

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

August 23, 1990

MEMORANDUM FOR: James M. Taylor  
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-90-235 - NRC RECOGNITION OF GOOD  
PERFORMANCE BY POWER REACTOR LICENSEES

The Commission has considered implementing the proposals discussed in the subject SECY paper. Specific comments and direction on each proposal follow.

1. SALP

The Commission (with Chairman Carr and Commissioners Rogers and Curtiss agreeing) disapproved the recognition of sustained superior SALP performance through the use of a formal letter. Such recognition can be included in the SALP cover letter, as is the current practice, with additional recognition provided by signing out the cover letter at the EDO level. While approving the proposal to use the SALP program as a means of positive reinforcement for good performance, Commissioner Remick agreed that recognition could be included in the SALP cover letter. Commissioner Remick added that while he opposes the use of numerical grades in the SALP process, since the Commission's split vote on this question results in retention of numerical grades, he sees no reason not to use the SALP results as a means of positive reinforcement for good performance.

The Commission (with Chairman Carr and Commissioners Rogers and Remick agreeing) approved of extending the SALP period from 18 to 24 months at the discretion of senior management. such recognition and extension should be clearly tied to sustained superior performance. Commissioner Curtiss believes the current flexibility to extend the SALP period up to 18 months is sufficient.

SECY NOTE: THIS SRM, SECY-90-235, AND THE VOTE SHEETS OF COMMISSIONERS ROGERS, CURTISS AND REMICK WILL BE MADE PUBLICLY AVAILABLE 10 WORKING DAYS FROM THE DATE OF THIS SRM

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## 2. senior management Meeting

The Commission (with commissioners Rogers, Curtiss and Remick agreeing) approved recognition of plants identified during the Senior Management Meeting as exhibiting sustained outstanding safety performance by issuing a formal letter. The staff should establish a pilot program implementing this proposal for a period of 30 months. The wording of recognition letters must be carefully crafted to avoid encouraging complacency. Therefore, the Commission should be offered the opportunity to comment on some sample letters before being sent, although it is not the intent that the Commission should approve individual letters prior to issuance. Although performance is always subject to rapid change, what is rated is largely past performance and to a lesser extent expected near term future performance. Motivation through positive reinforcement by recognition serves to remind licensees of what they are doing right in the NRC's judgement.

Commissioner Rogers believes that sustained high level SALP ratings normally should be a major criterion used by senior management in the identification of outstanding plant performance. He therefore requests the staff advise the commission of any plants they identify as outstanding on the basis of consideration at senior Management Meetings that do not also have sustained high level SALP ratings. commissioner Remick believes that although more qualitative than SALP and more global in that an overall judgement is made, it is appropriate for senior managers to apply their judgement in assessing utility performance.

Chairman Carr would have preferred not to make such a broad endorsement of performance believing it may lead to complacency within the utility top management. Some of the plants identified as good performers at the last Senior Management Meeting would not have qualified as good performers under the proposed criteria for sustained excellent SALP performance. Chairman Carr also believes that disadvantages stem from the fact that these judgements are more qualitative than SALP and that performance in some

areas may be subject to rapid change.

### 3. Operator License Requalification Program

In a split vote, the Commission lacked the majority required to approve the reduction in regulatory requirements for licensees whose operator requalification programs have maintained satisfactory evaluations for two consecutive periods. The current approach should be maintained until the first six-year cycle of these examinations has been

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completed and subsequent changes are justified and approved based on an assessment of the program at that time.

Chairman Carr and Commissioner Curtiss disapproved this proposal. They believe the results of requalification program evaluations to date are sufficient to demonstrate that continued NRC evaluation of programs and licensed operators is necessary to maintain confidence in the knowledge, skills, and abilities of the individuals who operate the plants. once in an audit status, program weaknesses could go undetected until it was too late.

commissioners Rogers and Remick would have preferred approval of this proposal. Commissioner Remick strongly supported reducing regulatory requirements for licensees whose operator requalification programs have maintained satisfactory evaluations for two consecutive periods as a means of recognizing sustained good safety performance initiatives.

### 4. Operator License Certificate Program

All Commissioners concurred in the staff's recommendation not to recognize initial and requalification operator license applicants that achieve an outstanding score on their written examination.

Commissioner Remick added that although he did not object to excluding this element in the pilot program at this time, he requested staff to devote further creative thinking to these and other potential areas for providing positive reinforcement to individuals who take the extra steps to improve their proficiency in a field important to safe operation of a nuclear power plant.

## 5. Individual contributions to Safety

All Commissioners concurred in the staff's recommendation not to provide special recognition of the contribution to safety of an individual or specific plant program based on the results of an augmented inspection team (AIT) or an incident investigation team (IIT).

As with the Operator Licensing Certificate Program, Commissioner Remick added that although he did not object to excluding this element in the pilot program at this time, he requested staff to devote further creative thinking to these and other potential areas for providing positive reinforcement to individuals who take the extra steps to improve the safe operation of a nuclear power plant.

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Staff should implement a pilot program for a period of 30 months in accordance with the guidance provided above.

(EDO) (SECY Suspense: 12/28/90)

With respect to the concept of recognizing good performance by licensees in general, Commissioner Remick added that he continues to believe that our attempts to motivate through positive reinforcement can be improved. The Commission should always be open to innovative means to enhance public health and safety. Examples of areas in which positive reinforcement can be useful are many. Further, it should not be the intent of this pilot program to dispense certificates in large quantities and thereby render their reinforcement attributes ineffective, but to provide NRC senior managers with tools to positively reinforce individual and organizational performance where appropriate.

cc: Chairman Carr  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick  
OGC  
GPA