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

December 27, 1989

MEMORANDUM FOR: Dennis M. Crutchfield, Associate Director
for Special Projects

FROM: Frank J. Miraglia, Chairman
DPO Review Panel on Comanche Peak

SUBJECT: COMANCHE PEAK DPO ON SALP

As we discussed, the DPO Panel is prepared to meet with members of the Comanche Peak SALP Board, Messrs. Grimes, Warnick, Livermore and Wiebe on January 4, 1990. The meeting time is 8:30 a.m. in 12-B-11.

As we previously discussed, the DPO Panel has identified some areas that we would like the SALP Board members to be prepared to address.

Enclosure 1 is a review of the DPO comments related to the SALP process, compared to the SALP Manual Chapter guidance and matters that the DPO Panel would like to discuss. Enclosure 2 is a similar matrix of comments from the CASE letter sent by Billie Garde on November 20, 1989.

There are certain differences in SALP drafts identified in enclosure 3 relating to engineering and technical support and plant operations. The DPO Panel would like to discuss the reasons for these differences with the SALP Board.

Frank J. Miraglia

Frank J. Miraglia, Chairman
DPO Review Panel on Comanche Peak

Enclosures:
As stated

cc: J. Sniezek
J. Partlow
C. Grimes
R. Warnick
H. Livermore
J. Wiebe

ENCLOSURE 1

MATRIX OF CASE COMMENTS CONCERNING SALP VS SALP MC

CASE COMMENT	RELATED MC GUIDANCE	ANALYSIS AND QUESTIONS
1. Our review and analysis revealed that the use of the SALP process for Comanche Peak at this time was inappropriate and, thus, inherently problematic. The restart of the SALP process for the period September 1, 1987 to July 31, 1988 was inappropriate because many of the areas of performance were still less than Category 3 as defined in MC 0516.	1. The NRC will normally review and evaluate each power reactor licensee possessing a construction permit every 15 months. [0516-04] When the Regional Administrator determines that the performance of a particular utility or facility warrants a more frequent evaluation, such as in the case of licensee's that were assigned a Category 3 performance rating in several functional areas during the previous evaluation, the period between SALP evaluations should be reduced to about 12 months. [0516-04.b]	1. The SALP MC does not clearly address the criteria for discontinuing or restarting the SALP process for a particular facility. [redacted] Q1A How many SALP Catagory 3's did CP have during the previous period?

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The SALP process was suspended by the NRC from 1984 until 1987 because of TU Electric's massive corrective action program to address eleven specific areas of design and construction problems. It is CASE's understanding that this suspension recognized that TU Electric's performance was by definition less than Category 3.	When a SALP evaluation will be used as part of a determination of the readiness for new plant startups, a SALP evaluation should be conducted approximately one month before the expected milestone date. [0516-04.c] Unacceptable performance is addressed through NRC's enforcement policy. [0515-01]	It is not clear why the SALP process was discontinued when it was and what were the criteria for restarting. A letter was issued FEB 20, 1985 which stated that the SALP would be ommitted due to the considerable resources devoted to CP by the NRC to evaluate the utility. The letter also stated the next SALP period would be set when the present special NRC activities conclude.
2. CASE believes that under the unique situation at Comanche Peak the recent SALP should have followed the NRC's review of operational readiness by the Operational Readiness Assessment Team (ORAT). We do not understand how the Board could even perform a valid SALP without the information provided by the ORAT.	2. See #1 above.	2. The SALP period was set at 12 months as required by the MC. The extension of the period is generally for good performance. In addition, CASE seems to think the data will be lost and does not acknowledge that SALP is meant to be a continuous process and the ORAT would be captured in the next SALP which is already 4 months old.

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3. If the agency decides to use the SALP process at Comanche Peak, our evaluation indicates that a new SALP evaluation should be considered and should follow the final operational readiness inspection. CASE believes that the standard SALP process should not be used at this point but a special modified process should be developed to evaluate TU Electric's performance including the character and competence to operate a nuclear plant.	3. See #1 above.	3. The SALP period was correct in accordance with the MC and should not be revised, or redone. However, a 6-month mini-SALP could be performed prior to operation as was done at TMI. [redacted]
4. The emphasis (of SALP) should be on evaluating management performance from TU Electric's corporate management down to site level supervision to determine attitude, character, competency and operational performance skills.	4. The SALP process is used by the NRC to synthesize its observations of and insights into a licensee's performance and to identify common themes or symptoms. [0516-01]	4. The elements to be considered in evaluating each functional areas are very clear in the MC. These same areas suggested by CASE are reviewed in each area. The "emphasis", however, is to understand the reasons for the licensee's performance.

5. The composition of the board was stacked with managers who in some cases had little or nothing to do with the day-to-day site inspections. On the other hand senior resident inspectors, who were most knowledgeable and represent the inspectors, were excluded from the process in 1988 and 1989.	5. See #'s 1, 2, 3 and 4 in Enclosure (1).	5. See #'s 1, 2, 3, and 4 in Enclosure (1). This comment implies the managers can not make an objective judgement on the performance level of the utility based on the input of the inspectors, so it is difficult to address. It does not recognize that many inspectors perform inspections at the site and even the SRI does not have the detailed knowledge of the utilities performance in each area. It is the managers function to be aware of all the inspection activities and come up with an overall picture. The SALP Board composition in 1988 was smaller (8), but similar. The 1989 Board had two more RIV representatives.

6. The senior resident for construction provided a very negative input and memorandum about TU Electric performance; however, this was not reflected anywhere in the SALP process or report. In fact, according to the list of those participating in the process, the senior resident inspector was not even acknowledged as participating in the process. Also an NRC consultant who performed important inspections was dropped from the participants, while one consultant who had been on site less than a month was included.	6. See #1 in Enclosure (1).	6. The list of participants in the SALP report is typically only those personnel who attended the actual SALP Board meeting. The many individuals who provide input are not listed separately. Q6A Why was the SRI-Construction not an attendee at the SALP Board?

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7. NRC management excluded and did not consider significant performance problems during the 1988 and 1989 SALP periods. Performance concerning a breakdown in the QA program service water system was deferred for more than two years because of pending enforcement in report (50-445/88-47;50-446/88-42) in the 1988 SALP period. This issue was still not picked up and evaluated during the 1989 SALP process, because it was referred to the NRC Office of Investigations.	7. See #10 in Enclosure (1).	7. [redacted] The Service Water System problem should be discussed in one of the SALP periods if it is a significant issue providing insight into the utilities performance.
8. The AFW check valve failure and backflow incident was discussed but management action that led to enforcement issues was not discussed because of pending enforcement.	8. See #10 in Enclosure (1).	8. [redacted]

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9. The SALP process apparently went forward without considering extending the SALP period to include important program deficiencies such as discussed above. MC 0516 allows extending the SALP period from 12 to 18 months. In the face of critical performance indicators, we believe the NRC should have considered extending the period to include information crucial to evaluating performance and deciding whether or not to grant a license.	9. See #1 above.	9. The SALP period is only allowed to be extended for good performance and not weak performance. If the utility has problems as severe as presented by CASE then the period should not be more than 12 months. [redacted]

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10. The functional areas for design and construction were deemphasized by placing more emphasis on other areas where there was not real performance to evaluate. Eleven functional areas in construction that should have been independently evaluated were combined into one area and this diluted negative findings in these areas. Disciplines were not specifically addressed as required by MC 0516.	10. For reactors in the preoperational phase, functional areas for either operating phase reactors or construction phase reactors should be selected, as appropriate. [0516-062] Although not all functional areas need to be assessed in a given review, an explanation should be given in the SALP report if a functional area appropriate to a licensee is not evaluated. [0516-06]	10. The MC allows some flexibility, as needed, in selecting the functional areas to be evaluated. It is routine to deemphasize the construction areas when nearing the pre-operational phase. However, the rationale for selecting the areas in the draft report is not specified as required by the MC. [redacted] Q10[redacted] How were the functional areas for the current SALP selected?
11. MC 0516 states that the attributes and criteria listed in the appendix to MC 0516 should be relied on to develop a uniform and consistent approach. Our analysis of a sample of the draft reports showed that the approach did not rely on the specified criteria and	**11. The SALP Board members shall evaluate licensee performance in each functional area after considering the evaluation criteria with their associated attributes listed in Appendix A, Table 1. [APP B, B.3]**	11. The SALP report states that the criteria were used in the evaluation process.

attributes. 12. The general statements in the SALP draft appear to be selected from the criteria in Appendix 0516 that indicate CAT 2 performance; however, these statements were not supported by data in the same paragraph or by reference to data. Instead many such statements were only supported by examples that appear to support a CAT 3 finding. Thus many of the CAT 2 conclusions were not supported by any data indicating the equivalent performance.	12. The SALP Board members shall review and discuss the SALP report. They shall ensure that each functional area section concisely conveys the Board's views, with selected examples to illustrate key findings. They shall ensure that a conclusion has been reached regarding licensee performance within each functional area. They shall ensure that the discussion of performance within each functional area identifies common themes or symptoms of that performance if known. [APP B, B.3]	12. [redacted]
13. MC 0516 does not define the term repetitive deficiencies. Instead it is interpreted narrowly and subjectively without supporting data.	13. The word repetitive is used several times in the evaluation criteria for Enforcement History. For example: Category 3: Minor violations are repetitive and indicative of programmatic breakdown. [APP A]	13. The Board did not consider the deficiencies to be repetitive or indicative of a programmatic breakdown. Q13A What factors were weighed when considering whether the findings were not repetitive?

14. Comments and observations about TU Electric's inability to address root causes which were evident in inspectors'input in early SALP drafts but were either dropped or minimized in the SALP draft. In the case of TU Electric responses to violations in NRC reports 50-445/84-32; 50-446/84-11, and 50-445/86-08;50-446/86-06 the subjects were not addressed at all, even though meetings were held during the SALP period to discuss inadequate corrective action regarding these issues.	14. See #6 in Enclosure (1).	14. [redacted]
15. CASE's analysis showed that many of the NRC staff's other negative findings were provided in the original draft reports but were dropped from the initial SALP draft or were rewritten to minimize them.	15. See #6 in Enclosure (1).	15. [redacted]

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16. The NRC should have, but did not perform a formal trend analysis of repetitive deficiencies identified by the NRC. Instead the SALP Board made general statements that major or minor violations were not repetitive and did not indicate a program breakdown. **There is no evidence of any detailed trend analysis to determine if findings in the 1988 versus the 1989 SALP were, in fact, repetitive. Similarly, there was no trend analysis of violations and deficiencies found during the 1989 SALP period which was compared to findings of violations and deficiencies by the NRC in the CAP from the time period 1985 to the present to evaluate recurrence.**	16. Formal trend analysis is not required or mentioned by the MC.	16. [redacted]
17. **Although** no formal trending was performed, it is CASE's understanding that inspectors attempted	17. See #16 above.	17. [redacted]

to point out the repeat program weaknesses in the initial drafts, i.e.,TU Electric's QA program was still not identifying and correcting problems that are now part of their corrective action program.		
18. Several years ago SALP Boards were generally composed of fewer managers and supervisors, but had a larger number of inspectors who performed the inspections, had a personal and direct involvement with an applicant or licensee, and voted. As the Regions have become top heavy with more and more managers, the Board composition has steadily changed in the other direction where the senior resident inspector (SRI) is the only working level person on the Board.	18. See #1 in Enclosure (1).	18. The SALP Board composition over time should be reviewed and reevaluated. CASE's complaint concerns how RIV became top heavy, but in this instance NRR is much more represented on the Board than by procedure.
19. Since the SRI is classified as a supervisor, no working inspectors are usually on the board. The SALP Boards for 1988 and 1989	19. See #1 in Enclosure (1).	19. See #1 in Enclosure (1).

at Comanche Peak were selected by the Office of Special Projects. They went a step further than the rest of the agency and removed the senior resident from the board.		
20. The composition of the Board was lopsided and stacked with 5 high managers who had no day-to-day involvement with inspections versus one site manager and two site supervisors who did. The final board composition became even more lopsided.	20. See #1 in Enclosure (1).	20. CASE seems to think that there was more than one board for the SALP. [redacted]
21. Senior inspectors had no vote and would have been outvoted even if they had been allowed to vote as board members. The eleven to twelve site NRC inspectors/consultants who did the work had the least to say in the whole matter.	21. See #1 in Enclosure (1).	22. See #1 in Enclosure (1).

22. Specific areas for construction were not addressed per MC 0516; soils/foundations; containment, major structures and steel supports, piping systems/supports; mechanical components, auxiliary systems, electrical equipment/cables; and, instrumentation.	22. See #10 above.	22. See #10 above.
23. The draft SALP reports do not really address the seriousness of the program deficiencies. The exclusion of these matters appears especially suspect since the final SALP excludes the negative comments about Unit 1, but praises the corrective action taken for work on Unit 2 service water system.	23. See #6 in Enclosure (1).	23. [redacted]
24. The issue of TU Electric's response to the service water system enforcement action not being accurate and complete was not	24. See #6 in Enclosure (1).	24. [redacted]

considered in the as yet unissued NRC inspection report 50-445/89-23; 50-446/89-23. The NRC deferred the evaluation of the issue effecively forever by referring it to be investigated and considered in the next SALP.		
25. TU Electric performance in this area (AFW) was also understated in the SALP report and evaluation of enforcement activity as relates to performance in this area has deferred for another year on the basis of considering escalated enforcement.	25. See #6 in Enclosure (1).	25. [redacted]
26. The NRC policy of deferring key programmatic failures connected with enforcement or investigations that occurred during the SALP period until the next SALP is illogical and is a serious flaw in the SALP process as MC 0526 does not specifically prohibit such practices.	26. Not addressed.	26. [redacted]

27. Most of the negative findings quoted and discussed (inability to address root cause) were either dropped from the SALP final draft report or reworded to the point that the negative finding was minimized. Inexplicably, in some cases, the findings were changed to become positive program/management statements.	27. See #6 in Enclosure (1).	27. [redacted]
28. In general the SALP drafts showed a lack of data or references to data to support conclusions about large complex areas of work performed by TU Electric. Without such a collection of all of the data about each functional area, ratings became extremely arbitrary and lost much of the purpose for the SALP.	28. See #6 in Enclosure (1).	28. [redacted]

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29. Insufficient inspections were done in the functional area of maintenance/surveillance and should not have been rated.	29. See #10 above.	29. [redacted]
30. TU Electric performance is obviously, at a minimum, a Category 3 in the area of corrective action and root cause analysis by virtue of their performance in the service water system evaluation and check valve incident.	30. See #12 above.	30. [redacted]

Enclosure 1

DPV COMMENT	RELATED MC GUIDANCE	ANALYSIS AND QUESTIONS
1. Ten NRC managers made up the SALP Board.	1. A Board quorum will consist of a minimum of six persons. Generally, there should be no more than nine persons on the Board. [APP B, B.2]	1. Ten individuals were listed in the draft SALP report as SALP Board members. [redacted]
	The composition of the SALP Board is multidisciplinary in nature and is intended to result in an integrated assessment of licensee performance. [APP B, B.2]	The SALP Board composition was not as required by the MC, but a review of equivalency is required due to the unique organization of Special Projects.
	The SALP Board composition shall be as follows with each member having a vote:	
	a. SALP Board Chairperson (Regional SES-level manager);	a. Reg. SES= Grimes [redacted]
	b. Senior Resident Inspector;	b. SRI= Livermore [redacted]
	c. NRR Project Manager;	c. NRR PM= [?]
	d. NRR SES-level manager;	d. NRR SES= Mckee [Y]
	e. Regional Projects Division Director, Deputy Director, or Branch Chief;	e. Reg. DRP= Gwynn [Y]

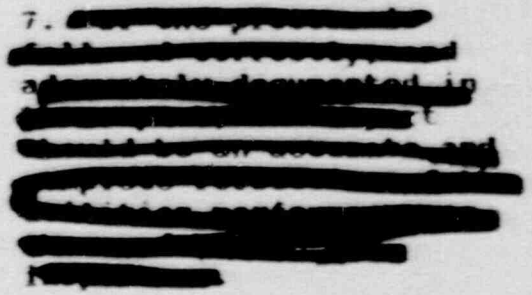
	f. Regional Specialist Division Director, Deputy Director, or Branch Chief (at least one from each Specialist Division); g. Others as designated by the Regional Administrator for any specific Board. [APP B, B.2]	f. Req. DRS= Jaudon [Y] Req. DRSS= Yandell [Y] g. Others = Lyons [redacted] = Warnick = Wiebe [redacted] = Wilson [redacted] [redacted] Q1A Who appointed the ten members to the Board? Q1B Was there a conscious decision to appoint more than the recommended nine members? Why? Q1C What procedure was used to control the process?

2. Three of the SALP Board members were Region IV managers who had no direct and significant involvement with the site.	2. See #1 above.	2. According to the MC, at least four members of the SALP Board should have been from Region IV, therefore there is less than required. [redacted] Q2A How much inspection activity was conducted by Region IV? Q2B Did the Region IV members represent a significant amount of inspection coverage?
3. Two of the SALP Board members were involved with site matters but they administered their project management and licensing duties from their White Flint Offices.	3. See #1 above.	3. It appears that the two Assistant Directors from CP Project Division do not have an equivalent in the SALP MC, except for the Specialist regional divisions which were also on the Board. However, the MC states that the RA can appoint others as necessary. Q3A Were both the CP Asst Directors and RIV Deputy

		Directors needed on the Board? Q3B Why was the NRR PM not on the SALP Board?
4. NRC Senior Resident/Resident and Consultants who were entirely knowledgeable of licensee performance had no vote on the board.	4. See #1 above. Specification of the Board's voting members is not meant in any way to limit presentations before the Board by other NRC staff members when appropriate. The staff members closely associated with a functional area should be requested to discuss their views with the SALP Board. [APP B, B.2]	4. There was no one on the Board with the title of "Senior Resident Inspector," as required by the MC. [redacted] Typically, per the MC, there is only one "inspector" on the SALP Board. [redacted] The Resident's function is to participate at the meeting and to provide insight to the Board members. Q4A What is the equivalent position of the SRI at the

		CP site and was he on the Board? Q4B Two individuals with the word "inspector" in their title were on the Board. What is their equivalent position in relationship to the MC titles?
5. All of the recommendations for below average, coming from those who knew the real performance, were outvoted by managers on the SALP Board.	5. The functional area ratings will be determined by a majority vote of the Board's voting members. [APP B, B.3]	5. The MC states that the majority vote rules, so if there was one or more recommendations for a "below average," they could certainly be outvoted. [redacted] Q5A How many Category 3 votes were cast in the different areas? Q5B Did any participants voice their disagreement with any functional area

		rating during the meeting?
6. Information and findings brought to the attention of the SALP Board were deliberately excluded.	6. The SALP Board members shall review and discuss the SALP report. They shall ensure that each functional area section concisely conveys the Board's views, with selected examples to illustrate key findings. [APP B. B.3]	6. All information and findings discussed at the Board cannot be included in the report. However, it is each inspectors responsibility when developing the SALP report to ensure the important findings and information are included in the report so the Board is aware of the significant issues. [redacted] The draft report does not list any regional inspectors as participating in the Board meeting. Q6A Did the site inspectors develop the report input?

		Q6B Did the inspectors (site and regional) actively participate in the SALP Board meeting?
7. The pending SALP report is neither an accurate nor complete reflection of TU Electrics performance during this SALP period.	7. See #6 above. The SALP Board members shall ensure that a conclusion has been reached regarding licensee performance within each functional area. [APP B, B.3]	7. [redacted]  Q7A Do the Board members consider the report an accurate and complete reflection of the utilities performance? Q7B Do the site and regional inspectors consider the report an accurate and complete reflection of the utilities performance?

8. If the information were properly considered and evaluated, it would indicate a less than satisfactory performance rating in some areas, a need for increased attention and applicant action prior to NRC approval to load fuel.	8. Voting members are expected to participate in Board discussions of each functional area in order to contribute effectively to the assessment of the licensee's performance and the identification of common themes and symptoms of that performance. As a result, SALP Board deliberations should be oriented toward reaching a consensus view when possible. [APP B, B.2]	8. [redacted] Q8A Did the Board ask the participating inspectors for input during the meeting? Q8B How much experience did the Board members have in the SALP process?
9. The SALP Board did not adequately consider the full implications of certain ASME issues identified during the reporting period by staff inspectors.	9. See #6, #7, and #8 above.	9. [redacted] Q9A Did the Board members discuss the ASME issues during the meeting? Q9B Were these issues discussed in the draft report?

10. The SALP Board did not adequately consider the inability of the applicant to recognize conditions potentially or actually adverse to quality as demonstrated by events surrounding service water system and the auxiliary feedwater system (check valves and motors).	10. See #6, #7, and #8 above.	10. [redacted] Q10A Did the Board members consider the service water and AFW system issues during the meeting? Q10B Were these issues discussed in the draft report?
11. The SALP Board did not adequately consider the inability of the applicant to identify and evaluate root causes of deficiencies and program failures necessary for effective corrective action.	11. See #6, #7, and #8 above.	11. [redacted] Q11A Did the Board consider the utilities corrective action process during the meeting? Q11B Were these issues discussed in the draft report?

than the Category 2 rating listed in the draft final version). The changes do not, however, raise safety questions but involve differences in the characterization of the applicant's performance in known areas.

A discussion of the applicant's submittals and responses to NRC requests for information regarding FSAR amendments and technical specifications (paragraph B4) was substantially rewritten. Several strongly negative comments were deleted from this subsection. Although some aspects of these deleted statements are reflected in the final report, the characterization of this subsection appears to be more positive as a result of the changes. The bases for changes are not apparent from a review of the documents. However, the language in the draft report does indicate some inconsistency in that, while the summary statements are generally positive, the discussion/examples of the activities are, generally, strongly negative. The final draft language, conversely, is consistent with generally positive summary statements and less negative comments.

In the subsection addressing assessment of the configuration control program (paragraph B8) it was noted that the applicant has "...difficulties in implementing a truly effective configuration control program [which] have resulted in repetitive minor violations." This statement is replaced in the final draft with statements that the applicant "...has implemented an effective configuration control program..." and "[o]nly a few minor discrepancies have been identified..." Additionally, the final draft added that programmatic enhancements had been made to address the problems. These changes appear to result in a more favorable assessment of the applicant's performance in this area. Although the bases for these changes are not clear from a review of the documents, it appears that the Board concluded that the "repetitive minor violations" noted in the draft version were not indicative of the overall effectiveness of the program.

A strongly negative comment regarding the procurement program was deleted in the final draft (paragraph B9). Although the statement that noted "...other procurement problems ...have resulted in the staff's impression that the applicant appeared to be meeting only minimal requirements..." was not supported with examples and may be covered to some extent by the addition, in the final draft, of noted problems in the removal of coatings in the service water systems, the bases for deleting this comment is not clear from a review of the documents. A statement indicating that corrective actions were being implemented at the end of the SALP period was added to the final draft and may represent updated information on this issue.

A number of other changes, which did not significantly change the subsection assessments, were also made. For example, changes to a discussion of the statistical aspects and the programmatic significance of violations (paragraph B5) were made. This appears to be based on additional or updated information not reflected in the draft report. There is, however, no supporting data, such as an inspection report/violation matrix, which would permit cross checking of these numbers.

It is significant to note that nearly all summary statements in the evaluation criteria subsections within this functional area remain essentially unchanged between the draft and final draft versions of the report. For example, both versions (see paragraph C6) note that the "...applicant's program for the identification and correction of non-conforming or deficient conditions was effective." Summary statements related to management involvement, prior planning and assignment of priorities, resolution of deficiencies, responsiveness to NRC issues and NRC assessment of the plant evaluation group, were also substantially unchanged. The modifications that were made to the draft SALP including; 1) additions and one deletion previously noted, 2) numerous editorial changes, and 3) deletion of two positive comments (paragraphs C3 and C4), did not result in changes to the subsection summaries and do not significantly change the characterization of this functional area in the SALP report.

4. Plant Operation

This section underwent a substantial reworking between the draft and draft final SALP reports. For the most part the changes were editorial in nature and do not appear to substantively change the assessment of the applicant's performance in this functional area.

Statistical changes were noted in the analysis of violations (paragraph D7). The lack of data, such as a matrix of inspection reports included and violations, does not allow determination of the basis for the changes. However, the statements only represent a factual tabulation of violations, therefore this change is not considered significant.

A discussion of an NRC inspection of operating procedures was rewritten (paragraph D5). Both drafts were critical of the quality of the procedures as inspected and noted that corrective actions had been initiated; however, a strongly negative statement in the draft to the effect that procedures were not at a quality level necessary for plant operation was deleted. The basis for deletion of this statement is not apparent from a review of prior drafts. However, since both versions indicated existing problems with procedures and that the applicant had initiated corrective actions, the change does not significantly impact the characterization of this issue. Additionally, the final draft did add a Board recommendation specifically aimed at correction of procedures. Initiation of corrective actions, coupled with the Board's recommendation, may have been the basis for the deletion of the comment.

A major discussion (paragraph D8) regarding the applicant's poor performance relative to several auxiliary feedwater check valve backleakage events was rewritten. Both writeups remained critical of the applicant's performance regarding this series of events. The changes are essentially editorial. However, the final draft notes a subsequent increased sensitivity to events and provides an example (not in the draft) to substantiate the comment.

Several subsections in the draft final report were added, including a positive discussion of the prestart test group's performance (paragraph D9) and a neutral discussion of the training program for operations and support personnel (paragraph D11). Several positive comments in the draft