



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

November 3, 1989

MEMORANDUM FOR: Frank J. Miraglia, Chairperson  
NRR Standing Review Panel

FROM: Dennis M. Crutchfield, Associate Director  
for Special Projects  
Office of Nuclear Reactor Regulation

SUBJECT: DPO ON COMANCHE PEAK SALP

On October 10, 1989 a memo was sent to "All NRC Staff Involved in Inspection Activities Related to Comanche Peak." It went to 8 HQ inspection personnel, 7 site or former site inspection personnel, 24 regional inspectors and 14 consultants. In that memo, the inspectors were asked to review the initial SALP report and submit any comments on the SALP Board's findings by October 15, 1989. It was indicated that the comments could be provided anonymously but they should be as specific as possible.

To date, 21 responses have been received. Copies of those responses are enclosed for your use. In general, the respondents have no problems with the report as written or the process used to prepare the SALP. Also, there were no negative findings on the qualifications of the Board members. Comments received in the areas of Security, EOP's and the AIT check valve problem have received additional consideration and are discussed below in further detail.

A Region IV Physical Security Inspector provided some added views on the Comanche Peak Security Program and SALP rating. Two of the views deal with errors that are straight forward to correct and do not affect the overall rating. The third comment deals with the fact that the security inspector feels that the pre-op security program is far superior to other utilities at this phase. Also, the applicant's desire to lockdown without having construction delayed or completed unfairly casts the security program in a bad light. Consequently the security inspector and his section chief feel that the security program should be rated a Category 1 for the Comanche Peak pre-op phase.

I recommend that the Security section of the report be changed to better reflect the impact of the lack of completion of construction had on the rating but that the rating of "2" for Security stand. Copies of the changes that are appropriate are enclosed.

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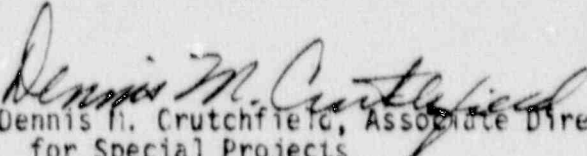
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The second area of comment related to the EOP's. The responder did not have a problem with the overall rating or the information provided in the SALP. Rather, he felt that the EOP team's inspection report (not available at the time of the Board meeting) could provide additional details concerning engineering review of the ERG's and the applicant's QA involvement in the review of the ERG's. Including this information in the SALP report would provide additional examples to support the findings. Since it would not result in a change to the SALP Board's findings, I do not think the report should be changed to include this information.

The next area raised in the responses deals with the AIT check valve problem. No issues with the SALP were raised but the individual was concerned with followup of the Borg-Warner valve problem at Comanche Peak. Both issues raised (i.e., need for corrective action before startup and generic action) have been addressed by TU and the staff. No action for the SALP report is recommended.

Another respondent felt that perhaps the Borg-Warner problem could have been discussed in more detail, but did not object to what was done in the SALP report.

Finally, most had no comment on the SALP process. A number of those answering the memo felt that the process and report were fairly done, done in accordance with the Manual Chapter, and accurately reflected the applicant's performance. I have included copies of all responses received to date. If others are submitted, copies will be sent to you also.

  
Dennis H. Crutchfield, Associate Director  
for Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Mark-Up SALP Pages
2. Responses Received

cc w/enclosures:

J. Sniezek  
J. Partlow

10/11/89

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R J. A. Kelly, RIV	M. N. Stein C
R R. L. Caldwell, RIV <i>10/20 - SALP 1</i>	C. D. H. Schultz <i>10/17 no problems</i>
R A. B. Earnest, RIV <i>received 10/27, no</i>	G. A. Stobtzl
R R. J. Everett, RIV <i>received 10/27</i>	Pacific Northwest Laboratory
R E. Murray, RIV	
R H. D. Chaney, RIV <i>note 10/16 no</i>	
R R. E. Baer, RIV <i>received 10/27, no</i>	
R J. E. Nicholas, RIV	
R L. T. Ricketson, RIV	
S R. Warrick, NRR <i>recd 10/30</i>	



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problems and is working on resolution of the remainder.

The applicant's security organization has implemented an aggressive program for the self-identification of security problems to ensure compliance with the requirements of 10 CFR Part 73 and the Physical Security Plan (PSP). Corrective actions initiated as a result of the applicant's ~~audit program~~ or NRC identified problems have been technically correct and effective. Plant and corporate management has been supportive and actively involved in providing timely solutions to issues identified by the security staff. The applicant has been responsive to NRC initiatives.

The applicant appears to have a sufficient number of security supervisors, fully qualified security officers, and security support personnel assigned to the security department to implement a proper security program during normal operations during the transition from construction to operation. However, during the transition from construction to operations overtime use appeared to be excessive and, thus, could have a negative impact on security staff effectiveness. Applicant management has recognized this problem and has initiated actions to hire more security personnel. The lines of authority within the security force are clear and well-understood. ~~No~~ *minor deficiencies were* ~~problems were~~ identified with the security training program. A more accurate assessment of the training program will be possible following the completion of lockdown, but it appears that security force personnel have a good understanding of the applicant's policies and procedures. The applicant has established the necessary procedures to provide for the implementation of a proper security program.

The transition to a security organization responsible for safeguarding an operating nuclear power plant from a long-term security organization responsible for industrial protection has not been implemented to a degree that has permitted the inspectors to establish the assurance of acceptable performance in this area. The applicant initiated a three-stage phased lockdown of the protected and vital areas on July 1, 1989. Phase 1 was completed and portions of Phase 2 were accomplished prior to the end of this assessment period. It appears that applicant management did not recognize that the plant was not ready to enter into the final phase (hard lockdown), but has since acknowledged that fact. The applicant has committed to performing an internal security

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program self-evaluation, to correct any deficiencies identified and to inform the NRC when they consider the plant ready for completion of the preoperational inspection. Based on the preoperational inspections completed to date, it appears the applicant has established the basis for an acceptable security program.

The applicant's submittals with respect to safeguards matters were technically sound and consistent. These submittals indicate that the applicant has well-developed policies and procedures for control of security related activities. During this assessment period, there was consistent evidence of prior planning and involvement by utility management.

2. Performance Rating

The applicant's rating is Performance Category 2 in this area.

The change in rating from a Category 1 (last SALP period) to a Category 2 does not necessarily reflect a change in applicant's performance. The last SALP rating was based primarily on the acquisition, installation, and activation of state-of-the-art security equipment which demonstrated the applicant's commitments to the security program. The applicant had not yet implemented the security plan. The present SALP rating is based on additional activities necessary to demonstrate implementation of the physical security plan which was scheduled to occur after the SALP period ended.

3. Board Recommendations

a. Recommended NRC Action

None.

b. Recommended Applicant Action

None.

*The final rating for the security program was impacted by the fact that the applicant elected to "load down" while there was a substantial amount of construction still ongoing*

G. Radiological Controls

1. Analysis

The assessment of this functional area consists of activities directly related to radiological controls, including occupational radiation safety (e.g., occupational radiation protection, radioactive