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SUBJECT: Comment on NRC SALP Program. Util views SALP program as important aspect of ongoing communication between licensees & NRC.

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**SUSQUEHANNA STEAM ELECTRIC STATION  
SALP PROGRAM COMMENTS  
PLA-4360**

Docket Nos. 50-387/NPF-14  
and 50-388/NPF-22

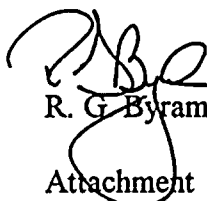
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Pennsylvania Power & Light Company (PP&L) appreciates the opportunity to provide comments on the current NRC Systematic Assessment of Licensee Performance (SALP) Program, as requested in Volume 60, No. 147 of the Federal Register. PP&L is the Licensee for the Susquehanna Steam Electric Station.

PP&L views the SALP Program as an important aspect of the ongoing communication between Licensees and the NRC. The changes made to the SALP Program in 1993 have generally enhanced communication, and thus represent real improvement in the overall program. However, some of the objectives of the changes implemented in 1993 remain to be realized. Several suggestions for enhancing the current SALP Program are included in the attachment to this letter.

Please find the attached comments which address each of the issue areas identified in the Federal Register notice. If you have any questions, or require additional information, please contact Mr. Terence Bannon at (610) 774-4019.

Very truly yours,

  
R. G. Byram  
Attachment

copy: NRC Document Control Desk (original)  
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## SALP PROGRAM COMMENTS

### RECOMMENDED SALP ENHANCEMENTS SUMMARY

1. Rate the individual areas of Radiological Controls, Emergency Preparedness, and Security & Safeguards separately; and then use these ratings as input in determining the overall rating for the composite Plant Support area.
2. Amend the scoring process to use performance terms (ie. Superior, Good, Acceptable) to describe the results of the assessment in each SALP area.
3. Enhance consistency in setting SALP period length to ensure that performance is accurately considered, and that there is a strong correlation between performance and SALP period.
4. Extend the current range in the SALP period from 12 to 24 months to 18 to 30 months in light of the maturation of the industry and the move toward longer operating cycles. As more plants establish 24 month operating cycles, and as the performance of the industry continues to improve, the range in SALP values should be adjusted to make 24 months the nominal SALP period.
5. Use performance trends during the SALP period to adjust the period length while in progress. Both extensions and reductions in SALP period length should be allowable under the program.
6. Enhance licensee access to NRC during the last six months of the SALP period to ensure that there are adequate opportunities to discuss performance issues. Opportunities to discuss performance with the NRC during the end of the SALP period have been reduced due to the NRC policy of not discussing SALP related issues during the last three months of the SALP period and the elimination of the draft SALP report.

### RESPONSE TO ISSUE AREAS

#### A. FUNCTIONAL AREAS

1., 2., 3. *Four Functional Areas*

PP&L has found the consolidated Plant Support area to contain Radiological Controls, Emergency Preparedness, and Security & Safeguards discussions which are well written and informative. The drawback to the composite area is in the rating of this area. PP&L suggests that the individual areas of Radiological Controls, Emergency Preparedness, and Security & Safeguards be

rated separately, and that these ratings be considered in determining the overall rating for the composite Plant Support area.

Past consolidations of SALP areas have generally resulted in related functional areas being grouped together to reduce the complexity of the SALP process. However, the reorganization of Radiological Controls, Emergency Preparedness, and Security & Safeguards into the Plant Support area did not provide for greater functional alignment. The three main functions in the Plant Support area are largely unrelated, and thus composite scoring of this area does not promote a greater understanding of the performance of each of the functional areas.

## B. MANAGEMENT INVOLVEMENT

### 1. *NRC Management Involvement*

The current NRC Management involvement in the SALP Program is beneficial and appropriate.

### 2., 5. *Licensee & Public Understanding / Changes*

PP&L believes that a performance based, consistently applied SALP Program is a useful tool in monitoring the regulatory performance of licensees, and can be very effective in providing meaningful feedback. However, because of its public nature, SALP Reports are received by many audiences outside of the NRC / Licensee interface. The public, including the financial community, often respond only to the numerical ratings associated with the SALP Program and do not understand the basis for the assessment. By scoring SALP areas, the assessment process is seen in strictly black and white terms by a public unfamiliar with the objectives of the process. The public's lack of understanding allows the SALP scores to be misinterpreted as a measure of plant safety, instead of licensee performance. The public does not understand that a SALP 3 equates to acceptable, albeit marginal, performance, and that "unsafe" is not an increment on the SALP scale.

PP&L strongly supports public acceptance of nuclear energy through involvement and communication. However, information needs to be provided in a form which can be understood by the diverse audiences represented by "the public". PP&L suggests that the NRC consider either eliminating the practice of releasing SALP scores, or amend the scoring process to use performance terms (ie. Superior, Good, Acceptable) to describe the results of

the assessment in each SALP area. These performance terms would help to more accurately communicate the NRC's findings to the public.

3., 4. *SALP Meeting Involvement / Format*

The conduct of the SALP Meeting has been generally unaffected by the changes implemented in 1993; and is appropriate.

C. ASSESSMENT PERIOD

1., 2., 3. *SALP Period Length*

The SALP Program is intended to consider performance in determining the length of the SALP period; one measure of performance are the SALP ratings. PP&L supports the concept of having the SALP assessment period be performance based. However, PP&L's experience with the SALP Program does not reflect the performance based SALP period concept. The most recent SALP period for the Susquehanna plants totaled 16 months; less than the nominal period of 18 months and substantially less than Susquehanna's last SALP period of 22 months. This reduction in SALP period length did not correspond with a leveling off in performance, as indicated by previous SALP periods having received equivalent SALP scores. Greater consistency should be used in setting SALP period length to ensure that performance is accurately considered.

Establishing the performance basis for SALP period length is a vital step in maintaining consistency between performance and assessment frequency. SALP ratings should continue to be used as an important indicator of performance in determining the length of the subsequent SALP period. But performance should also be viewed broadly to ensure that a balanced perspective on overall performance is maintained and to account for changes in performance between SALP assessments. Inspection reports, Resident Inspector feedback, as well as licensee assessments and initiatives, and plant operating performance should all be considered in setting and adjusting SALP period length.

The range in the SALP period, 12 to 24 months with a nominal value of 18 months, should be reconsidered in light of the maturation of the industry and the move toward longer operating cycles. As more plants establish 24 month operating cycles, and as the performance of the industry continues to improve, the range in SALP values should be adjusted to make 24 months the nominal SALP period. This would allow the assessment period to address performance

over the entire operating cycle and recognize strong performance through longer assessment periods. In addition, performance trends during the SALP period should be used to adjust the period while in progress. Adjusting the SALP period down based on a poor performance trend has always been a part of the SALP process; however, the SALP Program should also allow the period to be extended based on an improving trend. These mid-term adjustments would allow the SALP Program to be more responsive, enhance the effective use of Licensee and NRC resources, and be truly performance based.

#### D. SALP REPORT

##### *1. thru 9. SALP Report Length, Focus, and Content*

The revised SALP Program established more concise reports, and this has enhanced the clarity and readability of the reports. The SALP reports appear to be well balanced and consider licensee actions and initiatives. PP&L believes that the report length and format are appropriate. As discussed previously, PP&L does have a concern with the inclusion of numeric SALP scores in the report. Please see the responses to section B.2. and B.5. for a discussion of these concerns.

The revised SALP Program established performance during the last six months of the SALP Period as the main focus of the assessment. The practice of focusing on the last six months of the period enhances the applicability of the SALP Report to current licensee status, and is therefore an overall positive change to the program. However, the end of period focus, when coupled with the NRC's policy of not discussing SALP related issues during the last three months of the SALP period and the elimination of the draft SALP report, can limit a licensee's ability to address performance issues during this critical part of the SALP period. PP&L suggests that the issue of licensee access to NRC on SALP issues be reevaluated to ensure that there are adequate opportunities to discuss performance issues during the last six months of the period.