



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 24, 1998

The Honorable Pete V. Domenici, Chairman
Subcommittee on Energy and Water Development
Committee on Appropriations
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

In accordance with the Fiscal Year 1999 Energy and Water Development Appropriations Act, Senate Report 105-26, and your letter dated November 23, 1998, the first monthly report on the status of licensing activities and regulatory duties of the Nuclear Regulatory Commission (NRC) is enclosed.

On August 7, 1998, I issued a memorandum identifying six broad areas in which NRC improvement efforts must be focused, and a seventh category identifying specific activities that should be completed within six months. Recognizing that improvement initiatives were ongoing in a number of these areas, I noted that ongoing initiatives would have to be adjusted and accelerated, and directed the staff to concentrate on those areas where considerable progress could be made.

On August 25, 1998, the NRC's Executive Director for Operations (EDO) responded to this memorandum, providing a comprehensive plan for completing an array of improvement initiatives, and establishing both short-term and long-term milestones for the completion of specific activities. The EDO's memorandum, since referred to as the "Tasking Memorandum," continues to be updated monthly to reflect the completion of milestones, adjustments to the plan, and revisions in target dates, as necessary. A copy of the latest revision to the Tasking Memorandum is also enclosed.

The staff has completed several important milestones since the development of the Tasking Memorandum. Among them are the approval of the license transfer rule by the Commission, the development and transmittal of a revision to the Enforcement Policy associated with non-risk significant violations, the final design approval for AP-600, the publication of a proposed rule change to 10 CFR 50.59 for public comment, the issuance of a paper to the Commission clarifying the staff's interpretation and applicability of the backfit rule to decommissioning, the completion of several risk-informed licensing actions, the issuance of improved standard Technical Specifications at a number of sites, and improved guidance for the issuance of Confirmatory Action Letters.

Extensive NRC resources have been committed to implementing these improvements. The NRC staff is conducting numerous public meetings and workshops to assure that stakeholder views are considered. The following status report highlights the accomplishments and progress made in each of the areas identified within your November 23, 1998 letter. These areas

Originated by: [GTracy, EDO]

include: risk-informed regulations; the nuclear plant assessment, inspection and enforcement processes; resolution of the NRC's generic issues; NRC oversight of watch list facilities; timeliness of licensing actions; license renewal; licensing of Private Fuel Storage; and a reduction in unnecessary burden associated with enforcement. Detailed information on the status and progress on other agency improvement initiatives are described within the Tasking Memorandum. This first report is intentionally more lengthy than future monthly updates since we have included background information on many of these topics. We intend to provide more concise updates beginning next month.

Sincerely,



Shirley Ann Jackson

cc: Senator Harry Reid

Enclosures:

1. First Monthly Report
2. Tasking Memorandum



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CORRECTED LETTER

December 24, 1998

The Honorable Joseph M. McDade, Chairman
Subcommittee on Energy and Water Development
Committee on Appropriations
United States House of Representatives
Washington, D.C. 20515

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Shirley Ann Jackson

cc: Representative Vic Fazio

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CORRECTED LETTER

December 24, 1998

The Honorable James M. Inhofe, Chairman
Subcommittee on Clean Air, Wetlands,
Private Property and Nuclear Safety
Committee on Environment and Public Works
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

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Shirley Ann Jackson

cc: Senator Bob Graham

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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CORRECTED LETTER

December 24, 1998

The Honorable Dan Schaefer, Chairman
Subcommittee on Energy and Power
Committee on Commerce
United States House of Representatives
Washington, D.C. 20515

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Shirley Ann Jackson

cc: Representative Ralph Hall

Enclosures:

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2. Tasking Memorandum

Enclosure 1

**MONTHLY STATUS REPORT ON THE
LICENSING ACTIVITIES AND REGULATORY DUTIES OF THE
UNITED STATES NUCLEAR REGULATORY COMMISSION**

DECEMBER 1998

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I. Implementing Risk-Informed Regulations

The staff has made progress on a number of tasks in four specific issue categories: Evaluation of Industry Proposals and Rulemaking; Pilot Applications; Plant-Specific Licensing Reviews; and Guidance Documents. A public Commission meeting to discuss the staff's efforts in these areas is scheduled on January 11, 1999. Noteworthy accomplishments are summarized below.

Evaluation of Industry Proposals and Rulemaking: The staff is preparing a paper outlining and discussing a set of options for making Title 10 of the Code of Federal Regulations, Part 50, risk-informed, in order to place more emphasis on incorporating risk concepts and the results of risk assessments in its reactor regulatory requirements. The paper is due to the Commission in December 1998.

Pilot Applications: Pilot programs are underway to conduct first of a kind risk-informed licensing reviews such that subsequent lessons learned may be used in future staff reviews. Pilot applications provide a forum for developing guidance documents for both the staff and industry. Risk-informed pilot programs included inservice inspection (ISI), inservice testing (IST), graded quality assurance (QA), and technical specification requirements. For example, in the ISI pilot program, Vermont Yankee proposed to reduce the examination of welds from 113 welds to 41 welds based on a risk-informed approach to select the welds. The staff accepted the licensee's findings that the implementation of the program would result in an insignificant change in risk and concluded that the proposed alternative to the requirements of Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code would provide an acceptable level of quality and safety. Surry Units 1 and 2, and Arkansas Units 1 and 2 are also participating in the ISI pilot program.

Plant-Specific Licensing Reviews: NRC now places high priority on review of license amendment requests which use risk assessment to justify the change. Numerous plants have used risk assessment to support requests for changes to their technical specifications for several different safety systems, such as emergency diesel generators and emergency core cooling systems. For example, six facilities, supported by the Combustion Engineering Owners Group (CEOG), each requested technical specification modifications to extend the allowable outage times for a single inoperable Safety Injection Tank. The justifications for these extensions are based on a balance of probabilistic considerations, traditional engineering considerations, including defense-in-depth, and operating experience. The staff evaluated the licensees' proposed changes, determined that they are acceptable, and issued the license amendments.

Guidance Documents: In addition to specific regulatory guides on ISI, IST, and technical specification changes, the NRC has prepared associated review guidance for the staff to enhance consistency and provide an infrastructure for use in risk-informed regulation. The NRC has also recently issued guidance for processing risk-informed licensing amendments, recognizing that these amendments are given higher priority and are reviewed by multiple technical disciplines.

II. Nuclear Plant Assessment, Inspection and Enforcement Processes

The NRC staff has convened three internal NRC task groups (regulatory framework; baseline inspection program; assessment process) to develop and define an integrated assessment, inspection, and enforcement process. These task groups have been holding weekly public meetings with the Nuclear Energy Institute (NEI) to engage in dialogue with the industry on the

NRC task groups' developments in these three areas. The staff resources utilized in the task groups were made available by the suspension of the Systematic Assessment of Licensee Performance (SALP) process, approved by the Commission on September 15, 1998.

Plant Inspection and Assessment

We have engaged in dialogue with NEI and other industry, public interest and governmental stakeholders on the new framework for inspection and assessment which will focus our future NRC activities on risk significant systems and areas. We have begun to define the new baseline inspection program, integrating the results from the framework review. We are developing the new assessment process that will limit NRC oversight to a minimum baseline inspection program if licensees meet certain performance standards. NRC interaction with the licensee will increase when performance decreases as determined by the assessment process.

The NRC staff is on schedule to provide the new regulatory oversight process to the Commission prior to the January 20, 1999, Commission meeting to discuss these processes.

Enforcement

NRC has initiated several actions in the area of enforcement in order to reduce the unnecessary regulatory burden associated with non-risk significant violations while maintaining a safety focus. NRC issued guidance to the staff in July 1998 which emphasizes among other things, the provisions in the current Enforcement Policy that permit certain licensee-identified Severity Level IV violations to be treated as non-cited violations (NCVs) and certain notices of violation (NOVs) to be issued without requiring a written response. Preliminary data indicates that this guidance has resulted in a decrease in the number of cited NOVs and in cited NOVs requiring a response.

The Commission has before it a staff proposal (SECY-98-256) to amend the enforcement policy that would affect the treatment of individual Severity Level IV violations by: 1) expanding the use of NCVs to include Severity Level IV violations identified by the NRC; 2) providing that except under limited, defined circumstances, individual Severity Level IV violations will normally result in NCVs and not NOVs; and 3) permitting closure of most Severity Level IV violations based on their having been entered into a licensee's corrective action program. This recommendation was made in recognition of the relatively low risk significance of these violations and the fact that most power reactor licensees generally enter such noncompliances into corrective action programs and appropriately resolve them in accordance with NRC regulations in a manner commensurate with their safety significance.

The near-term changes necessary in the inspection program and associated training necessary to implement this approach are expected to be completed by the end of January 1999. The NRC recognizes that additional Enforcement Policy changes for both escalated and non-escalated issues may be considered as a result of ongoing efforts to make improvements to the inspection and performance assessment processes for power reactors. The NRC is considering additional changes to the Enforcement Policy and guidance documents to address issues such as the use of the term "regulatory significance" in determining severity levels, and further clarifying the threshold between Severity Level IV and "minor" violations, which are not normally described in inspection reports. This clarification will assist inspectors in determining which issues need not be pursued and also enhance the consistency within the regulatory process.

III. Status of Issues in the Reactor Generic Issue Program

A reactor generic issue is a matter that may affect the design, construction, operation, or decommissioning of all, several, or a class of commercial nuclear power reactors. Candidate reactor generic issues are typically classified as a (1) Unresolved Safety Issues (USIs) or (2) Generic Safety Issues (GSIs). USIs are concerns that pose important questions concerning the adequacy of existing safety requirements and involve conditions not likely to be acceptable during the lifetime of a commercial nuclear power reactor. At the present time, there are no open USIs. GSIs are potential improvements that can be implemented through new or revised rules and/or guidance, if the improvements are cost-beneficial.

During the past 15 years, 639 GSIs have been handled within the Reactor Generic Issues Program. There have been no USIs identified during this period. Of the 639 reactor GSIs, 624 have been resolved (or closed) and 15 are open. The current inventory of reactor generic issues is the lowest since the beginning of the program. The work related to the majority of GSIs (412 of the 624 resolved) resulted in a determination that no new regulations or additional regulatory guidance were justified.

The evaluation of each GSI is based upon a technical analysis to determine whether a substantial increase in public health and safety would be realized by imposing new requirements on licensees. This technical analysis is followed by a cost benefit analysis to determine whether potential new requirements meet the NRC's backfit criteria (10 CFR 50.109). Prior to imposing new requirements, both the technical and cost benefit criteria must be satisfied. This program has been successful in that the majority of questions concerning the adequacy of existing safety requirements have been resolved without the need to impose new requirements on licensees. The table below provides a brief description of the status of each open reactor GSI as well as the scheduled completion date.

Recently, the Reactor Generic Issue Program has undergone an assessment to improve its effectiveness and efficiency. This assessment was conducted with support from Arthur Andersen. A plan and timetable are being developed to restructure the program to correct the deficiencies that were identified and to implement improvements.

Open Reactor Generic Safety Issues (December 1998)

GSI#	TITLE	SCHEDULED RESOLUTION DATE	STATUS
B-61	Allowable ECCS Equipment Outage Periods	02/99	A proposed resolution to close this issue with no new or revised requirements is being reviewed. Resolution will be forwarded to ACRS in 12/98. ACRS response expected in 2/99.
B-55	Improve Reliability of Target Rock Safety Relief Valves	03/99	Three activities currently being performed by the industry are being reviewed to determine whether they adequately resolve the issue.

GSi#	TITLE	SCHEDULED RESOLUTION DATE	STATUS
23	Reactor Coolant Pump Seal Failures	06/99	Work on the technical basis (i.e., reassess risk associated with seal failures in context with station blackout rule) for a possible resolution is ongoing.
145	Actions to Reduce Common Cause Failures	06/99	A proposed resolution to close this issue with no new requirements and by publishing a report documenting the information collected on common mode failures is being finalized.
158	Performance of Safety-Related Power-Operated Valves Under Design Basis Conditions	06/99	Work on a technical basis for a possible resolution is ongoing. This issue is being evaluated to determine the safety significance of air-, hydraulic-, solenoid-operated valve failures.
173.A	Spent Fuel Storage Pool: Operating Facilities	06/99	The NRC is working with industry to develop new and revised guidance intended to be contained in a standard and incorporated into an NRC regulation.
165	Spring-Actuated Safety and Relief Valve Reliability	07/99	A proposed resolution to close this issue with no new or revised requirements and the technical basis for reaching that conclusion is being finalized.
190	Fatigue Evaluation of Metal Components for 60-Year Plant Life	07/99	Work on the technical basis (i.e., risk associated with fatigue failures) for a possible resolution is ongoing. Present focus is on making improvements to the computer code for this type analysis.
B-17	Criteria for Safety-Related Operator Actions	03/00	A proposed resolution (i.e., endorsement of an industry standard) has been developed, but alternative guidance is being considered before finalizing a resolution with new or revised requirements.
168	Environmental Qualification of Electrical Equipment	9/00	Work on the technical basis (i.e., pre-aging and testing of low voltage instrumentation and control electrical cables) for a possible resolution is ongoing.

GSi#	TITLE	SCHEDULED RESOLUTION DATE	STATUS
191	Assessment of Debris Accumulation on PWR Sump Performance	09/01	Recently, work on the technical basis for a possible resolution of this issue has just begun. Development a technical basis for a possible resolution involves a long-term research effort.
Issues pending completion of research activities			
163	Multiple Steam Generator Tube Leakage	TBD ¹	A proposed resolution has been prepared, but finalization and implementation are being delayed while the NRC works with industry on a possible voluntary industry initiative.
170	Reactivity Transients and Fuel Damage Criteria for High Burn-up Fuel	TBD ¹	Work on the technical basis (i.e., fuel damage criteria at high burn-up) for a possible resolution is ongoing and includes cooperative research with EPRI. Development of a technical basis for a possible resolution involves a long-term research effort.
172	Multiple System Responses Program (MSRP)	TBD ¹	Work performed by the industry is being reviewed to determine whether it adequately resolves the issue without new or revised requirements.
156.6.1	Pipe Break Effects on Systems and Components	N/A ²	This item is in the process of being prioritized. The prioritization is scheduled for completion by 6/99.
NOTES: 1. Resolution dates for these GSIs have not been determined and will be based on NRC approval of industry efforts. 2. The resolution date will be defined as part of its prioritization.			

IV. Nuclear Power Plants on the Watch List

Based on discussions at the July 1998 NRC Senior Management Meeting (SMM), the following facilities are currently on the NRC "Watch List:"

Category 2: (Authorized to operate, however, NRC will monitor closely)

Clinton
LaSalle 1 & 2
Millstone 3

Category 3: (Requires NRC authorization to restart)

Millstone 2

A summary of reasons why each plant is on the Watch List follows. On the basis of a review of the Watch List removal matrix, NRC may remove a plant from the list if the licensee has taken effective action to correct identified weaknesses, as determined during the annual SMM. The next SMM is in April 1999. A Watch List removal matrix is utilized to assess licensee corrective actions. The removal matrices for the Clinton and LaSalle facilities used during the July 1998 SMM are in Attachment 1. A Watch List removal matrix was not developed for Millstone during the July 1998 SMM due to the fact that the Commission had just approved the restart of Unit 3 on June 15, 1998, (changing the categorization from 3 to 2) and numerous issues remained to be resolved prior to consideration for Watch List removal. In addition, Millstone Unit 2 remained in the Category 3 status. Plants in this category require Commission approval for restart and changing the Watch List status from Category 3 to Category 2.

Clinton:

Clinton Station has been voluntarily shutdown since September 1996. Clinton Station received a trending letter from the Executive Director for Operation after the January 1997 SMM because of declining performance trends at the station. At the June 1997 SMM, the NRC senior managers determined that Illinois Power did not have a full understanding of the depth and scope of the performance issues at Clinton and, until that occurred, it would be difficult to consider the performance decline arrested. Therefore, the NRC senior managers determined that a diagnostic evaluation of Clinton Power Station was necessary to identify the scope of problems at Clinton. In response, Illinois Power performed an independent Integrated Safety Assessment (ISA) of Clinton's performance.

The ISA identified weaknesses in operations, engineering, maintenance, and plant support. Examples of these weaknesses were evident in the management and supervision of plant operations, the performance of system engineers, the control and understanding of the plant's design bases, maintenance work scheduling and work processes, and radiation protection activities. An NRC Special Evaluation Team (SET) confirmed that the findings of the ISA accurately characterized the station's performance deficiencies and their causes.

In addition to the findings of the ISA, the weaknesses manifested by the recirculation pump seal failure continued in 1997. These weaknesses were demonstrated by the inability to bound and prioritize the issues that were required to be addressed prior to plant restart and by the inability to adequately respond to and resolve two significant circuit breaker failures. Extensive NRC involvement was needed prior to Clinton's recognition of the significance of the circuit breaker issue and other issues that impacted safety related equipment.

Based on the weaknesses identified by the ISA and continuing equipment problems at the plant, Clinton Power Station was placed on the NRC Watch List as a Category 2 plant at the January 1998 SMM.

At the July 1998 Senior Management Meeting (SMM), the NRC senior managers focused on the Watch List removal matrix criteria that the plant had not yet achieved. They discussed the licensee's organizational changes and Illinois Power's decision to extend the shutdown in order to complete human performance and hardware improvements, such as those associated with electrical breaker and degraded voltage concerns. It was noted that while management

oversight at the facility had improved and a new comprehensive recovery plan and corrective action program had been developed, equipment condition and human performance problems continued to surface since the January 1998 SMM, indicating that these programs were still in the early stages of implementation. NRC performance indicators revealed several concerns including long-standing design issues. The senior managers determined that there was a continued need for high level NRC attention at this site.

The licensee currently estimates its restart date to be early in calendar year 1999.

LaSalle 1 & 2:

LaSalle was discussed at each SMM from January 1994 through June 1996 because of various performance issues. Following the June 1996 SMM, a safety-significant service water event occurred that indicated that significant performance weaknesses continued to exist. Substantial NRC involvement was required to ensure that the station took conservative and comprehensive corrective actions in evaluating the full extent of this event. Operations performance was characterized by a number of personnel errors resulting in inoperable safety-related equipment and configuration control problems for important plant systems. Problems with plant equipment continued and were indicative of weaknesses in maintenance performance. Performance problems in the engineering area were demonstrated by a number of weak or inaccurate root cause evaluations and non-conservative operability determinations; a tolerance of poor material condition; and failure to use the design control process properly.

In September 1996, both LaSalle units were shutdown; Unit 1 to repair a turbine control valve and Unit 2 for a refueling outage. In December 1996, the licensee made a decision to extend the outages for both units to address performance issues revealed by the service water event, NRC findings, and station self-assessment initiatives.

In January 1997, NRC management placed LaSalle on the NRC Watchlist as a Category 2 plant based on continuing performance and material condition deficiencies. LaSalle was identified as having weaknesses that warrant increased NRC attention until the licensee demonstrated a period of improved performance.

At the July 1998 SMM, the senior managers considered the Watch List removal matrix in determining the appropriate agency response to the identified performance concerns. Although the licensee is making significant progress toward resolving historical performance problems, particularly in correcting material deficiencies, improvements have not been in place long enough to be considered self-sustaining. Desired improvements in operator performance, including procedure adherence, have not yet been fully demonstrated and the ongoing procedure upgrade program has not been completed. Consistent and effective root cause analysis still relies heavily on oversight organizations. Sustained, successful plant performance has not yet been demonstrated. Also, as a result of the extended outage on both units, performance indicators provide limited insights regarding performance trends. The senior managers decided that LaSalle would remain a Watch List Category 2 facility.

LaSalle Unit 1 restarted in August 1998. The licensee's restart date for LaSalle Unit 2 is estimated to be April 1999.

Millstone 2 and 3:

Millstone Units 2 and 3 were voluntarily shutdown in early 1996. Performance of the Millstone units has been of concern to the NRC since 1991. For example, there were numerous events demonstrating continued failure to correct the root cause of problems. These events included significant deficiencies in the corrective action program, untimely operability determinations for identified deficiencies, and a failure to implement procedures which precipitated significant plant events. The Millstone site also had a chronic problem in dealing effectively with employee safety concerns. The NRC determined that an unhealthy work environment, which did not tolerate dissenting views and did not welcome or promote a questioning attitude, existed at the Millstone plants. Additionally, there were examples where Millstone has not complied with safety-related aspects of its Final Safety Analysis Report and other NRC requirements. In June 1996, at the Commission's direction, the Millstone site was designated a Category 3 facility on the NRC's Watch List.

On November 3, 1996, the NRC created a new organization, the Special Projects Office (SPO), within the Office of Nuclear Reactor Regulation (NRR), to provide a specific management focus on future NRC activities associated with the Millstone units. SPO developed a restart action plan for oversight of each Millstone plant recovery effort. The restart action plan is used to track and monitor all significant NRC actions necessary to support a decision on restart approval.

On June 15, 1998, the Commission issued a staff requirements memorandum (SRM) providing its restart authorization for Millstone Unit 3. This decision resulted in changing the Watch List status of Unit 3 from Category 3 to Category 2. This restart authorization was subject to the satisfactory completion of all remaining issues requiring NRC verification. By letter dated June 29, 1998, the NRC Executive Director for Operations (EDO) authorized Northeast Nuclear Energy Company (NNECO) to commence restart actions for Millstone Unit 3. Millstone Unit 3 was restarted in early July 1998.

On the basis of discussions at the July 1998 SMM, Millstone Unit 3 remained on the NRC Watch List as a Category 2 Plant. Based on the past history of problems identified at the Millstone Nuclear Power Station and based on the recent Commission action to approve restart of Millstone Unit 3, the senior managers concluded that making judgements about whether performance changes will be long-lasting for Unit 3 will require an additional period of agency-level monitoring. NNECO remains under an NRC Order dated October 24, 1996, to continue the independent third-party oversight organization at Millstone until the licensee demonstrates by its performance that the conditions which led to the requirement of that oversight have been corrected to the satisfaction of the NRC. Additionally, Millstone Unit 2 remains under on NRC Order dated August 14, 1996, to implement an independent corrective action verification program (ICAVP). A removal matrix for Millstone Unit 3 will be provided to the NRC senior managers for their consideration at the April 1999 SMM.

At the July 1998 SMM, the NRC senior managers did not review considerations for decreasing or maintaining the level of agency attention at Millstone Units 1 and 2, given their Category 3 standing. The NRC staff developed and maintains a restart action plan for Millstone Unit 2 which identifies the issues, including those related to the two NRC orders, that require resolution before the unit restarts.

On July 21, 1998, Northeast Nuclear Energy Company submitted a letter stating their decision to cease operations at Millstone Unit 1. As a result, in an SRM dated July 22, 1998, the

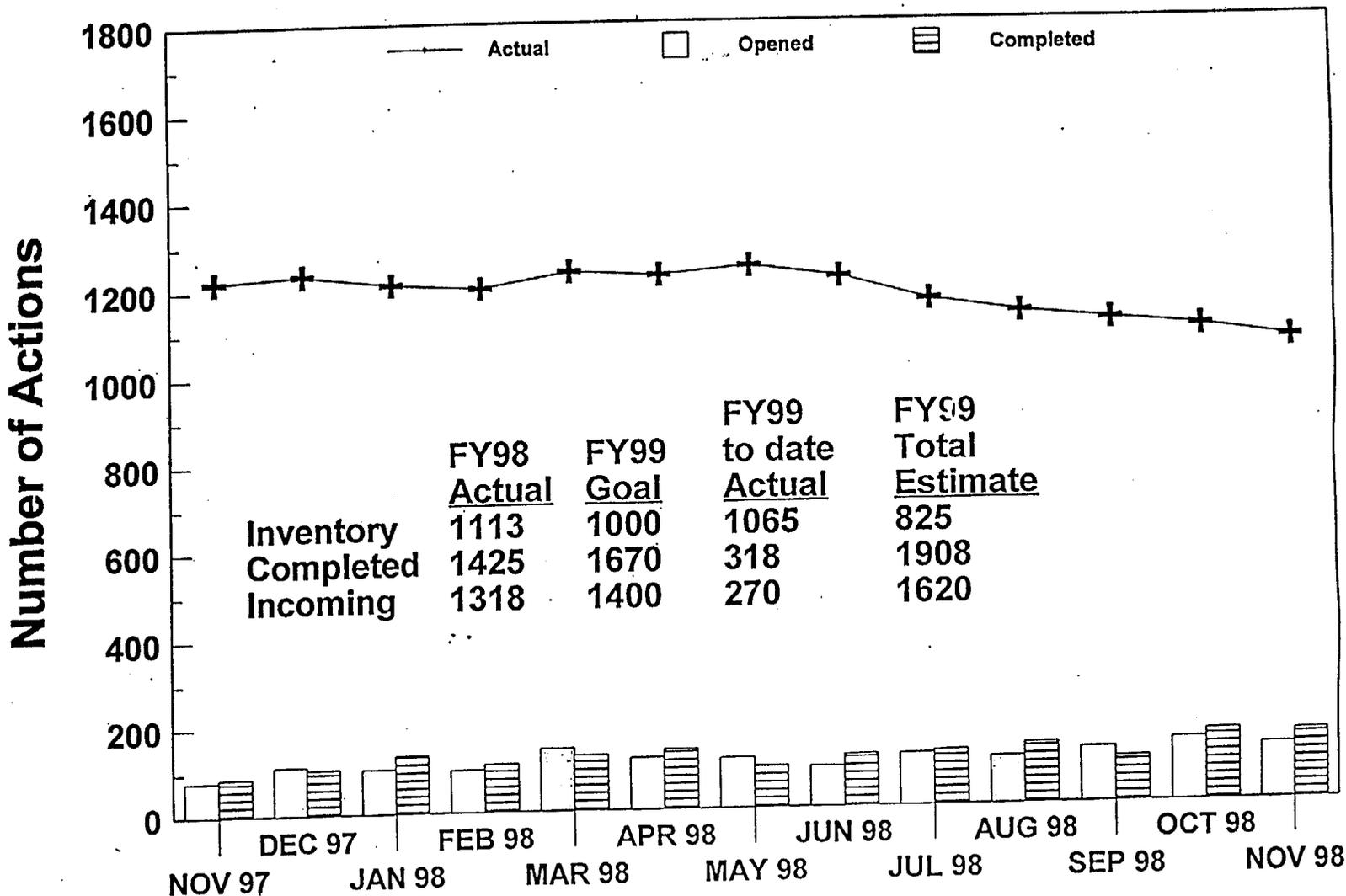
Commission directed the staff to no longer list Millstone Unit 1 as a Category 3 facility. A Commission meeting has been scheduled for January 19, 1999 to consider the need for continued independent oversight of the licensee's employee concerns program.

V. Licensing Actions

The FY 1999 goal for the age of the licensing action inventory in the nuclear reactor regulation program is 80% of actions less than 1 year old, 95% less than 2 years old and all actions less than 3 years old. During FY98, the licensing action inventory was reduced by slightly greater than 10%. This inventory consists primarily of lower priority items. NRC staff review efforts have traditionally been directed toward the completion of items with the highest safety significance. Accordingly, the older items in the inventory are of the lowest safety significance. The FY 1999 goal for the size of the licensing action inventory is 1000 actions. The actual age and size of inventory at the start of FY 1999 did not meet the FY1999 goals. In FY 1999, NRC increased resources for completing licensing actions, such that given the current size of the inventory and the estimated number of licensing action requests, the inventory goal should be met during FY1999. However, the goal for the age of the inventory has historically not been met. NRC has undertaken several initiatives to reduce the age of licensing action inventory. For instance, a special effort was initiated in mid-1998 to conduct a management review of the older items in the inventory. For each item, status was assessed, success paths for resolution were identified, and completion schedules were established. Monthly progress reports have been published and follow up management meetings have emphasized the need to meet established schedules. The following charts demonstrate NRC's progress in meeting these goals.

Nuclear Reactor Safety - Reactor Licensing

Licensing Action Inventory

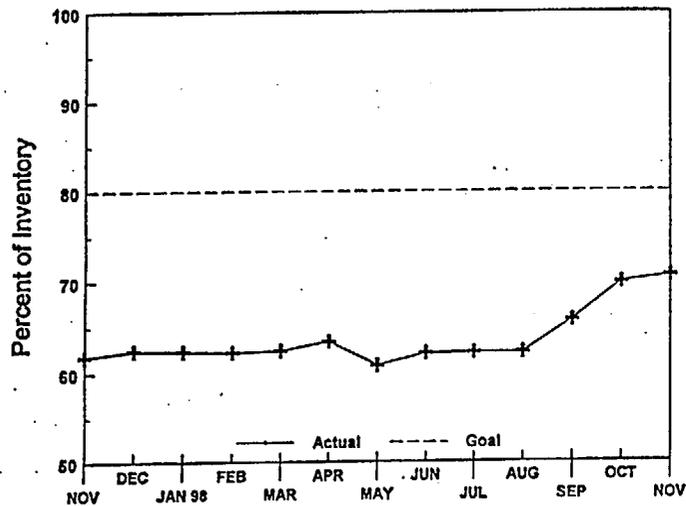


Nuclear Reactor Safety - Reactor Licensing

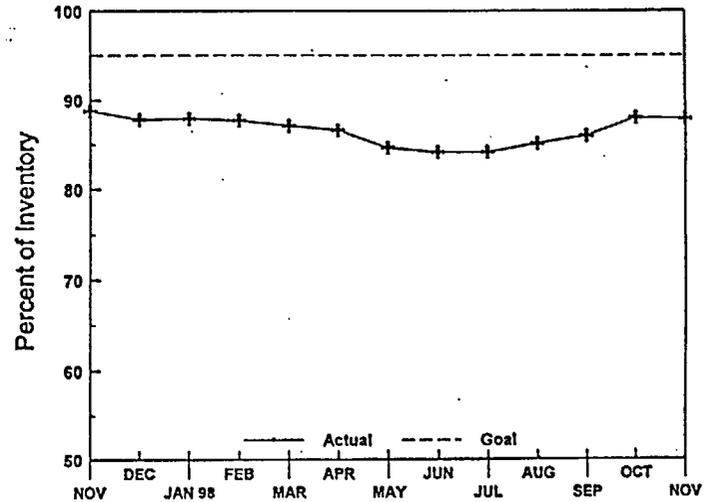
FY 1999 Goal: 80% \leq 1 year, 95% \leq 2 years, 100% \leq 3 years

11

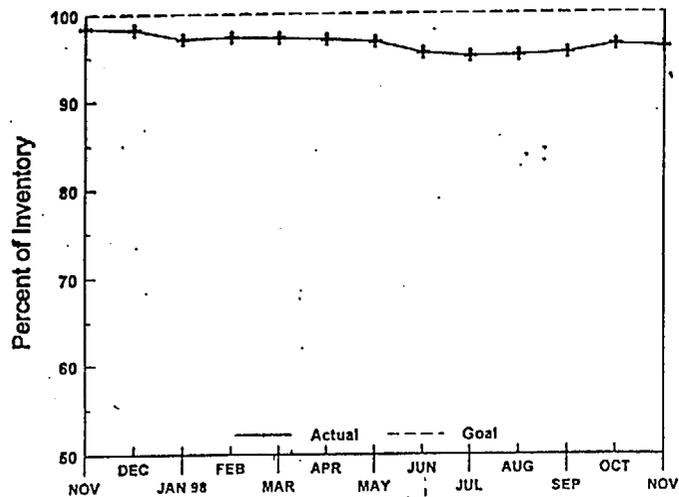
\leq 1 YEAR OLD



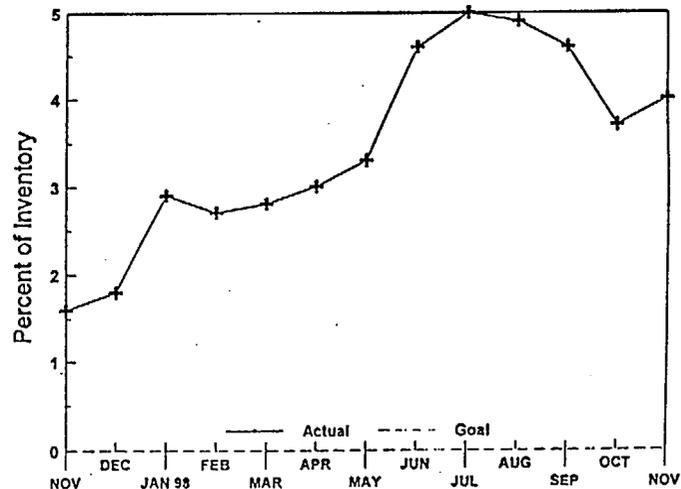
\leq 2 YEARS OLD



\leq 3 YEARS OLD



> 3 YEARS OLD



VI. Status of Calvert Cliffs License Renewal Application

The Commission has emphasized its expectations for an efficient and timely review process for license renewal, including a specific action to achieve a prompt and fair adjudicatory process. The NRC Executive Council was directed to provide stewardship for the program. Staff initiatives include the development of appropriate implementing procedures to complete the review within 36 months and the development of a working-level steering committee to ensure effective communication with the applicants, industry, and other stakeholders, to closely monitor specific tasks and issues, and to promptly identify any policy issues.

The following information provides the staff's current tasking actions for the review, resolution of issues and approval for the license renewal application for Calvert Cliffs. At present, the schedule for a Commission decision on Calvert Cliffs is May 2000. These dates may change dependent upon whether or not hearings are held.

Milestone	Date
Receive renewal application	4/10/98
Notice application tendered	4/21/98
Complete acceptance and docketing	5/8/98
Public meeting and environmental impact statement (EIS) scoping	7/9/98
Commission issued policy statement "Conduct of Adjudicatory Proceedings"	7/28/98
Request for hearing received	8/7/98
Commission issued case specific order	8/19/98
Staff complete technical Requests for Additional Information (RAIs)	9/7/98
Staff complete environmental RAIs	9/28/98
Atomic Safety and Licensing Board (ASLB) decision on intervention (Denied)	10/16/98
Applicant complete response to environmental RAIs	12/3/98
Applicant complete technical RAI responses	12/14/98
Commission decision affirming ASLB decision	12/23/98
Issue Draft Environmental Statement (DES) for comment	3/99
Complete Safety Evaluation Report (SER) and identify open items	3/99
Public meeting to discuss DES	4/99
Complete DES comments	5/99
Applicant complete response to open items	7/99
Issue Supplemental SER and Final Environmental Statement	11/99
Advisory Committee on Reactor Safeguards meeting	2/00
Commission decision on application	5/00

VII. Status of Review of Private Fuel Storage, Limited Liability Corporation's (PFS) Application for a License to Operate an Independent Spent Fuel Storage Installation (ISFSI) on the Reservation of the Skull Valley Band of Goshute Indians

The NRC received an application in June 1997 from PFS, a consortium of nuclear utilities, for a license to operate an ISFSI. NRC's licensing process consists of (1) a safety review culminating in a Safety Evaluation Report (SER), and (2) development of an Environmental Impact Statement (EIS). The license must incorporate at least one dual-purpose transportation/storage cask design. PFS has incorporated two such designs (Holtec and TranStor) in its application. These designs involve four cask reviews which are certification actions separate from the PFS licensing action. The status of the licensing and certification reviews is as follows:

Review	Next Significant Milestone	Projected Date	Status	NRC Completes Licensing/Certification ¹
SER ¹	PFS responds to NRC's request for additional information (RAI)	02/99	On Schedule	09/00
EIS ¹	PFS responds to NRC's RAI	02/99	On Schedule	09/00
Holtec Dual-Purpose Cask System (HI-STORM 100)	Holtec responds to NRC's RAI on HI-STORM 100 Storage Overpack	02/99	On Schedule	07/00
Holtec Dual-Purpose Cask System (HI-STAR 100)	NRC completes Transportation Certificate of Compliance for Holtec HI-STAR 100 Transportation Cask	03/99	On Schedule	03/99
TranStor Cask System (Storage)	Applicant submits revised Safety Analysis Report	06/99	On Schedule	06/00
TranStor Cask System (Transport)	Applicant responds to NRC's RAI on the TranStor Transportation Cask	TBD	Pending	TBD - NRC's schedule and completion date based upon receipt of applicant's response to RAI

¹This is a contested proceeding. The Atomic Safety and Licensing Board (ASLB) has scheduled hearings on safety and environmental contentions (to commence in August 1999, May 2000, and November 2000). This schedule is undergoing ASLB review and may be revised in the near future. Licensing of the facility must await completion of hearings and issuance of an ASLB decision.

VIII. Summary of Reactor Enforcement by Region

Reactor Enforcement Actions*						
		Region I	Region II	Region III	Region IV	TOTAL
Severity Level I	November 98	0	0	0	0	0
	FY 99 YTD	0	0	0	0	0
	FY 98 Total	0	0	0	0	0
Severity Level II	November 98	0	0	0	0	0
	FY 99 YTD	1	0	1	0	2
	FY 98 Total	3	1	1	1	6
Severity Level III	November 98	0	0	0	0	0
	FY 99 YTD	4	0	0	0	4
	FY 98 Total	46	11	15	19	91
Severity Level IV	November 98	8	9	11	10	38
	FY 99 YTD	29	13	18	25	85
	FY 98 Total	383	271	392	261	1307
Non-Cited Severity Level IV	November 98	36	17	13	12	78
	FY 99 YTD	57	25	30	35	147
	FY 98 Total	372	240	307	214	1133

* Numbers of violations are based on enforcement action tracking (EATS) system data that may be subject to minor changes following verification. The number of Severity Level I, II, III listed refer to the number of Severity Level I, II, III violations or problems. The monthly totals generally lag by 30 days due to inspection report and enforcement development.

Extrapolating the data for FY 99 shows a decrease in the number of violations in comparison to FY98. In addition, the number of cases where the agency has required a formal response has also decreased. There are a number of reasons for the reduction in enforcement activity, such as, July 1998 guidance (1) emphasizing not citing licensees for licensee identified and corrected violations, (2) emphasizing not requiring responses when the information was already docketed at NRC, (3) clarifying the use of multiple examples of a single violation, and

(4) focusing inspectors on violations of more safety significance. In addition, there has been a reduction in the number of team inspections. Licensees' performance continues to improve in areas such as FSAR discrepancies which in the past have contributed to numerous violations.

Given the changes in the regulatory process to date, including inspection and enforcement policies, and variable licensee performance, it is not possible to state that the current number of compliance findings is at the right number, based upon historical data. It is also important to note that there are no quotas on the number of citations.

Description of Significant Actions (Severity Level I, II or III) taken in October 1998.

- Donald C. Cook, Indiana Michigan Power Company

A Notice of Violation and Proposed imposition of Civil Penalties in the amount of \$500,000 for a Severity Level II problem consisting of 37 violations, was issued on October 13, 1998. The violations stemmed from the breakdown in the control of activities that led to the material degradation of multiple systems, including the ice condensers, at the Donald C. Cook units. In the SRM the Commission approved issuance of the violations at the severity levels proposed and approved the proposed assessment of a civil penalty for the subject violations.

- Maine Yankee Atomic Power Station, Maine Yankee Atomic Power Company

A Notice of Violation for a Severity Level II problem and four Severity Level III problems, was issued on October 8, 1998. The Severity Level III violations were related to four broad categories, namely, the failure to: (1) adequately test equipment; (2) environmentally qualify equipment; (3) perform adequate safety reviews; and (4) either identify deficiencies, or take appropriate corrective actions in a timely manner to address known deficiencies, including design related issues. Some of the violations led to safety equipment being inoperable or degraded for extended periods contrary to technical specifications. The Severity Level II violation was based on information developed during Office of Investigation (OI) investigations associated with the licensee's small break-loss-of-coolant (SBLOCA) analyses. NRC considered a substantial civil penalty for the broad programmatic deficiencies described above, and because Maine Yankee is still performing regulated activities important to safety. However, a civil penalty was not issued due to: (1) Maine Yankee essentially replaced the entire management infrastructure since the time these problems occurred, and the new management has been effective in safely managing shutdown and decommissioning operations; (2) the fact that the Maine Yankee facility has been shutdown since December 5, 1996, was permanently retired on August 6, 1997, and the violations at issue were not reflective of Maine Yankee's post shutdown and decommissioning performance; and, (3) unlike Haddam Neck in which a substantial civil penalty was imposed after declaring permanent retirement of the facility, Maine Yankee was not in the business of operating other nuclear power facilities. Accordingly, the NRC concluded that civil penalties were not necessary in this case to provide the emphasis for a high standard of compliance in the future.

**CLINTON POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST**

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
I. <u>Root Cause Identified and Corrected</u>		
Weak performance areas are thoroughly assessed.	Yes	Issues have been identified by the ISA, SET, routine inspections and from licensee self-assessments. A Plan For Excellence (PFE) summary was completed in February 1998 which is a comprehensive plan to address the identified problems. A restart list was included with the PFE summary and the licensee is in the process of fully implementing the PFE.
Comprehensive and clearly defined corrective action program has been developed.	Yes	The licensee's reply to the DFI concerning their corrective action program described several initiatives that have been taken to improve performance in this area. The corrective action program is now comprehensive and clearly defined. Several actions have been taken to ensure all performance issues have been identified including chartering the ISA and performing a System Design and Functional Verification (SDFV) inspection. The licensee developed a comprehensive Plan For Excellence (PFE) to address the identified issues. In addition, major changes have been made to the condition reporting process which is used day-to-day for problem identification and resolution.

CLINTON POWER STATION

Evaluation Factors	Response	Comments
Corrective actions include sufficient measures to prevent recurrence of problems.	Yes/No	While the licensee has initiated several programmatic actions to improve the corrective action process, the current process has not been in place long enough to determine its effectiveness and the past program did not consistently identify and address the root causes of issues. As a result, several equipment failures have recurred subsequent to their initial correction indicating continued improvement is needed in hardware root cause identification.
Management has allocated sufficient resources to carry out long-range corrective action programs.	Yes/No	Sufficient resources have been allocated to support plant restart. However, a long range schedule has not been sufficiently developed and resource loaded for long term corrective actions.
NRC is satisfied that corrective action program is sufficiently implemented.	No	Although licensee actions to improve the corrective action process have resulted in some progress, especially concerning issue identification, issue resolution remains a concern. Some aspects of the licensee's PFE have yet to be implemented and the response to the DFI was just recently received and has not been fully evaluated by the NRC.
Sustained, successful plant performance has been demonstrated.	No	The unit has remained shut down since September 1996. Restart is not anticipated until fourth quarter CY 1998.

CLINTON POWER STATION

Evaluation Factors	Response	Comments
<p>II. <u>Improved Self-Assessment and Problem Resolution Evident</u></p>		
<p>Program elements that monitor and evaluate effectiveness of corrective actions have been instituted.</p>	Yes/No	<p>Many improvement activities have been initiated; however, the licensee has not yet had the opportunity to complete assessments of the effectiveness of their improvement actions. Several assessments are planned before plant restart. Approximately 90% of the planned performance indicators have been developed and are in use. In addition, gant charts have been developed which provide a timeline for completion of recovery actions.</p>
<p>Safety issues are being identified to appropriate management level and corrected in a timely manner.</p>	Yes/No	<p>Licensee management is aware of the safety issues needing resolution. While this is indicative of an improvement in the licensee's ability to identify and raise problems to an appropriate management level, the development and implementation of effective corrective actions in a timely manner is inconsistent. The new corrective action process has not been in place long enough to evaluate its effectiveness.</p>
<p>Quality assurance and safety oversight groups provide timely and effective self-assessments of performance to site and corporate management.</p>	Yes/No	<p>Effective assessments of performance have been performed by the ISA and the SDFV. Improvement has been noted in the ability of the Quality Assurance group to perform probing and thorough assessments. However, QA</p>

CLINTON POWER STATION

Evaluation Factors	Response	Comments
III. <u>Licensee Management Organization and Oversight Improved</u>		identified that the Nuclear Review and Audit Group was not doing quality 50.59 reviews. Some recent changes have been made to safety oversight group functions and composition but the effects of these changes are as yet indeterminate.
Corporate and plant management teams are fully committed to achieving improved performance.	Yes	The new management team has accepted and is committed to addressing identified issues. Progress has been made to address the issues through the development and commitment to the PFE. The CEO repeatedly has voiced the corporation's support for the improvement efforts at Clinton as IP's number 1 priority. The CEO has announced his retirement effective July 6, 1998. The new CEO is Charlie Bayless.
Licensee has effective corporate management oversight and involvement in plant operations and problem resolution.	N/A	Illinois Power does not have a typical corporate office. All resources are located at the plant. The Senior Vice President is also at the plant and is very involved with the day to day activities at the station.
Management team provides strong direction and fosters a nuclear safety work ethic that is understood at all levels in the organization.	Yes/No	The Senior Vice-President and Plant Manager have conducted numerous meetings for plant staff and contractors to ensure management expectations for

ATTACHMENT 1

CLINTON POWER STATION

Evaluation Factors	Response	Comments
IV. <u>NRC Assessment Complete</u>		<p>individuals have been communicated to everyone. Expectations have also been forwarded in writing to the staff. However, the Senior Vice-President has indicated that some personnel, most notably in the maintenance area, remain resistant to change. Plant management addressed conduct of operations problems at a two day standdown during which management reenforced expectations and clearly communicated operator performance deficiencies.</p>
<p>Senior NRC management no longer considers the plant as having weaknesses that warrant increased NRC-wide attention.</p>	No	<p>Although some performance improvement has been noted, the licensee is only in the early stages of implementing the PFE. While the plan is comprehensive and material condition and programmatic improvements have been scheduled, close oversight of plan implementation and improvement initiatives is warranted.</p>
<p>Significant NRC inspection and licensing activities are complete and findings properly resolved or understood.</p>	No	<p>The NRC is implementing a Manual Chapter 0350 restart plan for Clinton Power Station. This plan, as well as the licensee's PFE, concentrates on issues pertinent to restart. A number of inspections and some licensing actions remain to be completed.</p>

ATTACHMENT 1

CLINTON POWER STATION

Evaluation Factors	Response	Comments
V. <u>Additional Considerations</u>		
Most recent set of Performance Indicators reflect overall improving performance.	No	The AEOD performance indicators reflect continuing procedure and design deficiencies. These issues are being addressed in the licensee's PFE.
Overall performance has improved as reflected in the most recent SALP ratings.	No	The June 1997 SALP rated Operations, Engineering, and Plant Support Category 3 and Maintenance Category 2, Performance has not improved in any of the areas and performance in the Maintenance area declined from the previous assessment. The current SALP assessment period has been extended until approximately 6 months after startup of Clinton Power Station.
Enforcement history has indicated an improving trend.	No	Design, corrective action, and procedural adequacy and adherence violations continued to be identified at the station. While the number of identified violations has decreased, the continued identification of violations indicates that improvement is still needed in these areas.
Performance has improved as demonstrated by a lack of operational problems.	No	The failure of maintenance personnel to identify the root cause of the automatic inverter transfer to an alternate power supply, and the failure of operations personnel to properly evaluate the risk associated with maintenance on the alternate power supply resulted in a loss of shutdown

ATTACHMENT 1

CLINTON POWER STATION

Evaluation Factors	Response	Comments
Performance has improved as demonstrated by a lack of significant operator errors.	No	cooling event in February 1998. Since the event, the organization of the operations department was changed. Although some overall progress is apparent since the event, continued focus is necessary to ensure more consistent performance improvement across the operating organization. For example, operators did not believe a local EDG power indication when it indicated the diesel was overloaded and continued the surveillance. A subsequent review revealed that the EDG was overloaded.
Procedure adherence problems are not evident.	Yes/No	Operator deficiencies, such as TS compliance issues, a partial vessel draindown, and tagging errors, occurred during the past six months and were discussed during the two day work standdown in February. Improvement has been noted recently as operators responded well to the shutdown cooling event and few operator errors have been noted since the standdown. However, operators recently failed to properly address an off-scale service water flow indication.
		Strict procedural compliance has been emphasized by licensee management and plant staff generally understand the expectations. Unlike past actions where procedures were used as guidance and many violations were identified, only occasional procedure adherence violations

ATTACHMENT 1

CLINTON POWER STATION

Evaluation Factors	Response	Comments
Simulator is operational.	Yes	<p>are identified. Most procedural compliance violations occur during maintenance activities.</p> <p>The simulator has been observed to function properly.</p>
All identified aging problems have been addressed to the NRC's satisfaction.	N/A	There are no major aging issues at Clinton.
The licensee has improved its management organization.	Yes	<p>The management contract in place with PECO Energy has provided a competent, safety-conscious management team that has been making steady progress in addressing the issues at the station and implementing the PFE since being put in place in early February 1998.</p>
Licensee procedures are considered adequate overall.	No	<p>As a result of increased licensee emphasis on strict procedure compliance, procedural adequacy issues continue to be identified. The licensee also identified many procedural deficiencies through its SDFV inspection. Plant staff generally understand the expectations for strict procedural compliance, look for procedure problems, and usually correct the problems before proceeding with work. Most identified procedural adherence violations are in the maintenance area.</p>

CLINTON POWER STATION

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
Licensee has an effective root cause analysis program.	Yes/No	Accurate and timely root cause determinations continue to be a challenge for the licensee. Some improvement has been noted but problems in this area continue as well.
PRA has been performed.	Yes	Complete.
PRA has been used.	Yes	The licensee has a shutdown risk program. The on-line risk program is under development.

**LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST**

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
I. <u>Root Cause Identified and Corrected</u>		
Weak performance areas are thoroughly assessed.	Yes	Issues have been identified by NRC and from licensee self-assessments and a comprehensive Restart Plan has been implemented for identified problems. The licensee's Restart Plan consists of seven strategic areas for improved performance. The areas are: 1) safe plant operations; 2) human performance; 3) plant material condition; 4) engineering support; 5) corrective action and self-assessment; 6) training; and 7) process improvement. The NRC Oversight Panel for LaSalle Station is evaluating licensee progress in these areas in accordance with the Confirmatory Action Letter and NRC Manual Chapter 0350 Restart Plan. In addition, ComEd's 50.54(f) response was comprehensive and included plans to review several processes at LaSalle that were identified as deficient. These efforts are encompassed within ComEd's more recent Strategic Initiatives.
Comprehensive and clearly defined corrective action program has been developed.	Yes	The licensee has implemented comprehensive actions, such as establishing a Corrective Action Review Board, to improve the corrective action program. These actions,

**LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST**

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
Corrective actions include sufficient measures to prevent recurrence of problems.	No	defined in the licensee's corrective action program, are resulting in improved performance. The licensee initiated several programmatic actions to improve the corrective action process such as establishing a Corrective Action Review Board. These actions provide a foundation for future improvement. In particular, the ability to identify problems and root causes have improved. However, implementation of corrective actions, although improved, is not yet consistent and remains a concern. More aggressive approaches by the Quality and Safety Assessment (Q&SA) organization in the engineering and plant support areas have been noted. However, the value added from this organization in the operations and maintenance areas is not as clearly apparent.
Management has allocated sufficient resources to carry out long-range corrective action programs.	Uncertain	Sufficient resources have been assigned to support plant restart. However, plans to address long-term performance improvement are not as clear and so resource needs have not yet been assessed. The licensee is currently developing a longer term improvement plan.
NRC is satisfied that corrective action program is sufficiently implemented.	No	Through programmatic changes, strong management focus, and special oversight efforts, such as the Corrective

LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST

Evaluation Factors	Response	Comments
<p>Sustained, successful plant performance has been demonstrated.</p>	<p>No</p>	<p>Action Review Board, some improved corrective action program effectiveness is evident. Although these initiatives set a firm foundation for continued improvement, related expectations and practices are not sufficiently ingrained in the plant staff to ensure improving performance would continue without these ongoing oversight efforts.</p>
<p>II. <u>Improved Self-Assessment and Problem Resolution Evident</u></p>		
<p>Program elements that monitor and evaluate effectiveness of corrective actions have been instituted.</p>	<p>No</p>	<p>Both units have remained shut down since September 1996. Restart is not anticipated until August 1998.</p> <p>The licensee has not yet completed assessments of the effectiveness of many of the improvement actions. Several assessments which the licensee plans to finish before plant restart, such as those performed by Corporate and the Site Assessment and Quality Verification organizations, are not complete. In response to the NRC's 50.54(f) letter, ComEd has initiated additional performance indicators, tracked at all the ComEd nuclear plants, which are reviewed monthly with corporate officers and all the Site Vice-Presidents. In January 1998, ComEd developed the Strategic Initiatives</p>

**LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST**

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
		effort which encompasses the 50.54(f) response items and provides accountability with individual senior managers.
Safety issues are being identified to appropriate management level and corrected in a timely manner.	Yes	The licensee's ability to identify and implement actions to correct safety issues has been steadily improving. Notable examples include operator performance deficiencies identified and addressed through the High Intensity Training Program and plant design, material condition, and surveillance procedure deficiencies identified and addressed following the Safety System Functional Reviews.
Quality assurance and safety oversight groups provide timely and effective self-assessments of performance to site and corporate management.	No	More aggressive approaches by the Quality and Safety Assessment (Q&SA) organization in the engineering and plant support areas have been noted. However, the value added from this organization in the operations and maintenance areas is not as clearly apparent. Improvements in the corrective action process and oversight by the Plant Operations Review Committee, Corrective Action Review Board and Engineering Assurance Group are resulting in improved root cause evaluations and identification of appropriate corrective actions.

**LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST**

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
<p>III. <u>Licensee Management Organization and Oversight Improved</u></p>		
<p>Corporate and plant management teams are fully committed to achieving improved performance.</p>	Yes	<p>The Site Vice-President has implemented a long-term improvement strategy and is focusing efforts on ensuring plant personnel stay on the established path. The plant management team understands and is supporting the current course of action.</p>
<p>Licensee has effective corporate management oversight and involvement in plant operations and problem resolution.</p>	Yes	<p>The Site Vice-President has been effective in focusing plant management attention on problems, resulting in improving performance. The licensee recently implemented extensive changes in corporate management. Although, the changes appear to have increased corporate management involvement, its too early to judge the overall impact of the changes with regards to LaSalle.</p>
<p>Management team provides strong direction and fosters a nuclear safety work ethic that is understood at all levels in the organization.</p>	Yes	<p>The Site Vice-President and Plant General Manager have conducted meetings with plant staff and contractors to ensure management expectations for individuals have been communicated to everyone. The Engineering Assurance and Quality and Safety Assessment organizations have increased expectations for improved</p>

**LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST**

<u>Evaluation Factors</u>	<u>Response</u>	<u>Comments</u>
		corrective actions and communicated the expectations to the plant staff. Based on interviews with plant personnel, overall improvement has been noted in the workers' willingness to work with management to address the plant performance deficiencies.
IV. <u>NRC Assessment Complete</u>		
Senior NRC management no longer considers the plant as having weaknesses that warrant increased NRC-wide attention.	No	Based upon the most recent plant performance review, the licensee is making progress towards resolving some deep-seated performance problems. Some improvement is evident, but is still in its early stages and not yet self-sustaining. Without continued strong management focus and oversight, these gains could easily disappear.
Significant NRC inspection and licensing activities are complete and findings properly resolved or understood.	No	The NRC is implementing a Manual Chapter 0350 restart plan for LaSalle Station. This plan, as well as the licensee's Restart Plan, concentrate on issues pertinent to restart. Some licensee actions are not yet complete or verified.

LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST

Evaluation Factors	Response	Comments
V. <u>Additional Considerations</u>		
Most recent set of Performance Indicators reflect overall improving performance.	No	The most recent AEOD performance indicator report and licensee operational performance indicators reflect little operational data available since the plant remains shut down. These indicators mainly reflect the licensee's improved identification of pre-existing design and procedure deficiencies. These results also indicate a continued concern with personnel performance.
Overall performance has improved as reflected in the most recent SALP ratings.	N/A	The October 1996 SALP noted a decline in Operations and Engineering from Category 2 to Category 3. Maintenance remained Category 3, while improvement in the Plant Support area was noted and rated a Category 2. The large amount of emergent work and poor work control processes limited plant material condition improvements. Operations safety focus was considered unsatisfactory and weaknesses in engineering support to operations were noted. <u>The current SALP assessment period has been extended until approximately 6 months after startup of one of the reactors at LaSalle Station.</u>
Enforcement history has indicated an improving trend.	Yes	Violations continue to be identified at LaSalle, but at a reduced rate and with generally lesser severity levels since

LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST

Evaluation Factors	Response	Comments
		the plant shutdown began. Enforcement discretion has been given for several design and corrective action problems identified by the licensee since the June 1996, service water event.
Performance has improved as demonstrated by a lack of operational problems.	No	The plant has not been operated since being shut down in September 1996. The licensee has implemented extensive actions such as the Operator High Intensity Training Program to address operational deficiencies. Although some effective overall progress is apparent compared to before the extended shutdown, continued focus is necessary to ensure more consistent performance improvement across the operating organization. More recently some decline has been noted in operator performance and the licensee is taking actions to address this trend.
Performance has improved as demonstrated by a lack of significant operator errors.	Yes	The licensee has aggressively pursued operator performance improvements in accordance with the Restart Plan. In particular, a High Intensity Training (HIT) program was implemented to address identified operator performance weaknesses. Individual operator and

LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST

Evaluation Factors	Response	Comments
		operating crews were removed from shift duty as a result of licensee simulator evaluations conducted during the HIT program. Some improvement has been noted and, although some operator errors have continued, none have been significant. More recently some decline has been noted in operator performance and the licensee is taking actions to address this trend.
Procedure adherence problems are not evident.	No	Some improvement in operator procedure adherence is evident. However, improvement is not consistent and problems remain with some operating personnel.
Simulator is operational.	Yes	The simulator has been observed to function properly.
All identified aging problems have been addressed to the NRC's satisfaction.	Yes	Licensee root cause analyses are identifying aging issues where appropriate. Specific identified aging problems are being addressed. The licensee replaced General Electric (GE) SBM (switchboard, miniature) control switches throughout the plant because the switches were at the end of their qualified life and GE recommended a changeout of the switches to address a manufacturing process problem. However, the licensee experienced a design problem with some of the replacement switches and is currently evaluating the need to replace these. The licensee

LASALLE COUNTY NUCLEAR POWER STATION
EVALUATION FACTORS FOR REMOVAL OF PLANTS FROM THE PROBLEM PLANT LIST

Evaluation Factors	Response	Comments
		continues to aggressively investigate equipment failures with a steam tunnel check valve damper (incorrect closing springs) and a system auxiliary transformer feedbreaker to a division 3 bus (inadequate preventive maintenance) as recent examples.
Licensee has improved its management organization.	Yes	Plant management, including the plant manager, continue to emphasize clear standards of performance to plant personnel and is affecting positive change. The licensee continues to bring in new plant management members when it sees the need.
Licensee procedures are considered adequate overall.	No	A procedure upgrade program has been slowly progressing. The licensee identified many procedural deficiencies through its Safety System Functional Reviews. All associated procedure changes are not yet complete. Plant staff understand the expectations for strict procedural compliance, look for procedure problems, and correct the problems before proceeding with work.
Licensee has an effective root cause analysis program.	No	The licensee has implemented several initiatives to improve root cause analysis such as establishing a Corrective Action Review Board to begin re-enforcing expectations in this area. As a result, significant

**LASALLE COUNTY NUCLEAR POWER STATION
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Evaluation Factors	Response	Comments
		improvement has been noted in this area. However, these expectations have not totally been met and Corrective Action Review Board involvement is still necessary in some instances to ensure adequate efforts from personnel in this area.
PRA has been performed.	Yes	Complete.
PRA has been used.	Yes	The licensee has a shutdown risk program and an on-line risk program for use during daily plant operations.