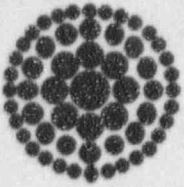


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R. Borchardt

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RULES REVIEW & DIR. BR.
USNRC

Florida Power

CORPORATION
Crystal River Unit 3
Docket No. 90-302

August 31, 1995
NL95-0079

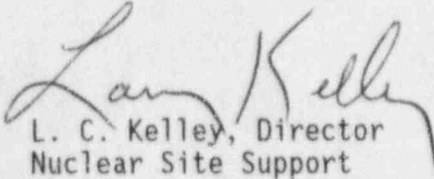
U. S. Nuclear Regulatory Commission
Attention: David Meyers, Chief, Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
Office of Administration, Mail Stop T-6D-59.
Washington, D. C. 20555

Subject: Review of Revised NRC Systematic Assessment of Licensee
Performance (SALP) Program

Dear Sir:

The Federal Register, Vol. 60, No. 147 dated August 1, 1995, requested comments from the regulated industry concerning the revised NRC Systematic Assessment of Licensee Performance (SALP) Program and its implementation. Florida Power Corporation provides the attached as our comments.

Sincerely,


L. C. Kelley, Director
Nuclear Site Support

LCK/RLM:ff

Attachment

A. Functional Areas

QUESTION:	COMMENT
1) Are the current four functional areas (operations, maintenance, engineering, and plant support) an improvement compared to the previous seven functional areas?	Somewhat. It does provide a more even weighing. Previously, less safety significant areas received a separate, equivalent rating. However, it has become too generalized for use by the licensee.
2) Are the plant support functional area messages clear in characterizing individual elements (radiological controls, emergency preparedness, security, fire protection, chemistry housekeeping)?	Generally, yes. However, concerns in some areas are inappropriately lumped together.
3) Are additional improvements needed for the designation of functional areas? What types of improvements?	No comment.

B. Management Involvement

QUESTION:	COMMENT
1) Did increased NRC management involvement in the SALP program result in program improvements and improved communication with licensee management?	No. The report still seems very subjective. Feedback during the public meeting to present the SALP seems to be missing. Too often board members only come to the site once right before the end of the SALP period. This is inadequate to gain a full perspective of performance.
2) Did the SALP program changes result in better licensee and public understanding of the SALP results?	No. The report still seems very subjective and based on little <u>first hand</u> knowledge of the SALP board members. The site visits by the board members seem to always occur just prior to the end of the period and seem to gather information only to support pre-conceived conclusions. The shorter report made for easier correlation between rating and written examples; however, the report does not reflect the significant volume of information that really supported the rating. The public only sees what is in the report and only looks at the average scores. Note comment in Section E on numerical scores.

<p>3) Did increased involvement of the regional administrator or deputy at the SALP meeting result in improved communication with licensee management?</p>	<p>There seems to be relatively small improvement. This is not meant to criticize the administrator or his deputy. The presentations are just not that different.</p>
<p>4) Was the change in SALP presentation meeting format from a presentation to more of a discussion effective in improving communication with licensee management?</p>	<p>Although it has the appearance of a two way discussion, listening and unbiased consideration of what the other party is saying still appears one way. As long as the meeting is a public meeting full, candid discussion will be inhibited.</p>
<p>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?</p>	<p>More feedback between SALPs is needed, <u>but</u> this must be based on first hand knowledge by periodic visits by NRC management at higher levels.</p> <p>There also needs to be more routine continuing communication throughout the SALP period.</p>

C. Assessment Period

QUESTION:	COMMENT
<p>1) What bases should be considered when determining SALP period length and how should they be applied?</p>	<p>With good communication SALP is really a formality; therefore the period really doesn't need to vary. Issuing SALP on 2 year basis for everyone would seem appropriate.</p>
<p>2) SALP assessments currently range from 12 to 24 months (nominally 18 month average). Is this variation in practice a appropriate?</p>	<p>No. Some of the most notable falls in performance (although rare) would be those at the top that became complacent and which went unnoticed for too long. Also, Wall Street ratings put unwarranted merit on these differences.</p>
<p>3) How long should the SALP assessment period be for good, average, and poor performing plants?</p>	<p>SALP periods should be the same - 24 months with 3 to 6 month interim updates between NRC and plant management.</p>

D. Salp Report

QUESTION:	COMMENT
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?	No. The structure of INPO reports is a better format. This lists criteria for performance measurements first then follows with strengths and areas for improvements.
2) Are SALP reports appropriately focused on safety issues and do they deliver a clear message?	Not always. The reports sometimes focus a significant amount of attention on non-safety significant issues and cross into utility management practices / personalities. The reports are based primarily on a review of correspondence between the NRC and licensees, which is by nature primarily dealing with negative aspects of operation.
3) Do SALP reports provide a balanced assessment of licensee performance (and are positive aspects of licensee safety performance appropriately considered)?	No. By their nature, SALP reports accentuate the negative in the majority of cases often using adjectives to embellish the descriptions drawn from subjective conclusions rather than just presenting the factual evidence or events.
4) Do SALP reports consistently focus on the last six months of performance? Is this practice appropriate?	There are notable exceptions indicating the reports do not focus on the last six months. Bias from even years before tend to influence judgements especially in those who do not visit the sites. Yes, it is appropriate.
5) Is the level of detail in the SALP report appropriate?	Yes, but only if you are familiar with the underlying basis. The report needs more information on how the board views related events, e.g. trend or unique.
6) Are SALP report conclusions well supported by documented facts?	Generally yes, but factual support for SALP report conclusions is inconsistent. There is so much data available, any conclusion could be supported depending on which data was chosen to be documented.
7) Are SALP report cover letter messages consistent with the associated SALP report messages?	Cover letter messages are usually consistent but are often incomplete or represent a partial view.

8) Are licensee self-assessment efforts adequately recognized in the SALP report and cover letter?	The level of NRC recognition of self-assessments is disappointing, especially in team inspections. Further, it seems the NRC still penalizes self-identified findings which tends to discourage the continued use of extensive self-assessments.
9) Are additional improvements needed in the SALP reports? What types of improvements?	See response to D.1. above. INPO specifies the criteria first and then assures their comment supports a measure of how the criteria was met or not met based on factual observation.

E. Other Comments

The use of numerical scores has proven to be punitive particularly from an economic perspective. Because of this, the tendency is to focus on the rating instead of the substance of the report. It seems a process without scores that evaluates and assesses areas as doing well or needing improvement would be a more effective approach.