

UNITED STATES

NUCLEAR REGULATORY COMMISSION

REGION V

1450 MARIA LANE, SUITE 210 WALNUT CREEK, CALIFORNIA 94596

JUL 28 1987

Docket Nos. 50-275/50-323

Report Nos. 87-29/29

MEMORANDUM FOR:

A. Chaffee, RV

R. Zimmerman, RV

M. Mendonca, RV

P. Narbut, RV

C. Trammell, NRR

G. Knighton, NRR

S. Richards, RV

J. Elin, RV

J. Burdoin, RV

M. Padovan, RV

K. Johnston, RV

C. Hooker, RV

D. Schaefer, RV

K. Prendergast, RV

FROM:

D. F. Kirsch, Deputy Director

Division of Reactor Safety and Projects, RV

SUBJECT:

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) FOR

DIABLO CANYON NUCLEAR POWER PLANT UNITS 1 AND 2 (AUGUST)

1, 1986 THROUGH JULY 31, 1987)

References:

(1) NRC Manual Chapter 0516, SALP Program, dated July

25, 1986

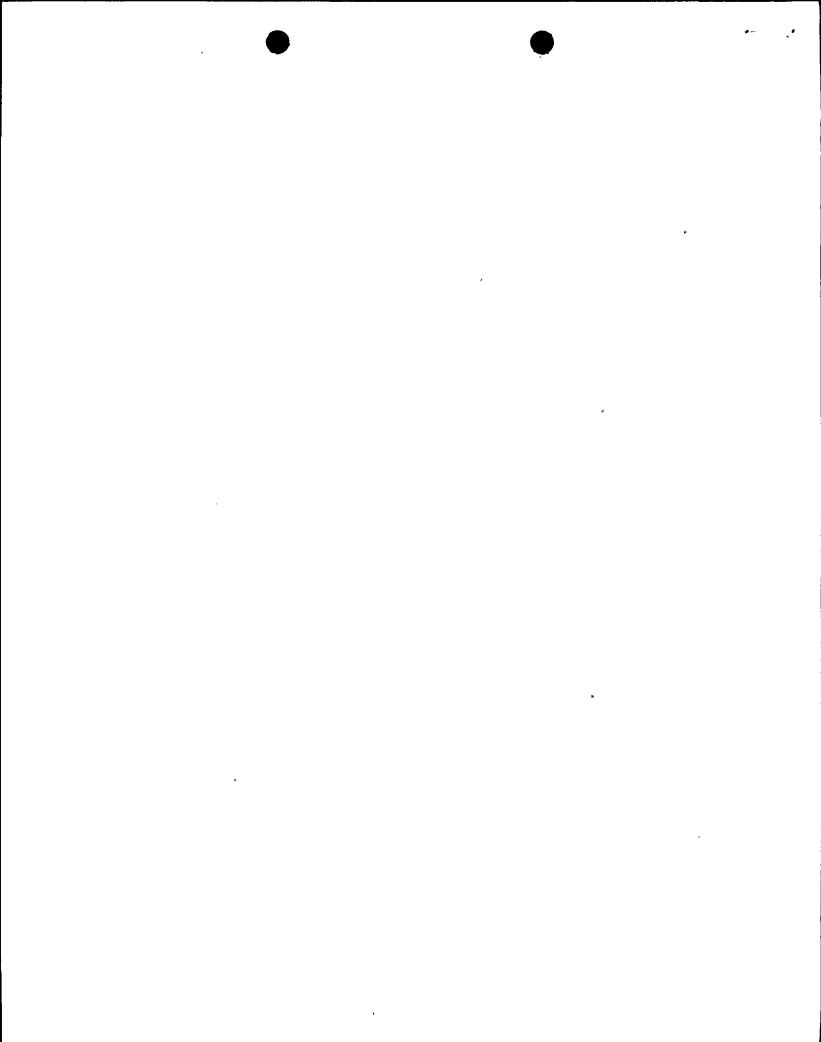
(2) Region V Instruction 0701

Pursuant to references (1) and (2) above, a Diablo Canyon SALP Review Board is established. Based on current assignments, the Board consists of the addressees listed above and myself who will serve as the chairperson. John Burdoin will serve as the Board Secretary. The Board will convene at 8:30 a.m. on September 9, 1987, at the Region V office. The projected date for a SALP meeting with the licensee (if deemed appropriate) is tentatively scheduled for October 14, 1987 (this has not been discussed with the licensee).

Members of the Diablo Canyon SALP Board are herewith provided a SALP guidance package to be used in preparing performance analyses of the various functional areas. This package consists of the following:

- Description of the functional areas (Attachment 1)
- Evaluation criteria (Attachment 2)
- Attributes for the evaluation criteria (Attachment 3)

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Performance categories (Attachment 4)

SALP evaluation matrix (Attachment 5)

Supporting Data and Summaries

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- Sample functional area performance analysis (Attachment 6)

Data on inspection effort, enforcement history, and licensee event reports will be distributed to the Board members by John Burdoin in the near future.

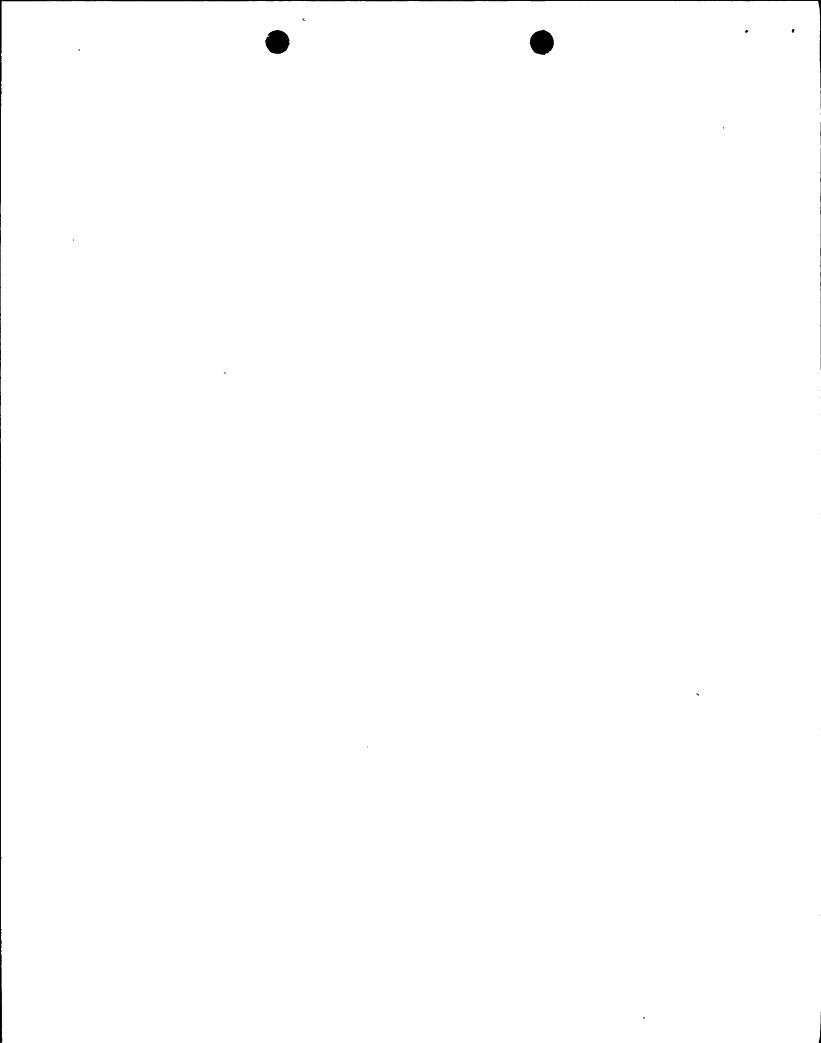
Consistent with reference (1), the anticipated outline of the SALP-Report is shown below, along with the individual(s) assigned lead responsibility for preparing each section.

I. Inti	roduction	Burdoin
II. Crit	teria	Burdoin
III. Summ	mary of Results	Burdoin
IV. Per	formance Analyses	
A.	Plant Operations	Narbut
В.	Radiological Controls	Hooker
C. .	Maintenance	Narbut
D.	Surveillance	Narbut
E.	Fire Protection	Richards
* F.	Emergency Preparedness	Prendergast
G.	Security	Schaefer
H.	Outages	Narbut
· 1.	Quality Programs and Administrative Controls Affecting Safety	A11*
J.	Licensing Activities	Trammell**
K.	Training and Qualification Effectiveness	Narbut/Elin*
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* Provide written input addressing observations during the SALP period. The Board secretary will consolidate these into one section.

** Provide NRR inputs on other functional areas directly to the responsible individual as soon as possible.

Burdoin



Each person assigned lead responsibility for a functional area shall prepare a performance analysis and submit it to John Burdoin by August 25, 1987. Each performance analysis shall be prepared as follows:

- 1. Assess the licensee's performance in the functional area based upon inspections performed, available data, and observations of licensee performance during the SALP period. Obtain inputs from others who had inspection responsibilities in the functional area. In assessing the licensee's performance, use the guidance in Attachments 1 through 4.
- 2. Prepare the licensee's performance analysis for the functional area following the format of Attachment 6. If appropriate, discuss the trend of the licensee's performance since the previous SALP period (refer to Attachment 4). The analysis should reference pertinent data, enforcement items, or events when appropriate, but should be principally a qualitative analysis of the licensee's performance in the area (depending upon level of activity, approximately one-half page to a page and a half in length when single-space typed).
- 3. Include recommendations for <u>licensee</u> actions related to the functional area.
- 4. Provide a copy of the SALP evaluation matrix (Attachment 5), assigning a performance category for each evaluation criterion.
- 5. Separately, identify appropriate recommendations for NRC actions (e.g., increase or reduce inspection resources). These recommendations will not be included in the SALP report, but will be a part of the Board Chairman's memorandum which transmits the report to the Regional Administrator.

For RITS reporting purposes, time expended for this Diablo Canyon SALP effort should be charged to Report Nos. 50-275/87-29 and 50-323/87-29.

By copy of this memorandum, the Director, Office of Investigations, San Francisco Field Office is requested to provide (by August 25, 1987) a summary of major investigative activities involving Diablo Canyon and their results.

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In addition, by copy of this memorandum, the offices of NMSS and AEOD are requested to provide performance analysis information by August 25, 1987.

Original signed by
D. E. Kirsch
D. F. Kirsch, Director
Division of Reactor Safety and
Projects, RV

cc:

J. Partlow, NRR

H. Thompson, NMSS

E. Jordan, AEOD

P. Polk, NRR

R. Marsh, OISFFO

F. Wenslawski, RV

M. Schuster, RV

J. Martin, ŔV

G. Yuhas, RV

J. Montgomery, RV

R. Scarano, RV

R. Fish, RV

E. Wenzinger, RI

bcc:

G. Cook

B. Faulkenberry

docket file

M. Smith

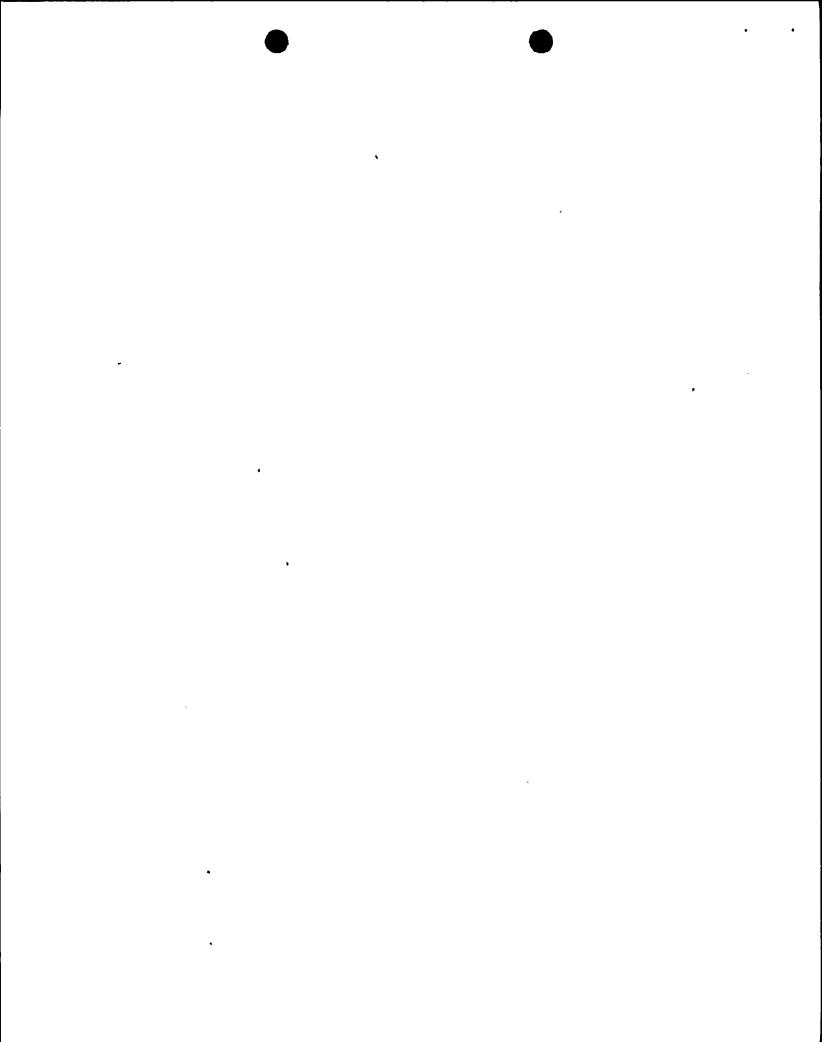
Project Inspector

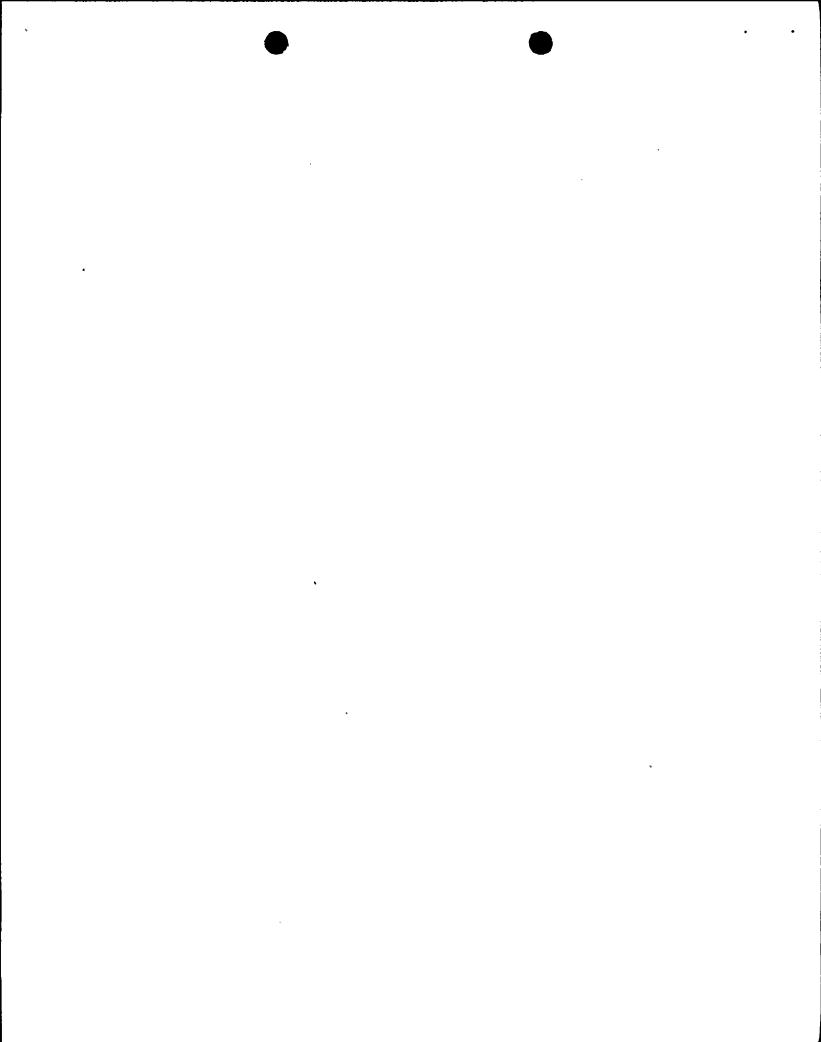
Resident Inspector

RSB/Document Control Desk (RIDS) (IE40)

REGION V JBurdoin/dot MMendonca RZimmerman 7/27/87 M/ 7/2\$/87 7/22/87 7/22/87 REQUEST COPY REQUEST COPY REQUEST COPY REQUEST COPY NO XÉS)/ NO YES YES

> SEND TO PDR YES /) NO





042 Functional Areas. A grouping of similar activities

Operating Phase Reactors

1. Plant Operations

· a.

Consists chiefly of the activities of the licensee's operational staff (e.g., licensed operators, shift technical advisors, and auxiliary operators). It is intended to be limited to operating activities such as: plant startup, power operation, plant shutdown, and system lineups. Thus, it includes activities such as reading and logging plant conditions; responding to off-normal conditions; manipulating the reactor and auxiliary controls; plant-wide housekeeping; and control room professionalism.

2. Radiological Controls

Includes the following areas of activity which may be evaluated as separate subareas to arrive at a consensus rating for this functional area.

- (a) Occupational Radiation Safety includes controls by licensees and contractors for occupational radiation protection, radioactive materials and contamination controls, radiological surveys and monitoring, and ALARA programs.
- (b) Radioactive Waste Management includes processing and onsite storage of gaseous, liquid and solid wastes.
- (c) Radiological Effluent Control and Monitoring includes gaseous and liquid effluent controls and monitoring, offsite dose calculations and dose limits, radiological environmental monitoring, and the results of NRC's confirmatory measurements program.
- (d) Transportation of Radioactive Materials includes procurement and selection of packages, preparation for shipment, selection and control of shippers delivery to carriers, receipt/acceptance of shipments by receiving facility, periodic maintenance of packagings and, for shipment of spent fuel, point of origin safeguards activities.
- (e) Water Chemistry Controls includes primary and secondary systems affecting plant water chemistry water chemistry control program and program implementation, chemistry facilities, equipment and procedures, and chemical analysis quality assurance.

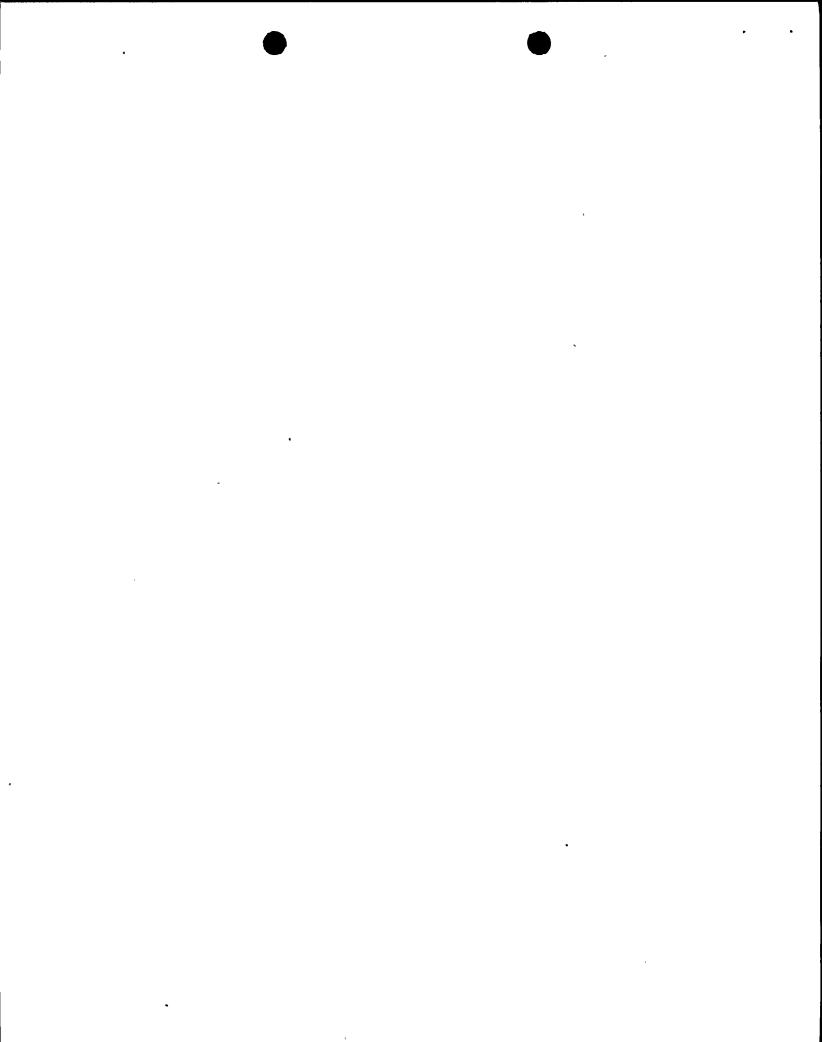
3. Maintenance

Includes all licensee and contractor activities associated with preventive or corrective maintenance of instrumentation and control equipment and mechanical and electrical systems.

4. Surveillance

Includes all surveillance testing activities as well as all inservice inspection and testing activities. Examples of activities included are: instrument calibrations, equipment operability tests, containment leak rate tests, special tests, inservice inspection and performance tests of pumps and valves, and all other inservice inspection activities.

ATTACHMENT 1



5. Fire Protection

Includes routine housekeeping (combustibles, etc.) and fire protection/prevention program activities. Thus, it includes the storage of combustible material; fire brigade staffing and training; fire suppression system maintenance and operation; and those fire protection features provided for structures, systems, and components important to safe shutdown.

6. Emergency Preparedness

Includes activities relating to the implementation of the emergency plan and implementing procedures. Thus, it includes such activities as licensee's performance during exercises which test the licensee, state, and local emergency plans; plan administration and implementation; notification; communications; facilities and equipment; staffing; training; assessment; emergency classification; medical treatment; radiological exposure control; recovery; protective actions; and interfaces with onsite and offsite emergency response organizations.

7. Security

Includes all activities whose purpose is to ensure the security of the plant. Specifically it includes all aspects of the licensee's security program (e.g., access control, security checks, safeguards).

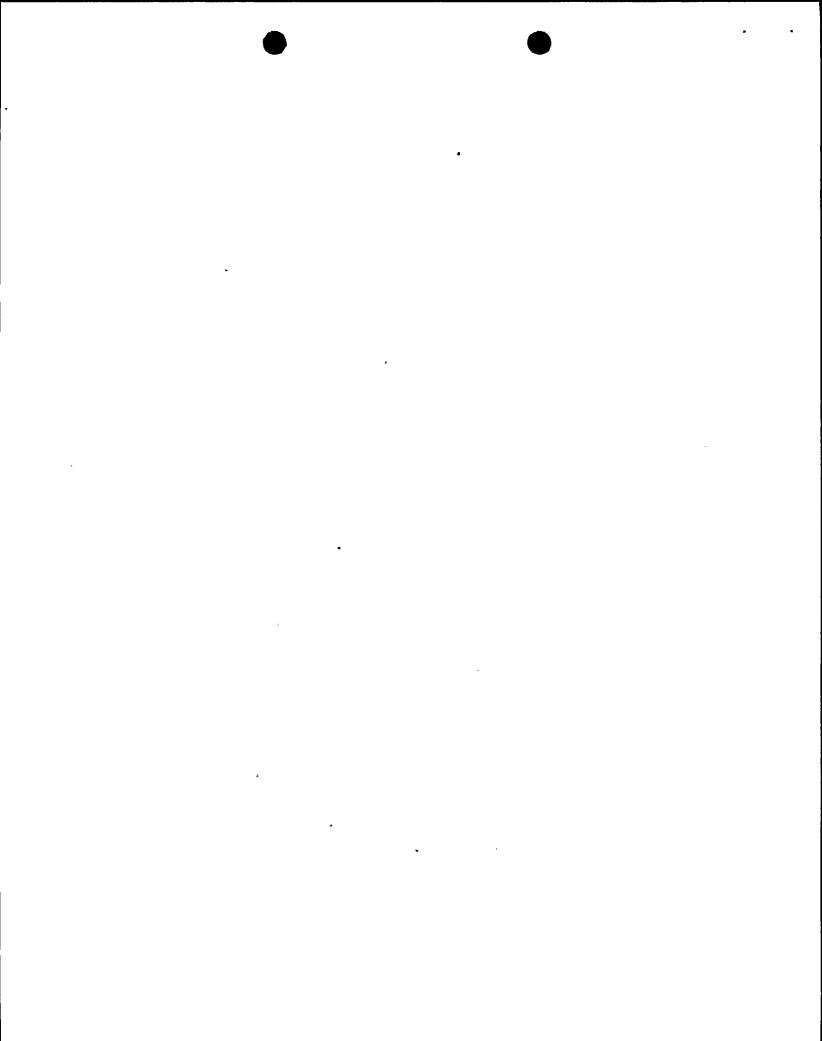
8. Outages

Includes all licensee and contractor activities associated with major outages. Thus, it includes refueling, outage management, major plant modifications, repairs or restoration to major components (e.g., steam generator tubé repairs or primary loop piping replacement), and all post-outage startup testing of systems prior to return to service.

9. Quality Programs and Administrative Controls Affecting Quality

Includes all management control, verification and oversight activities which affect or assure the quality of plant activities, structures, systems, and components. This area may be viewed as a comprehensive management system for controlling the quality of work performed as well as the quality of verification activities that confirm that the work was performed correctly. The evaluation of the effectiveness of the quality assurance system should be based on the results of management actions to ensure that necessary people, procedures, facilities, and materials are provided and used during the operation of the nuclear power plant. Principal emphasis should be given to evaluating the effectiveness and involvement of management in establishing and assuring the effective implementation of the quality assurance program along with evaluating the history of

ATTACHMENT 1 PAGE 2



lice ee performance in the key all s of: committee activities, design and procurement control, control of design change processes, inspections, audits, corrective action systems, and records.

10. Licensing Activities

Includes all activities supporting the NRC review of amendment requests, exemption requests, relief reports, response to generic letters and bulletins, and TMI items classified as: Multi-Plant Actions, Plant Specific Actions, and TMI (NUREG-0737) Actions. In addition, it includes an assessment of licensee activities related to design and safety issues. It also includes NRC meetings that dealt with significant licensing issues.

11. Training and Qualification Effectiveness

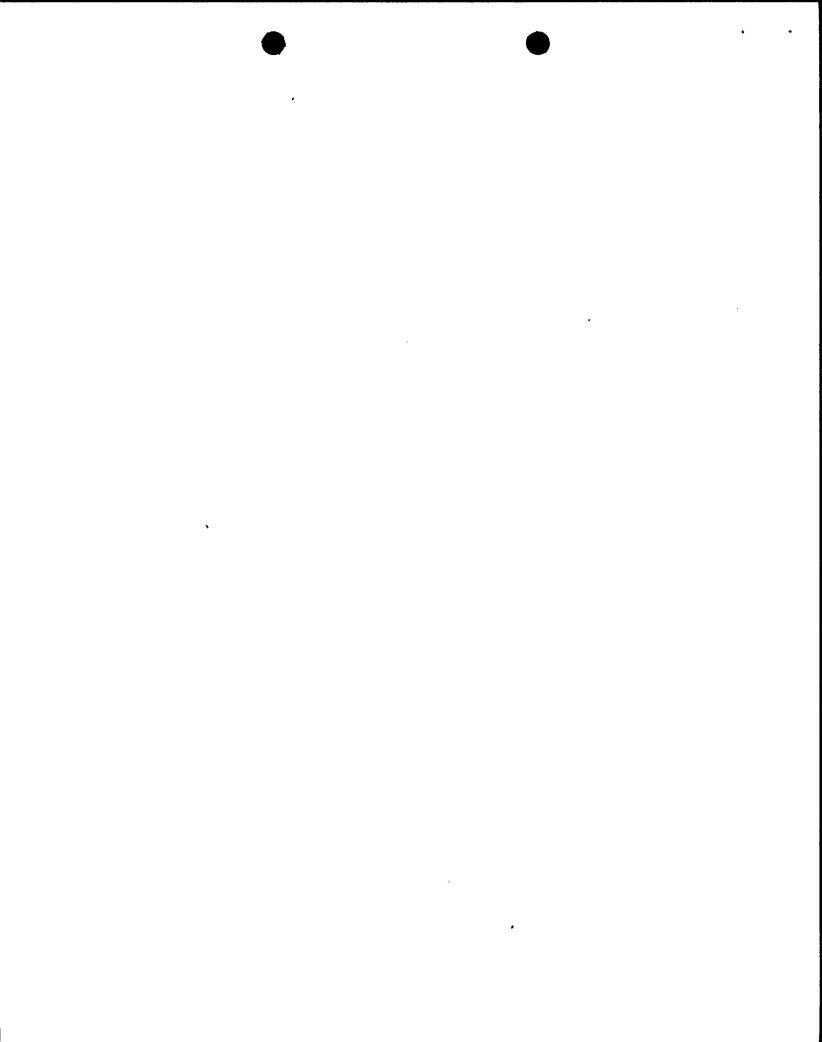
Although this functional area is limited to the following categories of facility training/retraining so as to parallel those training programs covered by the Commission Policy Statement on Training and Qualification, this functional area includes all activities relating to the effectiveness of the training/retraining and qualifications program conducted by the licensee's staff and contractors for these categories of facility training.

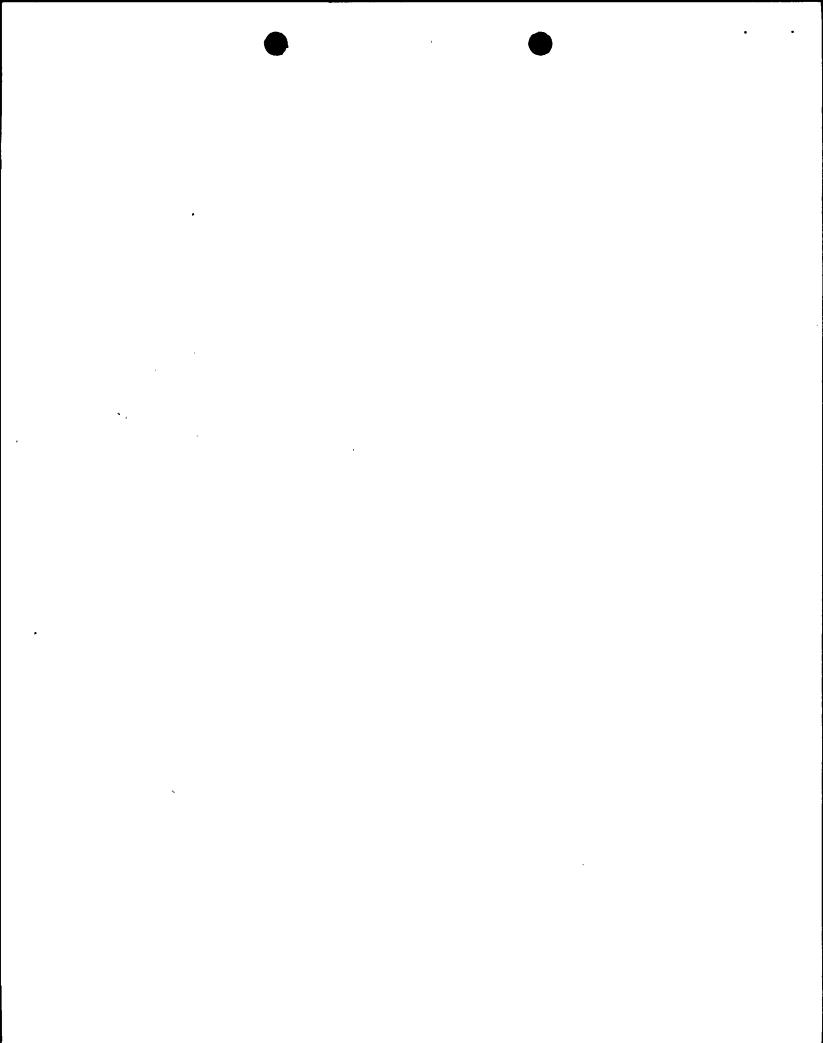
Other categories of facility training/retraining should be treated as evaluation criteria for the other functional areas.

- (a) Non-licensed operators
- (b) Control room operators ·
- (c) Senior control room operators/shift supervisors
- (d) Shift technical advisors
- (e) Instrument and control technicians
- (f) Electrical maintenance personnel .
- (g) Mechanical maintenance personnel
- (h) Radiological protection technicians
- (i) Chemistry technicians
- (j) Onsite technical staff and managers

ATTACHMENT 1
PAGE 3

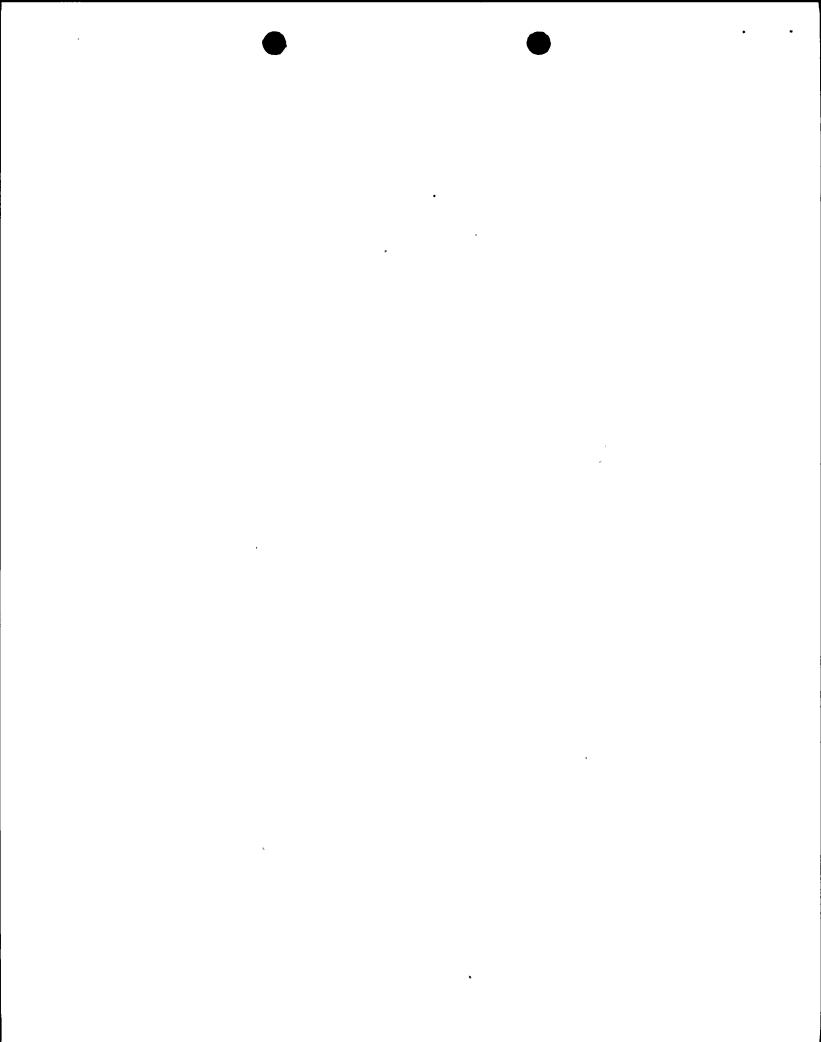
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045 Evaluation Criteria. Elements which must be considered when assessing a licensee's performance in a functional area.

- a. The evaluation criteria are as follows:
 - 1. Management involvement in assuring quality
 - 2. Approach to the resolution of technical issues from a safety standpoint
 - 3. Responsiveness to NRC initiatives
 - 4. Enforcement history
 - 5. Operational and Construction events (including response to, analysis of, and corrective actions for)
 - 6. Staffing (including management)
- Guidance for using these criteria to arrive at a category
 assignment is found in the appendix to this chapter.



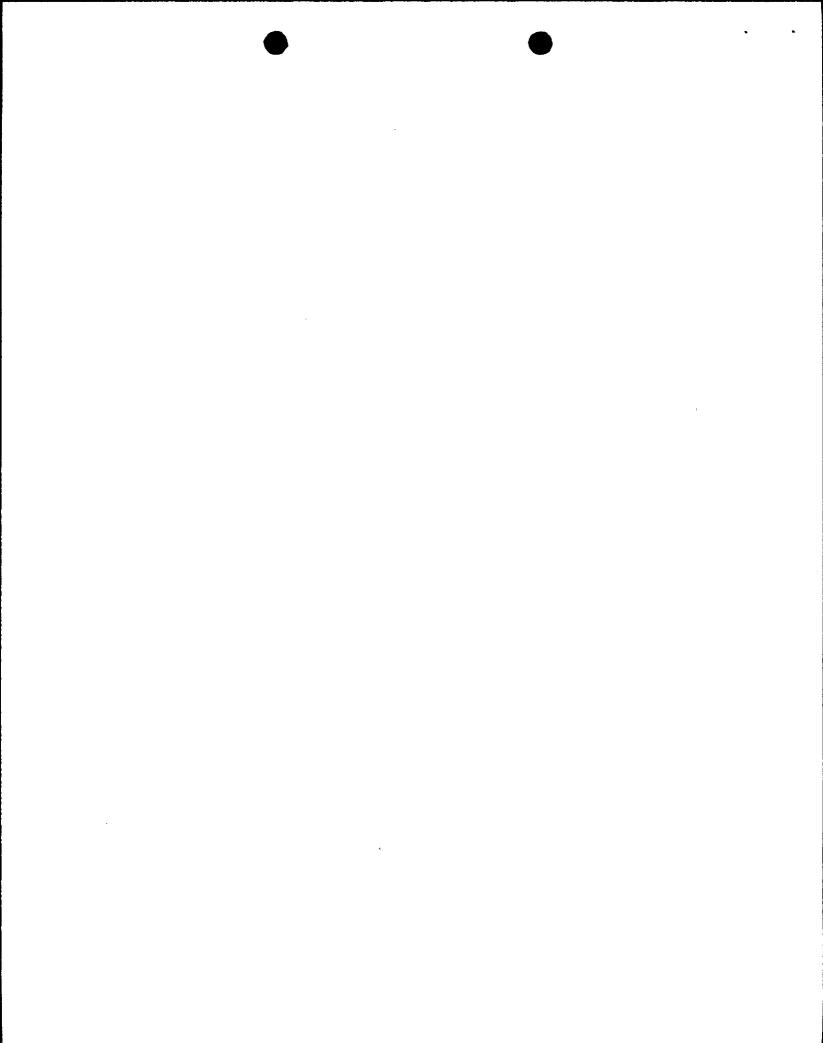


TABLE 1 EVALUATION CRITERIA WITH ATTRIBUTES FOR ASSESSMENT OF LICENSEE PERFORMANCE

Category 1

Category 2

Category 3

Hanagement Involvement in Assuring Quality

consistent evidence of prior planning and assignment of priorities; well stated, controlled and explicit procedures for control of activities

evidence of prior planning and assignment of priorities; stated, defined procedures for control of activities.

little evidence of prior planning and assignment of priorities; poorly stated or ill understood procedures for control of activities

well stated, disseminated, and understandable policies.

adequately stated and understood policies

poorly stated, poorly understood or nonexistent policies

decisionmaking consistently, at a level that ensures adequate management review

decisionmaking usually at a level that ensures adequate management review decisionmaking seldom at a level that ensures adequate management review

corporate management frequently involved in site activities

corporate management usually involved in site activities

corporate management seldom involved in site activities

reviews timely, thorough and technically sound

reviews generally timely, thorough, and technically sound

reviews not timely, thorough or technically sound

records complete, well maintained, and available

records generally complete, well maintained, and available

records not complete, not well maintained, or unavailable

procedures and policies strictly adhered to

procedures and policies rarely violated

procedures and policies occasionally violated

corrective action is effective, as indicated by lack of repetition

corrective action is usually taken but may not be effective at correcting the root cause of of the problem, as indicated by occasional repetition corrective action is not time or effective and generally ad dresses symptoms rather than root causes, events are repetitive

2. Approach to the Resolution of Technical Issues from a Safety Standpoint

clear understanding of issues demonstrated

understanding of issues generally apparent

understanding of issues frequently lacking

conservatism routinely exhibited when potential for safety significance exists

conservatism generally exhibited

meets minimum requirements

technically sound and thorough approaches in almost all cases '

viable and generally sound and thorough approaches

often viable approaches; but lacking in thoroughness or depth

timely resolutions in almost all cases

generally timely resolutions

resolutions often delayed

3. Responsiveness to NRC Initiatives

meets deadlines

generally timely responses

frequently requires extensions of time

timely resolution of issues

few longstanding regulatory issues attributable to licensee

longstanding regulatory issues attributable to licensee

technically sound and thorough responses in almost all cases

viable and generally sound and thorough responses

often viable responses, but lacking in thoroughness or depth

acceptable resolutions proposed initially in most cases

acceptable resolutions generally proposed

considerable NRC effort or repeated submittals needed to obtain acceptable resolutions

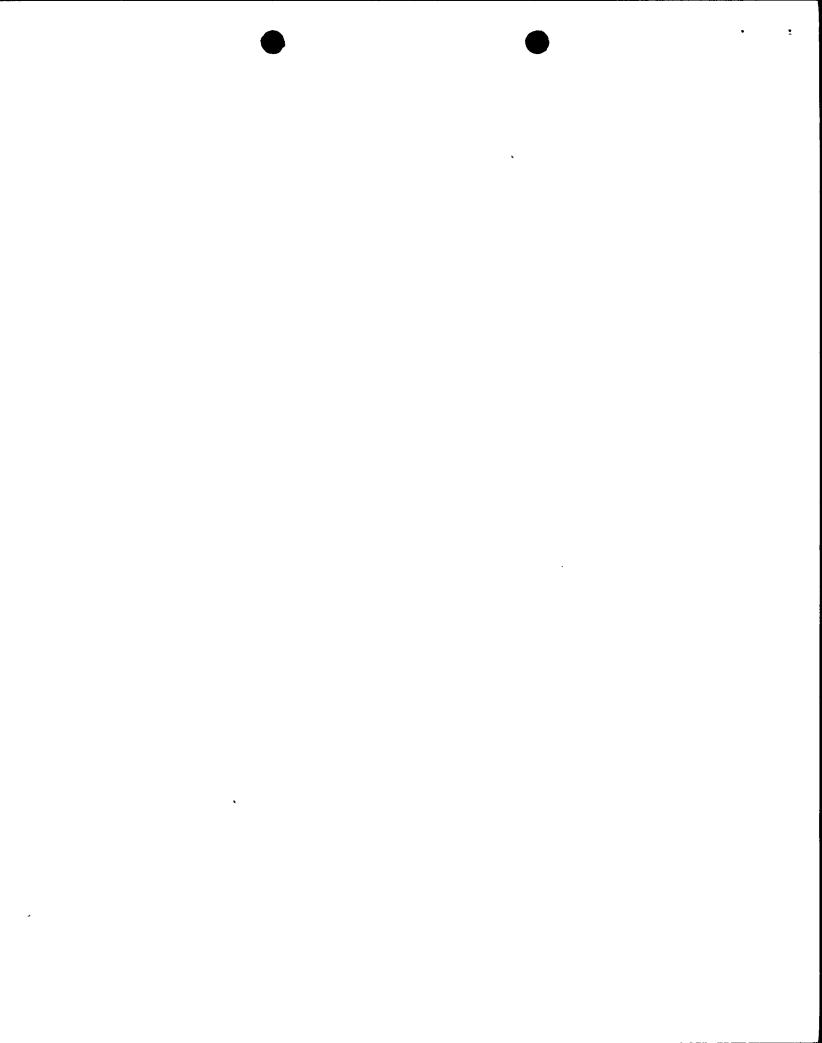


TABLE 1 (continued)

Category 1

Category 2

Category 3

4. Enforcement History

major violations are rare and are not indicative of programmatic breakdown

minor violations are not repetitive and not indicative of programmatic breakdown

corrective action is prompt and effective

major violations are rare and may indicate minor programmatic breakdown

multiple minor violations or minor programmatic breakdown indicated

corrective action is timely and effective in most cases

multiple major violations or programmatic breakdown indicated

minor violations are repetitive and indicative of programmatic breakdown

corrective action is delayed or not effective

5. Operational and Construction Events

few significant operational or construction events, attributable to causes under the licensee's control, have occurred that are relevant to this functional area

events are promptly and completely reported

events are properly identified and analyzed occasional significant operational or construction events, attributable to causes under the licensee's control, have occurred that are relevant to this functional area

events are reported in a timely manner, some information may be lacking

events are accurately identified, some analyses are marginal

frequent significant operational or construction events, attributable to causes under the licensee's control, have occurred that are relevant to this functional area

event reporting is frequently late or incomplete

events are peorly identified or analyses are marginal, events are associated with programmatic weaknesses

6. Staffing (Including Hanagement)

positions are identified, authorities and responsibilities are well defined

vacant key positions are filled on a priority basis

expertise is available within the staff; rarely needs outside consultants; staffing is ample as indicated by control over backlog and overtime

experience levels for management and operations personnel exceed commitments made by licensee at time of licensing

key positions are identified, and responsibilities are defined

key positions usually filled in a reasonable time

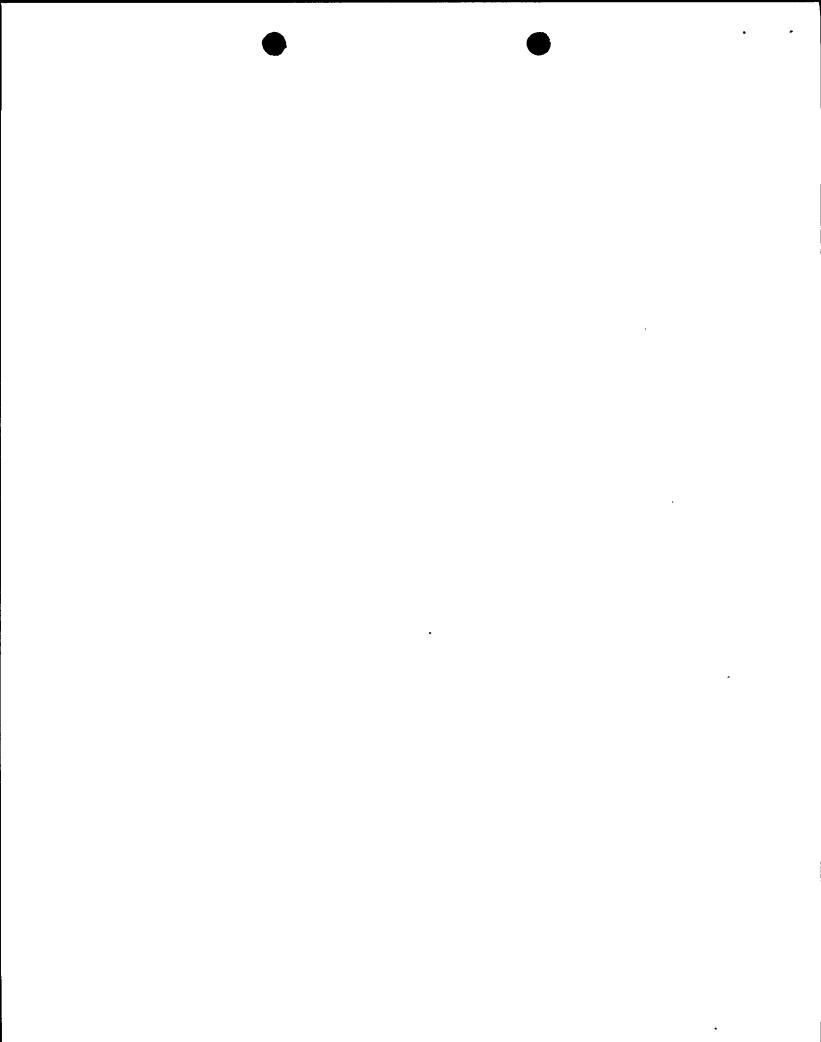
expertise is usually available within the staff; makes appropriate use of consultants; staffing is adequate, occasional difficulties with backlog or overtime

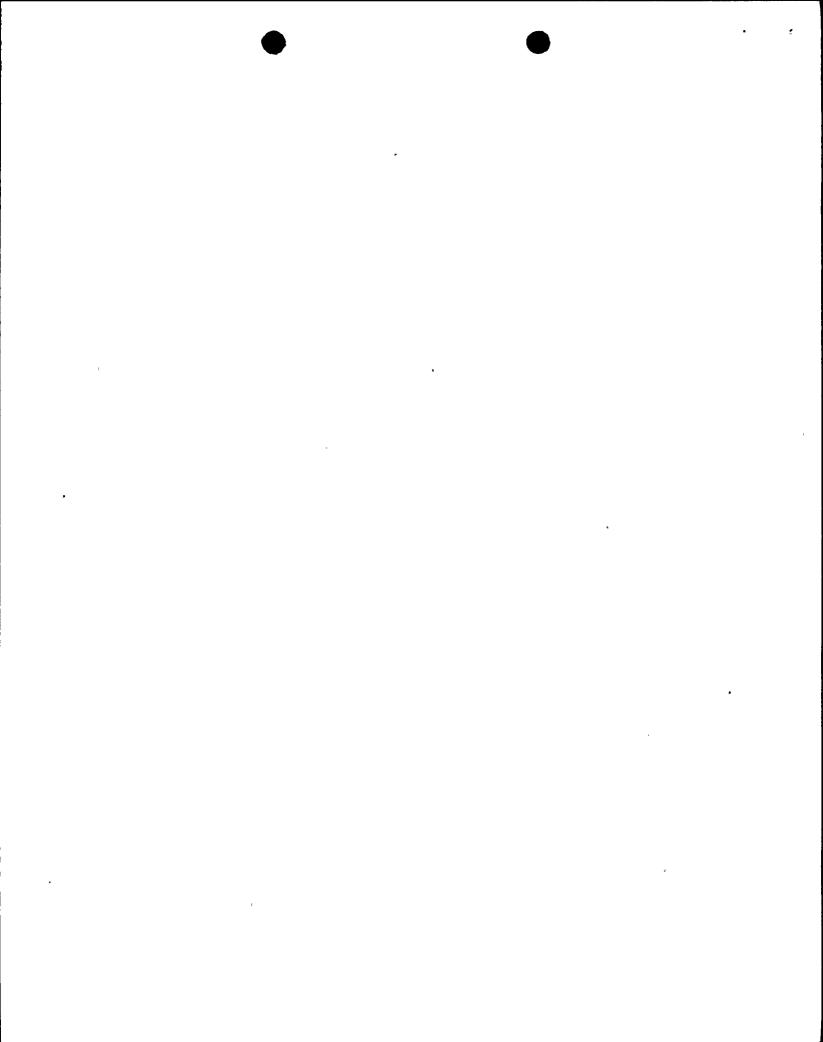
experience levels for management and operations personnel meet commitments made by licensee at time of licensing positions are poorly identified, or authorities and responsibilities are ill defined

key positions are left vacant for extended periods of time

very little expertise within th staff; excessive reliance on consultants; staffing is weak o minimal as indicated by excessi backlog or overtime

experience levels for managemen and operations personnel are below commitments made by licenses at time of licensing





043 <u>Performance Categories</u>. A rating of licensee performance in a given functional area.

a. Category 1

Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used so that a high level of performance with respect to operational safety and construction quality is being achieved.

b. Category 2

NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety. Licensee resources are adequate and reasonably effective so that satisfactory performance with respect to operational safety and construction quality is being achieved.

c. Category 3

Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used so that minimally satisfactory performance with respect to operational safety and construction quality is being achieved.

O44 Trend. The SALP Board may determine to include an appraisal of the performance trend of a functional area. Normally, this performance trend should only be used where both a definite trend of performance is discernible to the Board and the Board believes that continuation of the trend may result in a change of performance level. The Board's appraisal of the performance trend, if used, should appear as a Board Comment. It should be used selectively and should be reserved for those instances where the Board believes that it is necessary to focus NRC and licensee attention on an area because of a declining performance trend, or to credit licensee performance because of an improving trend.

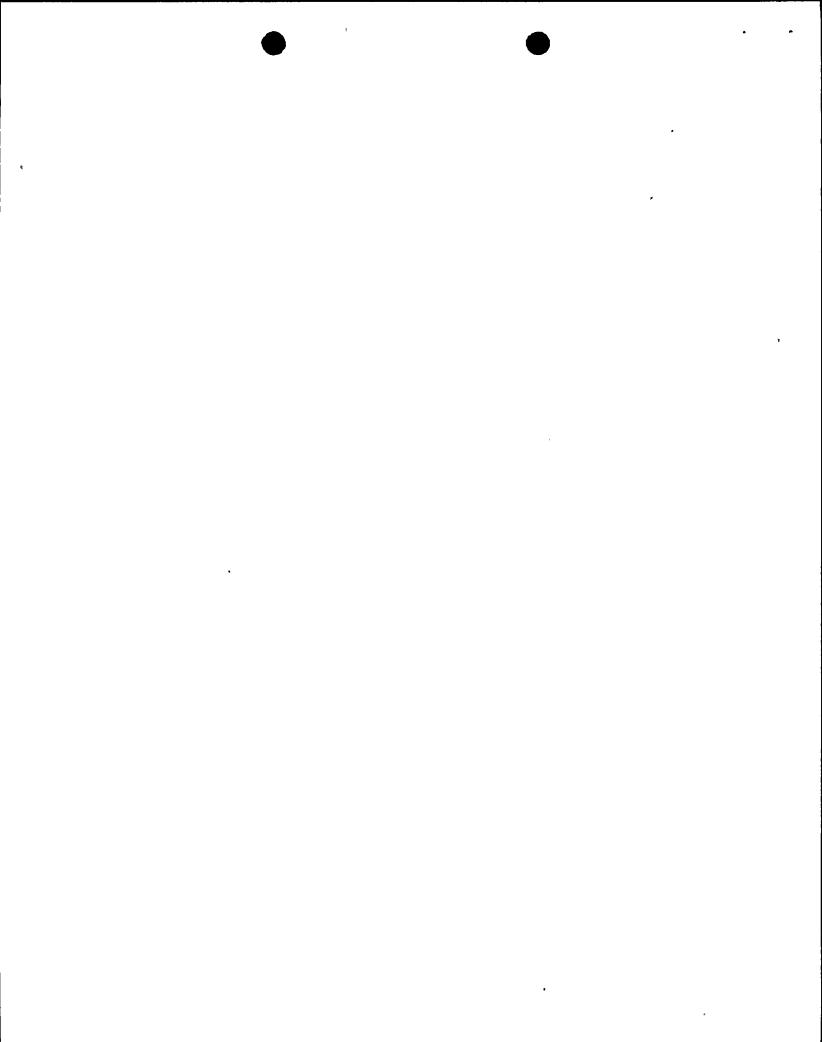
The trend, if used, is defined as:

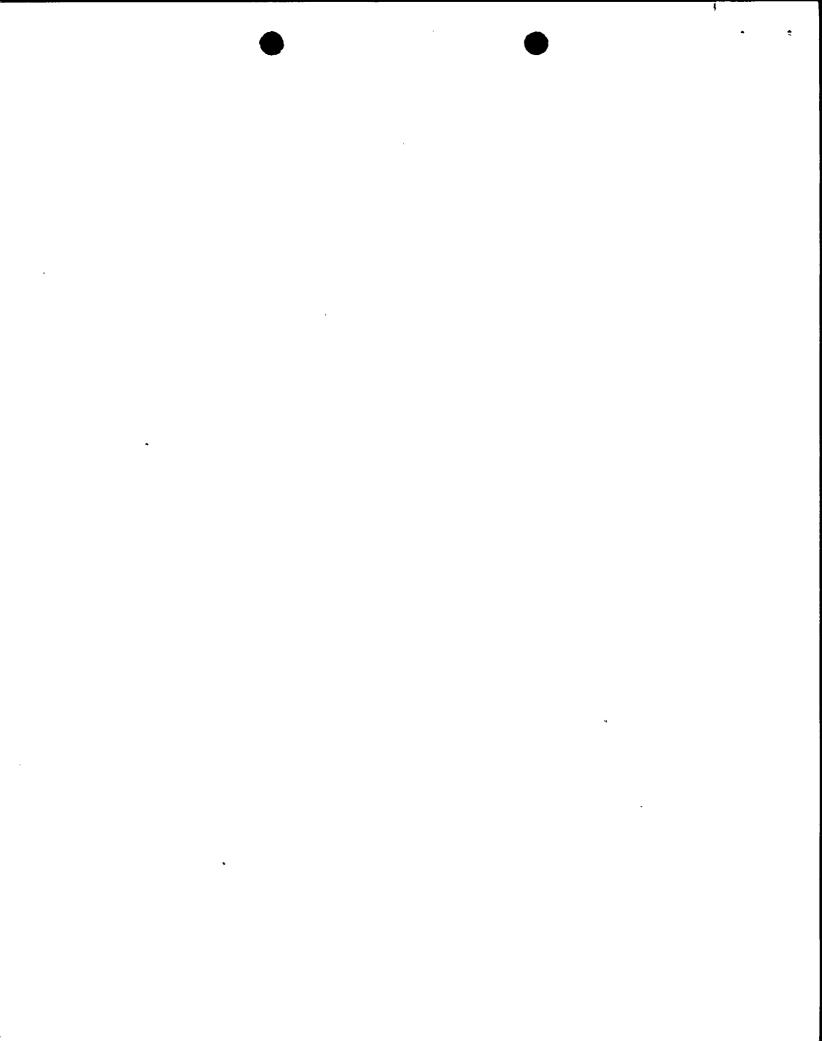
a. Improving

Licensee performance was determined to be improving near the close of the assessment period.

b. Declining

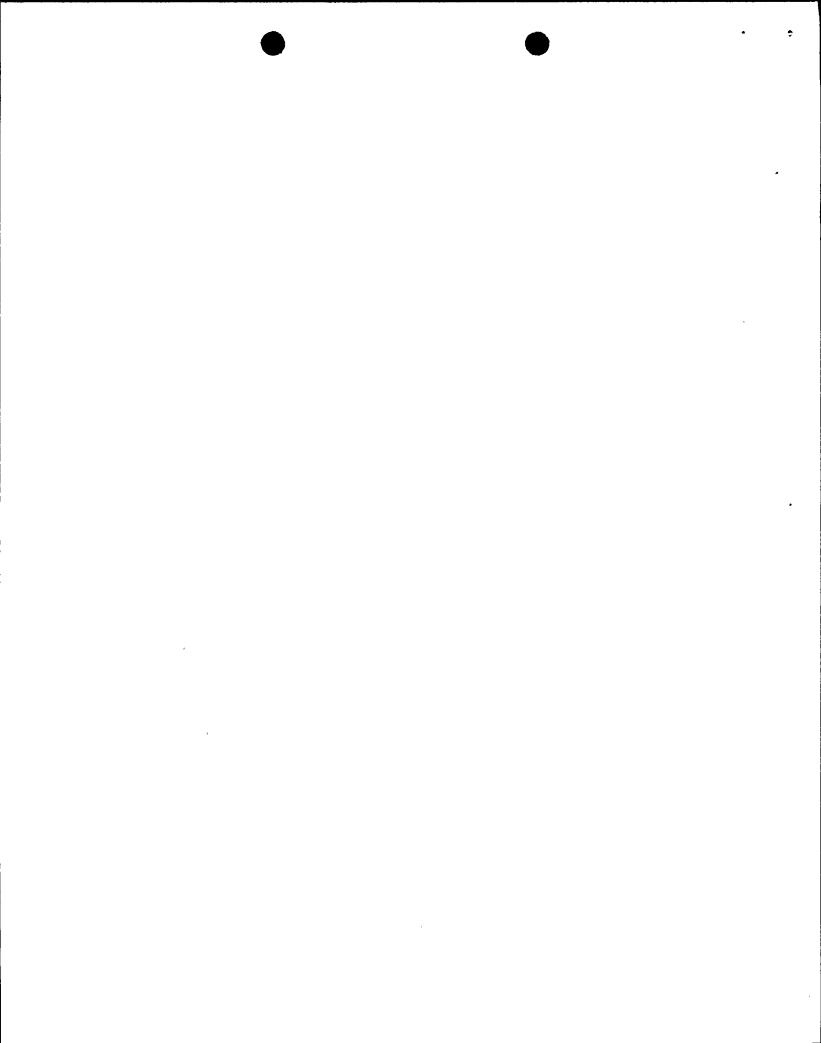
Licensee performance was determined to be declining near the close of the assessment period.

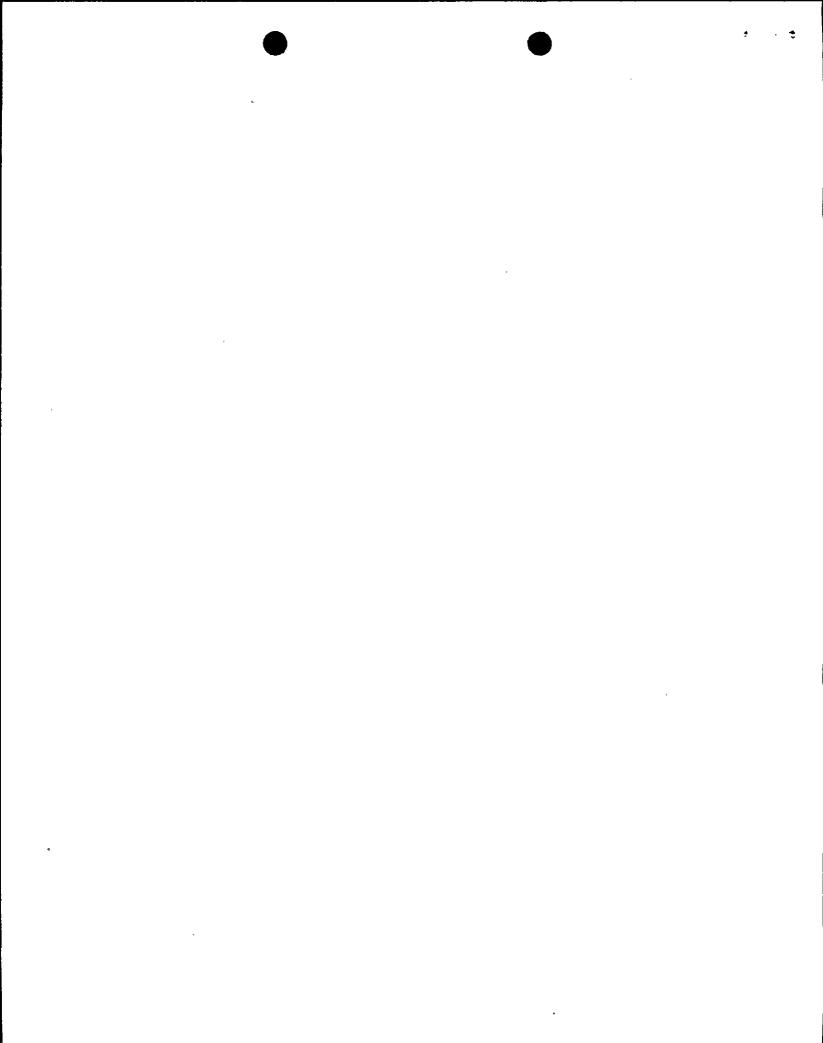




EVALUATION MATRIX FOR OPERATING PHASE FUNCTIONAL AREAS

	Management Involvement In Assuring Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Responsiveness to NRC Initiatives	Enforcement History	Operational and Construction Events	Staffing (Including Nanagement)
· Plant Operations						
Radiological Controls						
Maintenance						
Surveillance					٠	
Fire Protection						
Emergency Preparedness						
Security						
Outages .					Ì	
Quality Programs and Administrative Controls Affecting Quality	,					
Licensing Activities					4	-
Training and Qualification Effectiveness						





IV. PERFORMANCE ANALYSIS

A. [Functional Area being discussed]

1. Analysis

[The analysis of the licensee's performance in an area should include pertinent facts and observations to highlight the specific strong and weak aspects of the licensee's performance. These facts and observations shall be presented in a manner to place matters in perspective and to allow the reader to understand the rationale for stated conclusions. This analysis adequacy of the licensee's should concentrate on the management control systems, adequacy of resources, training of personnel, etc., and the effectiveness of these efforts. Upon presentation of the analyses, the attributes associated with the specified criteria are to be referred to for purposes of both completeness and to compare the conclusions reached with the attributes of each category. The attributes listed in Part II are specifically oriented toward this and should be utilized. In no event, however, are the examples of licensee performance for specific attributes to be used as stand-alone assessments; they represent a sampling of possible conclusions which must be supported by appropriate facts, observations or analysis. Each analysis should be written to avoid either 10 CFR 2.790 or safeguards information.

The analysis section is composed of three major subsections:

- A brief account of the inspection activity which occurred in this area.
- A brief summary of the previous evaluation if there has been a significant change or if there should have been significant improvement but there was not.
- A summary of the strengths, weaknesses, and other significant observations made by the NRC staff during the evaluation period.

2. Conclusion

[Provide the performance assessment (Category 1, 2, or 3) for each functional area considered.]

3. Board Recommendations

[Include any general or specific Board recommendations pertaining to either licensee management attention or NRC inspection activities in a functional area. If appropriate, include a trend assessment (improving or declining), characterizing licensee performance near the close of the assessment period. Note that even in the absence of a recommendation to vary inspection levels, the Regional Office may do so based on the assessment as discussed in appropriate chapters of the IE manual.]

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SAMPLE SALP PERFORMANCE ANALYSIS

D. Surveillance

The surveillance program was inspected on a monthly basis by the resident inspectors and periodically by the regional staff throughout this SALP period.

During this SALP period the licensee instituted a comprehensive surveillance program which is maturing under constant management and staff attention. During the earlier part of the period the licensee asked NRC for, and received, changes or schedule relief for some Technical Specification required surveillances. These were submitted on short notice, in some cases involving after-hours telephone requests which might have been avoided through stronger management control, internal communications and planning. Such problems were not experienced in the latter part of the period.

One violation in the surveillance area was identified regarding the installation of jumpers and the independent verification thereof. The NRC considers 14 licensee event reports (IERs) to be attributed to personnel errors during the many surveillance activities this SALP period. Management demonstrated no reluctance to properly report and analyze discrepancies. There were five IERs attributed to deficiencies in surveillance procedures; management and staff gave much attention to this area and routinely issued changes to improve the accuracy and clarity of procedures.

The licensee instituted a computer matrix of surveillance requirements corresponding to Technical Specification requirements, which appears to have been comprehensive with a few exceptions reported in licensee event reports. These were corrected promptly, and the matrix is routinely updated. Computer schedules and monitoring have allowed management visibility of trends in overdue dates, contributing to avoidance of technical specification violations. A program of procedure changes was implemented late in the period to fully incorporate independent verification requirements into surveillance procedures, in response to NRC initiatives.

Conclusion

Performance assessment - Category 1. An improving trend in performance was observed during the SALP.

Board Recommendation

Continue efforts to correct procedure deficiencies and provide training to the staff in their proper use.

