

MAR 24 1986

MEMORANDUM FOR: Eric Johnson, Director
Division of Reactor Safety and Projects, Region IV

THROUGH: Robert Bernero, Director
Division of BWR Licensing, NRR

Walter R. Butler, Director
BWR Project Directorate No. 4, NRR

FROM: Stephen M. Stern, Project Manager
BWR Project Directorate No. 4, NRR

SUBJECT: NRR INPUT FOR SALP REPORT FOR RIVER BEND STATION

Enclosed is the NRR SALP report for the Gulf States Utilities (River Bend Station) for the period January 1, 1985 until January 31, 1986. The report is based on SALP inputs provided by technical review personnel and the assessments made by the Project manager. The overall performance rating in the functional area of Licensing Activities is Category 2. In addition, we have provided a summary assessment of certain other functional areas to the extent of our involvement in those areas.

Original Signed by

Stephen M. Stern, Project Manager
BWR Project Directorate No. 4, NRR

Enclosure:
NRR SALP Report

cc: H. Denton
D. Eisenhut
G. Holahan
D. Vassallo
J. Jaudon
D. Chamberlain

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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Stephen M. Stern, Project Manager
BWR Project Directorate No. 4, NRR

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NRR SALP Report

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Docket No. 50-458

FACILITY: River Bend Station

LICENSEE: Gulf States Utilities

EVALUATION PERIOD: January 1, 1985 to January 31, 1986

PROJECT MANAGER: Stephen M. Stern

I. INTRODUCTION

This report presents the results of the evaluation of the performance of Gulf States Utilities (GSU), the licensee and applicant for the River Bend Station, in the functional area of Licensing Activities.

The approach used in this evaluation is consistent with the provisions of NRR Office Letter No. 44, NRR Inputs to SALP Process, dated January 3, 1984, which requires that each organization responsible for preparing a Safety Evaluation provide a SALP input upon completion of the evaluation. The staff has applied the SALP evaluation criteria for the performance attributes based on first hand experience with the licensee or with the licensee's submittals.

The individual SALP evaluations for each rated issue were assembled into a matrix (see Appendix A). Those data were then used, with appropriate weighting factors for the importance to safety of the licensing issue, to develop the overall evaluation of the licensee's performance. The assessments for the individual ratings were also tempered with judgment regarding the appropriateness of the rating for the specific licensing issue.

This approach is consistent with NRC Manual Chapter 0516, which specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes.

II. SUMMARY OF RESULTS

The licensee has, in general, continued the high level of performance of the previous two SALP evaluations in the Licensing Activities area. There were a few exceptions to this general high level of performance; specifically, continued last minute changes in plant design, evidenced by two rather large FSAR amendments in the few weeks immediately preceding low power license issuance complicated the staff's task to perform an integrated safety review of the plant design. However, the licensee's response to staff inquiries on the impact of these changes was responsive, comprehensive and technically sound in most instances.

Overall, the licensee's strongest point is management. The licensee proposed and the staff agreed (in part) to proposals to issue the low power operating license prior to completion of certain selected construction and test items. The staff was satisfied with the procedures implemented by the licensee to manage the list of construction and test completion items. In fact, the NRC Commissioners recommended that the management practices employed at River Bend

for managing work queues be considered for possible application to other plants. A weak point may be in the area of monitoring and implementing lessons learned from others in the instrumentation and control area.

Based on the assessment approach described in the Introduction, the licensee's performance in the functional area of Licensing Activities is rated Category 2.

III. CRITERIA

The seven evaluation criteria as given in NRC Manual Chapter 0516 (Table 1) were used in this assessment. In addition, housekeeping in and around the plant is also discussed. These criteria are as follows:

- A. Management involvement in assuring quality
- B. Approach to resolution of technical issues from a safety standpoint
- C. Responsiveness to NRC initiatives
- D. Enforcement History*
- E. Staffing (including management)*
- F. Reporting and analysis of reportable events
- G. Training qualification and effectiveness*
- H. Housekeeping*

IV. PERFORMANCE ANALYSIS

The licensee's performance for the Licensing Activities functional area was evaluated for four of the eight criteria listed above. The data base of experience in this rating period for the remaining four criteria (asterisked above) was much smaller than for the other four criteria and therefore, only a summary comment is provided for those criteria.

This performance assessment is based on the staff's evaluation of the licensee's performance in support of licensing actions which had a significant level of activity during the assessment period. These actions included preparation of four supplements to the SER, low power licensing, meeting with the ACRS, presentations in support of the proposed full power license for the Commission, and operation of the plant during the startup testing program throughout half of the rating period. An extensive effort was required by the staff and the licensee to support these actions during the rating period. Those actions which were explicitly identified as completed licensing actions and reported in SER supplements are listed below (92 actions):

OUTSTANDING LICENSING ISSUES RESOLVED DURING SALP PERIOD

- 1. Moderate-energy line break (ASB)¹
- 2. High-energy line break (ASB)
- 3. Inservice test program (including RCS pressure boundary valve leakage) (MEB)
- 4. Seismic and dynamic qualification of equipment (EQB)

¹ NRR review branch prior to 11/85.

OUTSTANDING LICENSING ISSUES RESOLVED DURING SALP PERIOD (cont'd.)

5. Environmental qualification of equipment (EQB)
6. Preservice inspection program (MTEB)
7. Containment loads (CSB)
8. ECCS LOCA analysis (II.K.3.31) (RSB)
9. Bypassed and inoperable status (ICSB)
10. Emergency diesel generators electrical loads (PSB)
11. Qualification of TDI diesel generators (TDI Task Force)
12. Auxiliary support systems (PSB)
13. Submergence of electrical equipment (PSB)
14. Heavy-loads handling system (ASB)
15. Safe/alternate shutdown (CHEB)
16. Communications systems (PSB)
17. Lighting systems (PSB)
18. HPCS diesel generator (PSB)
19. Fuel oil storage (PSB)
20. Separation of electric circuits (PSB)
21. Safety parameter display system (HFEB)
22. Control room survey (HFEB)
23. Resolution of HEDs (HFEB)
24. Standby service water system (ASB)
25. Standby liquid control system (ASB)
26. Low-pressure interface leakage (ASB)
27. Equipment and floor drains (ASB)
28. Control building ventilation (ASB)
29. Miscellaneous HVAC systems (ASB)
30. Starting voltage for Class 1E motors (PSB)
31. Hydrogen control - degraded core accident (CSB)

CONFIRMATORY LICENSING ISSUES RESOLVED DURING SALP PERIOD

1. West Creek sediment removal (CHEB)¹
2. Slope stability (SGEB)
3. Pipe failure modes and check valve stress analysis (MEB)
4. Annulus pressurization (MEB)
5. Thermal and anchor displacement loads (MEB)
6. Fuel rod mechanical fracturing (CPB)
7. Fuel assembly structural damage (CPB)
8. LOCTVS/CONTEMPT-LT 28 computer codes (CSB)
9. Reactor vessel cooldown rate (CSB)
10. SRV discharge testing (CSB)
11. Mark III-rated issues (CSB)
12. Containment repressurization (CSB)
13. Containment purge valves (EQB)

¹ NRR review branch prior to 11/85.

CONFIRMATORY LICENSING ISSUES RESOLVED DURING SALP PERIOD (cont'd.)

14. PVLCS leakage (CSB)
15. Electrical and instrumentation and control diagrams (ICSB)
16. Routing of circuits and sensors (ICSB)
17. Instrumentation setpoints (ICSB)
18. RPS power supply protection (ICSB)
19. RPS and ESF channel separation (ICSB)
20. Isolation devices (ICSB)
21. Reactor mode switch (ICSB)
22. ADS actuation (ICSB)
23. ESF reset controls (ICSB)
24. Initiation of ESF support systems (ICSB)
25. Instrumentation of ESF support systems (ICSB)
26. RCIC system (ICSB)
27. Standby liquid control system (SLCS) (ICSB)
28. Postaccident monitoring instrumentation (ICSB)
29. Temperature effects on level measurements (ICSB)
30. High/low pressure interlocks (ICSB)
31. End of cycle recirculation pump trip (ICSB)
32. NMS and RCIS isolation (ICSB)
33. Rod pattern control system (ICSB)
34. DRMS (ICSB)
35. High-energy line break control system failures (ICSB)
36. Multiple control system failures (ICSB)
37. Emergency Response Information System (ERIS) (ICSB)
38. LPCS/RHR A pump procedures (PSB)
39. EPA/RPS motor generator set interconnection (PSB)
40. Second level undervoltage protection relay setpoint (PSB)
41. Safety cable identification (PSB)
42. Non-Class 1E loads - powered from Class 1E power supplied (PSB)
43. Postaccident sampling system (CFEB)
44. Diesel generators - mechanical issues (PSB)
45. TMI Item II.F.1, Attachment 2 (METB)
46. TMI Item II.B.2 (RAB)
47. Backup RPM designate (RAB)
48. TMI Item I.C.1 (PSRB)
49. Initial test program revisions (PSRB)
50. Proper ESF function (II.K.1.5) (PSRB)
51. Ultimate heat sink with delayed fan start (ASB)
52. Participation of human factors specialists in detailed control room design review (HFEB)
53. Task analysis documentation (HFEB)
54. Control room modifications (HFEB)
55. Containment venting procedures (PSRB)
56. Monitoring instruments for HPCS 125-V ac system (PSB)
57. Protection for lighting penetration circuits (PSB)
58. Process Control Program (METB)
59. Subcompartment pressure analysis (CSB)
60. Cable derating (PSB)
61. Equipment qualification - audit (EQB)

A. Management Involvement and Control in Assuring Quality

The licensee's management participated directly in almost all of the major licensing activities addressed in this report. Notable examples of the contributions that resulted from this management involvement are summarized below:

- ° The Senior Vice President - River Bend Nuclear Group and the plant manager were directly involved in the headquarters management review of the status on construction and test completion (March 26, 1986), and the site visit by the Director, NRR and staff on readiness for licensing (May 13-14, 1986).
- ° The Commissioners commended Gulf States Utilities (GSU) for its innovative practices for managing the queue of remaining construction activities during the latter stages of licensing and early stages of low power startup.
- ° Furthermore, the NRC Commissioners commended GSU for its communications with the Commissioners, themselves, over their accelerated approach to completion of licensing.
- ° In January 1986, the staff had some concerns over the number of reportable events, scrams and LERs during the River Bend startup. The staff was impressed with the innovative programs instituted by GSU to prioritize activities and focus resources on problem areas. In particular, the staff was impressed with direct senior management (vice presidential level) involvement in these problem area remediation activities.

Furthermore, GSU has displayed a corporate commitment to resolution of issues through participation in various licensee review groups and owners groups. The staff views this approach as indicative of a positive attitude towards management involvement and control in licensing activities.

In a few instances, notably outstanding licensing issues number 4, 5, and 10 listed in item IV above, the staff raised concerns to GSU senior management over delays in resolution. GSU senior management became directly involved and mutually satisfactory resolutions of these issues were developed and implemented.

Based on the above detailed observations, GSU is rated Category 1 for this attribute.

B. Approach to Resolution of Technical Issues From a Safety Standpoint

Responses to NRC inquiries by GSU have been generally viable with technically sound, conservative and thorough approaches in almost all cases. The applicant has demonstrated a clear understanding of most technical issues involved in many review areas including containment systems, power systems, and instrumentation and control. GSU was willing to perform additional studies, as necessary, to resolve technical issues.

However, in several areas, particularly outstanding licensing issues number 3, 4, 15 and 31, the staff questioned the licensee's lack of understanding of the technical issues involved or the depth of their technical responses.

While GSU is aggressive in resolving many safety issues, the staff feels that the utility has relied excessively on its Architect-Engineer for technical responses. Additionally, the staff is of the opinion that GSU tends to be more concerned in many instances with cost rather than taking the more conservative approaches to issue resolution.

On the basis of the above observations, GSU is rated Category 2 in this area.

C. Responsiveness to NRC Initiatives

GSU proposed an accelerated licensing schedule, which involved the resolution of a large number of open licensing items (see Part IV) during the latter phases of licensing. This accelerated licensing schedule was complicated by GSU's desire for a low power license while several construction and test items remained to be completed.

Given the potential complexities of the "tight" review schedule, GSU performed very well indeed. GSU demonstrated an aggressive attitude in the resolution of many issues, requesting conference calls and meetings which were promptly followed up with submittals or responses. Responses were generally technically sound and addressed staff concerns. However, several submittals, particularly those for outstanding items 4, 5, 6 and 31 either required frequent slippages in schedules or were late.

Of particular concern was the submission of voluminous last minute amendments to the FSAR in the weeks preceding the low power licensing. While most of these FSAR amendments reflected previous docketed commitments, there was sufficient new material in these to complicate the staff's tight review schedule.

On the basis of these observations, considering the compressed licensing schedule, a rating of Category 2 is appropriate for this area.

D. Enforcement History

No basis for rating in this area.

E. Staffing

The comments in this area are based on the Project Manager's observations during the rating period.

Positions within GSU's organization are identified and authorities and responsibilities well defined. GSU licensing and engineering groups appear to be well staffed as indicated by representatives present at review meetings and site groups. During licensing, GSU consistently had staff available to discuss review items.

NRR's principal involvement with staffing issues during the review period involved the issues of engineering expertise or shift. On this topic, the licensee was faced by a change in Commission policy during the period between low power and full power licensing. Licensee management and the staff negotiated a phased resolution on shift staffing which was acceptable to the Commissioners.

Accordingly, the staffing attribute at River Bend is rated Category 1.

F. Reporting and Analysis of Reportable Events

GSU received its low power operating license for the River Bend station on August 29, 1985, and their full power operating license on November 20, 1985. This evaluation covers the low power license period and full power license period through January 31, 1986. During this five month period, the licensee reported 95 non-security events. Approximately 10% of these events do not appear to be reportable. Approximately one half of the events are associated with isolation of the Reactor Water Cleanup System or Residual Heat Removal System due to personnel error or leakage detection system temperature switch module malfunctions. Corrective measures instituted by the licensee reduced the number of events considerably during the month of January.

None of the reported events was considered individually significant enough to warrant detailed staff followup. The above average number of events overall, however, prompted staff attention and a site visit January 28-30, to discuss RBS operating experience. The events that were most safety significant were the loss of offsite power, feedwater system problems, and valve operator bolting inadequacies (may be generic). Operator errors in general including the RHR isolations, are also a concern. The number of such events appears to be decreasing, based on a review of the January reports.

RBS experienced 7 reactor scrams during the evaluation period. This number is not abnormal for a new plant, but is higher than the average frequency of 5.0 scrams/plant/year. All equipment operated normally following each scram.

The majority of the events appear to have been reported promptly and accurately.

Based on these evaluations, the number and repetition of reportable events, and the reactor scram experience, we recommend a rating of Category 3 for the licensee's performance in frequency, reporting, and analysis of reportable events.

G. Training and Qualification Effectiveness

No basis for rating in this area.

H. Housekeeping

During the rating period the licensee was completing an accelerated construction program. Based on the observations of the Project Manager during four site visits during this period, the licensee made great strides in cleaning up the plant prior to the commencement of fuel loading and has maintained a satisfactory level of cleanliness since that time. (Insufficient basis for rating in this category.)

APPENDIX A
SALP EVALUATION MATRIX

Review Branch	Management Involvement & Control	Resolution of Issues- (Safety)	Responsiveness to NRC	Staffing	Training Qualif'ctn Effect'vns	Other
ASB	3	2	2	*	*	*
CSB	1	2	3	*	*	*
CPB	1	2	1	*	*	*
RSB	2	2	2	*	*	*
METB	2	2	2	*	*	*
ICSB	*	1	1	*	*	*
RAB	1	1	1	*	*	*
PSB	*	2	3	*	*	*
TDI T.F	2	2	2	*	*	*
EHEB	2	2	2	*	*	*
EQB	2	3	2	*	*	*
MEB	*	2	3	*	*	*
CHEB	1	1	2	*	*	*
PSRB	2	2	2	*	*	*
HFEB	1	2	2	*	*	*

*Insufficient basis for evaluation

APPENDIX B - NRR Supporting Data and Summary

1. NRR/Licensee Meetings (for low power license)

- January 29, 1985 - Discuss River Bend Technical Specifications
- January 31, 1985 - Discuss findings of Equipment Qualification Audit Team
- February 14, 1985 - Brief incoming Director of DL on status of River Bend Station
- February 25, 1985 - Review security plan implementation at River Bend
- February 20-21, 1985 - Review documentation and hardware for standby Emergency Diesel Generators at River Bend Station
- February 27-28, 1985 - Review Power Systems implementation items at River Bend
- March 8, 1985 - Technical Specifications for River Bend
- March 14, 1985 - Technical Specifications for River Bend
- March 26, 1985 - Management Review
- April 3, 1985 - Diesel Generators for River Bend Station
- April 4, 1985 - Technical Specifications for River Bend Station
- April 24, 1985 - Technical Specifications and Diesel Generators for River Bend Station
- April 26, 1985 - Diesel Generators for River Bend Station
- May 10, 1985 - Discussion on possible GSU initiative to lessen emergency electrical loads on TDI diesel generators
- May 13, 1985 - Management discussion of the status of River Bend Station readiness
- July 2, 1985 - Discussion of the impact of FSAR Amendment #20 on the SER
- July 12, 1985 - One time exception to Technical Specifications to allow use of drywell purge and vent system during modes 2 and 3
- July 22, 1985 - One time exception to Technical Specifications to allow use of drywell purge and vent system during modes 2 and 3
- July 31, 1985 - Staff comments on hydrogen control-degraded core for River Bend Station

2. Commission Briefings

November 15, 1985 Consideration of Issuance of Full Power License

3. Schedular Extensions Granted

a) Low Power License Conditions (NPF-40, Issued 8/29/85)

1. Turbine Systems maintenance program - submit by October 26, 1987
2. Seismic and Dynamic qualification of seismic category 1 mechanical and electrical equipment:
 - modify hydraulic control units by May 15, 1985
 - seismic qualification of the in-vessel racks prior to use.

3. Equipment qualification (environmental) - by November 30, 1985.
4. Mark III containment issues - prior to startup following first refueling outage.
5. Inservice Inspection Program - submit for review and approval by August 29, 1986.
6. Bypassed and inoperable status indication - implement system modifications prior to startup following first refueling outage.
7. TDI diesel engines - final approval of staff of the overall design review and quality revalidation program prior to operation beyond the first refueling outage.
8. TDI diesel engines - reduce maximum emergency service load prior to exceed 5% rated power.
9. Ultimate heat sink - acceptable temperature monitoring system prior to startup following first refueling outage.
10. Operating staff experience - training of advisors and shift crew prior to achieving criticality.
11. Testing of the off gas system and off gas vault refrigeration system - prior to installing the reactor head.
12. Fire protection system - complete modifications prior to exceeding 5% rated power.
13. Radwaste systems - complete testing and place into service prior to exceeding 5% rated power.
14. Suppression pool valves - complete modifications prior to exceeding 5% rated power.
15. Post-accident sampling system - complete modifications prior to exceeding 5% rated power.
16. Station electric distribution voltage analyses - verify prior to completion of initial test program.
17. Emergency lighting system - complete modifications prior to completion of initial test program.
18. Fuel building sampling system - operational prior to the first refueling outage.
20. Safety Parameter Display System - installed and operational prior to March 31, 1986.
21. Emergency procedure guideline for containment venting - submit, review and approved prior to exceeding 5% rated power.

22. Instrumentation - specified instruments must be modified consistent with Reg. Guide 1.97 prior to start up follow first refueling outage.

b) Full Power License Conditions (NPF-47, issued November 20, 1985).
All sited above except:

- 1 - replaced by FSAR commitment
- 3 - completed
- 8 - completed
- 10 - completed
- 12 - completed
- 13 - completed
- 14 - completed
- 15 - completed
- 19 - completed
- 20 - replaced by FSAR commitment
- 21 - completed

4. Exemptions Granted

a) Low Power License -

From GDC-2 for qualification of air operated valves in suppression pool pump back system. (SSER 3)

b) Full Power License

None

5. License Amendments Issued

One request for an amendment of the low power license Technical Specifications was received during the rating period and granted on an emergency basis (see Item 6 below).

No request for amendments of the full power license Technical Specifications were received during the rating period.

The following activities relevant to the issuance of a low power license occurred:

- August 1985, SER Supplement No. 2
- August 1985, SER Supplement No. 3
- August 29, 1985, Low Power Operation License (NPF-40) issued.

The following activities relevant to the issuance of a full power license occurred:

- September 1985, SER Supplement No. 4
- September 11, 1985, ACRS Subcommittee meeting
- September 13, 1985, ACRS meeting
- November 1985, SER Supplement No. 5
- November 15, 1985, Commission meeting on Full power license
- November 20, 1985, Full Power License (NPF-47) issued.

6. Emergency Technical Specification Changes Granted

September 25, 1985; to revise Technical Specifications on transient generator voltage following a full load rejection by HPCS.

7. Orders Issued

None

8. NRR/Licensee Management Conference

March 26, 1985 - Briefing for the Director, NRR and staff by the applicant, GSU, on the overall status of construction and test completion.

May 13-14, 1985 - Site visit by the Director, NRR and staff to evaluate readiness for operating license.

Jan. 28-30, 1986 - Site visit by staff of NRR, IE and Region IV to review startup program.

Appendix C

SUMMARY OF PREVIOUS NRC SALP EVALUATIONS FOR RIVER BEND STATION

Previous SALP Evaluations

	<u>Functional Area</u>	<u>Latest Performance Category (9/1/83 to 12/31/84)</u>	<u>Previous Performance Category (9/1/82 to 7/31/83)</u>	<u>Notes</u>
A.	Soils and Foundations	Not Assessed (NA)	NA	1
B.	Containment and Other Safety-Related Structures	1	2	1
C.	Piping Systems and Support	2	2	2
D.	Support Systems	2	2	1
E.	Electrical Power and Supply and Distribution	2	2	1
F.	Instrumentation and Control Systems	2	2	3
G.	Safety-Related Components	2	2	4
H.	Corrective Action and Reporting	1	2	1
I.	Quality Assurance (Construction)	2	2	5
J.	Quality Assurance (Operations)	2	NA	6
K.	Design Control	2	1	7
L.	Preoperational Testing	2	NA	1
M.	Plant Operations	2	NA	8
N.	Emergency Preparedness	2	NA	9
O.	Radiological Controls	2	NA	10
P.	Security	2	NA	1
Q.	Training	2	NA	11
S.	Licensing	2	2	1

Notes

1. No additional need for management attention was identified for this functional area.
2. Additional management attention should be directed toward as-built verification and drawing resolution.
3. Additional attention and resources may be needed to accommodate increased activity.
4. Source inspection should be improved to support spare parts procurement.
5. Quality assurance personnel should provide greater surveillance of actual construction. Staff should be provided to accomplish this surveillance in addition to performing document reviews and other activities.
6. There should be aggressive recruiting to fill positions within the QA organization.
7. There should be aggressive closeout of all IDI findings and monitoring of as-built verification.
8. Evaluate completed walkthroughs of procedures in order to develop confidence in the internal procedure review and approval process. Open permanent plant positions should be filled.
9. Emphasis should be given to the timely correction of deficiencies identified during the emergency preparedness preoperational inspection. (This was inspected by an NRC inspection team May 6-10, 1985.)
10. Increased management attention is needed to assure that NRC identified concerns in the areas of radwaste systems, effluent releases, effluent monitoring, and transportation activities are completed.
11. Complete the definition of job qualifications and clearly define training and training requirements.

APPENDIX D

SUMMARY OF PREVIOUS NRR SALP EVALUATION OF
RIVER BEND STATION LICENSING ACTIVITIES

	09/01/83 to 12/31/84	01/01/85 to 1/31/86 (PROPOSED)
Licensing		
°Management Involvement	2	1
°Approach to Resolution of Tech Issues	2	2
°Responsiveness	2	2
°Enforcement History	*	*
°Reportable Events	*	3
°Staffing	1	1
°Training	*	*
°Houskeeping	2	*
<hr/>		
°Overall Summary	2	2