UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REVISED OFFSITE DOSE CALCULATION MANUAL, DATED AUGUST 29, 1985

AND THE PROCESS CONTROL PROGRAM, REVISION 1

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

On November 9, 1984, the staff issued Amendment No. 85 to Provisional Operating License No. DPR-20 for the Palisades Plant. This amendment modified the Technical Specification (TS) to add the Radiological Effluent Technical Specifications (RETS) necessary to implement the requirements of 10 CFR Part 50, Appendix I. Section 4.24 of the TS references the Offsite Dose Calculation Manual (ODCM), and Section 3.24.7 references the Process Control Program (PCP). Sections 6.18 and 6.19 of the TS prescribe the methods for changing the ODCM and PCP, respectively.

2.0 EVALUATION

By letter dated November 9, 1984, the staff approved the Consumers Power Company submittal dated July 31, 1984 of an ODCM and a PCP for the Palisades Plant. Since then, the only reported revisions to the Palisades ODCM and PCP were provided in the "Semiannual Radioactive Effluent Release and

Waste Disposal Report for January through June 1985." These revised documents, ODCM (dated 8/29/85) and PCP (Rev. 1), have been reviewed for the staff by Franklin Research Center (FRC) under a technical assistance agreement. The contractor's Technical Evaluation Reports (TERs), are enclosed in Supplements A and B to Appendix D from TER-C5506-593, and provide technical evaluations of the conformance of the licensee's submittals with the respective NRC criteria. They are considered a part of the SE.

The staff has reviewed the TER on the ODCM and agrees with the conclusion that the Palisades ODCM submitted in the January through June 1985 Semi-Annual Report generally uses documented and approved methods consistent with the guidelines of NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants." However, one item was identified in the contractor's TER as being at variance with the guidance of NUREG-0133 as follows. The Palisades ODCM does not provide a methodology for estimating the release of I-131 in gaseous effluents from the steam generator blowdown tank vent system. The Palisades design does not include continuous sampling of radioactive iodines and particulates in gaseous effluents from the steam generator blowdown tank vent system which exhausts directly to the atmosphere and is not released through the plant stack. The Palisades TS do not provide for the routine sampling and analysis of this effluent release. Monitoring of this release point is considered by NUREG-0133 to present difficulties due to the presence of steam in the exhaust. The Palisades TS provide for a noble gas activity monitor on the steam generator blowdown tank vent system and a gross radioactivity

monitor for the steam generator blowdown liquid effluent line. The TS also provide for the routine sampling and analysis of secondary coolant for gross radioactivity and for the dose equivalent I-131 concentration (isotopic analysis). It is also noted in NUREG-0133 that in lieu of a steam generator blowdown tank vent system monitor, determinations of the release of I-131 via the vent can be made by calculations based on the measured concentrations in the secondary water. The staff concludes, therefore, that the licensee should revise the ODCM in the near future to provide a methodology for estimating the release of I-131 in gaseous effluents from the steam generator blowdown tank vent system.

The staff has reviewed the contractor's TER on the PCP and agrees with the conclusion that the revised Palisades PCP generally is consistent with current NRC criteria and, is, therefore, acceptable. However, several deficiencies were noted:

1) A justification should be included in the PCP for specifying the quantity of chemicals added to solidify the radwaste in order to be within 20% of the quantity determined by the laboratory test of Step G. Also, the referenced Step G should be documented.

2) The commitment for processing of oily wastes does not include wastes which contain more than 50% oil by volume. The PCP should include a general description of the treatment and disposal of wastes containing more than 50% oil by volume.

3) A general sketch of the waste processing system should be included in the PCP.

4) The ALARA considerations in all phases of the solidification process should be addressed in the PCP.

The licensee should correct these deficiencies in a future revision of the PCP. It should noted that the acceptability of the revised PCP is based on currently available NRC guidance that does not fully incorporate consideration of the requirements of 10 CFR Part 61, which became effective in 1983. A future revision of the PCP should provide fully detailed information on assuring compliance with the requirements of 10 CFR 20.311 regarding classification of waste according to 10 CFR 61.56 and waste characteristics requirements of 10 CFR 61.55. NRC guidance in the above areas is scheduled for development and issuance by early 1988.

3.0 CONCLUSIONS

Based on the above, the staff concludes that the Palisades ODCM and PCP revisions, reported in the Palisades "Semiannual Radioactive Effluent Release and Waste Disposal Report - January through June 1985," are acceptable references for use with the plant TS for assuring compliance with the requirements of 10 CFR Part 20 and Part 50, Appendix A and Appendix I, governing the release of radioactive materials.

SUPPLEMENT A

TO

APPENDIX D

EVALUATION OF LICENSEE-REPORTED REVISIONS TO THE ODCM

FRANKLIN RESEARCH CENTER
DIVISION OF ARVIN/CALSPAN
20th & RACE STREETS, PHILADELPHIA, PA 19103

1. INTRODUCTION

1.1 PURPOSE OF REVIEW

The purpose of this document is to review and evaluate revisions or updates made to the Palisades Offsite Dose Calculation Manual (ODCM) through June 30, 1985,* as reported in the Licensee's Semiannual Radioactive Effluent Release Reports. These changes update the Licensee's ODCM from the one originally submitted on July 31, 1984 [1] and subsequently approved by NRC by letter dated November 9, 1984 [2].

The ODCM is a supplementary document for implementing the Radiological Technical Specifications (RETS) in compliance with 10CFR50, Appendix I requirements [3].

1.2 SCOPE OF REVIEW

As specified in NUREG-0472 [4] and NUREG-0473 [5], the ODCM is to be developed by the Licensee to document the methodology and approaches used to calculate offsite doses and maintain the operability of the effluent system. As a minimum, the ODCM should provide equations and methodology for the following topics:

- o alarm and trip setpoint on effluent instrumentation
- o liquid effluent concentration in unrestricted areas
- o gaseous effluent dose rate at or beyond the site boundary
- o liquid and gaseous effluent dose contributions
- o liquid and gaseous effluent dose projections.

In addition, the ODCM should contain flow diagrams, consistent with the systems being used at the station, defining the treatment paths and the components of the radioactive liquid, gaseous, and solid waste management systems. A description and the location of samples in support of the environmental monitoring program are also needed in the ODCM.

1.3 PLANT-SPECIFIC BACKGROUND

On behalf of Palisades Plant, the Consumers Power Company submitted changes to the existing ODCM [1] in the Semiannual Radioactive Effluent

*The Licensee indicated that the revised ODCM would become effective on July 1, 1985.

Release Reports issued by the Licensee. The Licensee did not make any revisions to the ODCM in 1984 [6, 7], but issued a complete, revised version in the first 6 months of 1985 [8].

The Licensee's Semiannual Reports and the changes of the ODCM were transmitted to an independent review team at the Franklin Research Center (FRC) for review. The review was subsequently conducted by FRC, and the results and conclusions of the ODCM evaluation are presented in Sections 3 and 4 of this document.

2. REVIEW CRITERIA

Review criteria for the ODCM were provided by the NRC in three documents:

NUREG-0472 [4], RETS for PWRs

NUREG-0473 [5], RETS for BWRs

NUREG-0133 [10], Preparation of RETS for Nuclear Power Plants.

In the ODCM review, the following NRC guidelines are used: "General Contents of the Offsite Dose Calculation Manual," Revision 1 [9], and NUREG-0133 [10]. Regulatory Guide 1.109 [11] also provides technical guidance for the review. The ODCM format is left to the Licensee and may be simplified by tables and grid printouts.

3. EVALUATION

The Licensee has followed the methodology of NUREG-0133 [10] to determine the alarm and trip setpoints for the liquid and gaseous effluent monitors, which ensures that the maximum permissible concentrations, as specified in 10CFR20, will not be exceeded by discharges from various liquid or gaseous release points. To augment conservatism in the case of simultaneous releases, the Licensee has introduced a conservative factor for liquid effluent setpoint calculations. For gaseous effluent setpoint calculations, the Licensee has included the effluent lines of the plant stack vent. The Licensee's method for setpoint calculations generally meets the guidelines of NUREG-0133. However, the Licensee has provided only a noble gas monitor (RIA 2320) for the steam generator blowdown system, which vents effluents directly to the atmosphere; monitoring of the iodine-131 release is not addressed. According to NUREG-0133, the Licensee should provide a method, in absence of an iodine monitor, to estimate the release of iodine-131.

The Licensee demonstrated the method of calculating the radioactive liquid concentration by describing in the ODCM the means of collecting and analyzing representative samples prior to and after releasing liquid effluents into the circulating water discharge. The method for liquid effluent concentration provides added assurance of compliance with 10CFR20 for liquid effluent releases, and thus satisfies the guidance specified by NUREG-0133.

Methods are also included for showing that dose rates at or beyond the site boundary due to noble gases, radioiodines, and particulates with half-lives greater than 8 days are in compliance with 10CFR20. The Licensee has made a commitment to use the highest annual average values of relative concentration (X/Q) of 1.43×10^{-6} sec/m^3 to determine the controlling locations. For iodine and particulates, the Licensee has considered inhalation as the pathway for dose rate calculations. The Licensee has demonstrated that the described methods and relevant parameters have followed the conservative approaches provided by NUREG-0133.

Evaluation of the cumulative dose is to ensure that the quarterly and annual dose design objectives specified in RETS are not exceeded.

For liquid releases, the Licensee has identified fish and water consumption as the two viable pathways. In the calculation, the Licensee has used near-field and far-field dilution factors specific to the plant; all other key parameters follow the suggested values given in Regulatory Guide 1.109. The Licensee's approach is to convert the annual dose objective into the curie design objective against which compliance with the newly implemented Technical Specification (which went into effect on January 1, 1985) is assessed. These approaches to liquid dose calculations satisfy the guidance specified by NUREG-0133.

Evaluation of the cumulative dose from noble gas releases includes both beta and gamma and air doses at and beyond the site boundary. The critical organs under consideration are the total body and skin for gamma and beta radiation, respectively. Again, the Licensee has used the maximum (X/Q) value as discussed earlier and has followed the methodology and parameters of NUREG-0133 and Regulatory Guide 1.109.

For tritium, radioiodines, and particulates with half-lives greater than 8 days, the Licensee has provided a method to demonstrate that cumulative doses calculated from the release meet both quarterly and annual design objectives. The Licensee has demonstrated a method of calculating the dose using maximum annual average (X/Q) values for the inhalation pathway and has also calculated doses for the food and ground-plane pathways. The Licensee's method to the cumulative dose calculations has satisfied the guidance of NUREG-0133.

Because of plant-specific reasons, the Licensee has not provided methods for monthly liquid and gaseous dose projections. The Licensee's alternative and commitment have been discussed in a previous evaluation* and were determined to meet intent of NUREG-0472.

Adequate flow diagrams defining the effluent paths and components of the radioactive liquid and gaseous waste treatment systems have been provided by the Licensee. Radiation monitors specified in the Licensee-submitted RETS are also properly identified in the flow diagrams. The information provided by the Licensee has satisfactorily met the guidance of NUREG-0133.

*Evaluation from FRC input to the SER dated November 9, 1984, supporting Amendment No. 85 to Operating License No. DPR-20 for the Palisades Plant.

The Licensee has not provided a description of sampling locations in the ODCM. The Licensee instead will continue to include maps and detailed locations in its Annual Radiological Environmental Operating Report. This has been discussed in a previous evaluation* and was determined to meet the intent of NUREG-0472.

In summary, the Licensee's ODCM and the revised changes use documented and approved methods that are generally consistent with the methodology and guidance in NUREG-0133, and therefore are an acceptable reference.

*Evaluation from FRC input to the SER dated November 9, 1984, supporting Amendment No. 85 to Operating License No. DPR-20 for the Palisades Plant.

4. CONCLUSIONS

The Licensee's revision (dated July 1, 1985) to the existing Offsite Dose Calculation Manual [1] submitted by the Licensee in the Semiannual Radioactive Effluent Release Reports for the period of January 1, 1984 through June 30, 1985, uses documented and approved methods and is consistent with the criteria of NUREG-0133, except for the following discrepancy:

- The Licensee has not provided monitoring of iodine-131 for the steam generator blowdown system, which vents effluents directly to the atmosphere. According to NUREG-0133, the Licensee should provide a methodology in the ODCM for estimating the release of iodine-131.

5. REFERENCES

1. Offsite Dose Calculation Manual for Palisades Plant,
   Consumers Power Company
   NRC Docket No. 50-255
   Submittal with letter dated July 31, 1984

2. J. A. Zwolinski (NRC/DL)
   Letter to D. J. VandeWalle (CPC)
   Subject: NRC/DL Approval of Palisades ODCM
   NRC Docket No. 50-255
   November 9, 1984

3. Title 10, Code of Federal Regulations, Part 50, Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion, 'As Low As Is Reasonably Achievable,' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents"

4. "Radiological Effluent Technical Specifications for Pressurized Water Reactors," Rev. 3, Draft 7", intended for contractor guidance in reviewing RETS proposals for operating reactors
   NRC, September 1982
   NUREG-0472

5. "Radiological Effluent Technical Specifications for Boiling Water Reactors," Rev. 3, Draft", intended for contractor guidance in reviewing RETS proposals for operating reactors
   NRC, September 1982
   NUREG-0473

6. "Semiannual Radioactive Effluent Release Report - January 1 through June 30, 1984," Palisades Plant, Consumers Power Company
   NRC Docket No. 50-255

7. "Semiannual Radioactive Effluent Release Report - July 1 through December 31, 1984," Palisades Plant, Consumers Power Company
   NRC Docket No. 50-255

8. "Semiannual Radioactive Effluent Release Report - January 1 through June 30, 1985," Palisades Plant, Consumers Power Company
   NRC Docket No. 50-255

9. "General Contents of the Offsite Dose Calculation Manual," Revision 1
   Branch Technical Position, Radiological Assessment Branch
   NRC, February 8, 1979

10. "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants, A Guidance Manual for Users of Standard Technical Specifications"
    NRC, October 1978
    NUREG-0133

11. "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10CFR50, Appendix I"
NRC, October 1977
Regulatory Guide 1.109, Rev. 1

SUPPLEMENT B

to

APPENDIX D

EVALUATION OF LICENSEE-REPORTED REVISIONS TO PCP

FRANKLIN RESEARCH CENTER
DIVISION OF ARVIN/CALSPAN
20th & RACE STREETS, PHILADELPHIA, PA 19103

1. INTRODUCTION

1.1 PURPOSE OF REVIEW

The purpose of this document is to review and evaluate revisions or updates made to the Palisades Process Control Program (PCP), updated through June 30, 1985,* as reported in the Licensee's PCP from the one originally submitted on July 31, 1984 [1] and subsequently approved by NRC by the letter dated November 9, 1984 [2].

The PCP is a supplementary document for implementing the Radiological Effluent Technical Specifications (RETS) in compliance with Standard Review Plan 11.4 [3] and Branch Technical Position ETSB-11-3 [4].

1.2 SCOPE OF REVIEW

As specified in NUREG-0472 [5] and NUREG-0473 [6], the PCP is to be developed by the Licensee to document the current formula, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radwastes are properly conducted. As a minimum, the PCP should provide commitments and information regarding the following topics [7]:

- Processing and packaging of liquid wet wastes
- Processing and packaging of other wet wastes
- Treatment of oily wastes
- Block diagram sketches of these systems
- Considerations of ALARA.

1.3 PLANT-SPECIFIC BACKGROUND

On behalf of Palisades Plant, the Consumers Power Company submitted changes to the existing PCP [1] in the Semiannual Radioactive Effluent Release Reports issued by the Licensee. The Licensee made no changes to PCP in 1984 [8, 9], but submitted a complete, revised PCP (Rev. 1) in the first 6-month period of 1985 [10].

The Licensee's Semiannual Reports and the changes of the PCP were transmitted to an independent review team at the Franklin Research Center

*The Licensee indicated that the revised PCP would become effective on July 1, 1985.

(FRC) for review. The review was subsequently conducted by FRC, and the results and conclusions of the PCP evaluation are presented in Sections 3 and 4 of this document.

2. REVIEW CRITERIA

NUREG-0472 [5] and NUREG-0473 [6] specify that the Licensee develop a PCP to ensure that the processing and packaging of solid radioactive wastes will be accomplished in compliance with 10CFR20 [11], 10CFR71 [12], and other federal and state regulations or requirements governing the offsite disposal of the low-level radioactive waste.

The PCP is not intended to contain a set of detailed procedures; rather, it is the source of basic criteria for the detailed procedures to be developed by the Licensee. The criteria used for the PCP are to address only current NRC guidelines [7] and do not include new criteria required by 10CFR61 [13]. The PCP should include, but is not limited to, the following:

- A commitment that all liquid wet wastes shall be solidified prior to shipment offsite.
- A commitment that containers, shipping casks, and methods of packaging for liquid wet wastes meet applicable federal regulations, e.g., 10CFR Part 71.
- A commitment that radioactive wastes will be shipped to a licensed burial site in accordance with applicable Commission, Department of Transportation, and state regulations, including the burial site regulation requirement.
- A general description of the laboratory mixing of a sample of waste to arrive at process parameters prior to commencing the solidification process.
- A general description of the solidification process including type of solidification agent, process control parameters, parameter boundary conditions, proper waste form properties, and assurance that the solidification systems are operated within the established process parameters.
- A general description of sampling of at least one representative sample from every tenth batch to ensure solidification and the action to be taken if the sample fails to verify solidification.
- The provisions to verify the absence of free liquid.
- The provisions to reprocess containers in which free liquids are detected.
- If the solidification process is exothermic, what process control parameters must be met prior to capping the container?

- Appropriate statements similar to those for liquid waste should be included for other wet wastes which could include filter sludge, spent powdered resins, spent bead resins, and spent cartridge filter elements.

- A general description of the dewatering technique and control parameters for other wet wastes.

- Provisions to reprocess the other wet wastes through the dewatering system if excess free water is observed should be included.

- A general description for treatment of oily wastes which are to be transported offsite for burial should be included.

- Sketches of the above systems.

- A statement that ALARA considerations were addressed in all phases of the solidification process.

3. TECHNICAL EVALUATION

The Licensee has made a commitment to process all liquid wet wastes prior to shipment offsite, a commitment to comply with federal regulations on shipping and packaging, and a commitment to comply with burial site regulations when shipped to a licensed burial site. These commitments satisfy the current NRC guidance.

The Licensee has demonstrated the methodology for laboratory mixing of a waste stream sample prior to commencing the solidification process. The Licensee has included a step-by-step procedure, listing the amounts of ingredients required and the parameter boundaries, and has included statements that denote the Licensee is performing solidification within the set process parameters. The Licensee's methodology is satisfactory and meets the current NRC criteria. However, the Licensee should provide justification for using solidifying chemicals which are 20% of the quantity determined by the laboratory test of step G. The referenced Step G was not documented and could not be evaluated.

Under the subject of collection and analysis of samples of the Licensee's PCP, a commitment has been made to verify the absence of free water and product solidification on a minimum of one container from every tenth batch or run. Verification is recommended on every tenth drum shipped. The required container shall be examined through a removable lid bung or equivalent means for solidification by checking penetration with a solid tool and inverted for a minimum of 8 hours to check for free water. Evidence of free water other than a few drops of condensation shall be cause for rejection. The Licensee's commitments to waste solidification and verification of free water meet the NRC criteria.

The Licensee has also made a commitment to process containers in which free liquids are detected. In the event liquid is observed, those drums with liquid shall be drained of all liquid. The drums will then be core-bored or overpacked with two bags of approved absorbent and inspected to verify that the drum is dry. After this verification and documentation, the drum may be prepared for shipment. The Licensee's commitment to process the containers meets the current NRC criteria.

The Licensee stated that oil must be emulsified with a detergent or boric acid in some type of neutral aqueous waste or tap water.

Such emulsification is applicable only if oil content does not exceed 50% by volume. The Licensee, however, did not address the situation when the oil wastes contain more than 50% of free oil in volume.

The Licensee has not specifically addressed the following subjects:

- Whether the solidification is exothermic, and the associated process control parameters to be met prior to capping the containers.
- Sketches of the waste processing systems.
- The ALARA consideration in all phases of the solidification process.

In summary, the Licensee's PCP and the revised changes use documented and approved methods that are generally consistent with the current NRC criteria [7]. However, the PCP should be revised in the future to show compliance with 10CFR61 [13] when NRC guidance becomes available.

4. CONCLUSION

The Licensee's Revision 1 (dated July 1, 1985) to the existing Process Control Program [1], submitted by the Licensee in the Semiannual Radioactive Effluent Release Reports for the period from January 1, 1984 through June 30, 1985, has been reviewed against the current NRC criteria [7]. It is found that the PCP as revised by the Licensee generally complies with current NRC criteria. However, several deficiencies described in the following were noted. The Licensee should update the PCP to correct these deficiencies. Further, the PCP should be revised in the future to show compliance with 10CFR Part 61 [13] when NRC guidance becomes available.

These deficiencies found in the Licensee's PCP submittal are:

- The Licensee has not provided justification for specifying the quantity of chemicals, added to solidify the radwaste, to be within 20% of the quantity determined by the laboratory test of Step G. Also, the referenced Step G was not documented in the submittals.
- The Licensee's commitment to processing of oily wastes does not include wastes which contain more than 50% of oil in volume.
- The Licensee has not provided a general description of treatment of oily wastes which are transported offsite for burial.
- The Licensee has not included a general sketch of the waste processing system in the PCP.
- The Licensee has not addressed the ALARA considerations in all phases of the solidification process.

5. REFERENCES

1. Process Control Program for Palisades Plant, Rev. 2, Consumers Power Company
   NRC Docket No. 50-255
   Submittal with letter dated July 31, 1984

2. J. A. Zwolinski (NRC/DL)
   Letter to D. J. VandeWalle (CPC)
   Subject: NRC/DL Approval of Palisades PCP
   NRC Docket No. 50-255
   November 9, 1984

3. "Solid Waste Management System," Standard Review Plan, Office of Nuclear Reactor Regulation, Section 11.4, Revision 2, dated July 1981

4. Branch Technical Position 11-3, "Design Guidance for Solid Radioactive Waste Management Systems Installed in Light-Water-Cooled Nuclear Power Reactors Plants," attachment to SRP 11.4, Revision 2, July 1981

5. NUREG-0472, "Radiological Effluent Technical Specifications for Pressurized Water Reactors," Draft 7", Revision 3, September 1982

6. NUREG-0473, "Radiological Effluent Technical Specifications for Boiling Water Reactors," Draft 7", Revision 7, September 1982.

7. Letter of transmittal from C. Willis (NRC) to S. Pandey (FRC), Subject: "Guidance for Review of the Process Control Program, Enclosure 2," Criteria for Process Control Program, January 7, 1983

8. "Semiannual Radioactive Effluent Release Report - January 1 through June 30, 1984," Palisades Plant, Consumers Power Company
   NRC Docket No. 50-255

9. "Semiannual Radioactive Effluent Release Report - July 1 through December 31, 1984," Palisades Plant, Consumers Power Company
   NRC Docket No. 50-255

10. "Semiannual Radioactive Effluent Release Report - January 1 through June 30, 1985," Palisades Plant, Consumers Power Company
    NRC Docket No. 50-255

11. Title 10, Code of Federal Regulations, Part 20, "Standards for Protection Against Radiation"

12. Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material"

13. Title 10, Code of Federal Regulations, Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"

Enclosure 3

PEICSB SALP INPUT

Plant: Palisades Plant
Licensee: Consumers Power Company
Docket Nos.: 50-255
SER Subject: Acceptance of the Revised ODCM and PCP (Rev. 1) Documents

PERFORMANCE PARAMETERS:
(1) Management Involvement in Assuring Quality
(2) Approach to Resolution of Technical Issues from a Safety Standpoint
(3) Response to NRC Initiatives
(4) Staffing (Including Management)
(5) Reporting and Analysis of Reportable Events
(6) Training and Qualification Effectiveness
(7) Any other SALP Functional Area

PERFORMANCE PARAMETER	NARRATIVE DESCRIPTION OF LICENSEE'S PERFORMANCE	CATEGORY/RATING
(1)	Not Applicable	N/A
(2)	The licensees explanation of ODCM and PCP methodology was technically sound and thorough, and demonstrated an excellent knowledge of RETS issues.	1
(3)	Not Applicable	N/A
(4)	Not Applicable	N/A
(5)	Not Applicable	N/A
(6)	Not Applicable	N/A
(7)	Not Applicable	N/A
	Overall Rating: 1	