UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

August 7, 1990

Docket No. 50-397
Report No. 90-23

MEMORANDUM FOR: R. Scarano, RV*
Dr. J. Larkins, NRR/PD5*
D. Kirsch, RV
S. Richards, RV*
P. Johnson, RV*
R. Huey, RV
C. Bosted, RV*
P. Eng, NRR/PD5*
C. Sorensen, RV*
T. Meadows, RV
K. Prendergast, RV
D. Chaney, RV
A. McQueen, RV

FROM: R. P. Zimmerman, Director
Division of Reactor Safety and Projects, RV

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) FOR WASHINGTON NUCLEAR PROJECT NO. 2 (WNP-2)
(JUNE 1, 1989 THROUGH AUGUST 31, 1990)

References:
(1) NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance, August 16, 1989
(2) Region V Instruction 0701
(3) SALP Board Schedule, J. B. Martin Memorandum dated October 11, 1989

Pursuant to references (1), (2), and (3) above, a SALP Review Board for WNP-2 is hereby established. Based on current assignments, the Board consists of the addressees listed above and myself who will serve as the chairperson. Those indicated above by an asterisk (*) are voting members in all functional areas; others will advise the board in their area(s) of cognizance. The Project Inspector will serve as the Board Secretary. The Board will convene at 8:30 a.m. on October 11, 1990 in the Region V conference room. The projected date for a SALP management meeting with the licensee is November 15, 1990 (this is a tentative date which has not been discussed with the licensee).

This assessment will cover the 15-month period from June 1, 1989 through August 31, 1990. The evaluation period will include recent events through August 1990.

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Members of the WNP-2 SALP Board are provided herewith 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)
- Discussion of evaluation criteria, performance categories, and trends (Attachment 2)
- Attributes for the evaluation criteria (Attachment 3)
- SALP evaluation matrix (Attachment 4)
- Guidance for functional area performance analyses (Attachment 5)

Data on inspection effort, enforcement history, and licensee event reports will be distributed to Board members by P. Johnson in mid-August 1990.

Consistent with reference (1), the anticipated outline of the WNP-2 SALP Report is shown below, along with the individual(s) assigned lead responsibility for preparing each section.

I.	Introduction	Project Inspector
II.	Summary of Results	Project Inspector
III.	Criteria	Project Inspector
IV.	Performance Analyses	
	A. Plant Operations	Bosted
	B. Radiological Controls	Chaney
	C. Maintenance/Surveillance	Bosted
	D. Emergency Preparedness	Prendergast
	E. Security	McQueen
	F. Engineering/Technical Support	Bosted
	G. Safety Assessment/ Quality Verification	Bosted
V.	Supporting Data and Summaries (Including Tables)	Project Inspector

Each person assigned lead responsibility for a functional area is requested to prepare a draft performance analysis and provide it to P. Johnson by September 7, 1990. NRR is requested to provide a SALP input to Region V by August 24, 1990 in order to allow time for the NRR input to be melded into the various functional areas by those responsible. 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 5. If appropriate, discuss the trend of the licensee's performance since the previous SALP period (refer to Attachment 2). The analysis should reference pertinent data, enforcement items, or events when appropriate, but should be <u>principally a qualitative analysis</u> of the licensee's performance in the area. While unit trips or events may be discussed as appropriate, specific reference to performance indicators should be avoided. The length of each functional area analysis should be limited to approximately two pages -- three pages maximum -- when single-space typed. Each of the criteria in Attachment 2 should be addressed in each draft analysis, unless it is not applicable, in which case this should be indicated.

   <u>NOTE:</u> The first paragraph of the performance analysis for <u>each</u> functional area should give an overview of the area. Overall performance should be characterized, and principal strengths and weaknesses should be identified. Subsequent paragraphs should then expand this discussion in a more comprehensive manner, using examples where appropriate.

3. Include recommendations for <u>licensee</u> actions related to the functional area.

4. Provide a copy of the SALP evaluation matrix (Attachment 4), assigning a performance category for each evaluation criterion.

5. Separately, identify appropriate recommendations for NRC actions (e.g., increase or reduce inspections resources, emphasize inspection of specified activities). These recommendations will not be included in the SALP report, but will be part of the Board Chairman's memorandum which transmits the report to the Regional Administrator.

It is requested that all inputs to the SALP report be submitted to Phil Johnson by IBM 5520 or by PC diskette (using Displaywrite 3 software) with a hard copy attached.

For RITS reporting purposes, time expended for this WNP-2 SALP effort should be charged to Report No. 90-23.

The Director, Office of Investigations Field Office, Region V, is requested to provide (by August 31, 1990) a summary of major investigative activities involving WNP-2 and their results.

In addition, by copy of this memorandum, the Office of AEOD is requested to provide performance analysis information by August 31, 1990.

R. P. Zimmerman, Director
Division of Reactor Safety
and Projects
SALP Board Chairman

cc w/enclosures:
G. Constable

cc wo/enclosures:
J. Martin, RV
B. Faulkenberry, RV
J. Partlow, NRR
B. Boger, NRR
D. Crutchfield, NRR
E. Jordan, AEOD
G. Yuhas, RV
R. Pate, RV
J. Roberts, RV (Acting)
L. Miller, RV
F. Wenslawski, RV
M. Slosson, EDO
R. Nease, NRR
R. Marsh, OI/SFFO

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Division of Reactor Safety
and Projects
SALP Board Chairman

cc w/enclosures:
G. Constable
N. Western (SALP File)

cc wo/enclosures:
J. Martin, RV
B. Faulkenberry, RV
J. Partlow, NRR
B. Boger, NRR
D. Crutchfield, NRR
E. Jordan, AEOD
G. Yuhas, RV
R. Pate, RV
J. Roberts, RV (Acting)
L. Miller, RV
F. Wenslawski, RV
M. Slosson, EDO
R. Nease, NRR
R. Marsh, OI/SFFO
M. Smith

bcc w /enclosures:
Resident Inspector
G. Cook, PA
A. Wieder, DRMA

LConstable
8/6/90

RZimmerman
8/6/90

REQUEST COPY	REQUEST COPY
YES / NO	YES / NO

0516-06 FUNCTIONAL AREAS

Functional areas represent a grouping of similar licensee activities. Each functional area evaluated will be assigned a rating as defined in section 0516-08. Although not all functional areas need be assessed in a given review, an explanation should be given in the SALP report if a functional area appropriate to a licensee is not evaluated. The evaluation criteria and associated attributes against which the functional areas are to be evaluated are provided in Appendix A to this chapter. Note that performance indicators should not be a factor in judgements about the effectiveness or rating in a particular SALP functional area. It is inappropriate to make reference to performance indicator program results in arriving at a SALP rating.

061 Operating Phase Reactors

a. Plant Operations. This functional area consists chiefly of the control and execution of activities directly related to operating a plant. It is intended to include activities such as plant startup, power operation, plant shutdown, and system lineups. Thus, it includes activities such as monitoring and logging plant conditions, normal operations, response to transient and off-normal conditions, manipulating the reactor and auxiliary controls, plantwide housekeeping, control room professionalism, and interface with activities that support operations.

b. Radiological Controls. This functional area consists of activities directly related to radiological controls, including occupational radiation safety (e.g., occupational radiation protection, radioactive materials and contamination controls, radiation field control, radiological surveys and monitoring, and as low as is reasonably achievable programs), radioactive waste management (i.e., processing and onsite storage of gaseous, liquid, and solid wastes), radiological effluent control and monitoring (including gaseous and liquid effluents, offsite dose calculations, radiological environmental monitoring, and confirmatory measurements), water chemistry controls, and transportation of radioactive materials (e.g., procurement of packages, preparation for shipment, selection and control of shippers, receipt/acceptance of shipments, periodic maintenance of packagings, and point-of-origin safeguards activities).

c. Maintenance/Surveillance. This functional area includes all activities associated with either diagnostic, predictive, preventive, or corrective maintenance of plant structures, systems, and components; procurement, control, and storage of components, including qualification controls; installation of plant modifications; and maintenance of the plant physical condition. It includes conduct of all surveillance (diagnostic) testing activities as well as all inservice inspection and testing activities. Examples of activities included are instrument calibrations; equipment operability tests; post-maintenance, post-modification, and post-outage testing; containment leak rate tests; special tests; inservice inspection and performance tests of pumps and valves; and all other inservice inspection activities.

d. Emergency Preparedness. This functional area includes activities related to the establishment and implementation of the emergency plan and implementing procedures, such as onsite and offsite plan development and coordination; support and training of onsite and offsite emergency response organizations; licensee performance during exercises and actual events that test emergency plans; administration and implementation of the plan (both during drills and actual events); notification; radiological exposure control; recovery; protective actions; and interactions with onsite and offsite emergency response organizations during exercises and actual events.

e. Security. This functional area includes all activities that ensure the security of the plant, that is, all aspects of access control, security checks, safeguards, and fitness-for-duty activities and controls.

f. Engineering/Technical Support. The purpose of this functional area is to address the adequacy of technical and engineering support for all plant activities. It includes all licensee activities associated with the design of plant modifications; engineering and technical support for operations, outages, maintenance, testing, surveillance, and procurement activities; training; and configuration management.

g. Safety Assessment/Quality Verification. This functional area includes all licensee review activities associated with the implementation of licensee safety policies; licensee activities related to amendment, exemption, and relief requests; response to generic letters, bulletins, and information notices; and resolution of TMI items and other regulatory initiatives. It also includes licensee activities related to the resolution of safety issues, 10 CFR 50.59 reviews, 10 CFR Part 21 assessments, safety committee and self-assessment activities, analyses of industry's operational experience, root cause analyses of plant events, use of feedback from plant quality assurance/quality control (QA/QC) reviews, and participation in self-improvement programs. It includes the effectiveness of the licensee's quality verification function in identifying and correcting substandard or anomalous performance, in identifying precursors of potential problems, and in monitoring the overall performance of the plant.

0516-07 EVALUATION CRITERIA

Licensees will be evaluated in the functional areas described in sections 0516-061 and -062 using the following evaluation criteria. Appendix A to this chapter describes a number of attributes for each evaluation criterion and provides guidance on using these criteria to assign a performance rating.

The evaluation criteria are as follows:

a. Assurance of quality, including management involvement and control;

b. Approach to the identification and resolution of technical issues from a safety standpoint;

c. Responsiveness to NRC initiatives;

d. Enforcement history;

e. Operational and construction events (including response to, analysis of, reporting of, and corrective actions for);

f. Staffing (including management); and

g. Effectiveness of training and qualifications program.

0516-08 PERFORMANCE RATINGS

The SALP program is a mechanism to assess the quality of licensee activities and the degree to which a licensee is committed to superior performance. It should be noted that NRC's standard for measuring licensee performance reflects the self-improvements in the nuclear industry and is continually increasing. Licensees earning a Category 1 rating in a functional area have clearly demonstrated superior performance, justifying some relaxation in NRC oversight. Conversely, licensees earning a Category 3 rating in a functional area are of concern to NRC and will receive substantial additional NRC interaction and oversight to ensure performance improvements.

The functional area being evaluated may have some attributes associated with a rating of Category 1 and others that are aligned with either a Category 2 or 3 rating. The final rating for each functional area will be a composite rating of the attributes tempered with judgment as to the significance of individual items. The assignment of a rating is a serious judgment based on a knowledgeable balancing of experiences and safety significance by senior NRC managers and staff. Statistical or numerical balancing is inappropriate.

The performance categories used when rating licensee performance are defined as follows:

a. Category 1. Licensee management attention and involvement are readily evident and place emphasis on superior performance of nuclear safety or safeguards activities, with the resulting performance substantially exceeding regulatory requirements. Licensee resources are ample and effectively used so that a high level of plant and personnel performance is being achieved. Reduced NRC attention may be appropriate.

b. Category 2. Licensee management attention to and involvement in the performance of nuclear safety or safeguards activities are good. The licensee has attained a level of performance above that needed to meet regulatory requirements. Licensee resources are adequate and reasonably allocated so that good plant and personnel performance is being achieved. NRC attention may be maintained at normal levels.

c. Category 3. Licensee management attention to and involvement in the performance of nuclear safety or safeguards activities are not sufficient. The licensee's performance does not significantly exceed that needed to meet minimal regulatory requirements. Licensee resources appear to be strained or not effectively used. NRC attention should be increased above normal levels.

The SALP is not intended to be a substitute for NRC's enforcement policy. Enforcement action should not await the outcome of a SALP, but should be taken at the time the unacceptable action(s) or event(s) occur(s). In this regard, the SALP process can assist NRC management by providing perspective, but it is not a substitute for effective enforcement action. Where licensees are incapable of meeting minimal regulatory requirements, the affected plants will be shutdown.

0516-09 PERFORMANCE TREND

The SALP report may include an appraisal of the performance trend in a functional area for use as a predictive indicator. Licensee performance during the assessment period should be examined to determine whether a trend exists. Normally, this performance trend should only be used if both a definite trend is discernable and continuation of the trend may result in a change in performance rating. The performance trend is intended to predict licensee performance during the next assessment period and should be helpful in allocating NRC resources. Of particular interest are those licensees with a Category 3 performance rating and a declining trend. If senior NRC management has not been previously informed, these situations should be brought to the attention of the Director, Office of Nuclear Reactor Regulation; the Deputy Executive Director for Nuclear Reactor Regulation, Regional Operations and Research; and the Regional Administrator.

Determination of the performance trend should be made selectively and should be reserved for those instances when it is necessary to focus NRC and licensee attention on an area with a declining performance trend, or to acknowledge an improving trend in licensee performance.

The trend, if used, is defined as:

a. Improving. Licensee performance was determined to be improving during the assessment period.

b. Declining. Licensee performance was determined to be declining during the assessment period and the licensee had not taken meaningful steps to address this pattern.

TABLE 1 EVALUATION CRITERIA AND ATTRIBUTES FOR ASSESSMENT OF LICENSEE PERFORMANCE

1. Assurance of Quality, Including Management Involvement and Control

Category 1	Category 2	Category 3
a. There is consistent evidence of prior planning and assignment of priorities; procedures for control of activities are well stated, controlled, and explicit.	a. There is evidence of prior planning and assignment of priorities; procedures for control of activities are stated and defined.	a. There is little evidence of prior planning and assignment of priorities; procedures for control of activities are poorly stated or not well understood.
b. Policies are well stated, disseminated, and understandable.	b. Policies are adequately stated and understood.	b. Policies are poorly stated, poorly understood or nonexistent.
c. Decisionmaking is consistently at a level that ensures adequate management review.	c. Decisionmaking is usually at a level that ensures adequate management review.	c. Decisionmaking is seldom at a level that ensures adequate management review.
d. Corporate management is frequently and effectively involved in site activities.	d. Corporate management is usually involved in site activities in an effective manner.	d. Corporate management is seldom or ineffectively involved in site activities.
e. Engineering evaluations are consistently technically adequate and records and plant performance data are complete, well maintained, and available.	e. Engineering evaluations are generally adequate and records and plant performance data are generally complete, well maintained, and available.	e. Engineering evaluations are frequently inadequate and records and plant performance data are not complete, well maintained, or available.
f. Corrective action is effective as indicated by lack of repetition of events.	f. Corrective action is usually taken but may not be effective in correcting the root cause of the problem, as indicated by occasional repetition of events.	f. Corrective action is not timely or effective and generally addresses symptoms rather than root causes, as indicated by repetition of events.
g. Safety review committees (ISEG, onsite, offsite, etc.) and feedback from QA/QC activities are used to provide critical self-assessments to the corporate management and to improve work activities.	g. Root cause analyses and self-assessments are occasionally evident and sometimes result in improvements.	g. Corporate management does not appear to rely on self-assessment to ensure quality in activities.

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

Category 1	Category 2	Category 3
a. Clear understanding of issues is demonstrated.	a. Understanding of issues is generally apparent.	a. Understanding of issues is frequently lacking.
b. Conservatism is routinely exhibited when potential for safety significance exists.	b. Conservatism is generally exhibited.	b. Minimum requirements are met.
c. Approaches are technically sound and thorough in almost all cases.	c. Approaches are viable and generally sound and thorough.	c. Approaches are often viable, but lacking in thoroughness or depth.
d. ISEG and safety review committees are routinely and effectively used to identify underlying problems before they become issues.	d. Problems often recur before they are effectively resolved.	d. Critical self-assessment is lacking; therefore, problems are not identified until they become evident.
e. Resolutions are timely in almost all cases.	e. Resolutions are generally timely.	e. Resolutions are often delayed.
f. 10 CFR 50.59 reviews are well documented and demonstrate a technical rationale.	f. 10 CFR 50.59 reviews are done well, but frequently lacking in documented detail or technical basis.	f. 10 CFR 50.59 reviews are not well documented and reflect a minimal technical analysis.

3. Responsiveness to NRC Initiatives

Category 1	Category 2	Category 3
a. Deadlines are met.	a. Responses generally are timely.	a. Extensions of time are frequently required.
b. Resolution of issues is timely.	b. Few longstanding regulatory issues are attributable to licensee.	b. Longstanding regulatory issues are attributable to licensee.
c. Responses are technically sound and thorough in almost all cases.	c. Responses are viable and generally sound and thorough.	c. Responses are often viable, but lacking in thoroughness or depth.
d. Acceptable resolutions are proposed initially in most cases.	d. Acceptable resolutions are generally proposed.	d. Considerable NRC effort or repeated submittals are needed to obtain acceptable resolutions.
e. Implementation of NRC initiatives and policies is timely and effective and licensee consistently meets expectations with regard to schedule or content.	e. NRC initiatives and policies are implemented within an acceptable timeframe, but licensee usually relies on NRC to establish an adequate scope, content, or timeframe.	e. Implementation of NRC initiatives and policies is frequently delayed or not done in a thorough manner.

4. Enforcement History

Category 1	Category 2	Category 3
a. Major violations are rare and are not indicative of programmatic breakdown.	a. Major violations are rare and may indicate minor programmatic breakdown.	a. Multiple major violations or programmatic breakdown is indicated.
b. Minor violations are not repetitive and not indicative of programmatic breakdown.	b. Multiple minor violations or minor programmatic breakdown is indicated.	b. Minor violations are repetitive and indicative of programmatic breakdown.
c. Corrective action is prompt and effective.	c. Corrective action is timely and effective in most cases.	c. Corrective action is delayed or not effective.
d. Root cause analyses are effective as evidenced by lack of recurrence.	d. Root cause analyses are frequently ineffective.	d. Root cause analyses are superficial, deal only with evident problem, and are not effective in preventing recurrence.

5. Operational and Construction Events

Category 1	Category 2	Category 3
a. Few significant operational or construction events, attributable to causes under the licensee's control, have occurred that are relevant to this functional area.	a. Occasional significant operational or construction events, attributable to causes under the licensee's control, have occurred that are relevant to this functional area.	a. Frequent significant operational or construction events, attributable to causes under the licensee's control, have occurred that are relevant to this functional area.
b. Events are promptly and completely reported.	b. Events are reported in a timely manner; some information is occasionally lacking.	b. Events are frequently reported late or not completely.
c. Events are properly identified and analyzed.	c. Events are accurately identified, but some analyses are marginal.	c. Events are poorly identified or analyses are marginal; events are associated with programmatic weaknesses.
d. Deficiencies in man-machine interface (e.g., in human engineering design and procedures) rarely result in personnel errors.	d. Deficiencies in man-machine interface result in personnel errors, but effective corrective actions are implemented.	d. Deficiencies in man-machine interface repeatedly result in personnel errors.

6. Staffing (Including Management)

Category 1	Category 2	Category 3
a. Positions are identified, and authorities and responsibilities are well defined.	a. Key positions are identified, and responsibilities are defined.	a. Positions are poorly identified, or authorities and responsibilities are ill defined.
b. Vacant key positions are filled on a priority basis.	b. Vacant key positions are usually filled in a reasonable time.	b. Key positions are left vacant for extended periods of time.
c. Expertise is available within the staff; outside consultants are rarely needed; staffing is ample as indicated by control over backlog and overtime.	c. Expertise is usually available within the staff; consultants are appropriately used; staffing is adequate as indicated by occasional difficulties with backlog or overtime.	c. Very little expertise is available within the staff; there is excessive reliance on consultants; staffing is weak or minimal as indicated by excessive backlog or overtime.
d. Experience levels for management and operations personnel exceed commitments made by licensee at time of licensing.	d. Experience levels for management and operations personnel meet commitments made by licensee at time of licensing.	d. Experience levels for management and operations personnel are below commitments made by licensee at time of licensing.

7. Effectiveness of Training and Qualification Program

Category 1	Category 2	Category 3
a. Training and qualification program makes a positive contribution, commensurate with procedures and staffing, to the understanding of work and adherence to procedures, as indicated by few personnel errors.	a. Training and qualification program contributes to an adequate understanding of work and fair adherence to procedures, as indicated by a modest number of personnel errors.	a. Training and qualification program is found to be the major contributing factor to poor understanding of work, as indicated by numerous procedural violations or personnel errors.
b. Training program is well defined and implemented with dedicated resources and a means for feedback of experience program is applied to nearly all the staff.	b. A defined program is implemented for a large portion of the staff.	b. Program is either lacking, poorly defined, or ineffectively applied for a significant segment of the staff.
c. Inadequate training could rarely be traced as a root cause of major or minor events or problems occurring during the rating period.	c. Inadequate training could occasionally be traced as a root cause of major or minor events or problems occurring during the rating period.	c. Inadequate training could regularly be traced as a root cause of major or minor events or problems occurring during the rating period.
d. Procedures and policies are followed.	d. Procedures and policies are rarely violated.	d. Procedures and policies are occasionally violated.

TABLE 2

EVALUATION MATRIX FOR OPERATING PHASE FUNCTIONAL AREAS

	Assurance of Quality	Identification and Resolution of Technical Issues	Responsiveness to NRC Initiatives	Enforcement History	Operational and Construction Events	Staffing	Effectiveness of Training and Qualifications
Plant Operations							
Radiological Controls							
Maintenance/Surveillance							
Emergency Preparedness							
Security							
Engineering/Technical Support							
Safety Assessment/Quality Verification							
Other							

IV. PERFORMANCE ANALYSIS

A. [State functional area being discussed]

1. Analysis

[This analysis should concentrate on the adequacy of the licensee's management control systems and assurance of quality, personnel performance and staffing, effectiveness of training and qualification program, enforcement history, and the degree to which the licensee is committed to superior performance. This section should not necessarily reiterate or tabulate the information and data that contribute to the analysis. Rather, it should be a summary of the supporting rationale. Information and data should be provided in Section V of the this report. Licensee performance should be discussed in light of the evaluation criteria and associated attributes both to ensure completeness and to compare licensee performance across functional areas. The analysis is intended to be sufficiently diagnostic to provide a rationale for allocating NRC resources and to provide meaningful guidance to licensee's management.]

2. Performance Rating

[Provide the performance rating (Category 1, 2, or 3) for each functional area considered. If appropriate, include a trend assessment (improving or declining), characterizing licensee performance near the close of the assessment period.]

3. Recommendations

[Include any general or specific NRC recommendations pertaining to either licensee management's attention or the level of NRC inspection activities in a functional area. Note that even in the absence of a recommendation to vary the inspection effort, the Regional Office may do so at its discretion on the basis of appropriate NRC Manual chapters.]

NOTE: An example performance analysis (from 1988 San Onofre SALP) is included.

A. Plant Operations

1. Analysis

During the SALP period, approximately 1800 hours of direct inspection effort were applied in the Plant Operations area. Plant Operations continued to be a licensee strength. The licensee was noted to have had several significant accomplishments in the operations area during this SALP period. The most significant was the reduction in the number of reactor trips. Other strengths were also observed regarding operator knowledge and the adequacy of procedures. The primary areas in which improvement appeared warranted involved enhancement of control over the work authorization process and improved interface among the operating, maintenance, and technical organizations.

The resident inspectors observed licensee operation of the units on a daily basis, including random backshift hours. Operations staffing was observed to be adequate and control room operators were consistently observed to be knowledgeable, attentive to plant conditions, and professional in their conduct. One example of exemplary performance was the prompt recognition and mitigation of an incipient loss of shutdown cooling during the Unit 3 refueling outage when the reactor coolant system was being drained to mid-loop. Although this indicated a weakness in Operations control of maintenance activities, the alertness of the control room operators was credited with preventing a potential loss of shutdown cooling flow. This event is discussed further under Maintenance/ Surveillance, Section IV.C.

The licensee's approach to the resolution of operational safety issues was generally sound. The licensee's Trip Reduction Program, initiated in 1986, has been effective in achieving a goal of not more than one unplanned reactor trip per reactor year. Performance improved significantly during this SALP period (a total of 3 trips this period compared to 16 trips last period). Unit 1 experienced no reactor trips during 190 days of power operation. Unit 2 experienced one manual trip (due to failure of a feedwater isolation valve) during 268 days of power operation, and Unit 3 experienced one automatic trip (low condenser vacuum due to influx of seaweed) and one manual trip (prompted by a spurious ESF actuation) during 235 days of power operation.

A sense of conservatism was generally exhibited by the Operations Staff when dealing with safety significant problems. A specific exception involved improper followup and operability determinations following observed low Freon levels on Unit 2/3 emergency chillers. The low Freon level was not properly understood or corrected for approximately one month, eventually contributing to inoperability of both emergency chillers. This indicated a weakness in interface among operations, maintenance, and technical organizations, since the plant

operators had ample opportunities to resolve questions with cognizant station technical personnel.

Inspection activities during the SALP period identified one Severity Level IV violation associated with the Plant Operations area. This involved failure to comply with a Unit 1 procedure for maintaining the operability of the auxiliary feedwater (AFW) backup nitrogen system.

During this SALP period, a total of ten LERs were issued in the Plant Operations area. For Unit 1, three LERs were issued during the period. Of these, two were due to equipment failure and one was the result of an inadequate procedure. Five Plant Operations LERs were issued for Unit 2. Of these, two were the result of operator error and three were the result of equipment failures. Two operations related LERs were issued for Unit 3; one was for a plant trip due to low condenser vacuum following an excessive influx of seaweed, and the other concerned an inadvertent containment purge isolation system (CPIS) actuation due to inadequate communication between operations and health physics personnel.

On-line performance for the three units declined slightly during the 365 day SALP period compared to the last SALP period. However, this was largely due to licensee corrective actions resulting from Unit 1 EQ design problems. During the period, Units 1, 2, and 3 had unplanned outage rates of 36% (up from 9% last period), 7%, and 5%, respectively. It is noteworthy that none of the trips or unplanned outages resulted from operator error.

The licensed operator training program was characterized by excellent performance during the SALP period. This was evidenced by a high pass rate of 92 percent (22 passes of 24 candidates) on replacement examinations. The facility also received a satisfactory evaluation for the Units 2/3 Requalification program from a pilot Requalification Program Evaluation conducted under a proposed change to Examiners Standard ES-601, "Requalification Program Evaluation". The facility expended a large amount of manpower and produced a quality product for its voluntary participation in this pilot evaluation. Their efforts included preparing job performance measurements, simulator scenarios, and a two-part written examination. The preparation of this material involved many changes from prior practice and required the production of entirely new material. The licensee had an acceptable pass rate of 86 percent (10 passes of 12 examinees) for this Requalification Program Evaluation.

The Board concluded that the licensee's approach to plant operation was generally conservative and safety conscious. There was consistent evidence of prior planning and assignment of priorities. Briefings ("tailboard meetings") were observed to be conducted with involved personnel prior to plant

evolutions and testing. A specific strength was observed concerning operating procedures, which were noted to be consistently well written, understood and implemented. Decision making was usually at a level that ensured adequate review. An exception was the licensee's improper use of Special Orders as interim emergency procedures for handling postulated ESF single failure events. The licensee took prompt corrective action when this deficiency was pointed out by the resident inspectors. In this and other cases, interface by the NRC generally showed the various levels of licensee management to be professional and responsive. In addition, plant housekeeping conditions were observed to be improving.

2. Conclusion

Performance Assessment - Category 1.

3. Board Recommendations

The Board recommends that the licensee continue management emphasis on trip reduction, procedure compliance, attention to detail by equipment operators, and housekeeping. Action should also be taken to strengthen the interface among Operations, Maintenance, and Technical personnel in a manner which will provide a more conservative approach to the resolution of plant problems.