

Docket Nos. 50-445
50-446
License No. NPF-87
Construction Permit No. CPPR-127

MAY - 6 1992

TU Electric
ATTN: W. J. Cahill, Jr., Group Vice President
Nuclear Engineering and Operations
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: FINAL SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT
NO. 50-445/92-99; 50-446/92-99

This forwards the final report of the Systematic Assessment of Licensee Performance (SALP) for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2, for the period of February 3, 1991, through February 1, 1992. This final SALP report includes:

1. The initial SALP report transmittal letter (no revisions required to the initial SALP report issued on April 3, 1992).
2. A summary and list of attendees at our April 21, 1992, meeting at the Nuclear Operations Support Facility, CPSES site.
3. Your April 29, 1992, response to the initial SALP report.

The next SALP period for CPSES is scheduled to last 12 months, from February 2, 1992, through February 6, 1993.

Sincerely,

ORIGINAL SIGNED BY
J.M. MONTGOMERY

Robert D. Martin
Regional Administrator

Enclosures:

1. Initial SALP report transmittal letter
2. Meeting summary and attendance list
3. TU Electric response to the initial SALP report

cc: (see next page)

RIV:SRI WDJohnson:df 5/4/92	SRI Deaves 5/4/92	C:DRP/B LAYandett 5/1/92	NRR MFelds 5/4/92	DRP TABack 5/4/92	DD:DRP SBack 5/4/92	DD:DRP WLForney 5/1/92
DD:DRS DDChamberlain 5/5/92	DD:DRSS PJaudon 5/4/92	DD:DRP TPGwynn 5/5/92	DD:DRP ABBeach 5/5/92	DD:DRP JMontgomery 5/6/92	DD:DRP RDMartin 5/6/92	

9205130122 920506
PDR ADOCK 05000445
Q PDR

IF40

TU Electric

-2-

cc w/enclosures:

TU Electric

ATTN: Roger O. Walker, Manager
Nuclear Licensing

Skyway Tower

400 North Olive Street, L.B. 81
Dallas, Texas 75201

Juanita Ellis

President - CASE

1426 South Polk Street
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1850 Parkway Place

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Bethesda Licensing

3 Metro Center, Suite 610

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Cooperative of Texas

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Texas Department of Labor & Standards

ATTN: G. R. Bynog, Program Manager/
Chief Inspector

Boiler Division

P.O. Box 12157, Capitol Station

Austin, Texas 78711

Honorable Dale McPherson

County Judge

P.O. Box 851

Glen Rose, Texas 76043

Texas Radiation Control Program Director
1100 West 49th Street
Austin, Texas 78756

Owen L. Thero, President
Quality Technology Company
Lakeview Mobile Home Park, Lot 35
4793 E. Loop 820 South
Fort Worth, Texas 76119

Texas Public Utility Commission
ATTN: Mr. Chet Oberg
7800 Shoal Creek Blvd.
Suite 400
Austin, Texas 78757-1024

bcc to DMB (IE40)

bcc distrib. by RIV:

R. D. Martin
DRP (2)
Section Chief (DRP/B)
DRSS-RPEPS
MIS System
The Chairman (MS: 16-G-15)
Commissioner Rogers (MS: 16-G-15)
Commissioner Curtiss (MS: 16-G-15)
Commissioner Reinick (MS: 16-G-15)
Commissioner de Planque (MS: 16-G-15)
J. M. Taylor, EDO (MS: 17-G-21)
J. M. Montgomery
J. T. Gilliland, PAO
C. A. Hackney

Resident Inspector (2)
DRS
Project Engineer (DRP/B)
Lisa Shea, RM/ALF
RSTS Operator
Records Center, INPO
G. F. Sanborn, EO
RIV Files
RRIs at all sites
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plant labeling, secondary plant condition, self-identification of problem areas, and root cause analyses were addressed and either fully corrected or much improved.

Areas requiring additional management attention include the root cause determination and correction of operator performance errors, the elimination of missed and improperly performed surveillance tests, the upgraded preoperational test preparation and review process, the implementation of corrective actions and the level of detail in licensing submittals.

On the basis of the SALP Board's assessment and the consideration of Unit 2 activities for 1992, the length of the SALP period will be approximately 12 months. Accordingly, the next SALP period will be from February 2, 1992, to February 6, 1993.

A management meeting has been scheduled with you and your staff at the CPSES training building auditorium on April 21, 1992, at 9 a.m. to review the results of the SALP Board. Within 20 days of this management meeting, you may provide comments on and amplification of, as appropriate, the initial SALP report.

Your written comments, a summary of our meeting, and the results of my consideration of your comments will be issued as an appendix to the enclosed initial SALP report and will constitute the final SALP report.

Sincerely,

Original signed by
John M. Montgomery

Robert D. Martin
Regional Administrator

Enclosure:
Appendix - Initial SALP Report
50-445/92-99; 50-446/92-99

cc w/enclosure:
TU Electric
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ATTN: G. R. Bynog, Program Manager/
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Boiler Division
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County Judge
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1100 West 49th Street
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Docket Nos. 50-445
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License No. NPF-87
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APR 3 1992

TU Electric
ATTN: W. J. Cahill, Jr., Group Vice President
Nuclear Engineering and Operations
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Gentlemen:

SUBJECT: INITIAL SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT

This forwards the initial SALP Report (50-445/92-99; 50-446/92-99) for the Comanche Peak Steam Electric Station (CPSES), Units 1 and 2. The SALP Board met on March 4-5, 1992, to evaluate CPSES performance for the period February 3, 1991, through February 1, 1992. The SALP board evaluated Unit 1 performance based on the normal operational SALP functional areas. The board's evaluation of Unit 2 performance was based on the construction SALP functional areas appropriately modified to reflect the unique status of Unit 2. The performance analyses and resulting evaluations are documented in the enclosed initial SALP report.

In accordance with NRC policy, I have reviewed the SALP Board's assessment and concur with their ratings as discussed below:

Unit 1

- ° Performance in the functional area of Plant Operations was rated Category 2, which represents a decline from the previous rating of Category 2 with an improving trend. Excellent operational programs have been implemented and strong management support was evident. Operators demonstrated excellent ability to respond to transients. However, the performance rating declined primarily due to a number of errors in system configuration control and personnel errors resulting in reactor trips, engineered safety feature actuations, and other plant transients. We acknowledge that you have initiated corrective actions in this area and strongly encourage that you carry this effort through to ensure effectiveness of the actions and adequate root cause determination.
- ° Performance in the functional area of Radiological Controls was rated Category 1, compared to a previous rating of 2. The increased performance rating was attributed primarily to the excellent performance of the radiation protection department during two outages in this assessment

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period as well as routine operations. Strong management involvement continued to be evident, and the staffing and training of the department was considered a strength.

- ° Performance in the functional area of Maintenance/Surveillance was rated Category 2. The maintenance area was considered good with excellent programs, involved management, and knowledgeable craftsmen, although there were several instances of inattention to detail during maintenance activities. Improved maintenance in the balance-of-plant was noteworthy, and technical support of maintenance activities was excellent. The surveillance area was noted for having a strong program and staff, but the previous SALP board concerns regarding missed surveillances and errors during the conduct of surveillance tests had not been effectively addressed and corrected.
- ° Performance in the functional area of Emergency Preparedness was rated Category 1. The emergency preparedness program and its implementation continued to improve this assessment period with no weaknesses identified by NRC during the annual emergency exercise. Excellent management support and a proactive approach to the resolution of issues was evident.
- ° Performance in the functional area of Security was rated Category 1. The security program continued in the excellent manner described in the previous SALP Report. Security systems were viewed as state-of-the art, and the security force was considered professional and dedicated. The Regulatory Effectiveness Review noted several strengths in the program and confirmed that safeguards measures did not adversely affect the safe operation of the plant.
- ° Performance in the functional area of Engineering/Technical Support was rated Category 1, an increase from the previous rating of Category 2. Strong management commitment to training and the improved success rate on initial operator license examinations was noted this assessment period. An excellent system engineering group was identified as a strength. Well managed, comprehensive programs for motor-operated valves, preventing loss of decay heat removal, and fire protection and prevention also contributed to the improved rating in this area.
- ° Performance in the functional area of Safety Assessment/Quality Verification was rated Category 1, an increase from the previous rating of Category 2, with an improving trend. This rating was based on strong management involvement in the quality assurance and self-assessment functions. The corrective action program utilizing the Operations Notification and Evaluation form was identified as a strength, although in some cases, corrective actions needed to be more effectively implemented. The programs for incorporating industry experience and performing risk assessments of outage activities were considered noteworthy. Licensing submittals continued to require additional detail in the safety analysis, as was also noted as a concern in the previous SALP report.

Unit 2

- ° Performance in the functional area of Construction Activities was rated Category 1. Management oversight has been excellent since construction activities were reinitiated in January 1991. Excellent coordination between construction, engineering, startup, and quality organizations resulted in consistently high quality performance. A multidisciplinary Configuration Management Inspection determined that design and construction activities were being accomplished in accordance with design requirements. The construction training program was considered superior. The quarterly construction status meetings held with the NRC have been beneficial, and it is recommended that they continue.
- ° Performance in the functional area of Engineering/Technical Support was rated Category 1. The engineering and technical support organizations were viewed as a strength, and an aggressive approach to problem solving was noted. The strong program identified on Unit 1 for motor-operated valves was evident on Unit 2 as well. The program for design basis documentation was considered thorough and extensive. Your ability to integrate multiple architect/engineering firms into a unified work group with good coordination and communication should be commended.
- ° Performance in the functional area of Safety Assessment/Quality Verification was rated Category 1. An excellent program exists for the identification, documentation, and correction of nonconforming or deficient conditions. Excellent preparation went into completed FSAR change packages. The program for handling external information was viewed as a strength. Your Integrated Design Assessment and Construction Assessment Team efforts were further indications of superior management oversight of construction.
- ° Performance in the functional area of Preoperational Testing was rated Category 2. The general implementation and execution of turnover and testing activities were good. However, notable weaknesses in the preparation and review of preoperational test procedures were identified and extensive corrective actions were necessary. Test activities were well controlled and personnel were found to be knowledgeable of test requirements and procedures. A close working relationship between construction and startup was seen as a positive factor in the successful implementation of the preoperational test program.

Overall, performance at Comanche Peak was excellent, with numerous strengths and some weaknesses in specific areas noted. Strong management oversight and involvement was a common thread through all functional areas. Strong programs to control activities were evident in all functional areas, but weaknesses in implementation at the working level were noted in the operations and surveillance areas and in the development of preoperational test procedures. Well qualified staffs were found in all areas, and the performance level of system engineers and maintenance craftsmen was considered high. Most areas of concern from the previous SALP report, such as initial operator licensing,

ATTENDEES

<u>Name</u>	<u>Affiliation</u>
J. Montgomery	NRC - Region IV
T. Gwynn	NRC - Region IV
D. Chamberlain	NRC - Region IV
L. Yandell	NRC - Region IV
T. Refs	NRC - Region IV
J. Gilliland	NRC - Region IV
W. Jones	NRC - Region IV
D. Graves	NRC - Region IV
R. Latta	NRC - Region IV
G. Werner	NRC - Region IV
M. Virgilio	NRC - NRR
S. Black	NRC - NRR
B. Hoffman	NRC - NRR
T. Bergman	NRC - NRR
S. Fletcher	NRC - NRR
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H. Bruner	TU Electric
A. Scott	TU Electric
J. Kelley	TU Electric
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M. Blevins	TU Electric
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B. Brink	CFUR

UNITED STATES
NUCLEAR REGULATORY
COMMISSION



SYSTEMATIC ASSESSMENT
OF
LICENSEE PERFORMANCE
(SALP)

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TU ELECTRIC
COMANCHE PEAK STEAM ELECTRIC STATION
UNITS 1 AND 2

FEBRUARY 3, 1991

THROUGH

FEBRUARY 6, 1992

GLEN ROSE, TEXAS

APRIL 21, 1992

AGENDA

INTRODUCTIONS

NRC

TU ELECTRIC

INTERESTED PARTIES

OPENING REMARKS

JOHN M. MONTGOMERY

SALP PRESENTATION

T. PAT GWYNN

CLOSING REMARKS

JOHN M. MONTGOMERY

COMMENTS AND/OR QUESTIONS

TU ELECTRIC

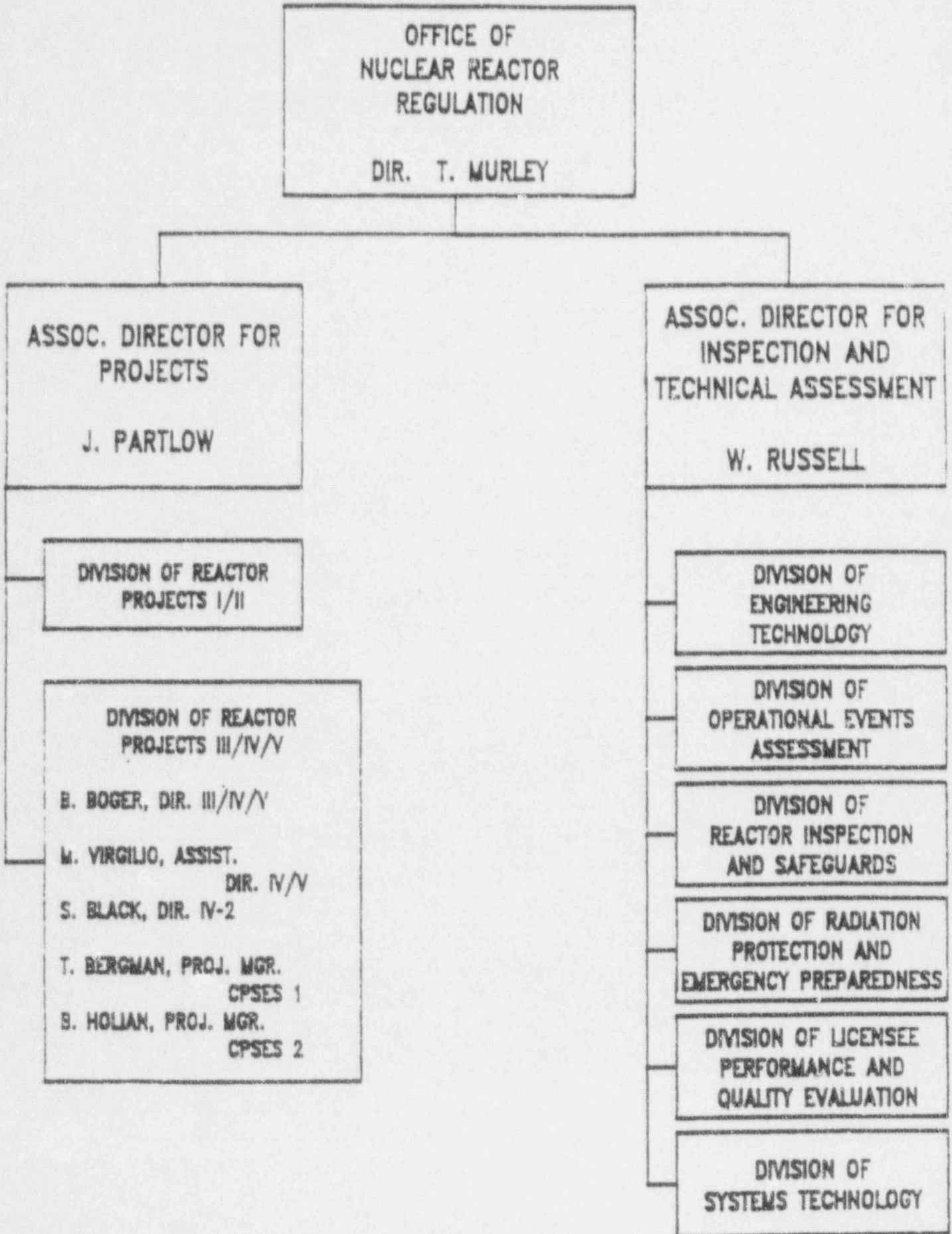
COMMENTS AND/OR QUESTIONS

CITIZENS ASSOCIATION
FOR SOUND ENERGY

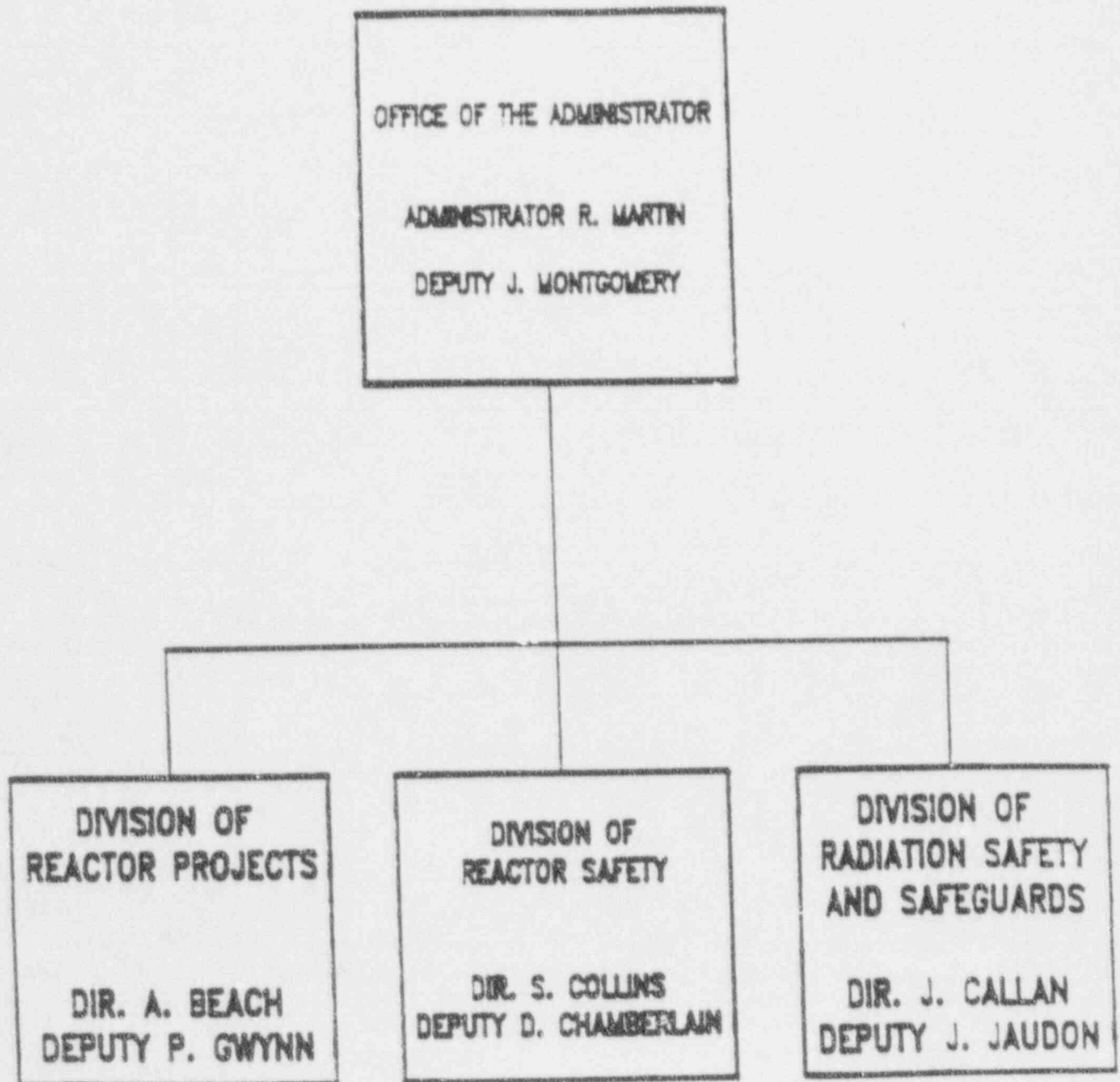
COMMENTS AND/OR QUESTIONS

PUBLIC/MEDIA

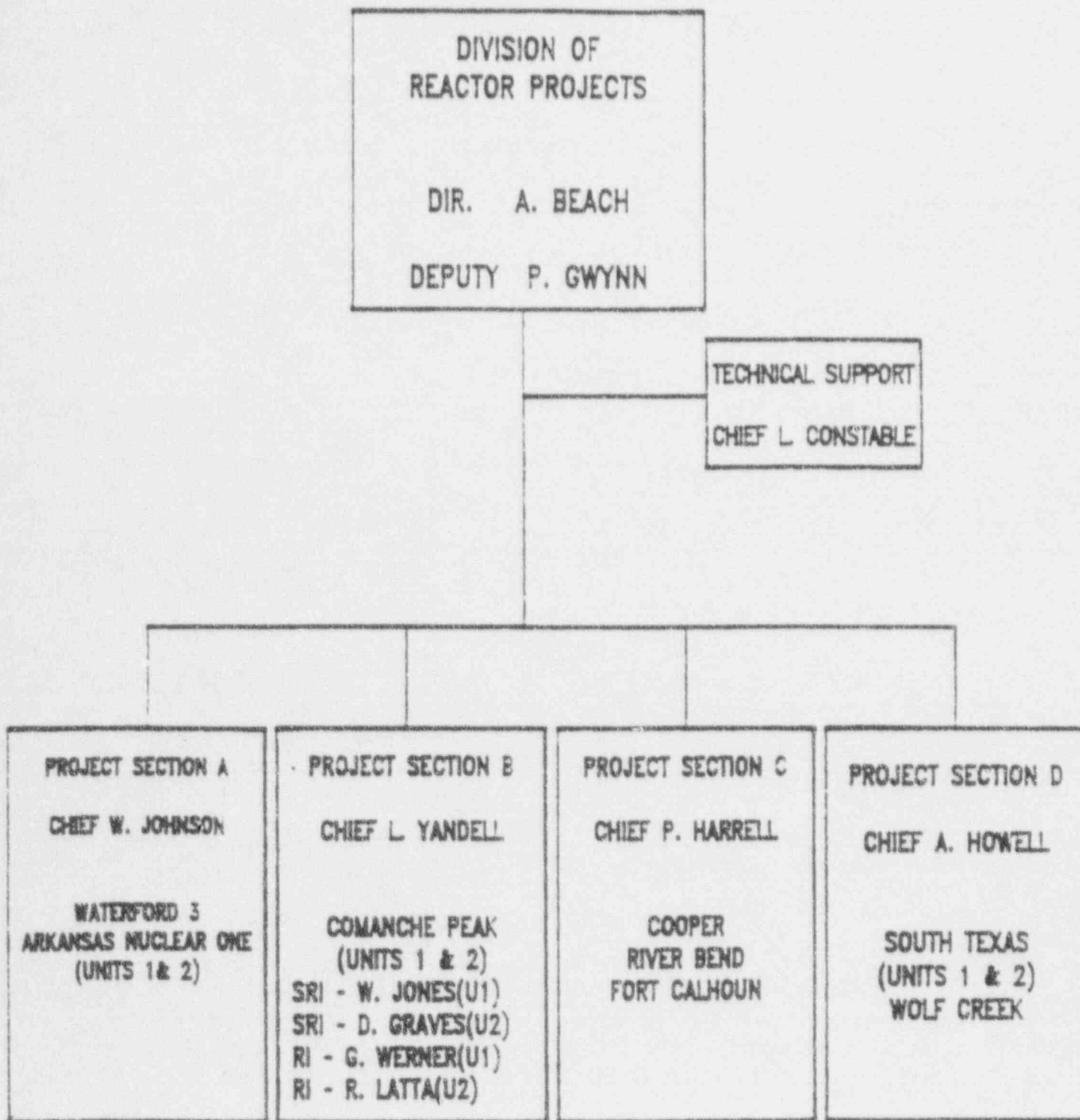
NRR ORGANIZATION



REGION IV ORGANIZATION



DIVISION OF REACTOR PROJECTS ORGANIZATION



SALP PROGRAM OBJECTIVES

1. IDENTIFY TRENDS IN LICENSEE PERFORMANCE
2. PROVIDE A BASIS FOR ALLOCATION OF NRC RESOURCES
3. IMPROVE NRC REGULATORY PROGRAM

PERFORMANCE ANALYSIS AREAS

- A. PLANT OPERATIONS - Unit 1
- B. RADIOLOGICAL CONTROLS - Unit 1
- C. MAINTENANCE/SURVEILLANCE - Unit 1
- D. EMERGENCY PREPAREDNESS - Units 1 & 2
- E. SECURITY - Units 1 & 2
- F. ENGINEERING/TECHNICAL SUPPORT - UNIT 1
- G. SAFETY ASSESSMENT/QUALITY VERIFICATION -
UNIT 1
- H. CONSTRUCTION ACTIVITIES - Unit 2
- I. ENGINEERING/TECHNICAL SUPPORT - UNIT 2
- J. SAFETY ASSESSMENT/QUALITY VERIFICATION -
UNIT 2
- K. PREOPERATIONAL TESTING - UNIT 2

EVALUATION CRITERIA	Assurance of Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Enforcement History	Operational and Constructio Events	Staffing	Effectiveness of Training and Qualifications	Category Rating
Plant Operations							
Radiological Controls							
Maintenance/Surveillance							
Emergency Preparedness							
Security							
Engineering/Technical Support							
Safety Assessment/Quality Verification							

UNIT 1

	EVALUATION CRITERIA	Assurance of Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Enforcement History	Operational and Construction Events	Staffing	Effectiveness of Training and Qualifications	Category Rating
Construction Activities								
Engineering/Technical Support-								
Safety Assessment/Quality Verification								
Preoperational Testing								

UNIT 2

PERFORMANCE RATING

CATEGORY 1

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A SUPERIOR LEVEL OF PERFORMANCE. NRC WILL CONSIDER REDUCED LEVELS OF INSPECTION EFFORT.

PERFORMANCE RATING

CATEGORY 2

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN A GOOD LEVEL OF PERFORMANCE. NRC WILL CONSIDER MAINTAINING NORMAL LEVELS OF INSPECTION EFFORT.

PERFORMANCE RATING

CATEGORY 3

LICENSEE MANAGEMENT ATTENTION TO AND INVOLVEMENT IN NUCLEAR SAFETY OR SAFEGUARDS ACTIVITIES RESULTED IN AN ACCEPTABLE LEVEL OF PERFORMANCE; HOWEVER, BECAUSE OF THE NRC'S CONCERN THAT A DECREASE IN PERFORMANCE MAY APPROACH OR REACH AN UNACCEPTABLE LEVEL, NRC WILL CONSIDER INCREASED LEVELS OF INSPECTION EFFORT.

COMANCHE PEAK STEAM ELECTRIC STATION
OVERALL PERFORMANCE SUMMARY

FUNCTIONAL AREA	RATING LAST	RATING THIS
	PERIOD	PERIOD
	9/1/89-1/31/91	2/3/91-2/1/92
PLANT OPERATIONS - Unit 1	2 (IMPROVING)	2
RADIOLOGICAL CONTROLS - Unit 1	2	1
MAINTENANCE/SURVEILLANCE - Unit 1	2	2
EMERGENCY PREPAREDNESS - Units 1 & 2	1	1
SECURITY - Units 1 & 2	1	1
ENGINEERING/TECHNICAL SUPPORT- UNIT 1	2	1
SAFETY ASSESSMENT/ QUALITY VERIFICATION-UNIT 1	2 (IMPROVING)	1
STARTUP PROGRAM - Unit 1	1	NA
CONSTRUCTION ACTIVITIES - Unit 2	NA	1
ENGINEERING/TECHNICAL SUPPORT- UNIT 2	NA	1
SAFETY ASSESSMENT/ QUALITY VERIFICATION-UNIT 2	NA	1
PREOPERATIONAL TESTING - Unit 2	NA	2

PLANT OPERATIONS

CATEGORY 2

ANALYSIS

- + STRONG MANAGEMENT INVOLVEMENT AND SUPPORT
- + EXCELLENT OPERATIONAL PROGRAMS
- + OPERATOR RESPONSE TO TRANSIENTS
- + PERFORMANCE OF COMPLEX EVOLUTIONS
- + OPERATOR STAFFING
- + SHIFT TECHNICAL ADVISOR PROGRAM
- + CONTROL ROOM OPERATIONS
- + UNIT 1/UNIT 2 INTERFACE CONTROL
- + OUTAGE PLANNING AND PERFORMANCE
- + MATERIAL CONDITION
- + PLANT LABELING
- SYSTEM CONFIGURATION CONTROL
- PERSONNEL ERRORS
- REACTOR TRIPS AND ESF ACTUATIONS

RADIOLOGICAL CONTROLS

CATEGORY 1

ANALYSIS

- + STRONG MANAGEMENT INVOLVEMENT
- + STAFFING
- + TRAINING
- + MOCKUP TRAINING
- + OUTAGE PERFORMANCE
- + STRONG PROGRAMS
 - + WASTE MANAGEMENT
 - + WATER CHEMISTRY
 - + RADIOCHEMISTRY
 - + ENVIRONMENTAL MONITORING
 - + TRANSPORTATION

MAINTENANCE/SURVEILLANCE

CATEGORY 2

- + STRONG MANAGEMENT INVOLVEMENT**
- + MAINTENANCE PROGRAMS**
- + SURVEILLANCE PROGRAMS**
- + INTER-DEPARTMENTAL COORDINATION**
- + OUTAGE PREPARATION**
- + TRAINING**
- BOP MAINTENANCE/RELIABILITY**
- MISSED TECHNICAL SPECIFICATION SURVEILLANCES**
- CONTROL OF CONTRACTOR ACTIVITIES**

EMERGENCY PREPAREDNESS

CATEGORY 1

ANALYSIS

- + STRONG MANAGEMENT INVOLVEMENT AND SUPPORT
- + CONTINUED PROGRAM IMPROVEMENT
- + EXERCISE PERFORMANCE
- + PROACTIVE RESPONSE TO IDENTIFIED WEAKNESSES
- IMPLEMENTATION OF EIPs BY LICENSED OPERATORS

SECURITY
CATEGORY 1

- + **STRONG MANAGEMENT INVOLVEMENT AND SUPPORT**
- + **PROACTIVE IN INITIATING IMPROVEMENTS**
- + **STATE-OF-THE-ART HARDWARE**
- + **PROFESSIONAL AND DEDICATED PERSONNEL**
- + **REGULATORY EFFECTIVENESS REVIEW**
- + **FITNESS FOR DUTY PROGRAM IMPLEMENTATION**

ENGINEERING/TECHNICAL SUPPORT - UNIT 1

CATEGORY 1

ANALYSIS

- + STRONG MANAGEMENT INVOLVEMENT
- + PROGRAMS
 - + DESIGN MODIFICATION
 - + MOTOR OPERATED VALVES
 - + PREVENTING LOSS OF DECAY HEAT REMOVAL
 - + FIRE PROTECTION AND PREVENTION
 - + DOCUMENT CONTROL AND RECORDS
- + SYSTEM ENGINEERING GROUP
- + ENGINEERING SUPPORT OF GENERIC COMMUNICATIONS
- + EFFECTIVE RESOLUTION OF TRAINING ISSUES
- STRONG DESIGN BASIS DOCUMENTATION PROGRAM WITH SOME ERRONEOUS INFORMATION

**SAFETY ASSESSMENT/QUALITY VERIFICATION
UNIT 1**

CATEGORY 1

- + **STRONG MANAGEMENT INVOLVEMENT**
- + **CONSERVATIVE SAFETY PHILOSOPHY**
- + **SUPERIOR PROGRAMS**
 - + **ONE FORM/CORRECTIVE ACTION**
 - + **USE OF INDUSTRY EXPERIENCE**
 - + **INDEPENDENT OVERVIEW/OUTAGE RISK
ASSESSMENT**
- **SAFETY ANALYSES TO SUPPORT LICENSING SUBMITTALS**

<u>EVALUATION</u> <u>CRITERIA</u>	Assurance of Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Enforcement History	Operational and Construction Events	Staffing	Effectiveness of Training and Qualifications	Category Rating
Plant Operations		+		-	+		2
Radiological Controls	+	+	+	+	+	+	1
Maintenance/Surveillance					+		2
Emergency Preparedness	+	+	+	NA	+		1
Security	+	+	+	+	+	+	1
Engineering/Technical Support	+		+		+	+	1
Safety Assessment/Quality Verification	+		+	+	+	+	1

UNIT 1

	Assurance of Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Enforcement History	Operational and Construction Events	Staffing	Effectiveness of Training and Qualifications	Category Rating
Plant Operations	+	+			+		2*
Radiological Controls	+		+				2
Maintenance/Surveillance					+	+	2
Emergency Preparedness	+	+	+	+			1
Security	+	+	+	+	+	+	1
Engineering/Technical Support					+		2
Safety Assessment/Quality Verification	+			+	+	+	2*
Startup	+	+	+	+	+	+	1

* Improving

CONSTRUCTION ACTIVITIES

CATEGORY 1

- + MANAGEMENT INVOLVEMENT AND OVERSIGHT
- + COMPREHENSIVE PROGRAMS AND PROCEDURES
- + EFFECTIVE IMPLEMENTATION
- + QUALITY OVERSIGHT
- + HIGH QUALITY WORK EVIDENT
- + SUPERIOR TRAINING
- + TIMELY CORRECTIVE ACTIONS
- CLEANLINESS CONTROLS/HOUSEKEEPING
- PERIODIC STATUS MEETINGS
- MINOR PROCEDURAL VIOLATIONS

ENGINEERING/TECHNICAL SUPPORT - UNIT 2

CATEGORY 1

ANALYSIS

- + STRONG MANAGEMENT INVOLVEMENT
- + "TEAM PLUS" PROGRAM
- + APPROACH TO PROBLEM SOLVING
- + TECHNICAL SUPPORT TO FIELD ACTIVITIES
- + PROGRAMS
 - + CONSIDER UNIT 1 IMPACT
 - + MOTOR OPERATED VALVES
 - + DESIGN BASIS DOCUMENTATION
- + TECHNICAL EVALUATIONS
- EFFECTIVENESS OF DESIGN VERIFICATION PROCESS

SAFETY ASSESSMENT/QUALITY VERIFICATION UNIT 2

CATEGORY 1

ANALYSIS

- + STRONG MANAGEMENT INVOLVEMENT**
- + STRONG SAFETY CONSCIENCE THROUGHOUT ORGANIZATION**
- + INDEPENDENT DESIGN APPRAISAL AND CONSTRUCTION APPRAISAL TEAM EFFORTS**
- + QUALITY ASSURANCE PROGRAM**
- + AUDITS**
- + UTILIZATION OF EXTERNAL INFORMATION**
- + CORRECTIVE ACTION/TUE PROGRAM**
- + FSAR SUBMITTALS**
- CORRECTIVE ACTIONS RESULTING FROM QA FINDINGS**

PREOPERATIONAL TESTING

CATEGORY 2

- + STAFFING/EXPERIENCE
- + CONSTRUCTION/STARTUP RELATIONSHIP
- TURNOVER AND TESTING ACTIVITIES
- UNIT 1/ UNIT 2 INTERFACE CONTROL
- ORGANIZATIONAL CHANGES
- PREOPERATIONAL TEST PROCEDURE DEFICIENCIES

EVALUATION CRITERIA	Assurance of Quality	Approach to the Resolution of Technical Issues from a Safety Standpoint	Enforcement History	Operational and Construction Events	Staffing	Effectiveness of Training and Qualifications	Category Rating
Construction Activities	+	+	+		+	+	1
Engineering/Technical Support-			+		+		1
Safety Assessment/Quality Verification	+		+		+	+	1
Preoperational Testing					+		2

UNIT 2

NEXT SALP PERIOD

○ **SCHEDULED**

FEBRUARY 2, 1992

THROUGH

FEBRUARY 6, 1993

○ **12 MONTHS**



Log # TXX-92209
 File # 10010
 10132
 Ref. # IR 92-99
 IR 92-99

William J. Cahill, Jr.
 Group Vice President

April 29, 1992

Mr. R. D. Martin, Regional Administrator
 U. S. Nuclear Regulatory Commission
 Region IV
 611 Ryan Plaza Drive, Suite 1000
 Arlington, Texas 76011

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NOS. 50-445 AND 50-446
 COMMENTS ON SYSTEMATIC ASSESSMENT OF LICENSEE
 PERFORMANCE (SALP)

Dear Mr. Martin:

By letter dated April 3, 1991, the Nuclear Regulatory Commission (NRC) transmitted the Systematic Assessment of Licensee Performance (SALP) Report for Comanche Peak Steam Electric Station (CPSES) to TU Electric. This report documented the staff's assessment of the performance of TU Electric with regard to CPSES during the period February 3, 1991, through February 1, 1992.

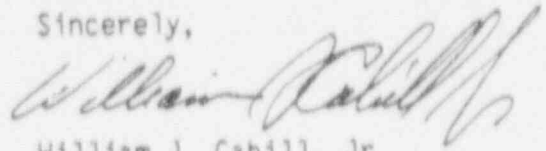
The staff concluded that TU Electric's performance was markedly improved, with numerous strengths and a few weaknesses in specific areas noted. Strong management oversight and involvement was a common thread through all functional areas. Well qualified staffs were found in all areas, and the performance level of system engineers and maintenance craftsmen was considered high. Prior areas of concern, such as initial operator licensing, plant labeling, secondary plant condition, self-identification of problem areas, and root cause analyses were addressed and either fully corrected or much improved.

Strong programs to control activities were evident in all functional areas, but some weaknesses in implementation at the working level were noted in the operations and surveillance areas and in the development of preoperational test procedures. Areas requiring additional management attention include the root cause determination and correction of operator performance errors, the elimination of missed and improperly performed surveillance tests, the upgraded preoperational test preparation and review process, the implementation of corrective actions and the level of detail in licensing submittals.

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TU Electric has carefully reviewed and evaluated the information contained in the SALP Report and, as stated at the meeting of April 21, 1992, finds it to be accurate and agrees with the overall conclusions and recommendations contained therein. TU Electric is initiating actions in response to the recommendations and to effect improvements in the areas of weaknesses identified by the NRC in the SALP Report. In the public meeting the NRC stated that for an operating plant, the functional areas of Operations and Maintenance/Surveillance are important. TU Electric concurs and is striving to improve performance in these two areas.

Sincerely,



William J. Cahill, Jr.

CBC/cbc

c - Resident Inspectors, CPSES (2)
Mr. T. A. Bergman, NRR
Mr. B. E. Holian, NRR