

DCS

February 29, 1996

MEMORANDUM TO: Distribution

FROM: Richard J. Conte, Chief
Projects Branch 5
Division of Reactor Projects

Original Signed By
Harold Eichenholz for:

SUBJECT: PILGRIM SALP MILESTONES - REVISION I

This memorandum specifies the development, schedule and preparation input responsibilities for the Pilgrim SALP. The assessment period runs from October 9, 1994 to April 6, 1996. During this SALP period, two Plant Performance Reviews were conducted in which an objective information base along with interim assessment was provided by DRP as lead and support from certain representatives of DRS. The PPR files are located on the shared items directory @ S:\PIILPPR subdirectory and will be updated as we get closer to the functional area input date. These files should save DRS considerable time in collecting the raw data from inspection reports but they should be independently re-reviewed by the FA coordinator.

The SALP report number is 50-293/96-99. Region I Instruction 1440.1, Revision 5, dated October 6, 1995, provides the necessary guidance for the SALP effort. Mr. R. Cooper is the designated Chairman for this SALP. The SALP Board is scheduled for April 18, 1996 at 9:30 pm in the DRP Conference Room.

Mr. W. Kane is the signature authority for the SALP report. The following individuals are the designated Responsible SALP Board Members and Functional Area Coordinators.

<u>Functional Area</u>	<u>Board Member</u>	<u>Coordinator</u>
OPERATIONS	R. Cooper	R. Laura
MAINTENANCE	R. Cooper	H. Eichenholz
ENGINEERING	J. Wiggins	D. Limroth
PLANT SUPPORT	J. Wiggins	J. Noggle
SA/QV	L. Marsh	R. Eaton

Attached to this memorandum are the applicable SALP preparation guidelines.

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J. Kane

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REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

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Harold Eichenholz for RJC

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Attachment: As Stated

Distribution:

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ATTACHMENT

PILGRIM SALP MILESTONES/PREPARATION GUIDELINES

Item	Target Milestone	Responsibility	Guidance
Issue SALP Milestone Memo	2/21/96	Conte	1440.1
Inputs to Coordinators and Board Members	3/22/96	Note 1	Note 1
Issue Supporting Data Package to Coordinators	3/22/96	Eichenholz	Note 3
SALP period ends	4/6/96		Note 2
Functional Area and SA/QV Summaries to DRP BC	4/5/96	Ops: Laura Maint: Eichholz Eng: Limroth P/S: Noggle SA/QV: Eaton	Note 3
Resolve Coordinator Comments and Distribute Final Functional Area and SA/QV Summaries	4/12/96	Eichenholz	Note 4
Conduct SALP Board	4/18/96	Chairman, Board Members and Subject Matter Experts	Note 5
Develop Functional Area and Cover Letter Draft Sections per Board Guidance; Distribute to Board Members	4/25/96	Board Members	Note 6
Develop 12 Month Inspection Plan per Board Decisions; Distribute to Board Members and DRS Branch Chiefs	4/25/96	Eichenholz	Note 7
Resolve Board Member Comments, Provide Final Functional Area Sections and Cover Letter to Conte	5/1/96	Board Members	Note 6
Resolve Board Member Comments, Provide Final Inspection Plan to Conte	5/1/96	Eichenholz	Note 7
Assemble Final SALP Report/Inspection Plan; Provide to Chairman and Board Members	5/2/96	Conte	
Provide SALP Report and Inspection Plan to DRA	5/3/96	Wiggins	
Issue SALP Report	5/15/96	Kane, Wiggins	MD 8.6
Meeting with BECo	5/29/96 NTE 6/5/96	Kane, Wiggins, NAP Chairman and Selected Subject Matter Experts	Note 8 and MD 8.6

NOTE 1 - Guidance on Feeder Inputs to SALP Function Area Coordinators

PURPOSE:

Preliminary feeder inputs shall be provided to the functional area coordinators to assist them in preparing for SALP. Inputs must be delivered on time (typically 15 days prior to the end of the period) and in proper summary description format.

RESPONSIBILITIES:

The functional area coordinator and suggested feeder assignments are listed below.

<u>Functional Area</u>	<u>Coordinators</u>	<u>Suggested Feeders</u>
Operations	Laura	Eaton (optional) Caruso (required)
Maintenance	Eichenholz	Laura (required) Eaton (optional) Caruso (required)
Engineering	Limroth	Eaton (required) Laura (required)
Plant Support	Noggle	Eaton (optional) Laura (required to comment on housekeeping and other areas inspected by the resident office) Lusher (required) Smith (required) Jang (required) Limroth/Harrison (required)
SA/QV (Problem Resolution)	Eaton	NRR receives copies of the above feeders

Other staff may provide input if they wish.

Note that even though safety assessment/quality verification (SA/QV) is no longer a functional area, SA/QV and licensee problem resolution insights will be discussed at the SALP board and are needed to develop the SALP report cover letter.

FORMAT:

Inputs must be brief and in exactly the same format as prescribed for functional area summaries (i.e., format, references). Potential SA/QV items shall be marked in the feeder input writeups. See Note 2 for exact format.

DELIVERY:

E-Mail is preferred; send to functional area coordinator with copies to the following:

- 1) SALP Board Member for that area
- 2) NRR SALP Board Member
- 3) NRR project manager
- 4) Functional area coordinator's branch secretary

NOTE 2 - Guidance on Functional Area Summaries

PURPOSE:

Functional area summaries provide highlights of licensee performance, thereby setting the framework for SALP Board discussions.

RESPONSIBILITIES:

The creation of functional area summaries normally is delegated to the functional area coordinator and review and finalization is conducted by the Responsible SALP Board Member. Each functional area coordinator compiles a summary, ensures that it is complete and in proper format, and ensures that it meets the Board Member's desires. Each functional area coordinator is responsible to thoroughly review licensee performance for the assessment period. This review would include the inspection report record, applicable correspondence, and any feeder inputs received.

With only four SALP areas, each area is very broad. Each functional area coordinator should read the MD 8.6 description of the functional area, as well as the category rating definitions, (pages 4-, of MD 8.6 Handbook) to understand and cover the scope.

The NRR Board Member's role is to provide independent, integrated review of safety assessment/quality verification and problem resolution insights. The NRR Board Member will receive all inputs and look for common (cross-functional) themes, and indicators of overall management effectiveness. The NRR Board Member organizes these into a summary format and transmits the SA/QV summary to the DRP branch chief.

The Responsible SALP Board Member reviews the summary and, when satisfied, sends it to the DRP branch chief for compilation into a package.

FORMAT:

Make assessment statements (full sentences) specific and well focused. List under these statements the supporting positive or negative conclusions from applicable inspection reports. It is assumed that all report conclusions are factually based and those facts may need to be brought forward if asked by the Board Member. Summary statements should be concise (from a couple of sentences to a paragraph).

Identify examples as "Positive Observations (+)/Strengths (S)," "Negative Observations (-)/Weaknesses (W)" and "Other Observations (O)." Cite References (e.g., inspection reports - inspectors, or other docketed correspondence) in parentheses at the end of each example. Use **bold print** for items that apply to the last six months of the SALP period (e.g., items that developed in, or continued through, the last six months).

As a substitute (except for SA/QV) and until more experience is gained using the PPR format (Region I Instruction 1440.2 -To be issued), the PPR format is acceptable for use in any of the functional areas and should be used in the operations and maintenance area.

Care should be exercised on what is called a strength and weakness. Strengths (or weaknesses) so stated in inspections should be carefully weighed with the preponderance of the evidence for the entire SALP period and integrated into a reasonable conclusion. A strength (or weakness) is an attribute of licensee performance in which the control measure or performance stands out (in a negative way for weakness) among normally expected performance. Also, the strength (weakness) needs to be well supported by substantial numbers of conclusions over a good number of inspections related to the basic functional activity for which performance is being assessed. Performance related results such as safety-significant initiatives/accomplishments or safety issues/events should be noted in support of the strength or weakness, respectively.

DELIVERY:

E-Mail to DRP branch chief, with copy to DRP branch secretary and SRI.

NOTE 3 - Guidance on Supporting Data

NOTE: Use the PSR and PSR Attachment (developed for PPR meetings) as much as possible without recreating information in a different format for SALP. Maximize the use of accurate IFS/MIP reports in this area

PURPOSE AND RESPONSIBILITIES:

The DRP project engineer will collect supporting data to assist the SALP Board. The DRP branch chief will assign others as needed to develop data.

FORMAT:

The following information should be included in the supporting data package:

- Licensee initiative/self assessment activities summary: List major initiatives and self assessments completed during the SALP period. Correlate these to the most applicable functional area (use SA/QV for site wide efforts) and be sure to address safety significant accomplishments from these efforts within the applicable functional area.
- NRC activities summary: List the number of residents, major inspection initiatives, and team inspections completed during the SALP period. If not completed by using the PPR format within each functional area, list allegations within the functional area, and, if substantiated, cause codes and root cause(s) statements. Also address significant licensing actions (from PM or PSR)
- Licensee's environment for problem identification, including any chilling effect or reluctance to raise safety concerns.
- Events Listing covering: forced outages or forced significant power reductions/transients (>5%), enforcement (no non-cited violations); LERs (which includes trips/scrams), Part 21 reports, other ENS reports retracted or that were not reportable by LER from which performance can be gleaned.

For each event list the causal analysis by providing: date, functional area, cause codes, and root cause (s) statements, if known. Distinguish licensee assessment of root cause from NRC staff assessment of root cause.

Be sure to address perspective on all events and underlying causes within the applicable functional area and in relation to inspection findings.

- Cover letters and executive summaries of inspection reports (Table Index - Report, Date, Inspector).

- Last SALP report.
- Proposed functional area inspection plan for next SALP cycle that identifies each required region-based core inspection procedure/activity, anticipated generic safety issues inspections, and recommended regional initiative and team inspections (with appropriate justification), including scheduled or estimated dates for the inspection.

Caution: Note that it is inappropriate to refer to performance indicator (PI) program results in forming a SALP rating (reference NRC Announcement 200, 11/28/89, signed by EDO). Although NRC staff may describe in the SALP report events and failures that would also appear in PI data, the SALP references are to be based on underlying causes of poor performance and not on PI program results.

DELIVERY:

Hard copy and/or E-Mail to DRP branch chief

NOTE 4 - Guidance on SALP Briefing Package

PURPOSE:

The briefing package helps Board Members study and prepare for the Board.

RESPONSIBILITY:

The DRP branch chief/branch secretary compiles the package and delivers it.

FORMAT:

The package includes:

- 1) Functional area summaries provided by area coordinators, after having been reviewed by the Responsible Board Members.
- 2) Supporting data provided by the DRP PE and others, as assigned.

DELIVERY:

Hard copy to Region I Board Members and resident inspectors. Combination of E-Mail and hard copy to NRR Board Member.

E-Mail (without hard copy portion of the supporting data) to all DRS branch chiefs (for feedback to first level supervisors and functional area feeder authors), all functional area coordinators (for feedback), and SALP observer from outside the Region or Headquarters auditor. CC the E-mail to Board Members

NOTE 5 - Guidance on SALP Boards

PURPOSE:

The SALP Board recommends the category ratings, determines the key insights to go into the SALP report and its cover letter, and proposes regional initiative and team inspections for the ensuing 12-month period. The SALP Board is a forum for collegial discussion of key performance insights, and therefore, does not involve itself in minute details of how the report will be phrased.

RESPONSIBILITY:

Prior to the SALP Board meeting, the Board Chairman should consider consulting with the Deputy Regional Administrator (DRA) to ensure that the board discusses any issues the RA/DRA may have regarding licensee performance. The Chairman manages the overall conduct of the board. A Board Member sponsors discussion of each area as follows:

<u>Area</u>	<u>Sponsor</u>
Operations	DRP Member
Maintenance	DRP Member
Engineering	DRP Member
Plant Support	DRS Member
SA/QV	NRR Member (see discussion below)

The area sponsor may present an area summary personally, or may rely on subject matter experts (e.g., DRS and DRP inspectors). Subject matter experts are brought in for each area as needed by the area sponsor. Additionally, the DRP BC, SRI and other residents, and NRR PM should be present, if possible, throughout the entire Board. After discussing the SALP insights, the area sponsor will lead a discussion of the proposed 12-month inspection plan, focusing on need to add or delete regional initiative and team inspections, or to change timing of significant inspections. The SALP Board will also identify areas for inspection focus through the core inspection program, which will be noted in the facility plant status reports following issuance of the SALP report.

The NRR Board Member will present the SA/QV insights to the board, including observations of common patterns that cross functional areas, and insights into management effectiveness, assurance of quality and problem identification. Note, in particular, the licensee's environment for problem identification, including any chilling effect or reluctance to raise safety concerns. The board will consider these observations for the cover letter.

The DRP branch secretary should ensure that one copy of each inspection report from the SALP period is available for reference in the SALP Board meeting room.

FORMAT/DELIVERY:

Verbal discussion, based on briefing materials, as managed and facilitated by the Chairman. See MD 8.6 for additional detail.

NOTE 6 - Guidance on Writing the SALP Report

PURPOSE:

After the SALP Board meeting, the report, and cover letter are written to capture the insights and conclusions reached during the board meeting.

RESPONSIBILITIES:

The Board Member sponsoring an area (listed in Note 5) is responsible for writing that section of the report and obtaining concurrence/consensus with the report section from other Board Members. The **SALP Board Chairman** has responsibility for the cover letter with input from the NRR Board Member for SA/QV insights. When desired, the SALP Board Chairman may request review of the SALP report by an NRR technical editor, as coordinated through the NRR Board Member.

FORMAT:

SALP report functional area sections should be concise, sharply focused, and superbly written. They should focus on exceptions to routine performance, i.e., particularly strong or weak performance. See MD 8.6 for other guidance.

Target lengths are as follows:

- Operations, Plant Support and cover letter - 1 1/2 pages each
- Maintenance and Engineering - 1 page each

These may be adjusted as needed.

DELIVERY:

By E-Mail, after obtaining consensus, to DRP BC, copy to DRP branch secretary and SALP Board Chairman.

NOTE 7 - Guidance on Developing the 12-month Inspection Plan

PURPOSE:

After the SALP Board meeting, the proposed 12-month inspection plan is updated to incorporate SALP Board inspection recommendations, based upon licensee performance insights.

RESPONSIBILITIES:

The DRP project engineer is responsible for updating the proposed 12-month inspection plan, to incorporate Board Member recommendations, and for merging the inspection plan with the SALP report cover letter. The DRS branch chiefs are responsible for providing schedular input to the inspection plan, including specific start dates and duration for all inspections in the first six months of the SALP period and, as a minimum, month/year for inspections in the second six months of the period (unless licensee milestone schedule information, i.e., emergency exercise or outage dates, is not known).

FORMAT:

The final 12-month inspection plan should be prepared as a separate attachment to the SALP report cover letter.

DELIVERY:

By E-Mail, after obtaining Board Member consensus and DRS branch chief schedule information, to DRP BC, copy to DRP branch secretary and SALP Board Chairman.

NOTE 8 - Guidance on Meeting with Licensees

PURPOSE:

To provide a forum for a candid discussion, with senior licensee management representatives, of issues relating to the licensee's performance.

RESPONSIBILITIES:

The **DRP BC** oversees **DRP** project engineer preparation of **SALP** management meeting slides to suit the needs and preferences of the **RA** or **DRA** and **DRP** branch secretary issuance of the meeting notice and coordination of meeting arrangements and logistics.

The **RA** or **DRA** presides over the meeting and orchestrates presentation of the results, using the slides prepared by the **DRP PE**.

RA/DRA, **SALP** Board Chairman and **NRR PD**, as appropriate, conduct a meaningful dialogue with licensee management representatives, with **NRR** playing an increasingly aggressive role in the Q&A session.

FORMAT:

Typically, the meeting format will be as follows:

- 1) Introductions and broad purposes of **SALP** by **RA/DRA**
- 2) Presentation of all functional area results by the **SALP** Board Chairman
- 3) Presentation of **SA/QV** insights, including the licensee's environment for problem identification, by the **NRR PD** (when attending the meeting).
- 4) Licensee presentation/response
- 5) Question and answer session between the staff and the licensee
- 6) Closing remarks by **RA/DRA**
- 7) Public/media session with the **NRC** staff