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RULES REVIEW & DIR. BR.
USNRC

August 29, 1995
LIC-95-0165

Chief
U. S. Nuclear Regulatory Commission
Attention: Rules Review and Directives Branch
Washington, DC 20555

- References: 1. Docket No. 50-285
2. Federal Register, Vol. 60, No. 147, August 1, 1995, Request for Public Comment on the Revised Systematic Assessment of Licensee Performance (SALP)

Dear Sir:

SUBJECT: Comments on Revised Systematic Assessment of Licensee Performance

This letter provides comments from Omaha Public Power District (OPPD) on the revised Systematic Assessment of Licensee Performance (SALP) of Reference 2.

OPPD has found the SALP program as revised to be improved and significantly more performance based. Any significant performance issues are addressed while licensee achievements and strengths are noted. The new shorter SALP reports allow for improved management focus and for better NRC and licensee communication. Current licensee performance is emphasized in the new reports which is appropriate.

Licensee self-assessment efforts are recognized in the report. Feedback from licensees to the NRC should be encouraged so that all appropriate utility initiatives are considered during the SALP process. There has been some reluctance in the past for the NRC to meet with the licensee during the SALP period to discuss the licensee's own self-assessment effort. The apparent reason is that the NRC does not want to be perceived as being unduly influenced by the licensee especially if such input is provided near the end of the current SALP period. Licensees feel especially obligated to share self-assessment results during the last six months of the SALP period since the NRC is primarily focused on this period in the SALP program reviews. Performance discussions with licensees should be held whenever requested by either party.

A new NRC inspection process, the Integrated Performance Assessment Process (IPAP), has been developed which is parallel to, and somewhat redundant with

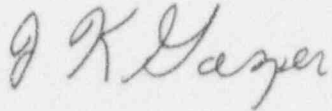
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the revised SALP process. This process was formerly called the Customized Inspection Planning Process (CIPP), and will occur at a facility once every four years. The IPAP's main purpose is to perform an integrated assessment of facility performance over the last 12 to 14 months over a wide range of information sources in the functional areas as defined by the SALP process. The IPAP is seen as a potential enhancement to the present SALP process.

Please contact me if you have any questions.

Sincerely,



W. G. Gates *for*
Vice President

GMC/gmc

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