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RULES REVIEW DIR. BR. USNRC

DS09
R. Borchardt

August 30, 1995
NMP1L 0972

U. S. Nuclear Regulatory Commission
Chief, Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
Office of Administration
Mail Stop T-6D-59
Washington, DC 20555

RE:	Nine Mile Point Unit 1	Nine Mile Point Unit 2
	Docket No. 50-220	Docket No. 50-410
	<u>DPR-63</u>	<u>NPF-69</u>

Subject: *Response to Request for Public Comments on the Revised NRC Systematic Assessment of Licensee Performance (SALP) Program*

Gentlemen:

Niagara Mohawk is pleased to have the opportunity to submit the attached comments in response to the NRC's request for public comment on the revised Systematic Assessment of Licensee Performance (SALP) Program. In accordance with the instructions in the Federal Register notice we have provided a general comment on the program, and some specific comments referenced to the questions identified in the request.

Should you have any questions regarding these comments, please contact Ms. Denise Wolniak, Manager - Licensing, at (315) 349-4246.

Very truly yours,

R. B. Abbott
Vice President - Generation

RBA/AFZ/lmc
Attachment

xc: Regional Administrator, Region I
Mr. L. B. Marsh, Director, Project Directorate I-1, NRR
Mr. G. E. Edison, Senior Project Manager, NRR
Mr. B. S. Norris, Senior Resident Inspector
Records Management

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ATTACHMENT

Niagara Mohawk Comments on Revised SALP Program

General Comment:

Niagara Mohawk believes that the current SALP program is very good, and provides us with valuable insight and feedback on our regulated activities. Niagara Mohawk also supports the rating system of the current SALP process.

Specific Comments:

Response to -

Comment

- | | |
|-------------|--|
| A.1.- | Yes |
| A.2.- | Yes |
| A.3.- | We recommend that the SALP report contain a separate section to discuss general comments and observations regarding performance. This section could address issues or topics that are not confined to one particular functional area. For example, "housekeeping" is currently included in the Plant Support functional area, but it is more the result of performance in all functional areas. Another example is the "Quality of Assessment," which used to be a separate category in the previous SALP system. While the new program indicates that this characteristic is evaluated in all Functional Categories, the discussion of this important characteristic does not seem to receive the attention it deserves, if appropriate, for a particular organization or report. |
| B.1 to B.4- | No changes noted |
| B.5- | There could be more emphasis on the explanation and meaning of the numerical scores, particularly in any information released to the general public. |
| C.1- | Current approach is appropriate. |
| C.2- | Variation in SALP period length is appropriate. |
| C.3- | Good plants=24 months; average plants=18 months; poor plants=12 months |
| D.1- | Not always |
| D.2- | No; see comment D.3. |
| D.3- | No; there seems to be a tendency to offset any positive comment with a negative comment. There should be a better correlation between the numerical score and the balance between positive and negative comments. Category 1 scores should have mostly positive comments, Category 2 should have about an even balance, and Category 3 should be mostly negative comments. |
| D.4- | Not always |
| D.5- | Yes |
| D.6- | Usually, with some expectations |
| D.7- | Yes |
| D.8- | No; see comment A.3. |
| D.9- | We would like to see more recognition of the role and input provided by the Resident Inspectors. These are the individuals on the scene and should have the best insight into the activities and performance of the licensees. |