

Enclosure 1

SALP 9

FINAL SALP REPORT

---

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

---

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

Inspection Reports No. 50-266/92001; 50-301/92001

Wisconsin Electric Power Company

Point Beach Nuclear Plant

September 1, 1990, through January 31, 1992

9206020249 920522  
PDR ADDCK 05000266  
Q PDR

REVISION SHEET

<u>PAGE</u>	<u>LINE</u>	<u>NOW READS</u>	<u>SHOULD READ</u>
15	5	"...communications reflected a weakness in inter- and intra-departmental..."	"...communications reflected a weakness in inter- and intra-sectional..."

Basis: In terms of the organizational references within Wisconsin Electric Power Company, the word section is more appropriate than department.

Periodic management meetings with NRC were generally informative, open and candid. While significant progress in improving communications with the NRC occurred over the evaluation period, there were early instances where information was not provided in a timely manner. Additionally, poor internal communications reflected a weakness in inter- and intra- departmental relations. For example, several compensatory measures to be employed while making repairs to emergency diesel generator cooling water piping were proposed, but these measures were not adequately communicated to control room supervisors and maintenance staff having responsibility for implementation. Also, operators did not always inform management of MSIV failures.

The approach to the identification and resolution of technical issues was mixed. The effective use of safety review groups resulted in generally good identification of technical issues. Review groups operated independently and with a critical approach to the review process. The offsite review committee had good management involvement and was recently restructured to include additional experience from outside the company. However, because the onsite review committee did not pursue operating events with sufficient aggressiveness to determine the root cause and prevent their recurrence, repeated problems were noted with a number of components including power range neutron flux monitors, flux recorders, hydrogen recorders, and diesel generator fuel oil pumps. Due to a lack of management oversight, technical specifications were at times interpreted in a nonconservative manner. For example, operability was not considered when taking components out of service in the service water and component cooling water systems.

Significant weaknesses were evident during the evaluation period regarding prioritization of audit findings and completion of overdue corrective actions. This deficiency was subsequently addressed by restructuring the QA procedures governing open item control and the assignment of dedicated personnel to monitor the status of corrective action progress. These actions resulted in a notable decrease in the backlog of overdue items and continued improvement in the management of newly identified deficiencies.

Staffing was adequate to carry out the quality assurance program and to identify corrective actions for deficiencies discovered. However, staffing was not effective in ensuring that corrective actions were implemented. Staffing increases and management changes were made to further strengthen the Safety Assessment and Quality Assurance capabilities.

The effectiveness of training and qualification was generally good. The new control room simulator was assembled in May and certified in July. The simulator was utilized in evaluating proposed design changes. A comprehensive cultural adjustment and team building training program continued to enhance problem identification and resolution. This program appeared to have had a positive impact on nuclear department personnel. However, continuing deficiencies were identified by the NRC concerning operator requalification dynamic scenarios and written examination question banks. Some improvement to the latter was noted toward the end of the assessment period.

Periodic management meetings with NRC were generally informative, open and candid. While significant progress in improving communications with the NRC occurred over the evaluation period, there were early instances where information was not provided in a timely manner. Additionally, poor internal communications reflected a weakness in inter- and intra- sectional relations. For example, several compensatory measures to be employed while making repairs to emergency diesel generator cooling water piping were proposed, but these measures were not adequately communicated to control room supervisors and maintenance staff having responsibility for implementation. Also, operators did not always inform management of MSIV failures.

The approach to the identification and resolution of technical issues was mixed. The effective use of safety review groups resulted in generally good identification of technical issues. Review groups operated independently and with a critical approach to the review process. The offsite review committee had good management involvement and was recently restructured to include additional experience from outside the company. However, because the onsite review committee did not pursue operating events with sufficient aggressiveness to determine the root cause and prevent their recurrence, repeated problems were noted with a number of components including power range neutron flux monitors, flux recorders, hydrogen recorders, and diesel generator fuel oil pumps. Due to a lack of management oversight, technical specifications were at times interpreted in a nonconservative manner. For example, operability was not considered when taking components out of service in the service water and component cooling water systems.

Significant weaknesses were evident early in the evaluation period regarding prioritization of audit findings and escalation of overdue corrective actions. This deficiency was subsequently addressed by restructuring the QA procedures governing open item control and the assignment of dedicated personnel to monitor the status of corrective action progress. These actions resulted in a notable decrease in the backlog of overdue items and continued improvement in the management of newly identified deficiencies.

Staffing was adequate to carry out the quality assurance program and to identify corrective actions for deficiencies discovered. However, staffing was not effective in ensuring that corrective actions were implemented. Staffing increases and management changes were made to further strengthen the Safety Assessment and Quality Assurance capabilities.

The effectiveness of training and qualification was generally good. The new control room simulator was assembled in May and certified in July. The simulator was utilized in evaluating proposed design changes. A comprehensive cultural adjustment and team building training program continued to enhance problem identification and resolution. This program appeared to have had a positive impact on nuclear department personnel. However, continuing deficiencies were identified by the NRC concerning operator requalification dynamic scenarios and written examination question banks. Some improvement to the latter was noted toward the end of the assessment period.

U.S. NRC  
REGION III

POINT BEACH NUCLEAR  
POWER PLANT

SALP 9 MEETING

April 30, 1992

TWO RIVERS, WISCONSIN

POINT BEACH SALP 9  
APRIL 30, 1992

AGENDA

Opening Remarks:

A. Bert Davis, Regional Administrator

SALP Process:

I. N. Jackiw, Chief, Section 3A, DRP

SALP Presentation:

K. Jury, Senior Resident Inspector ..

J. Gadzala, Resident Inspector

A. Hansen, Acting Project Manager, NRR

Summary:

E. G. Greenman, Director, DRP

Licensee Comments:

Closing Remarks:

A. Bert Davis

Inquiries:

Public and Media

# SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

## SALP

- Collection of Data to Evaluate Licensee's Performance
- Provide a Rational Basis for Allocating NRC Resources
- Provide Meaningful Guidance to Licensee Management

# SALP FUNCTIONAL AREAS EXAMINED

- PLANT OPERATIONS
- RADIOLOGICAL CONTROLS
- MAINTENANCE/SURVEILLANCE
- EMERGENCY PREPAREDNESS
- SECURITY
- ENGINEERING/TECHNICAL SUPPORT
- SAFETY ASSESSMENT/  
QUALITY VERIFICATION



## SALP EVALUATION CRITERIA

- Management Involvement in Assuring Quality
- Approach to Resolution of Technical Issues from a Safety Standpoint
- Enforcement History
- Operational Events
- Staffing (Including Management)
- Training and Qualification Effectiveness

## SALP

- Evaluations of Licensee Performance
  - Normally Performed Every 12 - 18 Months
- Four Performance Ratings are used by NRC:
  - Category 1 = Superior Level.
  - Category 2 = Good Level
  - Category 3 = Acceptable Level
  - Category N = Not Rated
- Trending (When Used)
  - Improving      ↑
  - Declining      ↓

## SALP BOARD

- Typical Voting Members of the Board Include:
  - Director, Division of Reactor Projects
  - Director, Division of Reactor Safety
  - Director, Division of Radiation Safety and Safeguards
  - Branch Chief, Division of Reactor Projects
  - Senior Resident Inspector
  - NRR Project Director
  - NRR Project Manager
- The Board Evaluates the Functional Areas
  - A Rating is Assigned to Each Functional Area
  - Rating Assignments are Based on Majority Vote
  - Conclusions Based on Fact & Subjective Judgement
- The Regional Administrator has Final Approval of the SALP Ratings and Report

# SALP PRESENTATION FORMAT

RATED CATEGORY \_\_\_\_\_

Overall Performance

STRENGTHS

Areas with Positive Attributes

CHALLENGES

Areas Requiring Additional Attention

OTHER

Areas Highlighted by SALP Board

# POINT BEACH SALP 9 PLANT OPERATIONS

## RATED CATEGORY 1 DECLINING

Overall performance was excellent, but a declining trend was attributable to personnel errors and procedural inadequacies.

### STRENGTHS

- Professional Control Room Demeanor and Dark Annunciators
- Management Involvement
- Knowledgeable and Experienced Operations Staff
- Response to Operational Events

### CHALLENGES

- Personnel Errors
- Interpretation of Technical Specifications
- Housekeeping

# POINT BEACH SALP 9 RADIOLOGICAL CONTROLS

## RATED CATEGORY 2 IMPROVING

Improved performance trend resulted from enhanced training initiatives and lower exposure levels. Increased support needed for ALARA program.

### STRENGTHS

- Staff Qualifications
- Station Dose
- Technician Training Program

### CHALLENGES

- Development and Implementation of the ALARA Program
- Radiological Condition of Controlled Areas

POINT BEACH SALP 9  
MAINTENANCE/SURVEILLANCE  
RATED CATEGORY 2

Performance declined from the previous period due to personnel errors and procedural deficiencies. Equipment continued to be reliable.

STRENGTHS

- Experienced and Stable Maintenance Staff
- Material Condition and Equipment Reliability

CHALLENGES

- Quality of Maintenance Procedures
- Use of Equipment History Database
- Personnel Errors

OTHER

- Maintenance Backlog
- Oversight of Work Activities
- Surveillance Activities

**POINT BEACH SALP 9**  
**ENGINEERING/TECHNICAL SUPPORT**

**RATED CATEGORY 2**

Performance remained acceptable during the assessment period. Improvements in planning, assignment of priorities, staff utilization and more aggressive involvement in the resolution of plant problems are needed.

**STRENGTHS**

- Staffing Expertise and Experience
- Dual Unit Simulator

**CHALLENGES**

- Strained Staff
- Engineering Evaluations/Calculations
- Problem Resolution

**OTHER**

- Increased Engineering Onsite



POINT BEACH SALP 9  
SAFETY ASSESSMENT/  
QUALITY VERIFICATION

RATED CATEGORY 3 IMPROVING

Performance was weak in this area. Management has recognized deficiencies in their programs and has undertaken a number of initiatives to strengthen their capabilities to ensure quality and safety at Point Beach. Continued attention to implementation of corrective actions is needed.

CHALLENGES

- Management Involvement in Ensuring Quality
- Scheduling and Control of Corrective Action Programs
- Communications

OTHER

- Safety Assessment Program
- Review of Technical Specifications



231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201

(414) 221-2345

VPNPD-92-178  
NRC-92-050

May 13, 1992

Mr. A. Bert Davis, Regional Administrator  
Region III  
U. S. NUCLEAR REGULATORY COMMISSION  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Gentlemen:

DOCKETS 50-266 AND 57-301  
SALP 9 REPORT  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Thank you for the candid discussion that we had on April 30 at the public meeting regarding our SALP 9 report. The Wisconsin Electric Nuclear Power Department is undergoing major changes with additional staffing, increased procedural control, and new initiatives. We appreciate your acknowledgment of those programs and initiatives, and we understand that much work needs to be done to prove them effective.

We concur with the factual content of the report and offer only the clarification that the reference to interdepartment and intradepartment communications should be described as inter-sectional and intrasectional communications in terms of the organizational references of our Company.

We also fully appreciate and support your initiative to have the members of the SALP Board visit the plant during the present SALP period. We believe this will encourage an open dialogue between the NRC and Wisconsin Electric and continue to enhance our communications.

Sincerely,

A handwritten signature in cursive script that reads 'James Zach'.

James J. Zach  
Vice President  
Nuclear Power

Copies to NRC Document Control Room  
NRC Resident Inspector

MAY 15 1992