HIL 2 7 1981

Docket Nos.: 50-361/362

MEMORANDUM FOR: R. A. Purple, Deputy Director, Division of Licensing

FROM:

F. J. Miraglia, Acting Chief, Licensing Branch #3,

Division of Licensing

THRU:

R. L. Tedesco, Assistant Director, Division of Licensing

SUBJECT:

SAN ONOFRE 2 & 3 SALP INPUT

Attached is the NRR performance evaluation for the San Onofre 2 and 3 SALP Cycle 2 evaluation. This evaluation is being issued in advance of the evaluation for other projects because the Regional SALP meeting on San Onofre 2 and 3 is scheduled for July 29, 1981.

> Frank J. Miraglia, Acting Chief Licensing Branch #3 Division of Licensing

U.S. NUCLEAR REGULATORY COMMISSION

cc: H. Rood

G. Zwetzig RV

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# NRR PERFORMANCE EVALUATION SALP CYCLE 2

Facility: San Onofre 2 and 3 Project Manager: H. Rood

Appraisal Period: July 1, 1980 - June 30, 1981

#### 1. Performance Elements

- a. Quality of responses and submittals (such as SAR amendments, technical specification changes, generic letter response, and responses to requests for additional information):
  - The quality of responses and submittals such as FSAR amendments and responses to requests for additional information has generally been acceptable. SCE performance has been excellent when responding to specific NRR audits such as the Human Factors Branch control room review, the System Interaction Program audit, and the Environmental Qualification audit. SCE performance was also above average in responding to staff concerns in geology-seismology areas.
- b. Efforts required to obtain an acceptable response or submittal including timeliness, effort, responsiveness to staff requests, and anticipation or reaction to NRC needs:

SCE timeliness, effort, and responsiveness has in general been good. It has been above average for critical path items, such as reducing the number of open items to allow the SER to be issued on schedule. When the applicant focuses on a specific problem and marshalls it's resources, it does a good job. However, a few lower-priority items have been delayed to the point that they could potentially impact the schedule if not resolved in the near future. Such items include testing the CPC, and providing the financial information necessary to perform the staff's financial analysis. Efforts on those areas appear to be below average. Also, development of operating procedures appears to be proceeding slowly.

- c. Working knowledge of regulations, guides, standards and generic issues: SCE knowledge of regulations, guides, etc., is above average, resulting from their early and continuous involvement with nuclear power.
- d. Technical competence:SCE technical competence is above average.
- e. Conduct of meetings with NRR: Conduct of meetings is generally above average. SCE has been well prepared, and has conducted the meetings in a competent and professional manner.
- f. Long-standing open items:

There are several open items that could be considered long-standing. Two of these are discussed in item b, above, and another, emergency planning, is a major issue at the hearing. Although the emergency planning issue is now the pacing item in the licenisng of Unit 2, it is a difficult issue to resolve, with changing staff criteria, FEMA review participation, and a number of State, local, and Federal agencies involved in the issue. SCE performance in this area is average.

g. Organization and management capabilities: SCE organizational and management capabilities were reviewed in some detail in resolving NUREG-0737 items, and were found to be acceptable. h. Results of operator licensing examinations conducted during the appraisal period:

No operator licensing examinations were conducted during the appraisal period.

i. Performance on specific issues (as selected by the Project Manager):

Specific examples to illustrate applicant performance are given in

items a, b, and f, above.

#### 2. Observed Trends in Performance

Performance during the appraisal period is improved over previous periods.

SCE has performed very well in the areas mentioned in la and lb, above.

The AE, Bechtel, has done an excellent job in preparing for various NRR audits, and in responding to staff requests.

## 3. Notable Strengths and Weaknesses

- a. Strengths
  - (1) Applicant has the capability to organize and maintain a sustained effort to solve difficult and complex technical problems.
  - (2) Applicant is capable of providing rapid response to staff requests when geared up for the effort.
  - (3) Applicant's licensing staff is cooperative and responsive to staff needs.

#### b. Weaknesses

The principal applicant deficiency noted during the appraisal period was below average performance in resolving certain issues, typically second priority items. This appears to be due to being overloaded with work as the fuel load date approaches.

## 4. Overall Summary

Based on my observation of other utilities over the past eight years, I rate SCE's performance above average, both in responsiveness and in quality of product.