



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

OCT 25 1989

MEMORANDUM FOR: D. M. Crutchfield, Associate Director  
for Special Projects  
Office of Nuclear Reactor Regulation

FROM: R. F. Warnick, Assistant Director  
for Inspection Programs  
Comanche Peak Project Division  
Office of Nuclear Reactor Regulation

SUBJECT: COMMENTS ON THE SALP AND THE DPO

I am responding to your memo and request dated October 10, 1989. I do agree with the draft SALP report, in which you asked for our comments on the recently prepared draft SALP report. In addition, I desire to inform you and members of the panel reviewing the differing professional opinion of: the process used in preparing the SALP report and in conducting the SALP Board meeting; measures established to identify early indications of unacceptable applicant performance; clarification of information in the DPO which might be misleading; and the measures utilized by the NRC onsite staff to identify and track inspector concerns.

Since the organization of the Office of Special Projects in February 1987, we have prepared two draft SALP reports for consideration by SALP Boards. In both cases, Manual Chapter 0516 was followed. In both cases, the report input was written by the individuals involved in the licensing and inspection of Comanche Peak. For the 1989 SALP, one of the onsite staff combined inputs provided by the onsite inspectors and consultants, Region IV, and Headquarters. At least two and maybe three revisions were made by the onsite staff before the draft was submitted to RIV and Headquarters for comments. All comments were considered and the report revised and distributed for consideration by the SALP Board at the September 19, 1989 meeting.

The onsite NRC manager, five NRC onsite inspectors, and three NRC onsite consultants attended the SALP Board meeting. The Senior Resident Inspector (SRI), Operations did not attend the SALP Board because he had just transferred here; however, the former SRI, Operations who had provided SALP input attended the Board meeting. Three consultants did not attend the SALP Board meeting. I felt it was more important for them to perform onsite inspection work. They were represented at the Board meeting by their lead inspectors and by the Lead Senior Inspector, a voting Board member. Inspectors and consultants present at the Board meeting were asked questions and were involved in the discussions. Three onsite NRC personnel (the Assistant Director for Inspection Programs, the Senior Project Inspector, and the Lead Senior Inspector) were voting Board members in 1988 and again in 1989.

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The SALP Board convened at approximately 8 a.m. at the Plantation Inn and discussions continued until approximately 7:30 p.m. The draft write-up of each area was discussed page by page and paragraph by paragraph. Comments were made; questions asked; and suggestions for improved explanation, justification, or flow were made. Assignments for rewrites were made or it was rewritten at that time. Each functional area was written and discussed by the Board approximately in the order of the seven SALP rating criteria. Then, each rating criteria was voted. A total of seven votes were taken for each functional area except for security and radiological controls and then a final performance rating was determined. Only one overall vote was taken for each of the functional areas of security and radiological controls, as agreed by the Board members. In the six functional areas that had individual criteria votes, a total of 93 votes were for performance rating of category 1, 255 votes were for category 2, 33 votes were for category 3, and 39 votes were for not rated. Using the definition for "performance trend" found in the MC516, no trends were identified in any area by any Board member. Recommendations were discussed by SALP Board meeting attendees and agreed to.

Following the SALP Board, the assigned inspectors, consultants, supervisors, and managers provided rewrites for their particular areas. The inputs were pulled together by the onsite staff and the Initial Draft SALP report was prepared and sent to RIV and Headquarters for comment. Comments were received and incorporated or otherwise resolved. The report was ready to issue on the goal date of October 8, 1989, the day the DPO was received.

NRC staff inspectors were involved in writing the SALP report, they were at the SALP Board meeting (or were represented by Regional or Headquarters management), and they participated in the SALP Board discussions. The entire SALP process was consistent with past and present NRC practice and with MC 0516.

In addition to the above, the onsite resident inspectors and consultants prepared mini-SALP evaluations every time they wrote an inspection report. This was done to identify trends and early indicators of declining or unacceptable applicant performance. Out of a total of 91 inspections included in this SALP assessment period, mini-SALP evaluations were submitted for 71 inspections. Of the 71 mini-SALP evaluations submitted, 2 performance category 1 ratings were given, 145 category 2 ratings were given, 8 declining 2 or 2- ratings were given, and 10 category 3 ratings were given.

Contrary to the opinion stated in the DPO memo, the SALP report does discuss work or issues covered by the ASME Code (Section IV.A.1 and Section IV.B.1); the negative aspects of performance demonstrated by the auxiliary feedwater system check valve backleakage events (Section IV.B.1 and Section IV.D.1); and the inability of the applicant to identify root causes (Section II, Section IV.A.1, and Section IV.C.1).

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Regarding the attachments to the DPO: (1) The attachment to the H. S. Phillips memo gives SALP Evaluation narrative for seven inspection reports that were completed and issued in the previous SALP period. Only the last two entries, both of which state "Report 50-445/88-67; 50-446/88-63 - No justification necessary," were for this SALP period. (2) The information contained on the two draft pages (31 and 32) is also contained in the Initial SALP Report that was concurred in by the SALP Board (Section IV.B.1 and Section IV.D.1). (3) The Phillips' memo "TU Electric Response to EA 88-310" dated June 21, 1989, and unissued Inspection Report 50-445/89-23; 50-446/89-23 were referred to the Office of Investigation for review and action. The subject matter is referred to in the SALP report (Section V.C). Because the information was referred for investigation, it was not proper to discuss in detail in the SALP.

Finally, the onsite NRC supervisors and manager have tried diligently to see that all inspector concerns were known, tracked, and satisfactorily resolved. In addition to the inspectors discussing findings with their supervisor and documenting them in inspection reports, each week there is a staff meeting for all the onsite technical staff and consultants. One of the items on the agenda each week is "any new major concerns." Inspectors and consultants inform the rest of the NRC staff of any major findings. These are tracked to assure adequate management attention and closure. For the last item on the staff meeting agenda, each and every individual is given an opportunity to ask questions, bring up for discussion any topic the individual desires, or talk about anything the individual desires.

I hope you and the panel find the above information to be useful. I will be glad to answer any questions you or others may have.

*RF Warnick*

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