

DS09

R. Borchardt

ROBERT E. DENTON  
Vice President  
Nuclear Energy

RECEIVED  
1995 SEP -6 PM 2:05  
RULES REVIEW & DIRECTIVES  
USNRC

60FR 39193

8/11/95

18

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, Maryland 20657  
410 586-2200 Ext. 4455 Local  
410 260-4455 Baltimore



August 31, 1995

Division of Freedom of Information and Publication Services  
Office of Administration  
US Nuclear Regulatory Commission,  
Washington, DC 20555

ATTENTION: Chief, Rules Review and Directives Branch

SUBJECT: Comments on Revised NRC Systematic Assessment of Licensee Performance Program (60 FR 39139)

The Baltimore Gas and Electric Company appreciates the opportunity to provide comments on the changes made to the Systematic Assessment of Licensee Performance (SALP) program on May 19, 1993. Our responses to the questions listed in the Federal Register are in the Attachment. In general, we believe the NRC can conclude that the revisions to the SALP program have had either positive, or at a minimum, no detrimental impact. For example, the revisions have generally been effective in more correctly focusing the SALP reports on significant performance issues. However, since our SALP reports have generally attracted little public attention, we cannot conclude that the revisions have given the public a better understanding of our SALP results.

Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

RED/JMO/dlm

Attachment: As Stated

- cc: D. A. Brune, Esquire
- J. E. Silberg, Esquire
- L. B. Marsh, NRC
- D. G. McDonald, Jr., NRC
- T. T. Martin, NRC
- P. R. Wilson, NRC
- R. I. McLean, DNR
- J. H. Walter, PSC

9509070071 950831  
PDR ADOCK 05000317  
Q PDR

1/0

## ATTACHMENT

### BALTIMORE GAS AND ELECTRIC COMPANY'S SPECIFIC COMMENTS ON THE REVISED NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE PROGRAM

---

#### A. FUNCTIONAL AREAS

1. Are the current four functional areas (operations, maintenance, engineering, and plant support) an improvement compared to the previous seven functional areas?

*Response:* The new areas are more representative of equal levels of importance and thus improve the validity of the overall numerical average as an indicator of plant performance.

2. Are the plant support functional area messages clear in characterizing individual elements (radiological controls, emergency preparedness, security, fire protection, chemistry, and housekeeping)?

*Response:* These messages are adequately clear. We do not know whether internal policies exist to ensure that a heavily documented adverse record in one element of Plant Support would not unduly influence the overall grade, but we have no experience showing that to be a problem. It would be useful to know how the various elements included under the plant support functional area are weighted.

3. Are additional improvements needed for the designation of functional areas? What types of improvements?

*Response:* None suggested.

#### B. MANAGEMENT INVOLVEMENT

1. Did increased NRC management involvement in the Systematic Assessment of Licensee Performance (SALP) program result in program improvements and improved communication with licensee management?

*Response:* No. There was already a high degree of management involvement regarding evaluation of our facility. The addition of senior SALP Board members and their visits to the site did not appreciably improve the quality of information integration. We do see potential for the combination of the new, shorter SALP report and the increased NRC management involvement to focus the SALP program on the "bigger picture" issues. While we believe it is productive to have senior NRC management onsite for the SALP meeting, the revised process did not notably affect the communication between our staff and the Regional directorates. Those that had strong communications before remained strong. Those with weaker ties may have been aided marginally, but they still need strengthening.

## ATTACHMENT

### BALTIMORE GAS AND ELECTRIC COMPANY'S SPECIFIC COMMENTS ON THE REVISED NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE PROGRAM

---

2. Did the SALP program changes result in better licensee and public understanding of the SALP results?

*Response:* No. As a licensee, we were already able to understand the NRC's conclusions. There has been little public attention. It is not clear to us that the process change would significantly affect their understanding even if they became more active in monitoring the communications.

3. Did increased involvement of the regional administrator or deputy at the SALP meeting result in improved communication with licensee management?

*Response:* We saw no effect. The Regional Administrator or his deputy had already been active in our SALP communications.

4. Was the change in SALP presentation meeting format — from a presentation to more of a discussion — effective in improving communication with licensee management?

*Response:* Our SALP presentations already offered substantial opportunity for discussion, so the changes were not significant.

5. Are additional improvements needed in the areas of communications with licensee management and licensee and public understanding of SALP results? What types of improvements?

*Response:* We have no suggestions at this time.

#### C. ASSESSMENT PERIOD

1. What bases should be considered when determining SALP period length and how should they be applied?

*Response:* This should be left to the subjective discretion of the Regional administration without attaching too much significance to the interval. If either the plant's performance or the quality of the communications interface with Region lead to a desire to shorten or extend the nominal interval, then that should be the Regional administration's prerogative. Interval determination need not be overly codified.

2. SALP assessments currently range from 12 to 24 months (nominally 18-month average). Is this variation in practice appropriate?

*Response:* Yes

## ATTACHMENT

### BALTIMORE GAS AND ELECTRIC COMPANY'S SPECIFIC COMMENTS ON THE REVISED NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE PROGRAM

---

3. How long should the SALP assessment period be for good, average, and poor performing plants?

*Response:* Current intervals are adequate. SALP periods for plants on the Watch List should be coordinated with the Senior Management Meetings (even if SALP remains at a 12-month interval) so that the agency can avoid inconsistent messages.

#### D. SALP REPORT

1. Are the new, shorter SALP reports more effective in communicating the results of the NRC's assessment of safety performance than the previous, more lengthy reports?

*Response:* The shorter, more concise SALP reports enhance communication flow.

2. Are SALP reports appropriately focused on safety issues and do they deliver a clear message?

*Response:* Yes. However, we suggest that trends should be clearly discussed in the functional area write-ups regardless of how significant the trends are. As currently written, NRC Handbook 8.6 states that it is appropriate to discuss trends in the functional area write-up only when they are significant. We believe it is always appropriate and helpful to the licensee and the public to discuss trends.

3. Do SALP reports provide a balanced assessment of licensee safety performance (and are positive aspects of licensee safety performance appropriately considered)?

*Response:* Yes. It is clear that there is an effort to include positive aspects of licensee performance, but it is a fact of life that regulators always spend the bulk of their time in problem areas. The proportion of positive to negative comments reflects that.

4. Do SALP reports consistently focus on the last six months of performance? Is this practice appropriate?

*Response:* In general, this emphasis has been evident. We would characterize this as the most positive and meaningful difference between the old and new processes. In our last SALP report, the NRC took exception to this practice in the ALARA area.

5. Is the level of detail in the SALP report appropriate?

*Response:* Yes.

## ATTACHMENT

### BALTIMORE GAS AND ELECTRIC COMPANY'S SPECIFIC COMMENTS ON THE REVISED NRC SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE PROGRAM

---

6. Are SALP report conclusions well-supported by documented facts?

*Response:* Generally, yes. One exception is currently under discussion in our pending report.

7. Are SALP report cover letter messages consistent with the associated SALP report messages?

*Response:* Yes

8. Are licensee self-assessment efforts adequately recognized in the SALP report and cover letter?

*Response:* Yes

9. Are additional improvements needed in the SALP reports? What types of improvements?

*Response:* We believe that the Senior Resident Inspector should be a member of the SALP Board. The Senior Resident's interpretation of the context of the documented evidence being reviewed by the Board is a key factor in its conclusions. It is appropriate to recognize that importance and to make the Senior Resident Inspector accountable for that input by formal membership on the Board.

#### E. ADDITIONAL COMMENTS

In addition to the above issues, commenters are invited to provide any other views on the NRC SALP program that could assist the NRC in improving its effectiveness.

*Response:* We believe that there are some issues where public attendance may have a chilling affect on the openness of discussion. We agree that NRC Handbook 8.6 should contain language that allows portions of the SALP meeting to be closed when proprietary, safeguards, personnel or other sensitive information will be discussed.