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FROM: Dick Clark, Project Manager
Operating REactors Branch #2
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SUBJECT: DRAFT NRR SALP INPUT - BROWNS FERRY NUCLEAR PLANT

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Enclosed is the draft NRR input for Browns Ferry's upcoming SALP evaluation
for CY 1982. The evaluation is based on PM experience with the licensee,
Tennessee Valley Authority (TVA), and on input solicited from selected staff
who had substantial involvement with TVA licensing actions. Individuals in
seven branches in four NRR divisions were contracted. The individual ratings
of the PMs and reviewers are tabulated in the enclosed evaluation matrix.

Please review the draft evaluation and provide any comments you feel appro-
priate. All comments received by February 15, 1983 will be considered in
the final report.

ORIGINAL SIGNED BY

Dick Clark, Project Manager
Operating Reactors Branch #2
Division of Licensing

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Enclosures:
1. Draft Evaluation
2. Evaluation Matrix

	cc w/enclosures:				DL:ORB#2	DL:ORB#2	DL:OR
OFFICE▶	T. Chan	G. Johnson	W. Koo		D.Clark	D.Vassallo	G/Lainas
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	E. Clemenson	G. Thomas					

Facility: Browns Ferry Nuclear Plant (BFNP)

Licensee: Tennessee Valley Authority (TVA)

Evaluation Period: January, 1982 - December, 1982

Project Manager: Dick Clark

I. Introduction

This report contains NRR's input to the SALP review for the BFNP.
The assessment of the licensee's performance was conducted according
to DL Operating Procedure 226, Revision 1, NRR Participation in Regional
Evaluation of SALP, dated February 18, 1982. This procedure incorporates
NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance.

II. Summary

NRC Manual Chapter 0516 specifies that each functional area evaluated
will be assigned a performance category (Category 1, 2 or 3) based on a
composite of a number of attributes. The single final rating of the
licensee is to be tempered with judgement as to the significance of the
individual elements. Based on this approach, the performance of the
Tennessee Valley Authority in the functional area of Licensing Activities
is rated Category 2.

III. Criteria

The evaluation criteria used in this assessment are given in NRC Manual
Chapter 0516 Appendix, Table 1, Evaluation Criteria with Attributes for
Assessment of Licensee Performance.

IV. <u>Methodology</u>

The basic approach used in the evaluation was for the PM to first
select a number of licensing activities which involved a significant
amount of staff effort. Each licensing activity selected was a
generic issue for which the technical reviewer would be able to
evaluate the performance of TVA vs the performance of many other
licensees. Comments were then solicited from individual reviewers;
staff members from seven branches in four NRR divisions participated.
Each individual also applied the evaluation criteria contained in NRC
Manual Chapter 0516 to the various performance attributes to be evaluated
and assigned a rating category based on his experience with the licensee.
Finally, this information was assembled by the PM in a matrix (enclosed)
presenting an overall evaluation of the licensee's performance. The
PM also generated a narrative assessment for each performance attribute
based on comments received.

The assessment of licensee performance was based on an evaluation on
the following licensing activities:

-- Project Management Administration

-- Response to NUREG 0737 Items

-- Appendix R

-- Environmental Qualification

-- RPS Power Supplies

-- Operator Licensing

-- Control of Heavy Loads

-- Response to NUREG-0313, Rev. 1

-- Adequacy of Dist. Voltages

-- Radiological Effluent TS

-- Single Loop Operation

V. Assessment of Performance Attributes

The licensee's performance evaluation is based on a consideration
of the seven attributes given in NRC Manual Chapter 0516. They are:

-- Management Involvement and Control in Assuring Quality

-- Approach to Resolution of Technical Issues

-- Responsiveness to NRC initiatives

-- Reportable Events

-- Enforcement History

-- Staffing

-- Training

For most of the licensing actions considered, only the first three
attributes were of significance and the composite ratings are heavily
weighted by them. The attributes of Reportable Events, Staffing, and
Training were judged to apply only to a few licensing activities. There
was no basis for an NRR evaluation of Enforcement History. An assessment
of each performance attribute based on the evaluation matrix and reviewer
comments is given below.

A. Management Involvement and Control in Assuring Quality

Overall rating for this attribute is Category 1/2.

Individual evaluations ranged from Category 1 to 3 depending on
the licensing activity. There is evidence of planning and assign-
ment of priorities and decision making seems to be at a level that
ensures management review. In general, the rating is consistent
when examined at the license activity levels listed above. Typical

areas where management involvement was evident are in meeting the requirements of Appendix R, inservice inspection, and the electrical modifications required to insure adequate inplant voltages. This level of performance is consistent with that noted in the last SALP.

B. Approach to Resolution of Technical Issues

Overall rating for this attribute is Category 2.

Individual evaluations were almost entirely Category 2. TVA's responses to generic issues were generally timely, viable and technically sound. Technical understanding of the issues was consistently demonstrated. TVA generally proposed technically acceptable resolutions; however, the proposed implementation schedules frequently extended well beyond the dates proposed by the NRC staff. This level of performance is consistent with that noted in the last SALP.

C. Responsiveness

Overall rating for this attrubute is Category 2.

Individual evaluations were preponderently Category 2. When there were delays, the licensee always informed the PM of the anticipated delay, and provided the information on a best effort basis. This rating would likely have been Category 1 were there not the often extended time between reaching a technically acceptable resolution and implementing associated plant modifications. At this time, there are few long standing regulatory issues attributed to the licensee. This level of performance is consistent with that rated in the last SALP.

D. Enforcement

No basis exists for an NRR evaluation of this attribute.

E. Reportable Events

Overall rating for this attribute is Category 2.

Events are generally reported in a timely manner, reasonably identifying causes and corrective actions. Followup reports are generally provided when appropriate.

Staffing

An overall rating for this attribute is Category 1 with respect to licensing activities. The adequate and well trained licensing, engineering and technical support staff is a key element in the licensee's performance.

Training

Overall rating for this attribute is Category 1.

Operator license examinations were conducted by OLB staff at Browns Ferry Nuclear Station from January 1982 to December 31, 1982. This process included simulator and plant oral exams.

Examinations were given to 20 candidates. Of these candidates, 17 persons passed. RO licenses were issued to 12 persons and SRO licenses were issued to 5 persons. These results fall under category 1 of criteria 7, training.

VI. Conclusions

An overall performance rating of Category 2 has been assigned. However, a substantial number of Category 1 and 3 ratings were assigned by individual reviewers. Strong management involvement and a relatively large and well trained staff appear to be key elements in the high level of performance of this licensee.

BROWNS FERRY - EVALUATION MATRIX

Licensing Activity	Management Involvement	Tech. Approach	Responsive	Enforcement	Reportable Events	Staffing	Training	Reviewer
PM Admin	1	2	1	NB-No Basis	2	1	2	Clark
0737 Items	1	2	2/3	NB	NB	NB	NB	Clark Chan
App. R	2	2	2	NB	NB	NB	NB	Chan
EQ	1	2	2	NB	NB	NB	NB	Shemanski
RPS	3	3	3	NB	NB	NB	NB	VanVliet
Operator Licensing	NB	NB	NB	NB	NB	NB	1	Keller
Heavy Loads	3	3	2	NB	NB	NB	NB	Clemenson
ISI	1	1	1	NB	NB	NB	NB	Johnson
Adequacy of Distrib. Voltages	NB	2	2	NB	NB	NB	NB	Prevatte
RETS	2	2	3	NB	NB	1	1	Willis
Single Loop	2	2	2	NB	2	NB	NB	Thomas
NURES 0313	1	1/2	1/2	NB	NB	NB	1	Koo