

NOV 06 1986

Docket Nos.: 50-272
50-311

MEMORANDUM FOR: Thomas M. Novak, Acting Director
PWR Project Directorate No. 5
Division of PWR Licensing-A

Frank J. Miraglia, Director
Division of PWR Licensing-B

Robert Bernero, Director
Division of BWR Licensing

Themis Speis, Director
Division of Safety Review and Oversight

THRU: Vincent S. Noonan, Director
Project Directorate No. 5
Division of PWR Licensing-A

FROM: Donald C. Fischer, Project Manager
Project Directorate No. 5
Division of PWR Licensing-A

SUBJECT: DRAFT NRR INPUT FOR SALP - SALEM NUCLEAR GENERATING
STATION, UNITS 1 AND 2

Enclosed is a draft of the NRR input for the SALP for Public Service Electric and Gas Company. This draft report is based primarily upon the mini-SALP evaluations enclosed with SEs prepared during this SALP period for Salem Units 1 and 2. Please review the draft evaluation and provide any comments you feel appropriate. All comments received by November 12, 1986, will be considered for incorporation in the final report. Your comments may be provided verbally due to the short turn-around time. Please note that the licensee overall evaluation for "Licensing Activities" is a Category 2.

The assigned SES for this plant is V. Noonan.

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Donald C. Fischer, Project Manager
PWR Project Directorate No. 5
Division of PWR Licensing-A

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Division of Safety Review and Oversight

THRU: Steven A. Varga, Director
Project Directorate No. 3
Division of PWR Licensing-A

FROM: Donald C. Fischer, Project Manager
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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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UNITED STATES
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WASHINGTON, D. C. 20555

Docket Nos. 50-272
and 50-311

FACILITY: Salem Nuclear Generating Station, Units 1 and 2
LICENSEE: Public Service Electric and Gas Company
EVALUATION: October 1, 1985 to September 30, 1986
PROJECT MANAGER: Donald C. Fischer

I. INTRODUCTION

This report contains NRR's input to the SALP review for the Salem Nuclear Generating Station, Units 1 and 2. The assessment of the licensee's performance was conducted according to NRR Office Letter No. 44, "NRR Inputs to SALP Process," dated January 3, 1984. This Office Letter incorporates NRC Manual Chapter 0516, "Systematic Assessment of Licensee Performance."

II. SUMMARY

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category (Category 1, 2, or 3) based on a composite of a number of attributes. The single final rating should be tempered with judgement as to the significance of the individual elements.

Based on this approach, the performance of the Public Electric and Gas Company in the functional area - Licensing Activities - is rated Category 2.

III. CRITERIA

The evaluation criteria used in this assessment are given in NRC Manual Chapter 0516 Appendix, Table 1, Evaluation criteria with Attributes for Assessment of Licensee Performance.

IV. METHODOLOGY

This evaluation represents inputs of the Project Manager (PM) and those technical reviewers who expended significant amounts of effort on the Salem Nuclear Generating Station, Units 1 and 2 licensing actions during the current rating period. Using the guidelines of NRC Manual Chapter 0516, the PM and each reviewer applied specific evaluation criteria to the relevant licensee performance attributes, as delineated in Chapter 0516, and assigned an overall rating category (1, 2, or 3) to each attribute. The reviewers included this information as part of each Safety Evaluation input transmitted to the Division of Licensing. The PM, after reviewing the SALP inputs of the technical reviewers, combined this information with his own assessment of licensee performance and, using appropriate weighting factors, arrived at a composite rating for the license. This rating also reflected the comments, if any, of

the NRR Senior Executive assigned to the Salem Nuclear Generating Station, Units 1 and 2.

A written evaluation was then prepared by the PM and circulated to NRR management for comments, which, if provided, were incorporated in the final draft.

The basis for this approval was the licensee's performance in support of licensing actions that were either completed or has a significant level of activity during the rating period. There was a total of 46 active actions for Salem Unit No. 1 and 40 for Unit No. 2 at the beginning of the rating period. Actions were added to the multi-plant and plant specific actions for a total of 60 actions for Unit No. 1 and 57 for Unit No. 2 by the end of the rating period. We have closed 22 actions for Unit No. 1 and 18 for Unit No. 2 during the rating period and have 38 active actions for Unit No. 1, and 39 for Unit No. 2 at the end of this rating period. These actions and a partial list of completions consisting of amendment requests, exemption requests, responses to generic letters, and licensee initiated actions for both Unit No. 1 and Unit No. 2 are:

FORTY-TWO MULTIPLANT ACTIONS (16 COMPLETED). Some of the completed actions in this category are:

- ° Reactor Trip System Reliability (B-80)
- ° Preventative Maintenance Program for Reactor Trip Breakers (B-81)
- ° Salem ATWS Items 3.1.1, 3.1.2, 3.1.3, 3.2.1, 3.2.2, 3.2.3, 4.5.1 (B-78, B-79, B-87, B-88, B-92)

FIFTY-THREE PLANT SPECIFIC ACTIONS (24 COMPLETED). Some of the completed actions in this category are:

- ° Change Surveillance Testing of Batteries
- ° RHR Operation while in Modes 5 and 6
- ° Technical Specifications for Analog Rod Position Indication System
- ° Appendix "J" Exemption
- ° Relief From ASME Code Section XI Test Requirements
- ° Revise RCS Pressure/Temperature Limits
- ° Safety Valve Operability While Shutdown
- ° Coolant Loop Operability While in Mode 3

V. ASSESSMENT OF PERFORMANCE ATTRIBUTES

The licensee's performance evaluation is based on a consideration of the seven attributes specified in NRC Manual Chapter 0516. These are:

- ° Management Involvement and Control In Assuring Quality
- ° Approach to Resolution to Technical Issues from a Safety Standpoint
- ° Responsiveness to NRC Initiatives
- ° Enforcement History
- ° Reporting and Analysis of Reportable Events

- ° Staffing (including Management)
- ° Training and Qualification Effectiveness

In addition to the above, Housekeeping is discussed. A summary of the SALP ratings in each area is shown below.

SUMMARY OF SALP RATINGS

<u>Criterion</u>	<u>Rating</u>
Management Involvement and Control in Assuring Quality	2
Approach to Resolution of Technical Issues	1
Responsiveness to NRC Initiatives	2
Enforcement History	2
Operational Events	2
Staffing	1
Training	2
Housekeeping	1
Composite Rating	2

A. MANAGEMENT INVOLVEMENT AND CONTROL IN ASSURING QUALITY

During the SALP evaluation period, the licensee has shown good management overview in the area of licensing activities. This was evident through the timely submittal and subsequent approval of several license amendments in anticipation of improving cycle reload efficiency. The licensee's management demonstrated active participation in licensing activities, and kept abreast of current and prospective licensing actions. During the rating period a system for identifying both the licensee and the NRC priority items was initiated.

The licensee's submittals are most often timely. However, in many instances additional information or revisions are necessary before review can be completed. This occurs most often in the area of plant-specific licensing actions. The licensee's treatment of the no significant hazards standards of 10 CFR 50.92 has shown steady improvement, and is almost always adequate. In some cases, the licensee does not provide enough detail.

There were several instances during the period when license submittals were made which followed their scheduled submittal date. These submittals were, in all instances, required because of NRC requests for additional information. In most instances the original schedules were set by the licensee after receipt of the information request. In most cases the licensee informed the staff that the submittals would be late. However, the fact that schedule dates were not arbitrarily imposed by the staff, but instead agreed upon or set by the licensee indicates a need for more attention in this area.

On the basis of these observations a rating of 2 is assigned to this area.

B. APPROACH TO RESOLUTION OF TECHNICAL ISSUES FROM A SAFETY STANDPOINT

The licensee maintains a significant technical capability in almost all engineering and scientific disciplines necessary to resolve items of concern to the NRC and the licensee. In addition, the licensee utilizes the services of other nuclear support groups to assist in the resolution of technical problems or to utilize new and proven techniques that will enhance the operation and safety of the Plant.

The licensee's good technical capability is reflected in the submittals made in support of or in response to licensee or NRC initiated actions. Although, as discussed in the previous section, the licensee is not always forthcoming with all of the information necessary to complete a review without requests for additional information, few licensee responses to NRC requests for additional information require subsequent questions. It should be noted that for several safety issues, the licensee anticipated problem areas before they occurred during staff review of the issues, and requested meetings to resolve the problems in a timely manner.

Based upon of this resource a SALP rating of Category 1 is assigned to this criterion.

C. RESPONSIVENESS TO NRC INITIATIVES

The licensee has been responsive to NRC initiatives in many instances. Schedules are negotiated with the licensee based on priorities. As discussed previously the licensee has had difficulty meeting many of these negotiated schedules. However, the schedular delays are usually limited to one or two weeks, and seem to be more a management problem than a responsiveness problem. The licensee appears to be more responsive to those items for which it has placed a high priority rather than those for which the NRC has indicated a high priority. As discussed earlier, a new policy has been initiated whereby both the licensee and the NRC agree on prioritization of certain licensing actions. This has helped alleviate some of the past problems in this area.

A rating of 2 is assigned to this area.

D. ENFORCEMENT HISTORY

The project manager has occasionally had the opportunity to participate in inspections and audits at the site during the rating period. The licensee was responsive to concerns voiced by the staff, and has taken actions to resolve deficiencies, deviations and open items in a satisfactory manner. The licensee's contact with the resident, regional, and headquarters inspectors appeared open, frank and professional.

A rating of 2 has been assigned to this attribute.

E. OPERATIONAL EVENTS

Thirty-eight nonsecurity events were reported for the station during the reporting period in accordance with 10 CFR 50.72 procedures. Nineteen Licensee Event Reports (LER) regarding Unit No. 1, and nine LERs regarding Unit No. 2 were submitted in accordance with 10 CFR 50.73. These reports were reviewed for promptness and completeness, proper identification and analysis of events, and effective corrective actions. The LERs appear to identify and analyze events adequately. The licensee should be encouraged, however, to close out commitments or otherwise update the LERS in a more timely manner if inaccurate or incomplete analyses are found.

Two events at the station during the reporting period were discussed at OR briefings. The licensee's investigations of these two events as reported in the LERs were thorough. A comparison of the number of briefings of Salem events versus events briefed for other PWRs showed Salem to be average in this area.

About 70% of the LERs (20 out of 28) involved personnel error or failure of administrative controls. Six of the 18 trips were attributed to personnel error; eight of the 10 Technical Specification violations or initiations of LCO Action Statements also are attributable to failure of administrative controls. Although, as will be noted later, the trip rate is not unusually high, the large proportion of events attributable to personnel error suggests that corrective actions have not been fully effective.

Unit No. 1 experienced 11 scrams during the rating period. Unit No. 2 experienced 8 scrams. Eight of the scrams were due to component failure. In the remainder, personnel actions played major contributory roles. The mean trip rates per 1,000 critical hours for two units are 1.8 for Unit No. 1 and 1.1 for Unit No. 2. The rates attained for both Units are above but close to the 1985 average for Westinghouse plants which was about 1.0 per 1,000 critical hours.

For the SALP period through August of 1986, both Units had achieved availability factors well above the national average of 68.5%. Unit No. 1 was available 82% of the time, and Unit No. 2 was available 90% of the time.

The two Salem Units historically have experienced high forced outage rates. The lifetime forced outage rate for Unit No. 1 is about 27%, and for Unit No. 2 about 35%. This has improved in most recent years. In 1985, Unit No. 1 operated with an availability of 95.3% while surpassing the U.S. record for annual gross generation by a nuclear unit.

The operating statistics indicate effective corrective actions to keep the units on-line.

In the area of Radiological Controls, preliminary data for 1985 show that 1,112 workers received measurable exposure to radiation at the Salem site in 1985 (the most recent year for which complete data are available). The total exposure was 204 man-rem. No worker received a whole body dose in excess of 3 man-rem. This total exposure was the lowest among all Westinghouse two unit sites. Point Beach and Prairie Island were the only two unit sites with a lower number of workers exposed.

Recognizing that Unit No. 1 accomplished a refueling during the SALP period and recognizing other significant maintenance outages, the low occupational exposure demonstrates effective administrative controls in this area.

The availability factors and the radiological exposure achieved are clearly commendable. The ESF/RPS actuation rates are good but not notably better than at other facilities, and the quality of reporting been improving.

An overall performance rating of 2 has been assigned for the current SALP rating period.

F. STAFFING (Including Management)

The licensing group has exhibited a high degree of cooperation with the NRC staff. The good communication between the licensing group and the NRC has been beneficial to both in the processing of licensing actions. Areas of expertise are well defined within the group. In addition, the group does an excellent job of coordinating the effort when input is required from the different groups within Public Service Electric and Gas Company.

Based on the licensing group's performance a SALP rating of Category 1 is given to this criterion.

G. TRAINING AND QUALIFICATION EFFECTIVENESS

The licensing group holds informal training sessions on topics of current and future interest. The group also participates in corporatewide training programs, and participates in industrywide training programs provided by various organizations. In addition, Public Service and Gas has a training simulator located at the site.

A rating of Category 2 is assigned to this area.

H. HOUSEKEEPING

In the past, housekeeping and cleanliness of the facility has been below average. However, during the rating period the licensee has continued a major program started during the latter part of the previous SALP period to clean up and refurbish the plant. An increased commitment for good housekeeping is evident.

A SALP rating of Category 1 is assigned to this area.

VI. CONCLUSION

The licensee's licensing activities are conducted by a well staffed, and well trained group resulting in an overall efficient operation. Management overview is evident in that the licensing group is well integrated into other plant activities and licensing activities reflect a uniform approach. Upper management becomes involved in licensing actions when necessary to assist in resolving potential deadlocks. Further, during the reporting period, licensee management, in their continuing efforts towards improving their SALP rating, met with NRR management to discuss the issue. Finally, direct plant observations during the SALP period indicate that improvements have been made concerning housekeeping.

The licensee's greatest strengths appear to be in the following areas:

- ° Approach to Resolution of Technical Issues from a Safety Standpoint -The licensee has extensive technical capability that is reflected in their submittals and discussions with the NRC.
- ° Staffing - The licensee continues to upgrade the experience, capability and effectiveness of the licensing group, and the supporting administrative and technical personnel required to operate a good facility.

The following areas need attention:

- ° Management Involvement and Control in Assuring Quality - The licensee needs to put more emphasis on assuring that more details are provided in submittals in order that fewer iterations are required during the review process.
- ° Responsiveness to NRC Initiatives - The licensee needs to pay closer attention submittal schedules in order that the number of short-term schedular slippages are reduced.

Based upon the evaluation of the above criterion an overall SALP rating of Category 2 for the area of "Licensing Activities" is assigned. As was indicated in the last SALP reporting period, there is a definite indication of improvement towards a Category 1 rating.

Enclosure

RECORD OF MEETINGS AND OFFICIAL DOCUMENTS

1. NRR/LICENSEE MEETINGS

Procedures Generation Package	10/10/85
Semi-automatic Switchover	12/03/85
RIVLS	12/03/85
Service Water Header T/S Changes	12/19/85
Appendix "R" Exemptions	08/21/86
DCRDR	07/01/86
	09/23/86

2. NRR SITE VISITS/MEETINGS

Preventive Maintenance Program	10/28-30/85
SPDS	
12/04-06/85 Salem Training Accreditation	06/24-26/86
EQ Audit	08/11-15/86

3. COMMISSION MEETING

None

4. SCHEDULAR EXTENSION GRANTED

None

5. RELIEFS GRANTED

ASME Section XI Relief

6. EXEMPTIONS GRANTED

Appendix "J"

7. LICENSEE AMENDMENTS ISSUED

<u>AMENDMENT</u> <u>NUMBERS</u>		<u>TITLE</u>	<u>DATE</u>
<u>Unit 1</u>	<u>Unit 2</u>		
68	43	Surveillance Testing of Hydrogen Analyzers	12/30/85
69	44	Coolant Loop Operability While in Mode 3	12/30/85

Unit 1 Unit 2

<u>AMENDMENT NUMBERS</u>	<u>TITLE</u>	<u>DATE</u>
70 45	Surveillance Testing of Batteries	01/29/86
71 -	Increase rated Thermal Power	02/06/86
72 46	RHR Operation While In Modes 5 and 6	03/07/86
- 47	Revise RCS Pressure/Temperature Limits	03/10/86
73 48	Modify analog rod positions indication system	03/19/86
74 49	Safety Valve Operability Requirements While Shutdown	04/03/86
75 -	Revise RCS Pressure/Temperature Limits	06/10/86

8. EMERGENCY TECHNICAL SPECIFICATIONS ISSUED

None

9. ORDERS ISSUED

None