

SALP BOARD REPORT

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

50-341/85027
Inspection Report No.

Detroit Edison Company
Name of Licensee

Fermi 2
Name of Facility

October 1, 1984 through June 30, 1985
Assessment Period

8507120336 850628
PDR ADOCK 05000341
Q PDR

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.

An NRC SALP Board, composed of staff members listed below, met on June 27, 1985, to review the collection of performance observations and data to assess the licensee's 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 Fermi Unit 2 for the period October 1, 1984, through June 30, 1985.

SALP Board for Fermi 2:

<u>Name</u>	<u>Title</u>
J. A. Hind	Director, Division of Radiation Safety and Safeguards (DRSS)
R. L. Spessard	Director, Division of Reactor Safety (DRS)
C. E. Norelius	Director, Division of Reactor Projects (DRP)
C. J. Paperiello	Chief, Emergency Preparedness and Radiation Safety Branch
L. A. Reyes	Chief, Operations Branch, DRS
N. J. Chrissotimos	Chief, Reactor Projects Section 1D
J. R. Creed	Chief, Safeguards Section
M. A. Ring	Chief, Test Programs Section
M. P. Phillips	Chief, Emergency Preparedness Section
D. H. Danielson	Chief, Materials Section, DRS
T. Madedo	Security Inspector, DRSS
S. G. DuPont	Reactor Inspector, TPS
S. Stasek	Project Inspector, Reactor Projects Section 1D
Z. Falevits	Reactor Inspector, DRS
R. Hasse	Reactor Inspector, DRS
M. D. Lynch	Licensing Project Manager, NRR

II. CRITERIA

The licensee's 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 also 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

Overall, the licensee's performance was found to be acceptable and showed an improving trend. The licensee was found to have aggressive management attention and a high level of performance in the areas of Emergency Preparedness, Fueling, and Preoperational and Startup Phase Testing. Performance in the Fire Protection area was found to need increased management attention as well as maintenance of the current increased NRC staff attention during subsequent inspections.

	<u>Functional Area</u>	<u>Rating Last Period</u>	<u>Rating This Period</u>	<u>Trend</u>
A.	Piping Systems and Supports	2	2	Same
B.	Electrical Power Supply/Distribution and Instrumentation/Control Systems	3	2	Improved
C.	Fire Protection	3	3	Same
D.	Preoperational and Startup Phase Testing	2	1	Improved
E.	Plant Operations	NR	2	NR
F.	Radiological Controls	2	2	Same
G.	Maintenance	NR	2	NR
H.	Surveillance	NR	2	NR
I.	Emergency Preparedness	1	1	Same
J.	Security	2	2	Same
K.	Fueling	NR	1	NR
L.	Quality Programs and Administrative Controls	2	2	Improved
M.	Licensing Activities	2	2	Same

*NR = not rated or not rated separately.

PIPING SYSTEMS AND SUPPORTS

CATEGORY 2 PERFORMANCE

TREND WITHIN SALP PERIOD SAME

- * Inspections focussed on closeout of items.

Two Violations:

- . Nonrepetitive.
- . Not Programmatic.
- * Management Controls Adequate.
- * Records Complete and Well Maintained.
- * Knowledgeable Staff.

ELECTRICAL POWER SUPPLY AND DISTRIBUTION
AND
INSTRUMENTATION/CONTROL SYSTEMS

CATEGORY 2 PERFORMANCE

TREND WITHIN SALP PERIOD IMPROVED

- * Major inspection effort/utility effort.
- * Six Violations.
- * Hardware and drawing changes required.
- * Drawing control improved.
- * Comprehensive corrective action.

FIRE PROTECTION

CATEGORY 3 PERFORMANCE

TREND WITHIN SALP PERIOD SAME

- * Acceptable Program Implemented.
- * Adequate Plant Systems and Procedures.
- * Adequately Trained Operations Personnel
- * Major Management Concerns on Problem Identification.

PREOPERATIONAL AND STARTUP TESTING

CATEGORY 1 PERFORMANCE

TREND WITHIN SALP PERIOD IMPROVED

- * Extensive NRC Involvement.
- * Early Problems Resolved.
- * Progressive Improvement.
- * Aggressive Management Initiatives.
- * Two minor violations concerning leak rate testing.

PLANT OPERATIONS

CATEGORY 2 PERFORMANCE
NO TREND – FIRST ASSESSMENT

- * Four Violations.
- * Seventeen LERs.
- * NRC License Pass Rate High.
- * Operational Readiness Inspection.
- * Good Management Attention.

RADIOLOGICAL CONTROLS

CATEGORY 2 PERFORMANCE

TREND WITHIN SALP PERIOD SAME

- * No Violations.
- * Management Involvement Satisfactory.
- * Responsiveness to NRC Issues Satisfactory.
- * Radwaste Systems Status Acceptable.

MAINTENANCE

CATEGORY 2 PERFORMANCE

NO TREND – FIRST ASSESSMENT

- * One Violation Identified.
- * Maintenance Program Well Defined.
- * Corrective Maintenance Activities Adequate.
- * Preventative Maintenance Concerns:
 - . Low Completion Rate.
 - . Prioritization.
 - . Management Attention.

SURVEILLANCE

CATEGORY 2 PERFORMANCE

NO TREND — FIRST ASSESSMENT

- * Management Attention Acceptable.
- * Staffing Adequate.
- * Surveillance Walk-throughs.
- * No Violations.

EMERGENCY PREPAREDNESS

CATEGORY 1 PERFORMANCE
TREND WITHIN SALP PERIOD SAME

- * No Violations.
- * Demonstrated Decision Making.
- * Well Qualified Staff.
- * Program Well Defined.
- * Responsive to NRC Initiatives.

SECURITY

CATEGORY 2 PERFORMANCE

TREND WITHIN SALP PERIOD SAME

- * Senior Management Actively Involved.
- * Middle Management Deficiencies.
 - . Program Implementation.
 - . Technical Solutions.
- * Security Event – Enforcement Conference
 - . Management Aggressiveness.

FUELING

CATEGORY 1 PERFORMANCE

NO TREND — FIRST ASSESSMENT

- * Management Involvement.
- * No Personnel Error.
- * No Violations.
- * Conservative Approach.

QUALITY PROGRAMS AND ADMINISTRATIVE CONTROLS AFFECTING QUALITY

CATEGORY 2 PERFORMANCE

TREND WITHIN SALP PERIOD IMPROVED

- * Program Well Defined.
- * Adequate Staffing.
- * Responsive to NRC concerns.
- * Two Minor Violations.
- * Backlog of Internal Audit Findings.

LICENSING ACTIVITIES

CATEGORY 2 PERFORMANCE

TREND WITHIN SALP PERIOD SAME

- * Active Management Participation.
- * Prior Planning.
- * Technical Understanding of Issues.
- * Inconsistent Information Exchange.

TABLE 1

<u>Functional Area</u>	<u>No. of Violations in Each Severity Level</u>					<u>Deviations</u>
	<u>I</u>	<u>II</u>	<u>III</u>	<u>IV</u>	<u>V</u>	
Operations				2	2	
Radiological Controls						
Maintenance					1	
Surveillance						
Fire Protection						2
Emergency Preparedness						
Security				1		
Fueling						
Piping Systems and Supports				1	1	
Electrical Power Supply/Distribution and Instrumentation/ Control Systems				6		
Preoperational and Startup Phase Testing				2		
Quality Programs and Administrative Controls				1	1	
Licensing Activities						