OFFICIAL COPY

NOV 27 1989

Docket Nos. 50-280, 50-281
License Nos. DPR-32, DPR-37

Virginia Electric and Power Company
ATTN: Mr. W. L. Stewart
Senior Vice President - Power
5000 Dominion Boulevard
Glen Allen, VA 23060

Gentlemen:

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
REPORT NOS. 50-280/89-16 AND 50-281/89-16

This letter refers to the NRC's Systematic Assessment of Licensee Performance (SALP) Report for your Surry facility, which was sent to you on September 22, 1989; our meeting of October 4, 1989, at which we discussed this report; and your written comments in a letter dated November 1, 1989, relative to the report. Enclosure 1 contains the meeting summary and the NRC response to your written comments of November 1, 1989. Enclosure 2 contains the slides presented at our October 4, 1989 meeting. Enclosure 3 is a copy of your letter dated November 1, 1989 providing comments to the SALP report. Enclosure 4 contains an errata sheet and a page change for the SALP report.

After receipt of your November 1, 1989 letter, the SALP Board was reconvened on November 14, 1989, to review and discuss your written comments. Based on the review, the Board finds that no changes to the SALP report are warranted.

No reply to this letter is required; however, should you have questions concerning these matters, I will be pleased to discuss them with you.

Sincerely,

Original signed by

Stewart D. Ebneter
Regional Administrator

Enclosures:
1. October 4, 1989 Meeting Summary and NRC response to written comments
2. October 4, 1989 SALP Slides
3. Va. Power comments on SALP Report (Letter dated November 1, 1989)
4. Errata Sheet

cc w/encls: (See page 2)

IE40

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(cc w/encls cont'd - see page 3)

NOV 27 1989

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Commonwealth of Virginia

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NRC Resident Inspector
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RII:DRP	RII:DRP	RII:DRP	RII:DRSS
PEFredrickson:er	MVSinukle	LAReyes	JPStohr
11/27/89	11/27/89	11/22/89	11/22/89

RII:DRS	RII:DRS
AGibson	JMilhoan
11/27/89	11/22/89

NA per JM
DCD

ENCLOSURE 1

I. Meeting Summary

A. A meeting was held at 10:00 a.m. on October 4, 1989, with Virginia Electric and Power Company (Virginia Power), at the Surry Nuclear Information Center, to discuss the Systematic Assessment of Licensee Performance (SALP) Report for the Surry facility.

B. Licensee Attendees

W. W. Berry, Chairman, Board of Directors, Virginia Power
T. E. Capps, Vice Chairman, Board of Directors, Virginia Power
W. T. Roos, Board of Directors, Virginia Power
J. B. Adams, Jr., Board of Directors, Virginia Power
A. R. Inskeep, Board of Directors, Virginia Power
A. B. James, Board of Directors, Virginia Power
S. S. Pierce, Board of Directors, Virginia Power
I. M. Moszer, Board of Directors, Virginia Power
J. T. Rhodes, President, Virginia Power
W. L. Stewart, Senior Vice President - Power
W. R. Cartwright, Vice President - Nuclear Operations
F. K. Moore, Vice President - Engineering
J. P. O'Hanlon, Vice President - Nuclear Services
M. R. Kansler, Station Manager, Surry
G. E. Kane, Station Manager, North Anna
J. L. Wilson, Asst. Vice President - Nuclear Operations

The list of licensee attendees above does not include the large number of Virginia Power employees that were present at the SALP presentation. The personnel were supervisors, plant operators, maintenance personnel, and representatives from various plant staffs. This large turnout was beneficial to the SALP process and is highly recommended for future presentations.

C. NRC Attendees

S. D. Ebneter, Regional Administrator
L. A. Reyes, Director, Division of Reactor Projects (DRP)
P. E. Fredrickson, Chief, Reactor Projects Section 2A, DRP
H. N. Berkow, Director, Project Directorate II-2, NRR
R. W. Borchardt, Regional Coordinator, EDO
B. C. Buckley, Project Manager, NRR
D. J. Roberts, Intern, NRR
L. E. Nicholson, Resident Inspector, Surry
J. W. York, Resident Inspector, Surry
M. S. Lewis, Project Engineer, Section 2A, DRP

D. SALP Meeting Slides

See Enclosure 2

II. NRC Response to Licensee's Comments

The NRC has reviewed your letter dated November 1, 1989, concerning the NRC SALP for Surry Units 1 and 2. We appreciate your efforts in developing the detailed comments. The initiatives addressed in your SALP response to improve the overall performance at the Surry station are definite indicators of a positive change in management approach to plant operations.

With respect to your specific comments in the area of Radiological Controls, we do not believe that your response provides any substantive new information which would warrant a change in rating for this functional area. The standard by which we determine the category rating is actual performance. Based on this criterion, as measured by several radiation area access control problems and numerous violations, your actual performance during the assessment period appears to be a SALP 3 Category. However, we do recognize that the programmatic enhancements initiated during the assessment period, if fully and effectively implemented, should result in significant performance improvements. In fact, these efforts contributed greatly to the SALP Board recognizing an improving performance trend in this area. As stated in the SALP report, and at our October 4 meeting, a performance trend is only used when the Board believes that continuation of the trend may result in a change of performance level. We believe that performance in the area of Radiological Controls was improving toward the end of the assessment period and continues to improve.

In the Emergency Preparedness functional area, the information you provided was not persuasive; thus, we believe that the Category 3 rating is appropriate. We also agree that the phrase used in the SALP, "minimally challenging," is not an accurate description of the remedial exercise scenario. We have revised the wording to focus on the limited scope of the exercise, which was to address the corrective action for the previously identified weaknesses. In this regard, we agree that the remedial exercise demonstrated effective corrective action for the event classification problem but, more importantly we believe, the remedial drill revealed that you had not taken effective corrective action for the emergency response facility (ERF) augmentation time problem. The change is noted in the errata sheet to the SALP report in Enclosure 4. Although we recognize that your threshold of ERF activation is more conservative than NRC guidance, this enhancement has minimal impact on ERF augmentation times for events that are sufficiently fast-moving in severity that the unit does not necessarily enter the event at the Unusual Event or Alert classification, but can either enter immediately at a higher level or enter and exit the lower level in a relatively short period. With respect to actual performance, you state that the ERF facilities have been challenged and were implemented sucessfully once at Surry and twice at North Anna. It is important to point out that only one of the events (a tube leak at North Anna) took place during the current SALP cycle. In addition, this event occurred during day shift, when sufficient resources were already on site to react to the event. We do want to emphasize that, although your performance was not judged to be improving enough to warrant an improving

trend at the end of the assessment period, your aggressive management attention in this area subsequent to the end of the period indicates to us that actual substantive improvement is now taking place. We note that you successfully implemented your emergency plan, subsequent to the assessment period, during the recent full participation exercise on November 15, 1989.

ENCLOSURE 2

UNITED STATES NUCLEAR REGULATORY COMMISSION

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

(SALP)

VIRGINIA ELECTRIC AND POWER COMPANY

MAY 1, 1988 through JUNE 30, 1989

SURRY UNITS 1 & 2

OCTOBER 4, 1989

SURRY, VIRGINIA

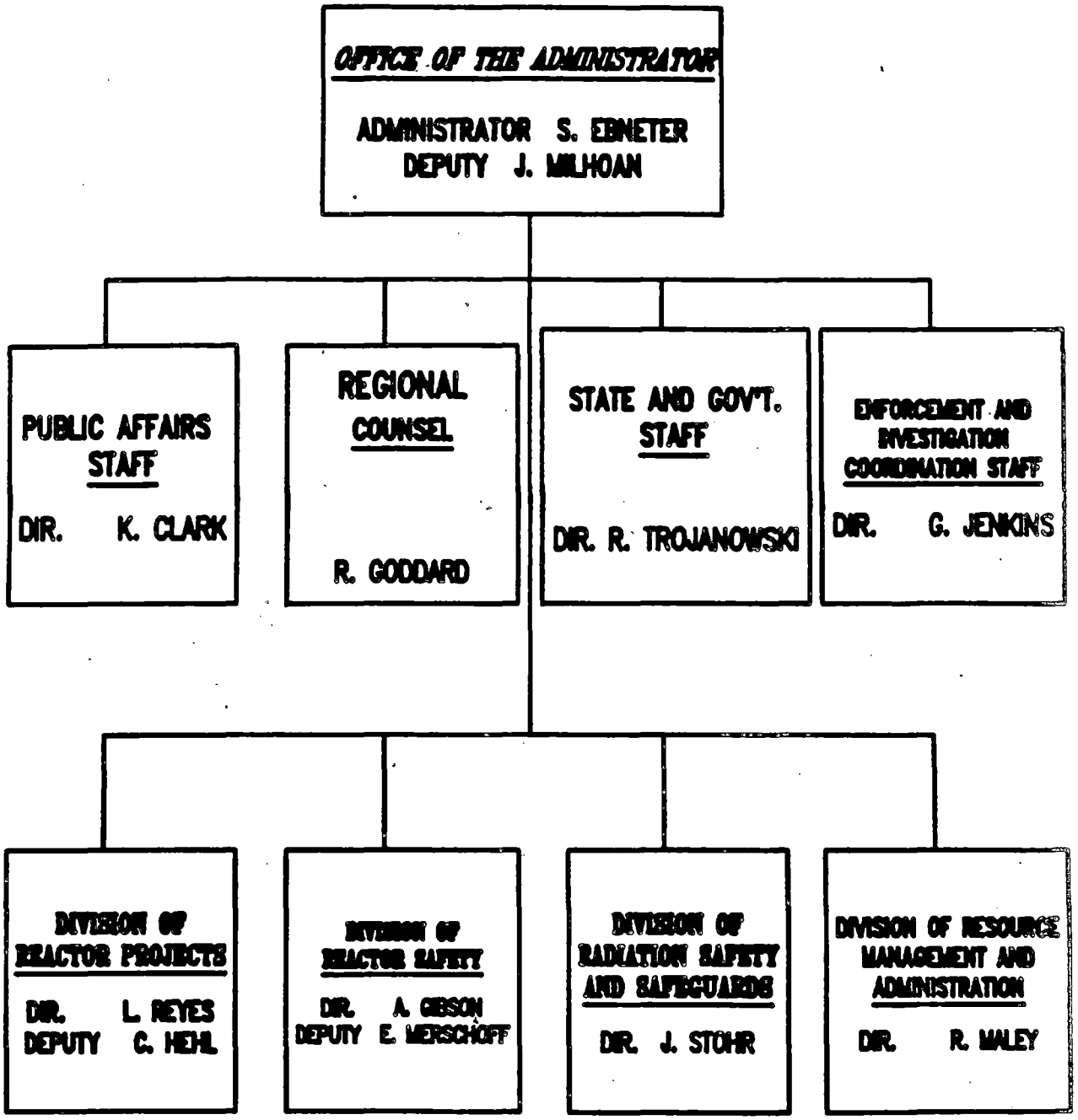
SALP PROGRAM OBJECTIVES

1. IDENTIFY TRENDS IN LICENSEE PERFORMANCE

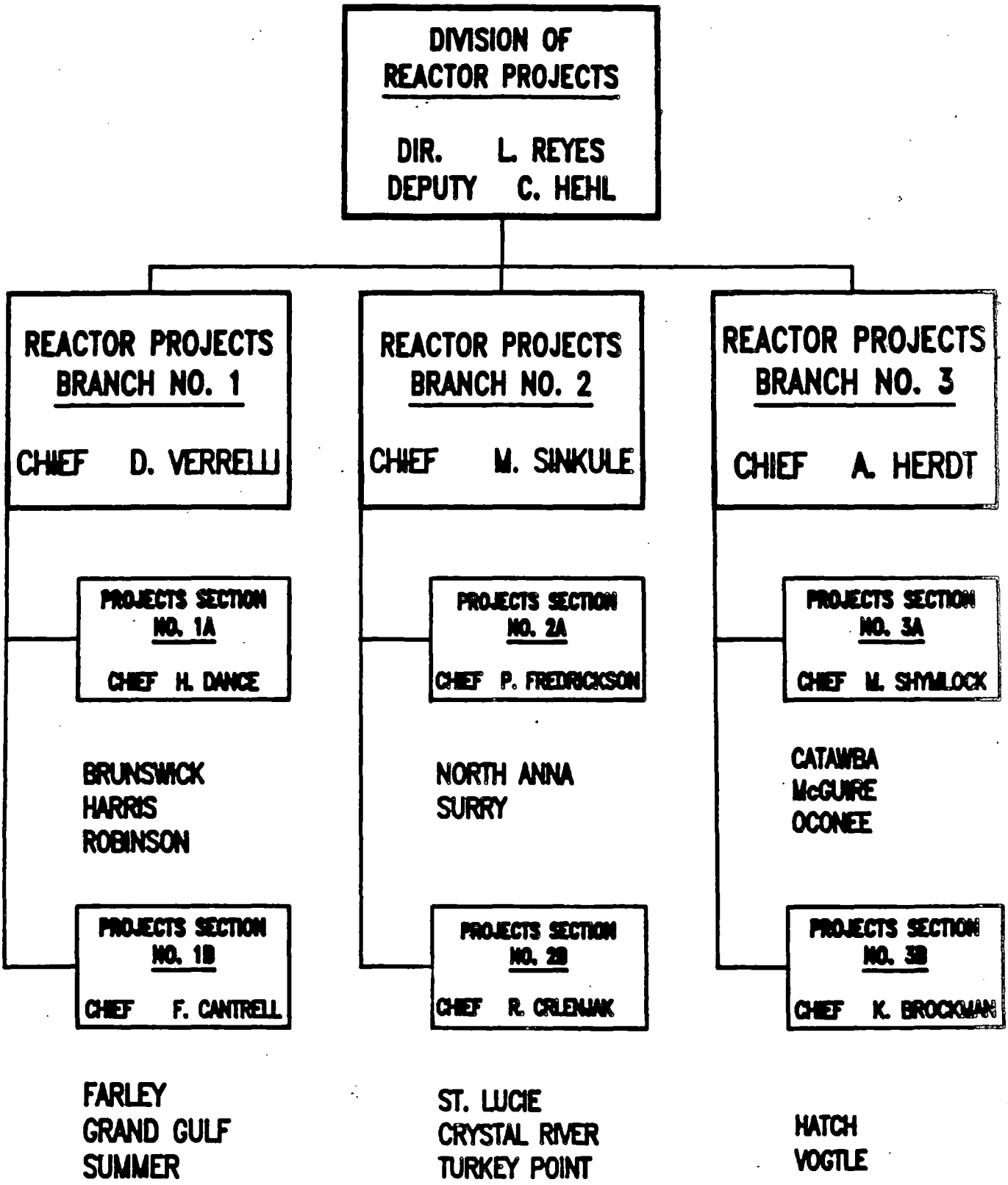
2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES

3. IMPROVE NRC REGULATORY PROGRAM

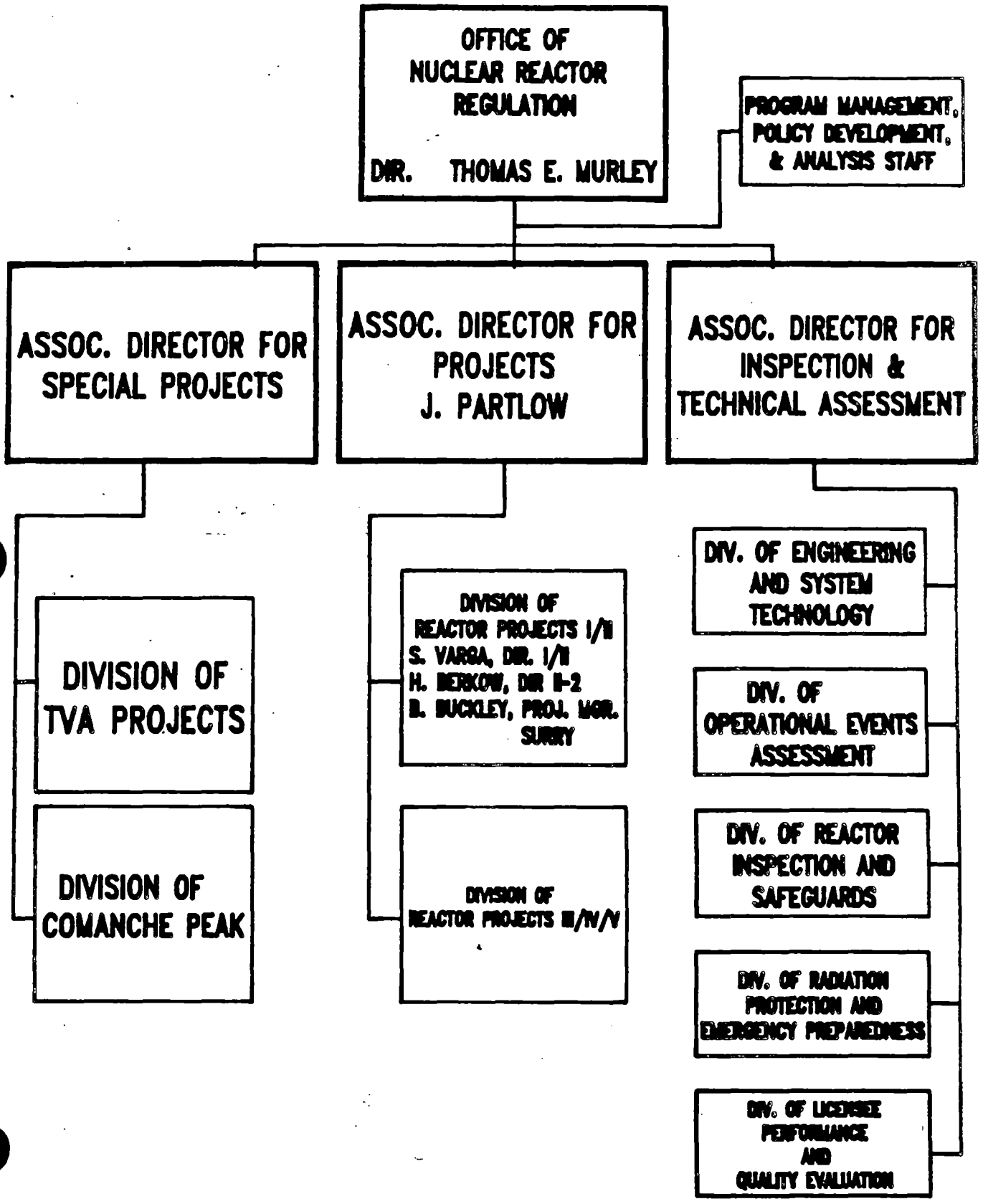
REGION II ORGANIZATION



DIVISION OF REACTOR PROJECTS ORGANIZATION



NRR ORGANIZATION



NRC

SALP PROGRAM

REVISIONS

MAJOR CHANGES TO THE SALP PROGRAM CONSIST OF...

* Redefinition of Functional Areas

* Reduction in Number of Separate Functional Areas

* Two New Functional Areas
  : Engineering/Technical Support
  : Safety Assessment/Quality Verification

* Attributes Addressing Human Performance and Self-Assessment

* Emphasis on Analysis

PERFORMANCE ANALYSIS AREAS

FOR OPERATING REACTORS

A. PLANT OPERATIONS

B. RADIOLOGICAL CONTROLS

C. MAINTENANCE / SURVEILLANCE

D. EMERGENCY PREPAREDNESS

E. SECURITY

F. ENGINEERING / TECHNICAL SUPPORT

G. SAFETY ASSESSMENT / QUALITY VERIFICATION

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 (including maintaining design bases and safety margins).

SAFETY ASSESSMENT/QUALITY VERIFICATION

The purpose of this functional area is to address the technical adequacy and completeness of the licensee's approach toward a variety of activities associated with the implementation of licensee safety policies and licensee activities related to amendment requests, exemption requests, 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 21 assessments, safety committee and self-assessment activities, analysis 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 substandard or anomalous performance in monitoring the overall performance of the plant.

PERFORMANCE RATING CATEGORIES

* Expanded discussion intent

* Redefinition of the categories to clarify their meaning

AREA PERFORMANCE

CATEGORY 1

LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE READILY EVIDENT AND PLACE EMPHASIS ON SUPERIOR PERFORMANCE OF NUCLEAR SAFETY OF SAFEGUARDS ACTIVTIES,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 ACHEIVED. REDUCED NRC ATTENTION MAY BE APPROPRIATE.

AREA PERFORMANCE

CATEGORY 2

LICENSEE MANAGEMENT ATTENTION 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 ACHEIVED. NRC ATTENTION MAY BE MAINTAINED AT NORMAL LEVELS.

AREA PERFORMANCE

CATEGORY 3

LICENSEE MANAGEMENT ATTENTION 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.

EVALUATION CRITERIA

1. MANAGEMENT INVOLVEMENT IN ASSURING QUALITY

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

3. RESPONSIVENESS TO NRC INITIATIVES

4. ENFORCEMENT HISTORY

5. REPORTING AND ANALYSIS OF REPORTABLE EVENTS

6. STAFFING (INCLUDING MANAGEMENT)

7. TRAINING EFFECTIVENESS AND QUALIFICATION

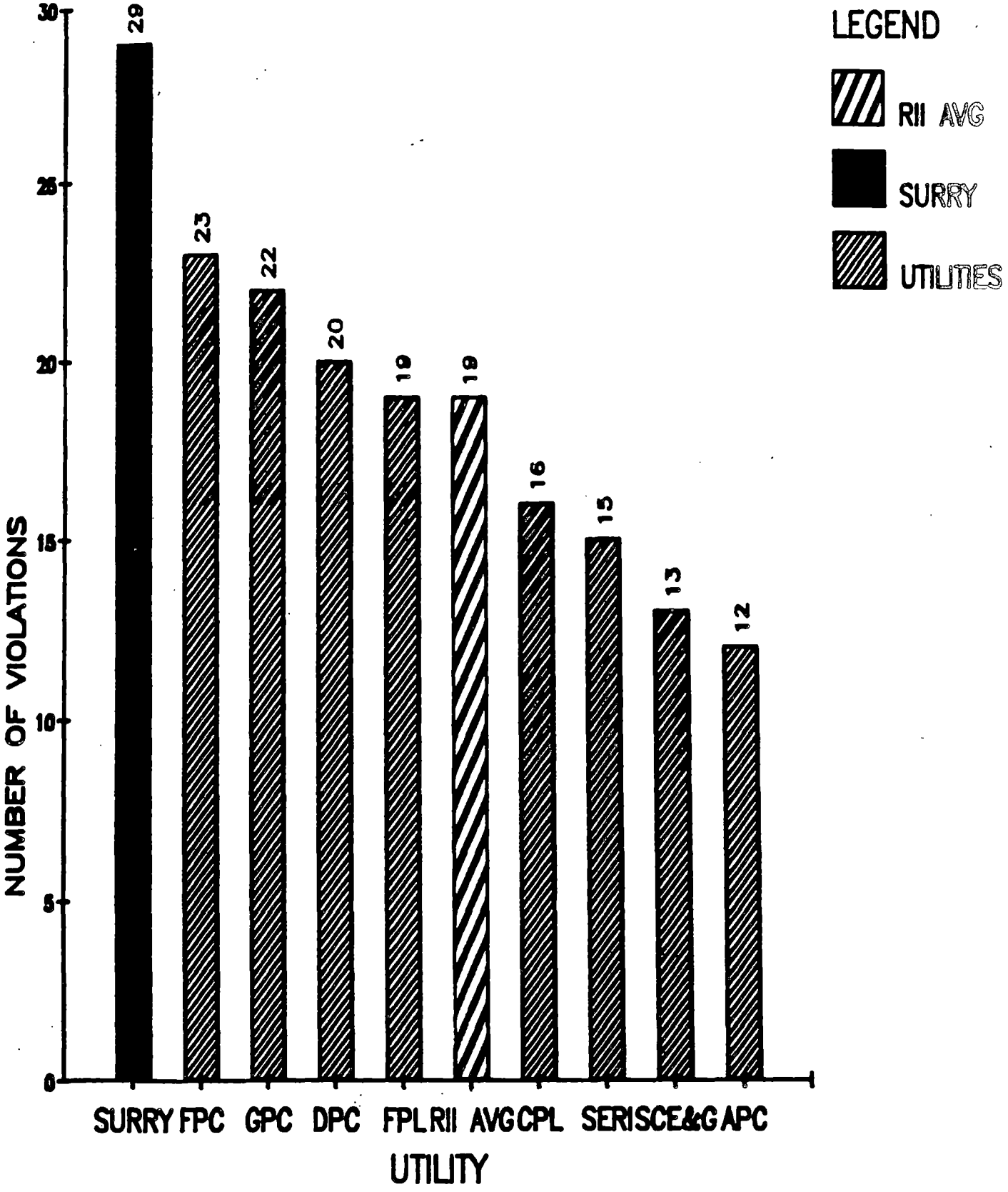
VIOLATION SUMMARY

MAY 1, 1988 through JUNE 30, 1989

	I	II	III	IV	V
SURRY 1	0	0	9	19	2
SURRY 2	0	0	9	17	2
REGION II AVE. PER UNIT	0	0	1	16	2

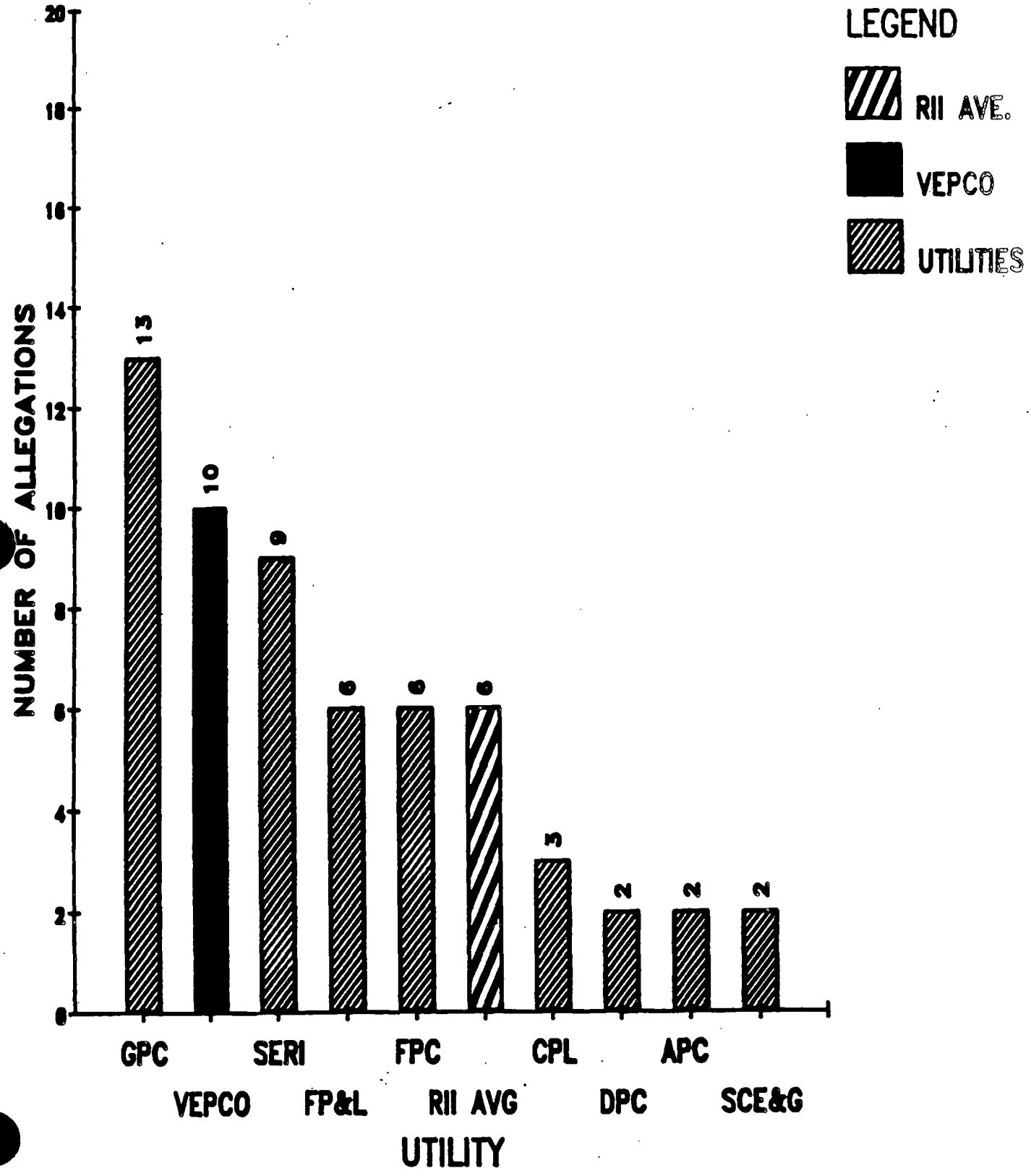
OPERATIONS PHASE VIOLATIONS/OPERATING REACTOR

MAY 1, 1988 through JUNE 30, 1989



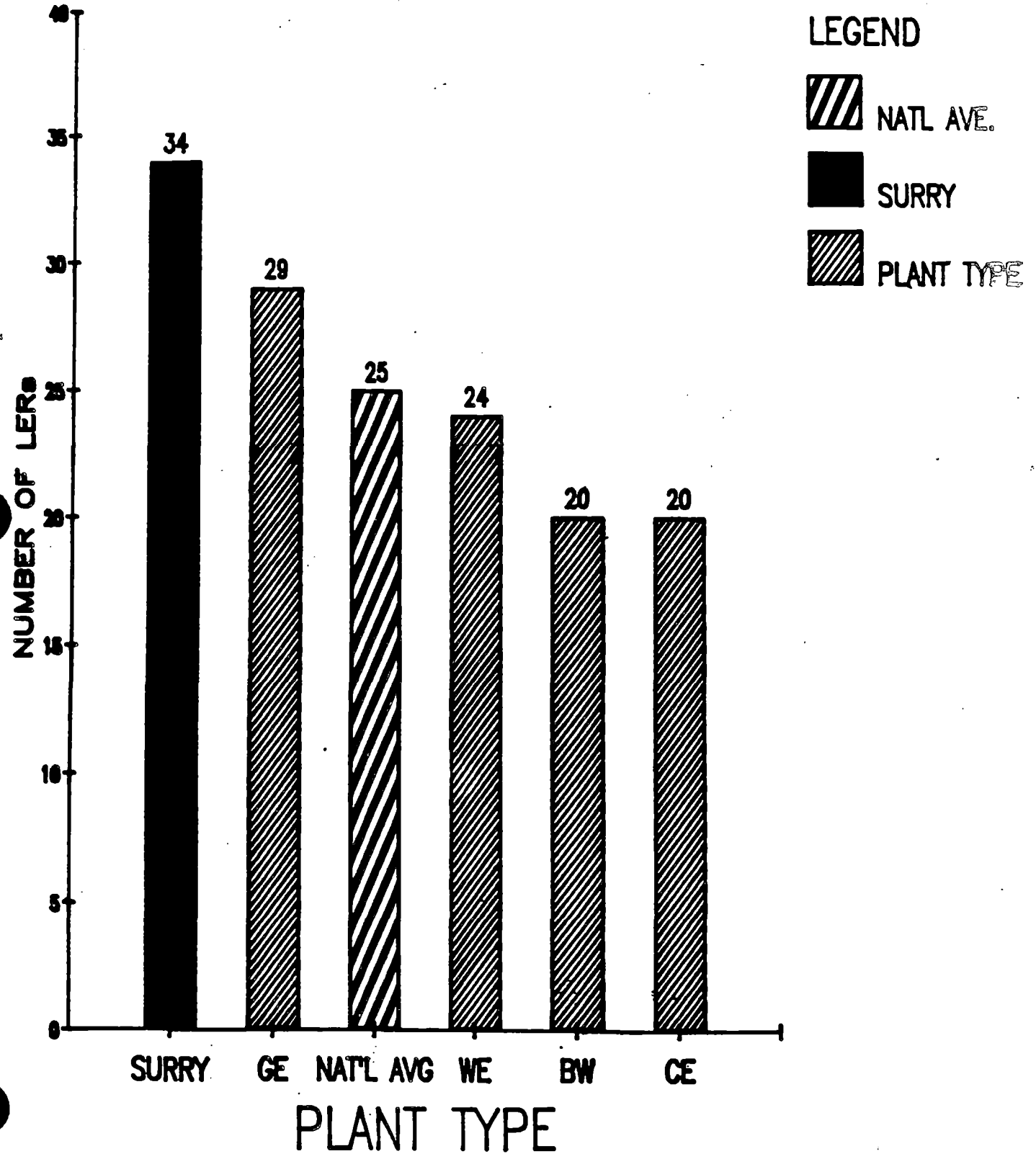
ALLEGATIONS PER UTILITY/SITE

MAY 1, 1988 through JUNE 30, 1989



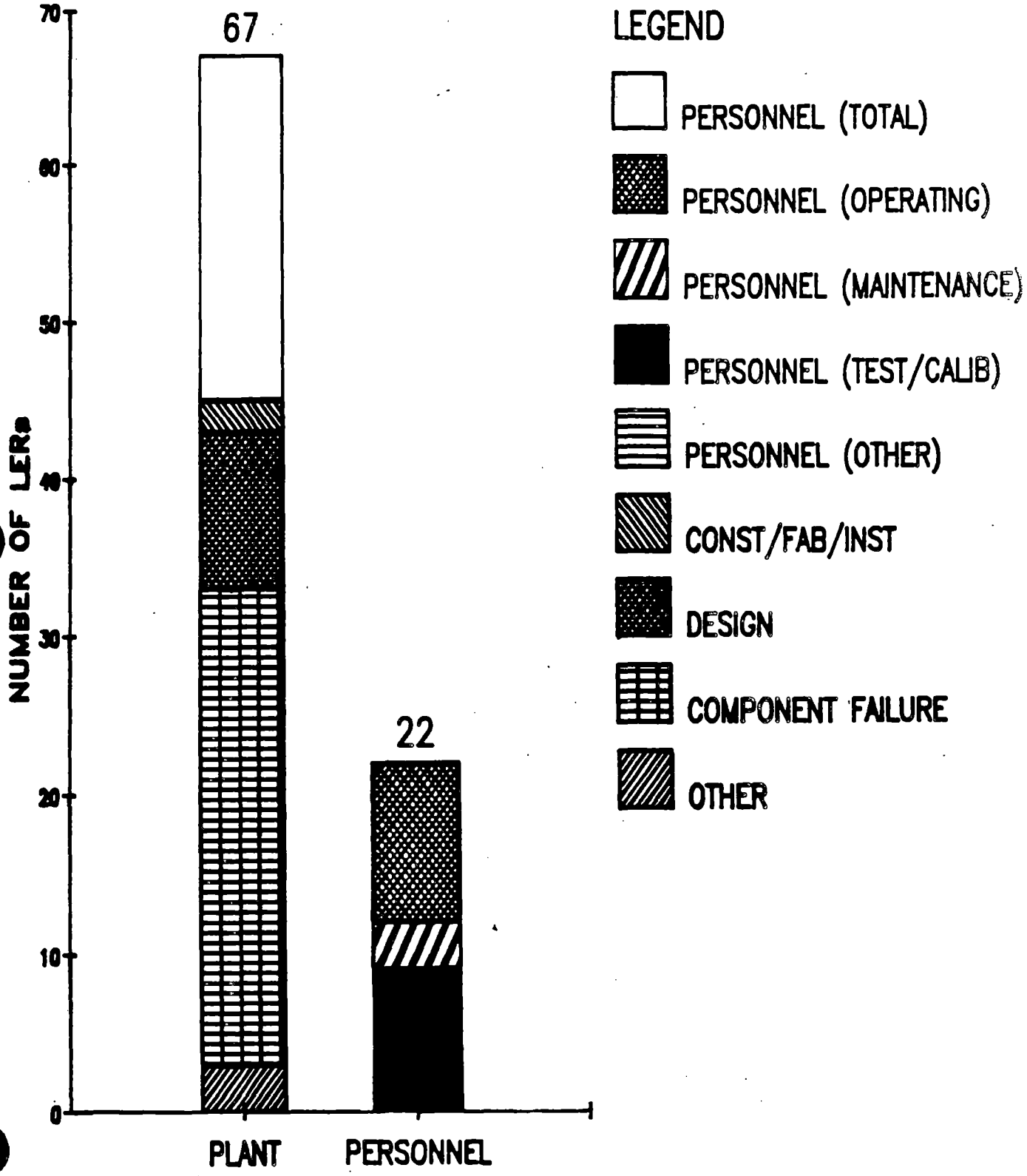
LERs PER UNIT

MAY 1, 1988 through JUNE 30, 1989

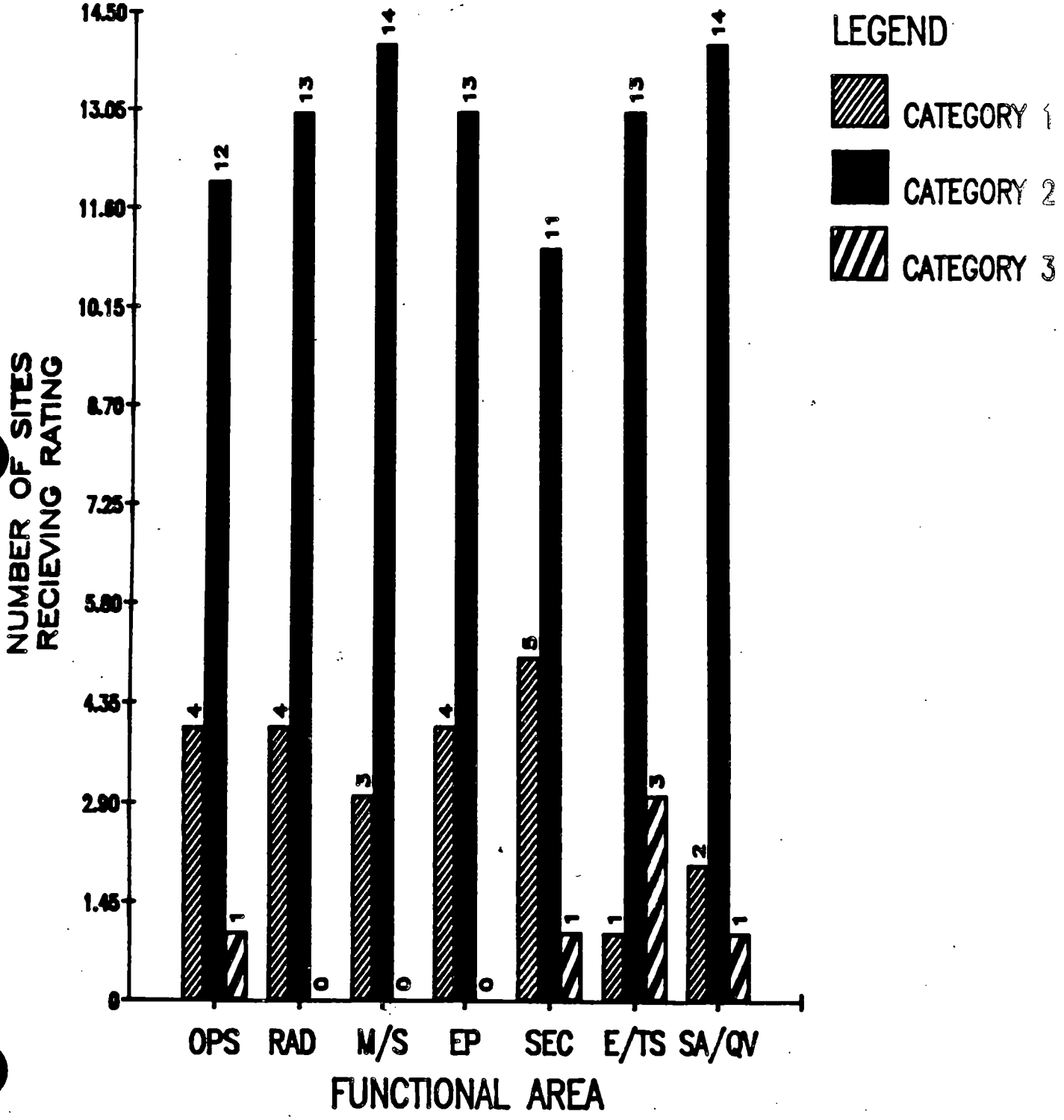


SURRY LERs

MAY 1, 1988 through JUNE 30, 1989



FUNCTIONAL AREA COMPARISON FOR REGION II SITES SALP CYCLE 7



PLANT OPERATIONS - CATEGORY 3 IMPROVING

- PROPER MANAGEMENT AND CONTROL WERE NOT EVIDENT DURING THE FIRST HALF OF THE ASSESSMENT PERIOD

- MANAGEMENT SENSITIVITY TOWARDS PROPER OPERATION OF THE STATION AND EXPECTATIONS REGARDING OPERATOR ATTENTION TO DETAIL WERE NOT EVIDENT UNTIL THE LATTER HALF OF THE ASSESSMENT PERIOD

- LACK OF PROPER MANAGEMENT OVERVIEW RESULTED IN AN INADEQUATE EVALUATION OF THE UNIT 1 REACTOR CAVITY SEAL EVENT

- OPERATING PROCEDURES WERE IDENTIFIED AS REQUIRING IMPROVEMENT. THIS WAS A CONTINUING PROBLEM FROM THE PREVIOUS ASSESSMENT PERIOD.

- DISCREPANCIES WERE NOTED WITH ESTABLISHING AND MAINTAINING ISOLATION TAGOUTS OVER THE LONG OUTAGES. IMPLEMENTATION OF THE COMPUTERIZED TAGOUT PROGRAM SHOULD HELP IMPROVE THIS AREA.

- A TENDENCY OF OPERATORS TO TOLERATE EQUIPMENT PROBLEMS AND WORK AROUND THEM EXISTED EARLY IN THE ASSESSMENT PERIOD

PLANT OPERATIONS - CATEGORY 3 IMPROVING-(CON'T)

- MANAGEMENT CHANGES MADE DURING THE ASSESSMENT PERIOD RESULTED IN IMPROVED SENSITIVITY TO SAFETY

- A COMPREHENSIVE OPERATIONAL READINESS ASSURANCE PROGRAM WAS INITIATED IN RESPONSE TO A LACK OF CLEAR DIRECTION AND APPROPRIATE SCHEDULING OF CORRECTIVE ACTIONS

- IMPLEMENTATION OF A PLANT STATUS LOG APPEARED TO HAVE A POSITIVE IMPACT ON SAFE OPERATION WITH REGARDS TO CONFIGURATION CONTROL

- OPERATIONS STAFFING LEVELS WERE IMPROVED WITH THE REQUIREMENT OF THREE SRO'S PER SHIFT

- A THREE-YEAR TECHNICAL PROCEDURES UPGRADE PROGRAM WAS INITIATED DUE TO POOR CONDITION OF PROCEDURES, BUT SCHEDULE APPEARED TO BE OPTIMISTIC

- FIRE PROTECTION PROGRAM CONTINUED TO BE EFFECTIVE

RADIOLOGICAL CONTROLS - CATEGORY 3 IMPROVING

- SPECIFIC DEFICIENCIES AFFECTED PERFORMANCE EARLY IN THE ASSESSMENT PERIOD

  - INABILITY TO ADEQUATELY CONTROL PERSONNEL EXPOSURE CONTINUED FROM THE PREVIOUS ASSESSMENT PERIOD

  - PERFORMANCE BY RADIATION PROTECTION DEPARTMENT PERSONNEL WAS INADEQUATE, DIRECTLY RESULTING IN NUMEROUS VIOLATIONS

- ALTHOUGH AMOUNT OF CONTAMINATED AREA HAS BEEN REDUCED, TOTAL AREA IS STILL HIGH

- A LACK OF MANAGEMENT ATTENTION WAS IDENTIFIED IN THE LIQUID AND GASEOUS EFFLUENT MONITORING PROGRAM

RADIOLOGICAL CONTROLS - CATEGORY 3 IMPROVING (CON'T)

- NEW INITIATIVES FOR ACCOUNTABILITY OF PERFORMANCE HAVE RESULTED IN IMPROVED HP SUPPORT, HOWEVER, NUMEROUS PROBLEMS WERE OBSERVED IN STATION WORKERS' COMPLIANCE WITH HP REQUIREMENTS

- A DOWNWARD TREND WAS NOTED IN PERSONNEL CONTAMINATION EVENTS, ATTRIBUTED TO THE DECONTAMINATION EFFORT AND INCREASED MANAGEMENT ATTENTION

- SIGNIFICANT ALARA PROGRAM IMPROVEMENTS WERE IDENTIFIED IN THE MANAGEMENT OF COLLECTIVE DOSE

MAINTENANCE/SURVEILLANCE - CATEGORY 3

- PROCEDURE INADEQUACY AND IMPLEMENTATION OF ADEQUATE PROCEDURAL CONTROL CONTINUED TO BE SIGNIFICANT WEAKNESSES

- DEFICIENCIES IN THE ABILITY TO CORRECT LONG-STANDING PROBLEMS WERE EXEMPLIFIED BY THE LACK OF A FORMAL CHECK VALVE MAINTENANCE PROGRAM AND INEFFECTIVE MAINTENANCE ROOT CAUSE AND TRENDING PROGRAM

- A LARGE MAINTENANCE BACKLOG EXISTED DURING THE PERIOD

- DURING THE PERIOD, THE PM PROGRAM WAS INEFFECTIVE, CONTRIBUTING TO SEVERAL LARGE-SCALE EQUIPMENT PROBLEMS

- MAINTENANCE-SPECIFIC PERFORMANCE INDICATORS WERE NOT ROUTINELY USED TO EVALUATE MAINTENANCE DEPARTMENT EFFECTIVENESS

MAINTENANCE/SURVEILLANCE - CATEGORY 3 (CON'T)

- INADEQUACIES WERE IDENTIFIED REGARDING THE IDENTIFICATION, PROCUREMENT, AND STAGING OF PARTS

- SIGNIFICANT AND NUMEROUS PROBLEMS WERE IDENTIFIED REGARDING THE MAINTENANCE OF MOVs. A MAJOR REWORK EFFORT WAS INITIATED LATE IN THE PERIOD

- THE OVERALL MATERIAL CONDITION OF VARIOUS SYSTEMS IMPROVED, BUT NOT UNTIL THEY WERE ALLOWED TO DEGRADE TO A POINT WHERE PERFORMANCE WAS IN QUESTION

- THE LACK OF A FORMAL, COMPREHENSIVE POST-MAINTENANCE TESTING PROGRAM WAS A WEAKNESS

- TS SURVEILLANCE TESTS WERE GENERALLY PERFORMED IN THE REQUIRED TIME FRAME, BUT MAJOR PROBLEMS REVEALED SOME SIGNIFICANT DEFICIENCIES

MAINTENANCE/SURVEILLANCE - CATEGORY 3 (CON'T)

- THE ISI TEST PROGRAM AND THE NDE PROGRAM WERE GENERALLY SOUND AND EXTENSIVE

- MAINTENANCE PREDICTIVE ANALYSIS FEEDBACK INTO THE SURVEILLANCE PROGRAM WAS A STRENGTH

- POST-REFUELING STARTUP PHYSICS TEST ACTIVITIES WERE APPROACHED IN A SOUND MANNER

- SECONDARY SYSTEM CORROSION PRODUCT MONITORING AND TRENDING HAS IMPROVED WITH THE ADDITION OF COMPUTERIZED DATA LOGGING

SECURITY - CATEGORY 1

- EXCELLENT SUPPORT WAS PROVIDED WITHIN THE REQUIREMENTS OF THE APPROVED PLAN

- THE DAILY PERFORMANCE OF THE SECURITY FORCE AND ITS ON-SITE SUPERVISION AND MANAGEMENT WERE PROGRAM STRENGTHS

- CORPORATE QA ANNUAL AUDITS OF THE SECURITY PROGRAM WERE AGGRESSIVE

- PROCEDURES WERE CLEARLY WRITTEN AND READILY AVAILABLE FOR REGULATORY TRACKING PURPOSES

- TRAINING AND REQUALIFICATION CONTINUED TO BE STRONG POINTS

- THE SECURITY STAFF'S IMPLEMENTATION OF A PERSONALIZED BRIEFING OF PERSONS WHO WERE BADGED FOR UNESCORTED ACCESS TO THE STATION WAS VERY POSITIVE

- ONE WEAKNESS WAS NOTED WITH REGARDS TO THE TIMELINESS OF SECURITY EQUIPMENT REPAIR. BETTER COORDINATION BETWEEN SECURITY AND MAINTENANCE WAS NEEDED

EMERGENCY PREPAREDNESS - CATEGORY 3

- THE ANNUAL EMERGENCY EXERCISE IDENTIFIED EVENT CLASSIFICATION AND AUGMENTATION TIMELINESS AS SIGNIFICANT PROBLEM AREAS, THUS NECESSITATING A REMEDIAL DRILL

- INCREASED MANAGEMENT ATTENTION AND INVOLVEMENT WAS NOT EXHIBITED DURING THE CONDUCT OF THE REMEDIAL DRILL

  - THE CLASSIFICATION PROBLEM WAS CORRECTED, BUT OVERALL AUGMENTATION TIMELINESS PROBLEM CONTINUED

  - A MINIMALLY CHALLENGING SCENARIO WAS INAPPROPRIATELY CHOSEN

  - CONTAMINATION ACCESS CONTROL TO THE EMERGENCY RESPONSE FACILITIES WAS IDENTIFIED AS A PROBLEM

EMERGENCY PREPAREDNESS - CATEGORY 3 (CON'T)

- IMPROVEMENT WAS NOTED IN THE KNOWLEDGE OF CLASSIFICATION PROCEDURES LATE IN THE ASSESSMENT PERIOD

- IMPROVEMENTS WERE NOTED IN THE UTILIZATION OF A COMPUTERIZED SYSTEM TO TRACK EMERGENCY RESPONSE TRAINING AND THE UPGRADES TO THE EARLY WARNING SIREN SYSTEM

- ONLY LIMITED PROGRAM IMPROVEMENTS WERE ACTUALLY OBSERVED BY THE END OF THE ASSESSMENT PERIOD

ENGINEERING/TECHNICAL SUPPORT - CATEGORY 2

- POOR ENGINEERING PERFORMANCE WAS DEMONSTRATED BY THE FAILURE TO CORRECTLY DETERMINE THE DESIGN BASIS ADEQUACY OF THE SERVICE WATER SYSTEM

- ENGINEERING MOV REVIEWS WERE INADEQUATE EARLY IN THE ASSESSMENT PERIOD, CONTRIBUTING TO THE SIGNIFICANT MOV PROBLEM

- SELF-ASSESSMENT CAPABILITY WAS LACKING, AS EVIDENCED BY A LARGE BACKLOG OF ENGINEERING PROBLEMS

- WEAKNESSES WERE EVIDENT IN PLANT EWR PROCEDURE QUALITY AND TECHNICAL REVIEWS

- NRC IDENTIFIED SSFI AND AIT FINDINGS RESULTED IN MANAGEMENT'S RECOGNITION OF EXISTING DEFICIENCIES IN ENGINEERING AND TECHNICAL SUPPORT

ENGINEERING/TECHNICAL SUPPORT - CATEGORY 2 (CON'T)

- ENGINEERING STAFF WAS REORGANIZED AND INCREASED TO FOCUS APPROPRIATE RESOURCES TO THE NEEDS OF THE STATION

- ENGINEERING SUPPORT TO THE EQUIPMENT QUALIFICATION PROGRAM WAS GOOD

- A DESIGN BASIS DOCUMENTATION PROJECT WHICH ENCOMPASSES 80 PLANT SYSTEMS WAS INITIATED

- AN ENGINEERING COMMITMENT OF RESOURCES WAS NOTED IN PREPARATION FOR UNIT 1 AND UNIT 2 RESTART

- OPERATOR TRAINING WAS EFFECTIVE AND TRAINING FACILITIES CONTINUED TO BE A STRENGTH

SAFETY ASSESSMENT/QUALITY VERIFICATION - CATEGORY 3 IMPROVING

- SIGNIFICANT WEAKNESSES IN PLANT AND CORPORATE LEADERSHIP AND SKILLS CONTINUED FROM THE PREVIOUS ASSESSMENT PERIOD
  - NUMEROUS EXAMPLES OF MANAGEMENT'S FAILURE TO TAKE ADEQUATE CORRECTIVE ACTION
  - PROBLEMS REGARDING FAILURE TO PERFORM PROPER SAFETY EVALUATIONS
  - INADEQUATE ROOT CAUSE ANALYSIS OF EVENTS, FAILURES, AND/OR CONDITIONS ADVERSE TO QUALITY
- APPROACH TO RESOLUTION OF TECHNICAL ISSUES CONCERNING NRC BULLETINS WAS NOT CONSERVATIVE NOR THOROUGH
- TRACKING OF REGULATORY COMMITMENTS WAS A WEAKNESS

SAFETY ASSESSMENT/QUALITY VERIFICATION -

CATEGORY 3 IMPROVING (CON'T)

- A MAJOR WEAKNESS WAS OBSERVED REGARDING THE CORPORATE INDEPENDENT REVIEW GROUP IN THAT TS REQUIRED REVIEWS WERE NOT BEING PERFORMED

- AMENDMENT AND RELIEF REQUESTS WERE OF GOOD QUALITY AND SUBMITTED IN A TIMELY MANNER

- LATE IN THE ASSESSMENT PERIOD, THE QA ORGANIZATION DEMONSTRATED AN IMPROVED CAPABILITY TO IDENTIFY PROBLEMS IN SAFETY-RELATED PLANT ACTIVITIES

- THE MAJORITY OF DEFICIENCIES OCCURRED EARLY IN THE ASSESSMENT PERIOD. TOWARD THE END OF THE PERIOD, INCREASED MANAGEMENT SENSITIVITY WAS NOTED AS CORRECTIVE ACTIONS BECAME MORE THOROUGH, SAFETY ASSESSMENT IMPROVED AND THE ROOT CAUSE ANALYSIS EFFORT INCREASED

OVERALL FACILITY EVALUATION

- OVERALL PERFORMANCE WAS MIXED AND DID NOT SIGNIFICANTLY EXCEED MINIMAL REGULATORY REQUIREMENTS

- PROBLEMS CONTINUED FROM THE PREVIOUS ASSESSMENT PERIOD DUE TO INADEQUATE MANAGEMENT OVERSIGHT, SELF-ASSESSMENT DEFICIENCIES AND AN INEFFECTIVE CORRECTIVE ACTION PROGRAM

- MANAGEMENT NEEDS TO EMPHASIZE THE PROCEDURE UPGRADE PROGRAM AND RELIABILITY OF EQUIPMENT NECESSARY FOR PLANT OPERATIONS

- THE RADIOLOGICAL CONTROLS FUNCTIONAL AREA IMPROVED, BUT NOT SIGNIFICANTLY, FROM THE PREVIOUS ASSESSMENT PERIOD

- CONSTRUCTION OF THE RADWASTE FACILITY, REDUCED CONTAMINATION EVENTS AND DOWNWARD DOSE TREND ARE A POSITIVE INDICATION OF THE RADIOLOGICAL CONTROL EFFORT

OVERALL FACILITY EVALUATION (CON'T)

- IMPROVEMENTS TO THE HP PROGRAM MUST ENSURE PERSONNEL ADHERENCE TO PROCEDURES

- MANAGEMENT SHOULD EMPHASIZE IMPROVEMENT IN THE MAINTENANCE PM PROGRAM, THE PARTS PROCUREMENT PROGRAM AND POST-MODIFICATION TESTING

- MANAGEMENT ATTENTION IS NEEDED TO COMPLETE THE IDENTIFIED ACTIONS NECESSARY TO IMPROVE THE EP PROGRAM

- THE EXCELLENT QUALITY OF SECURITY PERSONNEL, PROCEDURES AND TRAINING ARE DEFINITE PROGRAM STRENGTHS

- PERFORMANCE WITHIN THE ENGINEERING/TECHNICAL SUPPORT AREA WAS POOR EARLY IN THE ASSESSMENT PERIOD.

- MANAGEMENT NEEDS TO CONTINUE ENGINEERING IMPROVEMENTS AND CLOSELY MONITOR PROGRESS

OVERALL FACILITY EVALUATION (CON'T)

- ATTENTION IS REQUIRED TO CONTINUE IMPLEMENTATION OF THE CORRECTIVE ACTION, SAFETY ASSESSMENT AND ROOT CAUSE ANALYSIS PROGRAMS

- MANAGEMENT CHANGES RESULTED IN OVERALL INCREASED ATTENTION TO DETAIL AND IMPROVING TRENDS LATER IN THE ASSESSMENT PERIOD

- A NEW SENSITIVITY AND A POSITIVE ATTITUDE TOWARD PERFORMANCE OF PLANT ACTIVITIES HAVE BEEN NOTED.