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 KEISER, H.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 MARTIN, T.T. Region 1 (Post 820201)

SUBJECT: Responds to 910205 SALP rept. Util will continue active participation in industry/NRC review & rev of emergency action levels. Viewgraphs & agenda from 910301 meeting w/NRC encl.

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 TITLE: Systematic Assessment of Licensee Performance (SALP) Report

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Harold W. Keiser
Senior Vice President-Nuclear
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MAR 08 1991

Mr. Thomas T. Martin
Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO FEBRUARY 5, 1991 SALP REPORT
PLA-3534 FILE R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Martin:

We appreciated the opportunity to meet with members of your staff and NRR on March 1, 1991 to discuss the most recent NRC assessment of PP&L's performance. While we recognize that the SALP report was generally favorable, we value your input and will continue to seek to improve our performance in all areas.

Your staff is to be commended on the insightful nature of this particular SALP report. We feel that it was extremely well-written, and provided an accurate view of our strengths as well as areas where improvement is needed. Our confirmation of your judgement is in no small part due to the frequency and quality of the various discussions we have held with the NRC during the period; we will continue to keep these lines of communication open.

In closing, PP&L would also like to commend your decision to hold this and future SALP review meetings at the Susquehanna site. We believe it provides a valuable opportunity for our employees and our public to both witness and interact in the regulatory assessment process.

For your information, a copy of the PP&L presentation from the meeting is attached.

Very truly yours,

H. W. Keiser

Attachment

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PDR ADOCK 05000387
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cc: NRC Document Control Desk (original)
NRC Region I
Mr. G.S. Barber, NRC Sr. Resident Inspector - SSES
Dr. W.R. Butler, Project Director - OWFN
Mr. J.J. Raleigh, Project Manager - OWFN

AGENDA

PP&L SALP Meeting With NRC
March 1, 1991

Management Perspective **R.G. Byram**

1990 : A Good Year **H.G. Stanley**

**PP&L's Perspective On The
SALP Report**

- **Operations** **H.G. Stanley**
- **Engineering** **A.M. Male**

Department Direction : **R.G. Byram**

- **Operational Effectiveness**
- **People**
- **Functional Alignment**

1991-92 Outlook **R.G. Byram**

Summary **H.W. Keiser**

MANAGEMENT PERSPECTIVE

- *PP&L is committed to be the best.*
- *We have a commitment to excellence and strong organizational values.*
- *A strong nuclear safety culture is the key to success.*
- *Rising expectations require continual self assessment and implementation of change.*
- *Our people are the foundation for success.*
- *The SALP supports our assessment of where improvement is needed.*

SALP OVERVIEW

The SALP Report provided accurate, meaningful input to our assessment process.

Our Strengths

- *our safety culture*
- *active management involvement*
- *competent, well-trained people*
- *superior operational performance*
- *critical self-assessment*

Opportunities for Improvement

- *responsiveness*
- *work practices/procedural controls*

SUPERINTENDENT'S PERSPECTIVE

- 1990 Accomplishments

- *Unit 1 Fifth Refueling Outage successfully completed*
- *diesel generator inspections and overhauls performed*
- *several comprehensive assessments held*
- *implemented Fitness For Duty Program*
- *electrical generation exceeded yearly goal by 6%*
- *unplanned ESF actuations were reduced by 60%*
- *collective radiation exposure was the lowest in our history*
- *hazardous waste generated was reduced by a factor of 5 over previous years*
- *at year end, the number of open bypasses, NCRs, and SOORs were at all time lows*

OPERATIONS

Our Direction For The Future

- *In order to maintain our superior training program, implement plans to have new state-of-the-art simulator operational by September 1992.*
- *Define system improvements necessary to further reduce risks from offsite electrical transients.*
 - *equipment upgrades*
 - *design changes*
 - *enhanced maintenance*
- *Further enhance emergency response capabilities through structured transition to Rev. 4 of the EPG's.*
 - *complete and submit IPE*
 - *receive IPE SER*
 - *incorporated Rev. 4 of EPG's and IPE into EOP's*
 - *conduct training on new EOP's*

OPERATIONS CONT'D.

- ***Continue improvements to the material condition of the plant.***
 - ***expanded painting and labeling***
 - ***more rigorous control of transient equipment***

- ***Through increased management attention and clearly defined accountability focus on closure of open issues.***

MAINTENANCE AND SURVEILLANCE

Our Direction For The Future

- *Continue plan for expanded use of reliability data in planning maintenance activities.*
- *Strengthen predictive maintenance function through new functional organization and continued development and utilization of predictive techniques.*
 - *vibration monitoring*
 - *oil analysis and trending*
 - *thermography*
- *Reinforce our standards through worker and supervisor training.*
 - *procedure adherence*
 - *work practices*
 - *attention to detail*

MAINTENANCE AND SURVEILLANCE CONT'D.

- ***Focus line management accountability through expansion of functional organization.***
 - ***Electrical/I&C***
 - ***predictive maintenance***
 - ***integrated planning***

- ***Construct a new building to consolidate facilities in support of this new functional organization.***

- ***Continue actions identified to improve the long term reliability of our diesel generators.***
 - ***root cause testing***
 - ***aggressive inspection and refurbishment program***
 - ***diesel parameter trending***

RADIOLOGICAL CONTROLS

Our Direction For The Future

- *Continue plans for further reduction in collective dose for plant workers.*
 - *RWCU pump changeout*
 - *snubber reduction*
 - *control blade changeouts*
 - *condensate demin heel modification*
 - *use of improved personnel monitoring equipment*
- *Improve contamination control practices.*
 - *training and supervisory monitoring*
 - *upgrading protective clothing*
 - *additional use of PCM's*
- *Focus accountability for waste management through new functional organizations.*

SECURITY

Our Direction For The Future

- *Maintain our highly professional and well trained organization through continued management support.*
- *Implement needed hardware improvements as part of our security upgrade project.*
- *Fine tune the Fitness For Duty Program.*

EMERGENCY PREPAREDNESS

Our Direction For The Future

- ***Continue active participation in industry/NRC review and revision of EAL's.***
- ***Develop and implement action plan to support full field exercise in 1993.***
- ***Implement recommendations from the Susquehanna alert task force.***

ENGINEERING MANAGER'S PERSPECTIVE

The SALP period was a time of significant Engineering activity.

- *Plant Problems Resolved*
 - *437 modifications installed*
 - *reduced plant bypasses from 125 to 55*
 - *instrument air system modifications virtually eliminated plant transients from instrument air malfunctions*
- *Nuclear Safety Enhanced*
 - *major effort to assess and enhance diesel generator reliability*
 - *IPE upgrade project underway*
 - *RHRSW and ESW upgrades improved plant safety*
 - *completed installation of 60 modifications to achieve Appendix R compliance*
- *Engineering Enhancements*
 - *EDSFI preparation*
 - *developed in-house reload analysis methods*
 - *implemented engineering discrepancy management program*
- *Industry Leadership*
 - *development and use of risk analysis*
 - *CO2 testing and analysis confirms adequacy of fire suppression in relay rooms*

ENGINEERING ASSESSMENT

- *Technical Work Is High Quality*
 - *few errors have occurred*
- *Approach To Nuclear Safety Is Conservative*
 - *thorough involvement in plant problems*
 - *will shut down the plant to resolve safety risks*
- *Modification Process Is Effective*
- *Well Trained And Staffed*
- *Problem Resolution Process Needs Improvement*
 - *root cause identification and correction has not always succeeded in preventing recurrence of problems*
 - *some problems have taken too long to resolve*
 - *closure of issues such as EQ will be based on safety significance*

SAFETY ASSESSMENT

- ***Upgraded Program And Training For Presenting And Resolving Safety Concerns***
- ***Management Involvement In Nuclear Safety And Self Assessment***
 - ***corporate management visits to site***
 - ***Operational Effectiveness Review (OER)***
- ***IPE Used To Improve Operation, Accident Management Strategies, And Maintenance Prioritization***
- ***Improvements To Deficiency Management***
 - ***operability/reportability improvements***
 - ***increased attention to closure***
- ***Approach To Defining Safety Significance Impacted Timeliness Of Issue Resolution And Reportability Determinations***

ENGINEERING DIRECTION

Future direction in Engineering is to maintain strengths while correcting weaknesses..

- *Engineering Organization With The Capability, Authority, And Commitment To Resolve Problems*
 - *focused management accountability for results*
 - *better alignment with Plant Staff functions*
 - *accountability and resources to deal with engineering discrepancies*
 - *engineering improvement initiatives in design basis documentation, engineering training, and design tools*
 - *modifications organization to design and install modifications*
- *Program For Professional Development And Recognition Of Engineers*
- *Self-Assessment For Design Quality And Root Cause Evaluation Process For Design Errors*
- *Current Technical Challenges*
 - *IPE upgrade with management processes that utilize IPE results*
 - *root cause of the diesel generator over-pressurizations and confident basis for diesel generator reliability*
 - *NRC approval of fuel reload licensing methods*
 - *ALARA enhancements such as RWCU pump replacements*
 - *EQ program upgrade project*

NUCLEAR DEPARTMENT OER

**BROAD
SELF
ASSESSMENT**



- **FUNCTIONS**
- **PROCESSES**
- **ORGANIZATIONAL
STRUCTURE**

**OPERATIONAL
EFFECTIVENESS
REVIEW**



OER DIMENSIONS

- ***175 manmonths***
- ***1300 interviews***
- ***25,000 comments***



**SELECTED
OPPORTUNITIES**

- **LEADERSHIP AND
PEOPLE**
- **FUNCTIONAL WORK
ALIGNMENT**
- **ROLE OF THE
ENGINEER**

1991-92 ACTIVITIES

- *Refueling and Inspection Outages*
 - U2 4RIO 3/91
 - U1 6RIO 3/92
 - U2 5RIO 9/92
- *Power Uprate*
- *Design Basis Documentation*
- *EQ Enhancement Program*
- *Revisions to 10CFR20*
- *IPE (GL 88-20)*
- *Operator Training/Simulator (10CFR55)*
- *Motor Operated Valves (GL 89-04, GL 89-10)*
- *Service Water (GL 89-13)*
- *ERDS (GL 89-15)*
- *Preparation for Full Field Exercise*

1991-92 OUTLOOK

- *We will continue to foster an environment which conservatively assures that the health and safety of the public is protected.*
- *We will increase our responsiveness to potentially safety-significant issues.*
- *We will continue to implement the recommendations of the OER.*
- *We will manage finite resources in an industry that must aspire to rising expectations.*