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Chief, Rules Review and Directives Branch  
Division of Freedom of Information and Publication Services  
Office of Administration  
Mail Stop T-6D-59  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Duane Arnold Energy Center (DAEC)  
Docket No: 50-331  
Op. License No: DPR-49  
Request for Public Comment on SALP Process  
References: Federal Register Notice Vol. 60, No. 147.  
File: A-100

Dear Sir:

The following comments are provided by IES Utilities Inc. in response to the request for comments on the NRC Systematic Assessment of Licensee Performance (SALP) per the referenced Federal Register Notice.

**A1. Are the current four functional areas (operations, maintenance, engineering, and plant support) an improvement compared to the previous seven functional areas?**

Yes. The four functional areas are an improvement over the previous seven functional areas in that they provide a better focus on plant performance and operation. Additionally, the recent focus of routine Resident Inspection Reports on the same four functional areas provides more consistency between the normal inspection and SALP processes. However, assigning individual ratings for the functional areas can also have adverse consequences in that it encourages development of "functional silos" in which each individual department emphasizes its performance rather than the performance of the plant as a whole. The NRC staff should evaluate the benefits of an integrated plant rating.

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- A2. Are the plant support functional areas messages clear in characterizing individual elements (radiological controls, emergency preparedness, security, fire protection, chemistry, and housekeeping)?**

The most recent SALP report for the DAEC clearly characterized the individual elements of the Plant Support area.

- A3. Are additional improvements needed for the designation of functional areas? What types of improvements?**

See A1 above.

- B1. Did increased NRC management involvement in the SALP program result in program improvements and improved communication with licensee management?**

IES Utilities already has clear and open communications with NRC personnel at all levels. The SALP cycle visit to the plant by the senior NRC Regional Management is worthwhile in that it permits senior NRC personnel to personally assess the plant and the people, and communicate expectations to all levels of the utility management.

- B2. Did the SALP program changes result in better licensee and public understanding of the SALP results?**

I believe that the utilities understood the SALP results both before and after program changes; so changes did not enhance utility understanding.

The public does not understand SALP results. What they understand is the image that is created in their minds by listening to the tone of the SALP dialogue if they attend the meeting. Otherwise, they believe what they read in the newspapers. Most journalists listen for particular "sound bites" uttered by utility or NRC management, either during or after the meeting. Program changes have little or no affect on public understanding.

- B3. Did increased involvement of the regional administrator or deputy at the SALP meeting result in improved communication with licensee management?**

The SALP meeting is a formal meeting in a public setting. The quality of the communications are established more by the setting than by the degree of participation by any single individual.

- B4. Was the change in SALP presentation meeting format - from a presentation to more of a discussion - effective in improving communication with licensee management?**

Open and effective communications between a utility and the NRC are the result of long term efforts to develop an effective working relationship. The discussions at the SALP meeting are more formal and are based on an already issued and approved SALP report and therefore, do not substantially add to improving communications with licensee management.

**B5. Are additional improvements needed in the areas of communications with licensee management and licensee and public understanding of SALP results? What types of improvements?**

Yes. NRC routine and functional area inspection results are previewed before finalization through exit meetings which provide the opportunity for frank and open discussions of results and findings. Exit meetings clarify many issues. The SALP process could provide a similar mechanism for utility feedback on assessment results prior to issuance of the final report.

**C1-3. No Comments**

**D1. 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?**

Yes. The new SALP report format and level of detail are effective in communicating the results of the NRC's assessment but the link between identified weaknesses or concerns and safety performance needs to be better communicated. Additionally, issues of minor safety significance (as documented in previous inspection reports) are still included.

**D2. Are SALP reports appropriately focused on safety issues and do they deliver a clear message?**

See D1 above.

**D3. Do SALP reports provide a balanced assessment of licensee safety performance (and are positive aspects of licensee safety performance appropriately considered)?**

The most recent DAEC SALP report significantly improved in this area in that it provided a balanced view of DAEC performance by including examples of positive performance as well as areas in need of improvement. Traditionally, SALP reports have concentrated on the negative aspects of performance.

**D4. Do SALP reports consistently focus on the last six months of performance? Is this practice appropriate?**

Yes. The most recent DAEC SALP report focused on the last six months. Focusing SALP reports on the last six months of performance has both positive and negative aspect. The last six months reflect a licensee's recent performance trend and as such, ensures the SALP report emphasizes current performance. However, individual events (violations, equipment problems, etc.) that occur in this time period can have a disproportionately large effect on the SALP report which is not consistent with overall performance of the plant during an 18 month period. Additionally, an emphasis on the last six months often results in the scheduling of numerous inspections during this period which can put a large resource burden on utilities to support the inspections.

**D5. Is the level of detail in the SALP report appropriate?**

See D1 above.

**D6. Are SALP report conclusions well-supported by documented facts?**

While shorter SALP reports contain less supporting information than the previous SALP format, most of the observations and conclusions are well supported or documented in more detail in routine Resident and Functional Area Inspection Reports. On rare occasions, a report conclusion may be less than well supported.

**D7. Are SALP report cover letter messages consistent with the associated SALP reports messages?**

The SALP report cover letter message is usually consistent with the body of the SALP report. However, generalizations in the cover letter are sometimes not well supported in the body of the report.

**D8. Are licensee self-assessment efforts adequately recognized in the SALP report and cover letter?**

DAEC self assessment efforts were appropriately recognized in the most recent SALP report.

**D9. Are additional improvements needed in the SALP reports? What types of improvements?**

The relationship between the SALP process and the recently implemented Integrated Performance Assessment Process (IPAP) is unclear. The processes seem duplicative. The purpose and format of the SALP process should be re-evaluated as the IPAP is implemented.

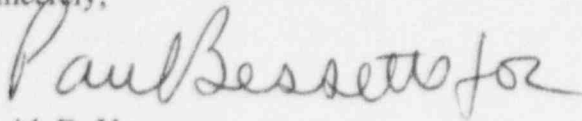
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Please contact this office at (319) 851-7307, if you have any questions on the above.

Sincerely,



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Manager, Nuclear Licensing

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