

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
400 Chestnut Street Tower II

DOCKETED  
USNPC

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August 5, 1982

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir:

DOCKET NUMBER  
PROPOSED RULE PR-Misc. Notice  
(Systematic Assessment  
(47 FR 12240))

TVA is pleased to provide comments on the Systematic Assessment of Licensee Performance (SALP) as noticed in the March 22, 1982 Federal Register (47 FR 12240-12243).

We believe the assessment process as modified is vastly improved over the process that has existed during the past two years. The evaluation criteria outlined in table 1 provides the licensee with a more precise understanding of what is expected of the utility in each of the areas of evaluation. Although one can always differ with the individual evaluation criteria, if these are the criteria NRC is using or intends to use, then it is beneficial for the reviewer as well as the licensee being reviewed to understand how the ratings are being determined.

We believe by providing the report to the licensee before a meeting will allow for more meaningful feedback from the utility during the meeting with NRC. It is presumed that if the licensee has valid comments regarding the findings NRC has in the report, that the final report will reflect these comments and ratings will be adjusted. This would provide greater assurance that the licensee's performance is evaluated in a fair manner.

The process appears to deemphasize the importance of individual findings during the previous year as well as the severity level of these findings. With the present system, a licensee could have a poor rating due to one isolated event with a severity level of III. The poor rating could have resulted in spite of the licensee having its overall programs evaluated as Category I. The new system would provide the licensee with a better understanding of where improvement is required both by functional area and in the seven areas of criteria evaluation.

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PDR PR  
MISC 47FR12240 PDR

add: James Taylor  
EW-S 360

Acknowledged by card. 8/11/82 emp

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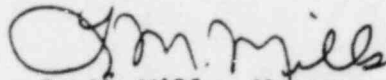
Secretary of the Commission

August 5, 1982

We appreciate the opportunity to comment and enclosed are our specific comments.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
L. M. Mills, Manager  
Nuclear Licensing

Enclosure

cc (Enclosure):

Executive Secretary  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Mr. Tom Tipton  
AIF, Inc.  
7101 Wisconsin Avenue  
Washington, DC 20555

## ENCLOSURE

### General

We would support further improvements in the assessment process to lessen the influence of individual interpretation in the assignment of categories.

We are concerned that some of the criteria for the assignment of a plant to categories are too subjective.

### Section B, Procedure

1. We believe that there should be some criteria concerning the membership of the SALP board.
2. We believe the statement ". . . provides a report of its efforts to the licensee at least one week before meeting with the licensee" does not allow enough time to properly prepare for the meeting. We suggest this should be at least two weeks.

### Section F, Evaluation Criteria

1. We believe evaluation criteria should include "Licensee Initiative: Innovative Programs." This would allow licensee performance that was above standard in new approaches to problems to be recognized.