should be based on fact. If subjective judgments are made, they should be supported.
 - d. Findings should be put into perspective as to how they relate to management's performance.
- 3. Rate the licensee's performance in each functional area based upon the guidance in NRC 0516.
 - a. A "Not Rated" conclusion should be based upon insufficient information.
 - b. Make a judgment as to whether performance improved, remained consistent or decreased, during the assessment period and provide descriptive narration to substantiate trend. Weight should be given on the performance trend during the assessment period.
- 4. After rating all functional areas, provide a summary statement on the licensee's overall performance emphasizing significant strengths or weaknesses. Highlight those areas that the Board feels require additional effort to improve performance.

ATTACHMENT 3

GUIDANCE ON REPORT FORMAT AND CONTENT

MEETING CONFIRMATION LETTER

Docket No. _____

Gentlemen:

The Nuclear Regulatory Commission has completed its SALP Assessment relating to the performance of your reactor facility(s) and will present its findings at a meeting on _____ at _____ at _____. Arrangements for this meeting were previously made between _____ of your staff and _____ of Region III on _____.

We encourage _____ to have appropriate corporate and plant management representation at the meeting to ensure a mutual understanding of the issues and findings being presented by NRC.

While this meeting is considered a presentation and discussion forum between _____ and the NRC, the meeting will be opened to any other interested parties as observers. Those persons outside the licensee and NRC staffs should inform the Regional Office, in advance of the meeting, of their intent to participate.

We hope this meeting will benefit your organization and provide you with a meaningful characterization of the overall safety performance for the _____ plant.

Sincerely,

C. E. Norelius, Director
Division of Reactor Projects

cc: (Standard Distribution) plus
NRR Project Manager
Senior Resident Inspector
State Liaison Officer, State
of _____
RIII, PRR
RIII, SGA

LETTER TRANSMITTING SALP REPORTDocket No. _____

Gentlemen:

Enclosed for your review, prior to our scheduled meeting of _____, is the SALP _____ Board Report for the _____, covering the period _____ through _____.

1. Paragraph presenting a characterization of overall safety performance. (Samples paragraphs can be found in NRC MC 0516, Exhibit I)
2. Paragraph amplifying the findings of the SALP Board, especially for functional areas rated Category 1 and 3, and for areas in which performance has declined since the previous SALP assessment period.

While you will have sufficient opportunity to present your comments at the meeting on _____, we also request written comments within 30 days after the meeting. Upon receipt, your comments will be thoroughly evaluated and we will provide you our conclusions relative to them.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the SALP Board Report will be placed in the NRC's Public Document Room.

2

No reply to this letter is required at this time; however, should you have any questions concerning the SALP report, we would be pleased to discuss them with you.

Sincerely,

James G. Keppler
Regional Administrator

Enclosure: SALP ____ Board Report
No. _____

cc w/enclosure:

Standard Distribution

J. M. Taylor, Director, IE

H. R. Denton, Director, NRR

Regional Administrators

RI, RII, RIV, RV

N. J. Palladino, Chairman

J. K. Asselstine, Commissioner

F. M. Bernthal, Commissioner

L. W. Zech, Commissioner

NRR Project Manager

H. L. Thompson, NRR

J. Axelrad, IE

RIII PRR

RIII SGA

State Liaison Officer, State

of _____

INPO

SALP _____

SALP BOARD REPORT

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT REGULATORY COMMISSION

Inspection Report No.

Name of Licensee

Name of Facility

Assessment Period

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 staff members listed below, met on _____, 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 _____ for the period _____ through _____.

SALP Board for _____:
[Name of Facility]

[illegible]

II. CRITERIA

The licensee performance is assessed in selected functional areas depending whether the facility is in a construction, pre-operational 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 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 such that satisfactory performance with respect to operational safety or construction is being achieved.

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.

Trend: The SALP board has categorized the performance trend in each functional area rated over the course of the SALP assessment period. The categorization describes the general or prevailing tendency (the performance gradient) during the SALP period. The performance trends are defined as follows:

- Improved: Licensee performance has generally improved over the course of the SALP assessment period.
- Same: Licensee performance has remained essentially constant over the course of the SALP assessment period.
- Declined: Licensee performance has generally declined over the course of the SALP assessment period.

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>Rating Last Period</u>	<u>Rating This Period</u>	<u>Trend</u>
Plant Operations			
Radiological Controls			
Maintenance			
Surveillance			
Fire Protection			
Emergency Preparedness			
Security			
Refueling			
Quality Programs and Administrative Controls			
Licensing Activities			

[OR]

Soils and Foundations
Containment and Other Safety-Related Structures
Piping Systems & Supports
Safety-Related Components
Support Systems
Electrical Power Supply and Distribution
Instruments and Control Systems
Quality Programs and Administrative Controls
Licensing Activities

IV. PERFORMANCE ANALYSIS

A. [FUNCTIONAL AREA BEING DISCUSSED]

1. Analysis

Activities - Include number of inspections and scope.

Findings - Also include Management/Enforcement Meetings, as appropriate.

Discussion of findings and status/adequacy of corrective actions - Include significance and an overall assessment (perspective) of findings. Also compare enforcement history between present and previous SALP to show performance change, if any, and substantiate rating.

Assessment of licensee performance to address areas highlighted in last SALP.

Through the extensive use of the seven criteria and their associated attributes, the SALP Board is aided in finalizing ratings.

2. Conclusion

The licensee is rated Category ____ in this area. The licensee received a rating of Category ____ in the last SALP period. Licensee performance during the assessment period has improved, declined, been mixed, or has remained essentially constant.

3. Board Recommendations

B. _____ [SAME FORMAT FOR SUCCESSIVE FUNCTIONAL AREAS]

[SPECIFIC GUIDANCE ON COMPLETION OF THESE AREAS MAY BE FOUND IN NRC MC 0516]

Guidance for Specific Functional Areas

QUALITY PROGRAMS AND ADMINISTRATIVE CONTROLS

MC 0516 suggests that this area may be viewed as a comprehensive management system for controlling the quality of work and the quality of verification activities.

This philosophy is inclusive of all activities covered by Section 6 of Technical Specifications, administrative controls.

Based on the broad spectrum of topics that may be included, the following areas are to be included in analyzing this functional area, and used as applicable to site construction or operations.

1. Control of procedures
2. Disposition of Bulletins, Circulars and Information Notices
3. System responsibilities for responding to noncompliance
4. Management control of contractors
5. Disposition of orders and CALs
6. Onsite review and investigation
7. Action on reportable occurrences
8. Action on deviations/deficiencies
9. Special inspections of a particular management function
10. Records control
11. Control of construction processes
12. Control of design changes
13. Regulatory Improvement Programs and other special programs.

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

1. Civil Penalties [Provide a summary.]
2. Orders (only those relating to enforcement) [Provide a summary.]

E. Management Conferences Held During Appraisal Period

1. Conferences [Discuss conferences that dealt with regulatory performance or enforcement, and which were conducted at a level of Division Director or Regional Administrator.]
2. 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.]

[REFER TO NRC MC 0516 FOR SUPPORTING INFORMATION FOR EACH OF THE CATEGORIES]

TABLE 1
INSPECTION ACTIVITY AND ENFORCEMENT

<u>FUNCTIONAL AREA</u>	<u>NO. OF VIOLATIONS IN EACH SEVERITY LEVEL</u>				
	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>
Plant Operations					
Radiological Controls					
Maintenance					
Surveillance					
Fire Protection	[FOR OPERATIONS PHASE FUNCTIONAL AREAS]				
Emergency Preparedness					
Security					
Refueling					
Quality Programs and Administrative Controls					
Licensing Activities	<hr/>				
Totals					
[OR]					
Soils and Foundations					
Containment and Other Safety-Related Structures					
Piping Systems & Supports	[FOR CONSTRUCTION PHASE FUNCTIONAL AREAS]				
Safety-Related Components					
Support Systems					
Electrical Power Supply and Distribution					

<u>FUNCTIONAL</u> <u>AREA</u>	NO. OF VIOLATIONS IN EACH SEVERITY LEVEL				
	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>
Instruments & Control Systems					
Quality Programs and Administrative Controls					
Licensing Activities					
TOTALS					

FINAL TRANSMITTALDocket No. _____

Gentlemen:

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) _____ Board Report for the _____, our meeting of _____ which discussed in detail, the contents of the report, and your written comments dated _____, relative to the report.

We have thoroughly reviewed and evaluated the context of your comments and have reached the conclusions presented in the Appendix to this letter.

Based on our in-depth discussions during the meeting on _____, and further reiterated in your letter of response, certain portions of the SALP Board Report have been modified as described in the attached Errata Sheet. Corrected page(s) are included herein to update your copy of the SALP Board Report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter with the referenced attachments, will be placed in the NRC's Public Document Room.

No reply to this letter is required; however should you have questions on the basis of conclusions reached by NRC, or if you need clarification on the changes made to the SALP Report, please let us know and we will be pleased to discuss them with you.

Sincerely,

James G. Keppler
Regional Administrator

Attachments:

1. Appendix to SALP ____ Board Report
No. _____
2. Errata Sheet (if appropriate)
3. Corrected Page(s) to SALP Report (if appropriate)

cc w/attachments:

Standard Distribution

J. M. Taylor, Director, EI

H. R. Denton, NRR

Regional Administrators

RI, RII, RIV, RV

N. J. Palladino, Chairman

J. K. Asselstine, Commissioner

F. M. Bernthal, Commissioner

T. M. Roberts, Commissioner

L. W. Zech, Commissioner

NRR Project Manager

H. L. Thompson, RRR

J. Axelrad, IE

RIII PRR

RIII SGA

State Liaison Officer, State

of _____

INPO

ERRATA SHEET

<u>PAGE</u>	<u>LINE</u>	<u>NOW READS</u>	<u>SHOULD READ</u>
-------------	-------------	------------------	--------------------

[AN ERRATA SHEET WILL BE USED TO IDENTIFY CORRECTIONS MADE TO THE REPORT AFTER ISSUANCE TO THE LICENSEE. IN ADDITION TO IDENTIFYING THE CORRECTIONS AS ABOVE, A NARRATIVE BASIS WILL BE INCLUDED TO SUBSTANTIATE WHY THE CORRECTIONS HAVE BECOME NECESSARY]

AN ERRATA SHEET WILL BE USED ONLY
TO CORRECT INFORMATION IN THE REPORT

[THE ORIGINAL PAGE WILL BE INCLUDED, BUT LINED THROUGH REFERENCING THE ERRATA SHEET, AND A CORRECTED PAGE FORWARDED AT THE TIME OF ISSUANCE OF THE ADMINISTRATORS LETTER AND ADDENDUM PACKAGE]

(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 LERs 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 (LERs 50-000/81-67 and 50-000/81-52) were of particular concern since they reflected a licensed operator's decision to operate a system (charging and letdown 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 operations 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.

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SALP _____

APPENDIX

SALP BOARD REPORT

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Inspection Report No.

Name of Licensee

Name of Facility

Assessment Period

A. Summary of Meeting with _____ on _____

B. Comments Received from Licensee

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

ATTACHMENT 4

GUIDANCE IN SUPPORT OF THE REGIONAL SALP PROGRAM

I. General Criterion on SALP Input/Report Content

A technically sound regulatory program requires concise reporting of inspection findings and observations and a thorough evaluation of such findings to reach conclusions of safety significance. SALP serves as an intricate part in establishing a sound regulatory posture and through application of its principles, provides a meaningful tool toward enhancing licensee safety performance.

As a matter of practice, to assure consistency in the application of the SALP principles, the following ground rules have been established and should be applied when preparing SALP inputs and in reviewing the content of all SALP documentation. Exceptions may occur and will be handled on a case-by-case basis.

SALP inputs, when prepared properly, serve as the ground work toward preparation of a diagnostic report to measure licensee safety performance. The preparation of SALP inputs should be taken seriously to ensure all pertinent information is captured as explicitly as possible and contain a firm basis for any conclusions reached.

SALP inputs are required to be prepared for all inspection activity within a functional area during the assessment period. Each Technical Division is required to provide SALP inputs covering inspections for which they had direct inspection responsibility.

SALP inputs generally take the form of narrations (by functional area) broken down into the following headings: Analysis, Conclusion, and Board Recommendations.

The intent here is to improve the quality of these inputs - not to completely change the format of them. In addition to the present format of SALP inputs, mandatory inclusion of an evaluation matrix (attached) will further enhance the effectiveness of all inputs by clearly providing a source of reference to ensure that all the criteria were included to reach an overall rating.

Attention should be directed toward this objective to eliminate any possibility of omissions. If there appears to be no basis for an evaluation or if the criteria does not apply, this information should be presented in a manner that makes it clear that these criteria, though not applicable, have not been overlooked in arriving at an overall rating.

Additionally, any trends toward improved, sustained, or regressed licensee performance should be factored in when arriving at an overall rating. Of a prevailing trend cannot be readily determined, state the basis for any inability to reach a proper determination and/or provide the basis for its omission.

Specific emphasis should be placed on the issues, performance trends, and Board Recommendations from the previous assessment period to ensure that within the current assessment all of the important concerns documented previously have been addressed or closed, whichever is applicable.

Submittal of concise information is an integral part of the SALP process.

For each SALP input submitted, provide a rating matrix with your input similar to the attached matrix. Address only the functional areas covered by your input. This matrix should be the basis for your overall Category rating for your input.

II. Criterion on Transition to O. L. Issuance

- A. Each Standard Construction functional area will be addressed even if it involves a NO RATING because of insufficient licensee or NRC activities to perform an adequate evaluation.
- B. Transitional functional areas such as Preops will be addressed once inspection activity starts even if it results in a NO RATING because of insufficient licensee or NRC activity to perform an adequate evaluation. Once a transitional area is opened, it will continue to be addressed until the criteria under III apply.
- C. Special functional areas will be addressed in the subsequent SALP either to close out the area or to continue it as a problem area. Once closed, it does not need to be readdressed unless there is a need to.
- D. For SALP information that may be used in the final licensing review, it may be necessary to provide a summary statement in the Introduction to reference previous special areas.

III. Criterion on Post O. L. Issuance Where an O. L. is Issued During the Assessment Period

- A. An assessment will be completed for each functional area for which there was inspection effort expended. This will include even those areas that have no direct bearing on the current status of the facility. For example, the facility received an O. L. during the assessment period, construction and preoperational functional areas are to be included for the record even though that facility may be in an operational phase.
- B. Construction and transitional (such as preops) functional areas will be included along with appropriate operational and startup testing (under plant operations). This will include ratings or no ratings, as appropriate, but Board Recommendations will note that no further action will be required by the licensee. An exception is the case where there is a dual unit site and one unit is still to be licensed. In this case, the construction and transition functional areas will be handled in the normal way.
- C. The Introduction to the SALP Report should include a paragraph which discusses the transition to an O. L.

IV. Criterion for Establishment of SALP Assessment Periods

A. Operating Plants

For Operating plants, the assessment period is to be 18 months unless a reduction is indicated.

- For the operating plants, the greatest weight will be given to:

- . Plant Operations
- . Radiological Controls
- . Maintenance/Modification
- . Surveillance

A Category 3 would make it a prime candidate for a future reduced assessment period.

- . For the other functional areas, any Category 3 rating is to be assessed individually. If the licensee's corrective action appears appropriate and there is evidence that it is being implemented, it should not change the next assessment period.

B. Construction Sites

For Construction sites, all assessment periods are to be 18 months unless a reduction is indicated by the following:

- . Two or more Category 3 ratings makes it a prime candidate to be reduced to 12 months.
- . One Category 3 rating makes it a candidate for reduction to 12 or 15 months depending upon the depth and scope of the weaknesses. If the licensee's corrective action appears appropriate and there is evidence that it is being implemented, it should not be the primary reason for reducing the assessment period.

A published SALP report should be available within 6 months prior to O. L. issuance.

The first SALP report after O. L. issuance should be greater than six months but less than 12 months after starting fuel load and startup testing.

C. Other Conditions and Exceptions

SALP Boards will not normally be scheduled in September or December and only in extreme circumstances will there be more than two scheduled in any one week. Every effort will be made not to schedule SALP Board Meetings on Fridays to accommodate the Compressed Work Schedule.

Normally three or less SALP Boards will be scheduled in any one month.

U.S. NUCLEAR REGULATORY COMMISSION
NRC MANUAL

Volume: 0000 General Administration
Part: 0500 Health and Safety

1E

CHAPTER 0516 SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

0516-01 COVERAGE

This Chapter and 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 with emphasis on resource allocation.

022 To improve licensee performance.

023 To collect available observations on an annual 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 and 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.

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

- a. implements the requirements of this chapter within the Office of Inspection and Enforcement.

are reasonably effective such 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 such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

043 Functional Areas.

a. Operating Reactors

- (1) Plant operations
- (2) Radiological controls
 - (a) radiation protection
 - (b) radioactive waste management
 - (c) transportation
 - (d) effluent control and monitoring
- (3) Maintenance
- (4) Surveillance - includes inservice and preoperational testing
- (5) Fire protection
- (6) Emergency preparedness
- (7) Security and Safeguards
- (8) Refueling - includes initial fuel loading
- (9) Licensing activities
- (10) Others (as needed)

b. Construction Phase Reactors

- (1) Soils and foundation
- (2) Containment and other safety related structures
- (3) Piping systems and supports - includes welding, NDE and preservice inspection

SYSTEMATIC ASSESSMENT
OF LICENSEE PERFORMANCE

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

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PART I

GENERAL

- A. Overall guidance for the Systematic Assessment of Licensee Performance (SALP) is provided in Chapter NRC-0516. Procedures for SALP are provided in this Appendix.
- B. The NRC will conduct an annual review and evaluation of the performance of each power reactor licensee possessing an operating license or construction permit. The individual facility assessments are intended to take place at an approximately uniform rate throughout the year. The evaluation process is comprised of three parts: (1) a SALP Board assessment; (2) a meeting with licensee management to discuss the assessment; and (3) issuance of the report.

PART II

EVALUATION CRITERIA

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

To provide a 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-0516-04 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 Quality Assurance, Design Control, Training and the like, are attributes 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 attributes that is observed in several functional areas, it may be desirable to highlight that attribute in a separate discussion; e.g., Quality Assurance may be a problem in Operations, Radiological Control and Surveillance. It would be appropriate to discuss Quality Assurance as if it were a functional area, in addition to covering the specific QA problem in each functional area.

The listed attributes are intended only as guidance in the assessment of performance in the functional areas and thus, are indicators of the licensee performance.

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 as to performance as it relates to an attribute should not be forced.

TABLE 1

EVALUATION CRITERIA WITH ATTRIBUTES FOR ASSESSMENT OF LICENSEE PERFORMANCE

1. MANAGEMENT INVOLVEMENT AND CONTROL IN ASSURING QUALITY

<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
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 non-existent policies
decision making consistently at a level that ensures adequate management review	decision making usually at a level that ensures adequate management review	decision making 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, and thorough	audits frequently not timely, incomplete or not thorough
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

3. RESPONSIVENESS TO NRC INITIATIVES

<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
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
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

<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
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

7. TRAINING AND QUALIFICATION EFFECTIVENESS

Category 1

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

Category 2

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

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

Category 3

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

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

PART III

SALP BOARD ASSESSMENT

The SALP Board Assessment should include the following activities:

1. Obtain assessment data applicable to the appraisal period.
 - a. Notify NRR, AEOD, and NMSS of the assessment period and the date when inputs from those offices are needed. The notification should be at least 30 days before the inputs are needed.
 - b. NRR will provide written input.
 - c. Normally, NMSS will respond to the notification by telephoning the regional security experts and, if appropriate based on licensing activities during the appraisal period, providing input to the draft functional area analysis.
 - d. AEOD will respond and will provide input, if appropriate based on AEOD activities relative to the appraisal period.
 - e. Inputs will be directed into the functional areas as defined in Chapter NRC-0516.
2. Tabulate and analyze the data obtained for the facility.
 - a. Prepare the enforcement and inspection summary data - numbers and types of inspections performed and enforcement findings for each functional area.
 - b. Provide the number of LERs submitted under each of the licensee's cause categories. This information will be included in the SALP Board report. If the review indicates that the proximate cause classification of significant LERs persistently varies from that reported by the licensee that issue should be discussed under the appropriate functional area of the performance evaluation. LERs should be discussed under the appropriate functional area.
 - c. Provide the number of Construction Deficiency Reports (CDR) and 10 CFR Part 21 reports submitted by the licensee. These reports should be discussed in the appropriate functional area.
 - d. Any events which have been determined to be "Abnormal Occurrences" should be identified.
 - e. The number and nature of unplanned trips.
3. Develop the performance analysis for each of the functional areas. It is expected that the performance analysis would be drafted (in a preliminary form) by a knowledgeable member of the NRC staff prior to the

PART IV

MEETING WITH LICENSEE

The licensee management meeting should be planned and conducted considering the following:

1. Notification of the meeting should be made at least two weeks 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.
3. The Board Chairman will transmit the Board's report to the licensee one week before the meeting. The transmittal letter will identify weak areas and request licensee response in these areas, as appropriate, within 20 days after the meeting. The licensee will also be given the opportunity to make comments on the report during the discussions at the meeting or in writing within 20 days after the meeting.
4. 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 or designated NRR manager
 - d. Resident Inspector and/or assigned inspectors

For meetings with minimal issues, the Regional Administrator may elect to involve fewer staff members in the licensee management meeting.

5. 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 on issues relating to the licensee's performance. Those aspects of the licensee's operation that need improvement will be identified.

PART V

ISSUANCE OF REPORT

After the meeting and after considering the licensee's oral and written comments, the report will be transmitted by letter to the licensee over the Regional Administrator's signature. The letter should acknowledge the licensee's comments and amplify as appropriate on these comments or other findings of the review board. Additionally, the letter will include a characterization of overall safety performance. This letter, enclosing the report and licensee comments, will receive standard distribution including PDRs.

PART VI
FORMAT FOR SALP BOARD REPORT

Report Cover Sheet

(Report Number)

U.S. NUCLEAR REGULATORY COMMISSION
REGION ____

Systematic Assessment of Licensee Performance

(Name of Licensee)

(Name of Facility)

(Date)

Report Body

I. INTRODUCTION

Provide an introductory statement.

II. SUMMARY OF RESULTS

Provide a tabulation of functional area assessments.

III. CRITERIA

Describe the evaluation criteria used.

IV. PERFORMANCE ANALYSES

Functional Area Analysis

For each functional area considered, provide a brief narrative of significant strengths and weaknesses; summary of major problems; significant events (LERs or CDRs); enforcement issues; and summary of NRC and licensee actions. Include 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.

6. Management Conferences Held During Appraisal Period. Discuss conferences that dealt with regulatory performance or enforcement.
7. Other. Narrative of any significant strengths, weaknesses, or issues at the discretion of the SALP Board.