

yellow

February 8, 1985

Mississippi Power and Light Company
ATTN: Mr. J. B. Richard
Senior Vice President, Nuclear
P. O. Box 23054
Jackson, MS 39205

Gentlemen:

SUBJECT: LETTER OF TRANSMITTAL

This refers to the meeting held at our request in Atlanta, Georgia, on January 9, 1985. The meeting provided a forum for members of the Region II staff to meet with utilities with power reactors that are to be licensed in the near future and to discuss recent inspection findings and regulatory issues relevant to Near Term Operating License (NTOL) facilities.

It is our opinion that the meeting was beneficial and will result in a better understanding of the issues concerning NTOL utilities. Furthermore, we plan to continue meetings such as this to facilitate the licensing and startup of NTOL facilities.

The meeting summary highlighting the topics discussed and a compilation of the slides presented during the meeting are provided as enclosures to this letter.

Should you have any questions, we will be pleased to discuss them.

Sincerely,

(Original signed by JNGrace)

J. Nelson, Grace
Regional Administrator

50-417

Enclosures:

- 1. Meeting Summary
- 2. Slide Presentation

cc w/encl:

R. T. Lally, Manager of Quality
Middle South Services, Inc.
R. W. Jackson, Project Engineer

bcc w/encl:

NRC Resident Inspector
Document Control Desk
State of Mississippi

RII
CAJutman
01/31/85

RII
AFGibson
01/31/85

RII
PRBemis
02/1/85

RII
JAOlshinski
02/4/85

RII
V.Panciera
02/4/85

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ENCLOSURE 1

MEETING SUMMARY

On January 9, 1985, the NRC Region II office hosted a meeting on issues and policies affecting utilities with nuclear power facilities that are to be licensed in the near future. Representatives of Region II utilities with Near Term Operating License (NTOL) facilities participated in this meeting. An attendance list of all Non-NRC Region II participants is provided in Attachment A to this summary.

The agenda for the meeting, provided as Attachment B, covered topics which were perceived as being most often misinterpreted or misapplied by NTOL utilities, general Region II NTOL regulatory process, and problems prevalent with NTOL facilities. The meeting was concluded with a question and answer session. A compilation of slide presentations is provided in Enclosure 2.

It was the opinion of the Region II staff, and concurred with by numerous attendees, that the conference was very beneficial and provided a useful forum to clarify issues concerning NTOL utilities. It was a consensus opinion that such meetings should continue on an on-going basis.

The conference adjourned at 4:14 PM on January 9, 1985.

Attachments:

- A. Attendance List
- B. Meeting Agenda

ATTACHMENT A

REGION II NTOL MEETING ATTENDEES - JANUARY 9, 1985

Carolina Power and Light Company

H. R. Banks	Manager - Corporate Quality Assurance
N. J. Chiangi	Manager - QA/QC, Harris
A. B. Cutter	Vice President - Nuclear Engineering and Licensing
J. M. Davis	Senior Vice President - Operations Support
M. A. McDuffie	Senior Vice President - Nuclear Generation
R. M. Parsons	General Manager - Completion Assurance
R. A. Watson	Vice President - Harris Nuclear Project
J. L. Willis	General Manager - Shearon Harris
S. R. Zimmerman	Manager - Nuclear Licensing

Duke Power Company

R. O. Sharpe	Nuclear Licensing Engineer
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Georgia Power Company

J. T. Beckham, Jr.	Vice President and General Manager - Nuclear Operations
G. Bockhold	General Manager - Vogtle Nuclear Operations
W. E. Burns	Manager - Nuclear Engineering and Evaluation
D. O. Foster	Vice President and General Manager - Vogtle
H. H. Gregory	General Manager - Vogtle Construction
P. D. Rice	Vice President and General Manager - Quality Assurance

Mississippi Power and Light Company

J. G. Cesake	Manager - Nuclear Licensing
B. Stewart	Construction Manager - Grand Gulf 2

Tennessee Valley Authority

G. G. Brantley	Nuclear Engineer, Nuclear Safety Review
J. D. Collins	Project Engineer, Watts Bar
W. T. Cottle	Site Director, Watts Bar
D. B. Ellis	Nuclear Engineer, Nuclear Licensing
M. S. Kidd	Group Head, Nuclear Safety Review
K. Mali	Nuclear Engineer, Nuclear Licensing
M. S. Martin	Project Engineer, Bellefonte
J. Mulkey	Manager - Technical Services, Watts Bar
R. M. Pierce	Project Manager, Watts Bar
R. H. Shell	Section Supervisor, Nuclear Licensing
D. L. Williams	Supervisor, Nuclear Licensing

NRC - Executive Directors Office

E. B. Blackwood	Regional Coordinator
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ATTACHMENT B

NTOL MEETING AGENDA
January 9, 1985
Region II Offices

<u>Time</u>	<u>Topic</u>	<u>Discussion Leader</u>
9:00 a.m.	Welcome to Attendees and Statement of Purpose of Meeting	James P. O'Reilly Regional Administrator
9:10 a.m.	Role of the Regional Staff in the Licensing Process: Discussion of the extent and timing of actions by the Regional Staff; communications between license applicant, Region, and NRR; significance of FSAR, SER, and confirmation of commitments.	John A. Olshinski Director, Division of Reactor Projects
9:45 a.m.	Regional Preoperational Testing Inspection Program: Discussion of scope and timing of preop inspection, sampling process, need for applicant to closely review test results for acceptability, NRC Bulletin and Notices, need to respond generally to identified deficiencies.	Frank Jape, Chief Test Programs Section
10:00 a.m.	Transition from Construction to Operational Quality Assurance (QA) Programs and Organizations: Relationship between programs and requirements; problems encountered in transition; expectations of NRC, timeliness of Operational QA program implementation.	Charles M. Upright, Chief Quality Assurance Programs Section
10:30 a.m.	Emergency Planning: Recent industry problems; NRC view of significance; Regional inspection program.	William E. Cline, Chief Emergency Preparedness Section
10:50 a.m.	Systematic Assessment of Licensee Performance (SALP): Differences in SALP between construction and operations; NRC views of SALP impact on the licensing process.	Dorald S. Price Technical Support Staff, Division of Reactor Safety
11:00 a.m.	Enforcement Activities: Description of enforcement activities specific to NTOLs, necessity for accurate and complete statements, critical areas where problems have arisen, NRC view of inaccurate submittals, NRC enforcement policy.	Bradley W. Jones Regional Counsel J. Michael Puckett Acting Enforcement Director

<u>Time</u>	<u>Topic</u>	<u>Discussion Leader</u>
12:00 Noon	Lunch (local) restaurants or in-house cafeteria)	
1:00 p.m.	Handling of Employee Identified Problems: Importance of responsive system for handling employee complaints; Regional handling of allegations; utility response to allegations; harassment and intimidation issues.	Bruno Uryc, Investigation/ Allegation Coordinator James Vorse, Director Office of Investigations Atlanta Field Office
1:30 p.m.	Inspection Related to Adequacy of Technical Specification: Recent problems with other NTOLs; NRR Tech Spec development process; Regional team inspections; need to certify adequacy of Tech Specs.	Caudle A. Julian, Chief Operational Programs Section
1:50 p.m.	Surveillance Testing Program: NRC view of significance; need to establish early management controls; procedure development and approval; control of changes.	Stephen P. Weise, Chief Reactor Projects Section 1A
2:10 p.m.	Reactor Operator Training, License Application and Examination: Recent problems with other NTOLs; significance of accuracy of applications; Vogtle operator licensing initiatives.	Bruce Wilson, Chief Operator Licensing Section
2:30 p.m.	Plant Procedures: NRC view of significance; recent problems with other NTOLs; Regional team inspections.	Caudle A. Julian, Chief Operational Programs Section
2:50 p.m.	Operational Readiness Inspections: History of concept; scope of Regional team inspection; Control room discipline; labeling of components; operator staffing and experience.	Paul R. Bemis, Acting Director, Division of Reactor Safety
3:15 p.m.	Vogtle Readiness Review Program	Marvin V. Sinkule, Chief Reactor Projects Section 2D
3:35 p.m.	Question and Answer Session	John A. Olshinski Director, Division of Reactor Projects

<u>Time</u>	<u>Topic</u>	<u>Discussion Leader</u>
4:00 p.m.	Closing Remarks	James P. O'Reilly Regional Administrator
4:15 p.m.	Close of Meeting (for travel planning purposes)	

ENCLOSURE 2

ROLE OF REGION II IN THE LICENSING PROCESS NEAR TERM OPERATING LICENSE (NTOL) ACTION TIMETABLE

<u>MONTHS/DAYS TO OL</u>	<u>ACTION</u>
12-18 MONTHS	<ul style="list-style-type: none">- REVIEW CONSTRUCTION AND PREOPERATIONAL TESTING INSPECTION PROGRAM STATUS- INFORM LICENSEE OF REQUIREMENT, 10 CFR 50.57(1), FOR STATUS OF COMPLETION LETTER DUE PRIOR TO OL- FOLLOW ADVISORY COMMITTEE ON REACTOR SAFEGUARDS (ACRS) ISSUES.
12 MONTHS	<ul style="list-style-type: none">- PROVIDE INPUT TO SAFETY EVALUATION REPORT (SER)
4 - 6 MONTHS	RECEIVE PROOF AND REVIEW TECHNICAL SPECIFICATIONS (PRTS)
6 MONTHS	<ul style="list-style-type: none">- IDENTIFY SAFETY EVALUATION REPORT (SER) CONFIRMATORY ITEMS FOR INSPECTION FOLLOWUP- PROVIDE REGIONAL INPUT TO "OL REVIEW MANAGEMENT REPORT"- ISSUE "READINESS FOR LICENSING" REGIONAL OFFICE NOTICE (RON) (INQUIRY)- PREPARE TO PARTICIPATE IN HEARINGS (IF ANY)

NTOL ACTION TIMETABLE, CONT'D.

- 90 DAYS
 - PUBLISH FIRST "STATUS OF FACILITY COMPLETION LETTER" (94300 LETTER) (PUBLISHED MONTHLY AND PRIOR TO OL)
 - SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
- 60-80 DAYS
 - PERFORM AN ONSITE AND REGIONAL TECHNICAL SPECIFICATIONS REVIEW
 - PERFORM AN ONSITE PROCEDURES REVIEW (OPERATING, EMERGENCY AND SURVEILLANCE)
- 65 DAYS
 - ISSUE "EVALUATION OF LICENSEE PRIOR TO RECOMMENDATION FOR OPERATING LICENSEE" RON (INQUIRY AND ESTABLISHES DATE OF REGIONAL REVIEW PANEL)
- 45 DAYS
 - CONVENE REGIONAL REVIEW PANEL
- 40-60 DAYS
 - RECEIVE THE LICENSEE COMPLETION LETTER
- 30-60 DAYS
 - EMERGENCY PLAN INSPECTION

NTOL ACTION TIMETABLE, CONT'D.

- 30 DAYS
 - SUBMIT PRTS COMMENTS TO NRR
 - ISSUE RESULTS OF REGIONAL REVIEW PANEL -
READINESS FOR LICENSING
- 15 - 30 DAYS
 - FINAL SECURITY PLAN INSPECTION
- 15 DAYS
 - OPERATIONAL READINESS INSPECTION (OPTIONAL)
- 10 DAYS
 - FINAL "STATUS OF FACILITY COMPLETION LETTER"
TO NRR (94300 LETTER)
- 1 DAY
 - PHONE CLOSEOUT OF ITEMS ON ENCLOSURES TO
94300 LETTER
- 0L
 - NRR ISSUES LOW POWER LICENSE
- 30 DAYS
 - RESOLUTION OF CONDITIONS FOR INITIAL
CRITICALITY
- 45 DAYS
 - DEVELOP REGIONAL INPUT TO COMMISSION BRIEFING
FOR FULL POWER LICENSE
- 50-60 DAYS
 - RESOLUTION OF CONDITIONS FOR EXCEEDING 5%
RATED POWER
- 60 DAYS
 - COMMISSION BRIEF FOR FULL POWER LICENSE

FACILITY COMPLETION LETTER CONTENT

MUST CERTIFY WITH ANY AND ALL EXCEPTIONS LISTED THAT:

1. FACILITY DESIGN, CONSTRUCTION AND TESTING IS COMPLETED IN ACCORDANCE WITH THE FSAR AS REVISED.
2. STATION OPERATING PROCEDURES ARE WRITTEN AND APPROVED.
3. STATION EMERGENCY PROCEDURES ARE WRITTEN AND APPROVED.
4. SURVEILLANCE (PERIODIC TEST) PROCEDURES REQUIRED TO IMPLEMENT TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS ARE WRITTEN AND APPROVED.
5. ALL ITEMS IDENTIFIED AS INCOMPLETE AT THE TIME OF FUEL LOADING (OL) HAVE BEEN EVALUATED AND DETERMINED THAT THE INCOMPLETE STATUS DOES NOT PRECLUDE ISSUANCE OF AN OPERATING LICENSE AND WILL NOT AFFECT THE HEALTH AND SAFETY OF THE PUBLIC.
6. THE NUCLEAR SAFETY REVIEW BOARD HAS CONDUCTED A REVIEW AND FOUND FACILITY READY FOR OPERATION.

AREAS OF SAFETY EVALUATION REPORT REGIONAL INPUT

1. MANAGEMENT AND TECHNICAL SUPPORT
ORGANIZATION AND QUALIFICATIONS
2. ADMINISTRATIVE CONTROLS AND PROCEDURES
3. EMERGENCY PLANNING
4. PLANT PROCEDURES MEETING OPERATIONAL
QA PROGRAM REQUIREMENTS
5. TRAINING PROGRAM

OL REVIEW MANAGEMENT REPORT CONTENT

- 1) A NARRATIVE SUMMARY OF LICENSING STATUS
- 2) A NARRATIVE SUMMARY OF HEARING STATUS
- 3) A NARRATIVE SUMMARY OF INSPECTION PROGRAM STATUS INCLUDING:
 - A) EMERGENCY PREPAREDNESS
 - B) SECURITY
 - C) CONSTRUCTION AND PREOPERATIONAL TESTING
 - D) STAFFING (BOTH MANAGEMENT AND LICENSED OPERATORS)
 - E) RADIATION PROTECTION
 - F) FIRE PROTECTION
 - G) ETC.
- 4) A TABLE OF OPEN FSAR ISSUES
- 5) A TABLE OF OPEN ALLEGATIONS, AND
- 6) AN INTEGRATED SCHEDULE OF NRC ACTIVITIES TO BE COMPLETED BEFORE LICENSING

REGIONAL PREOPERATIONAL TESTING
INSPECTION PROGRAM

INSPECTION OBJECTIVES

- TEST PROGRAM ADEQUATELY IMPLEMENTED
- TEST RESULTS DEMONSTRATE SYSTEMS ARE OPERATIONAL
- CONFIRM PRE-OP TESTS DESIGNATED IN FSAR ARE
COMPLETED - RESULTS EVALUATED PRIOR TO ISSUING A
LICENSE

PREOP INSPECTIONS FOR NTOLS, Cont'd.

MANDATORY TEST INSPECTIONS

- ENGINEERED SAFETY FEATURES TEST
- REACTOR PROTECTION SYSTEM TEST
- CONTAINMENT INTEGRATED LEAK RATE TEST
- INTEGRATED HOT FUNCTIONAL TEST
- REACTOR COOLANT SYSTEM HYDROSTATIC TEST

PREOP INSPECTION FOR NTOLS, CONT'D.

GENERAL AREAS OF INSPECTION

- TEST PROGRAM ADMINISTRATIVE CONTROLS
- TEST PROGRAM IMPLEMENTATION
- PRE-OP TEST PROCEDURE REVIEW
- PRE-OP TEST WITNESSING
- EXAMINE COMPLETED TEST RESULTS
- TECHNICAL SPECIFICATION REVIEW/WALKDOWN
- REVIEW/WALKDOWN PLANT PROCEDURES

PREOP INSPECTION FOR NTOLS, CONT'D.

INSPECTION REQUIREMENTS - COMMITMENTS

- FSAR CHAPTER 14.2 PRE-OP/STARTUP TESTING
- QUESTIONS AND ANSWERS TO FSAR CHAPTER 14
- RG 1.68 TEST PROGRAMS FOR NUCLEAR PLANTS
- ANSI 18.7 ADMIN CONTROLS/QA FOR NUCLEAR PLANTS
- QA PROGRAM CHAPTER 17.2
- 10 CFR 50, APPENDIX A AND B
- RG GUIDES - FSAR - SER

PREOP INSPECTION FOR NTOLS, CONT'D.

REGION II INSPECTION PROGRAMS

- 2512 CONSTRUCTION PROGRAM

- 2513 PRE-OPERATIONAL TEST PROGRAM
 - ° QA PROGRAMS

 - ° HP/RADWASTE PROGRAMS

 - ° EMERGENCY PREPAREDNESS

 - ° SECURITY/SAFEGUARDS

 - ° FIRE PROTECTION

 - ° PREOP TEST PROGRAM/FSAR 14.0

- 2514 CORE LOADING - STARTUP TEST PROGRAM
 - ° STARTUP TEST PROGRAM/FSAR CHAPTER 14.0

 - ° QA PROGRAMS

 - ° HP/RADWASTE PROGRAMS

TRANSITION FROM CONSTRUCTION TO OPERATIONAL QUALITY ASSURANCE

GENERAL:

- ALL THOSE PLANNED AND SYSTEMATIC ACTIONS NECESSARY TO PROVIDE ADEQUATE CONFIDENCE THAT A STRUCTURE, SYSTEM, OR COMPONENT WILL PERFORM SATISFACTORILY IN SERVICE (10 CFR 50 APPENDIX B).
- OPERATIONAL QA PROGRAM MUST BE FULLY DEVELOPED AND IMPLEMENTED PRIOR TO LICENSE ISSUANCE. (STANDARD REVIEW PLAN, NUREG 0800) (REGULATORY GUIDES AND ENDORSED STANDARDS)

PROBLEM AREAS

INTERFACES BETWEEN CONSTRUCTION AND OPERATIONAL QA PROGRAMS NOT WELL DEFINED.

- CONSTRUCTION QA PROGRAMS NOT CARRIED OVER WHEN EQUIPMENT TRANSFERRED. HOLE IN QA PROGRAM.
- OPERATIONAL QA PROGRAM NOT COMPATIBLE WITH CONSTRUCTION QA PROGRAM. NO TECHNICAL BASIS FOR DIFFERENCES.
- PROGRAMS NOT DEVELOPED FOR TURN BACK TO CONSTRUCTION. QA CONTROLS NOT APPLIED TO REWORK AND DESIGN CHANGES.

QUALITY RECORDS NOT ASSEMBLED, REVIEWED, AND READY TO TRANSFER AS PLANT COMPLETED.

MANAGEMENT POSITION FOR PERSONNEL PERFORMING QUALITY FUNCTIONS NOT CLEARLY DEFINED. (QA NOT SOLE RESPONSIBILITY OF QA DEPARTMENT)

TRANSITION, CONT'D.

OPERATIONAL QA PROGRAM NOT FULLY DEVELOPED

- PERSONNEL SHORTAGE
- TRAINING INCOMPLETE
- PROCEDURES NOT FULLY DEVELOPED OR INCORRECT
- DRAWINGS NOT UPDATED (NOT USEFUL)
- MEASURES DO NOT COVER ALL QA PROGRAM REQUIREMENTS
- DESIGN CONTROL (10 CFR 50.59)
- PROCUREMENT PROBLEMS
 - VENDOR SELECTION AND SURVEILLANCE
 - Q-LIST
 - COMMERCIAL GRADE ITEMS
- WEAK NONCONFORMANCE CONTROL
 - IMPROPER SIGN-OFF
 - NO ROOT CAUSE DETERMINATION
 - NOT CONSIDERED FOR REPORTABILITY
- SUPERFICIAL QA AUDIT PROGRAM
 - RG 1.33 AND TS SECTION 6
 - UNQUALIFIED AUDITORS
- QA PROGRAM EFFECTIVENESS NOT EVALUATED

NRC EMERGENCY PREPAREDNESS EXERCISE EVALUATION

- I. TYPE - ANNOUNCED, TEAM INSPECTION (4 - 6 PERSONS),

- II. DURATION - 1 - 2 DAYS (NORMALLY),

- III. WHEN - WITHIN 1 YEAR OF FUEL LOAD,

- IV. EXERCISE ELEMENTS
 1. CONTROL ROOM
 2. TECHNICAL SUPPORT CENTER
 3. EMERGENCY OPERATIONS FACILITY
 4. OPERATIONAL SUPPORT CENTER
 5. CORPORATE COMMAND CENTER
 6. OFFSITE MONITORING
 7. PUBLIC INFORMATION (ENC)
 8. MEDICAL SUPPORT

EMERGENCY PREPAREDNESS, CONT'D.

NRC EMERGENCY PREPAREDNESS APPRAISAL PROGRAM

- I. TYPE - ANNOUNCED, TEAM INSPECTION (6 - 8 PERSONS).

- II. DURATION - 2 WEEKS.

- III. WHEN - BEFORE EXERCISE - 12 TO 18 MONTHS BEFORE FUEL LOAD

- IV. REVIEW ELEMENTS.
 1. EP ADMINISTRATION
 2. EMERGENCY ORGANIZATION
 3. TRAINING PROGRAM
 4. FACILITIES/EQUIPMENT
 5. PROCEDURES
 6. COORDINATION W/OFFSITE AGENCIES
 7. REVIEW/AUDIT PROGRAM
 8. WALK THROUGH EVALUATIONS

EMERGENCY PREPAREDNESS, CONT'D.

EMERGENCY PLAN REVIEW FOR NTOLS

- I. RESPONSIBILITY - IE HQS, EPLB LEAD.

- II. SUBMITTAL - 2 TO 2½ YEARS BEFORE FUEL LOAD.

- III. REVIEW PROCESS
 1. LICENSEE SUBMITS PLAN
 2. COMPARE PLAN AGAINST:
 - A. 10 CFR 50.47(B)
 - B. 10 CFR 50 APPENDIX E
 - C. NUREG 0654

 3. NRC SUBMITS QUESTIONS
 4. LICENSEE RESPONDS
 5. NRC REVIEWS REVISED PLANS AND FEMA FINDINGS
 6. FINDS CRITERIA MEET
 7. SER WRITTEN

EMERGENCY PREPAREDNESS, CONT'D.

RECURRING PROBLEMS
EMERGENCY PLAN REVIEWS

1. LACK OF LETTERS OF AGREEMENTS WITH OFFSITE AGENCIES
2. INADEQUATE EMERGENCY ORGANIZATION DEFINITION - AUGMENTATION/STAFFING
3. DEFICIENT EAL/CLASSIFICATION SCHEME
4. LACK OF PROVISIONS FOR DECONTAMINATION OF PERSONNEL EVACUATED FROM SITE.

EMERGENCY PREPAREDNESS, CONT'D.

NRC EMERGENCY PREPAREDNESS
APPRAISALS RECURRING PROBLEMS

1. POST ACCIDENT SAMPLING SYSTEM SHORTCOMINGS
2. INADEQUATE EMERGENCY ORGANIZATION PERSONNEL
STAFFING AND AUGMENTATION
3. INCOMPLETE EMERGENCY PLAN IMPLEMENTING PROCEDURES
4. LACK OF PERSONNEL ACCOUNTABILITY MEANS

EMERGENCY PREPAREDNESS, CONT'D.

NRC EMERGENCY PREPAREDNESS
EXERCISES PROBLEM AREAS

1. NEED FOR THOROUGH ACCIDENT ASSESSMENT AND
PROPER RESPONSE ACTION
2. IMPROPER EMERGENCY CLASSIFICATION
3. LACK OF PROMPT NOTIFICATION AND FOLLOWUP TO
OFFSITE AGENCIES
4. PROMPT AND APPROPRIATE PROTECTIVE ACTION
RECOMMENDATIONS
5. OFFSITE AGENCY PROBLEMS
 - A. PUBLIC INFORMATION
 - B. LACK OF SUPPORT BY OFFSITE AGENCIES
 - C. ACTIVATION OF ENS/PNS

EMERGENCY PREPAREDNESS, CONT'D.

SUMMARY OF NRC INCIDENT RESPONSE PROGRAM

1. PROGRAM ELEMENTS
 - PLANS/PROCEDURES
 - EMERGENCY ORGANIZATION
 - TRAINING
 - EQUIPMENT/FACILITIES
 - PERIODIC EXERCISE, DRILLS AND TESTS

2. FEDERAL RADIOLOGICAL EMERGENCY RESPONSE PLAN

3. FEDERAL FIELD EXERCISE (FFE)

4. LESSONS LEARNED FROM FFE
 - EXPANDED SITE TEAM
 - COMMUNICATIONS NEEDS
 - FACILITY NEEDS
 - PROCEDURAL/PLAN IMPROVEMENTS

**UNITED STATES
NUCLEAR REGULATORY
COMMISSION**

SYSTEMATIC ASSESSMENT

OF

LICENSEE PERFORMANCE

(SALP)

SALP PROGRAM OBJECTIVES

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

PERFORMANCE ANALYSIS AREAS FOR OPERATING REACTORS

1. PLANT OPERATIONS
2. RADIOLOGICAL CONTROLS
3. MAINTENANCE
4. SURVEILLANCE
5. FIRE PROTECTION
6. EMERGENCY PREPAREDNESS
7. SECURITY AND SAFEGUARDS
8. REFUELING
9. QUALITY ASSURANCE PROGRAM
10. LICENSING ACTIVITIES

PERFORMANCE ANALYSIS AREAS FOR CONSTRUCTION REACTORS

1. SOILS AND FOUNDATIONS
2. CONTAINMENT AND OTHER
SAFETY RELATED STRUCTURES
3. PIPING SYSTEMS AND SUPPORTS
4. SAFETY RELATED COMPONENTS
5. SUPPORT SYSTEMS
6. ELECTRICAL POWER SUPPLY
DISTRIBUTION
7. INSTRUMENTATION AND CONTROL
8. LICENSING ACTIVITIES
9. CONSTRUCTION QUALITY
ASSURANCE PROGRAM

EVALUATION CRITERIA

1. MANAGEMENT INVOLVEMENT IN ASSURING QUALITY
2. APPROACH TO RESOLUTION OF TECHNICAL ISSUES FROM THE SAFETY STANDPOINT
3. RESPONSIVENESS TO NRC INITIATIVES
4. ENFORCEMENT HISTORY
5. REPORTING AND ANALYSIS OF REPORTABLE EVENTS
6. STAFFING (INCLUDING MANAGEMENT)
7. TRAINING EFFECTIVENESS AND QUALIFICATION

AREA PERFORMANCE

CATEGORY 1

REDUCED NRC ATTENTION MAY BE APPROPRIATE. LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE AGGRESSIVE AND ORIENTED TOWARD NUCLEAR SAFETY; LICENSEE RESOURCES ARE AMPLE AND EFFECTIVELY USED SUCH THAT A HIGH LEVEL OF PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

AREA PERFORMANCE

CATEGORY 2

NRC ATTENTION SHOULD BE MAINTAINED AT NORMAL LEVELS. LICENSEE MANAGEMENT ATTENTION AND INVOLVEMENT ARE EVIDENT AND ARE CONCERNED WITH NUCLEAR SAFETY; LICENSEE RESOURCES ARE ADEQUATE AND ARE REASONABLY EFFECTIVE SUCH THAT SATISFACTORY PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

AREA PERFORMANCE

CATEGORY 3

BOTH NRC AND LICENSEE ATTENTION SHOULD BE INCREASED. LICENSEE MANAGEMENT ATTENTION OR INVOLVEMENT IS ACCEPTABLE AND CONSIDERS NUCLEAR SAFETY, BUT WEAKNESSES ARE EVIDENT; LICENSEE RESOURCES APPEAR TO BE STRAINED OR NOT EFFECTIVELY USED SUCH THAT MINIMALLY SATISFACTORY PERFORMANCE WITH RESPECT TO OPERATIONAL SAFETY OR CONSTRUCTION IS BEING ACHIEVED.

TREND

IMPROVED: LICENSEE PERFORMANCE HAS GENERALLY IMPROVED OVER THE COURSE OF THE SALP ASSESSMENT PERIOD

SAME: LICENSEE PERFORMANCE HAS REMAINED ESSENTIALLY CONSTANT OVER THE COURSE OF THE SALP ASSESSMENT PERIOD

DECLINED: LICENSEE PERFORMANCE HAS GENERALLY DECLINED OVER THE COURSE OF THE SALP ASSESSMENT PERIOD

SYSTEMATIC ASSESSMENT OF
LICENSEE PERFORMANCE (SALP)

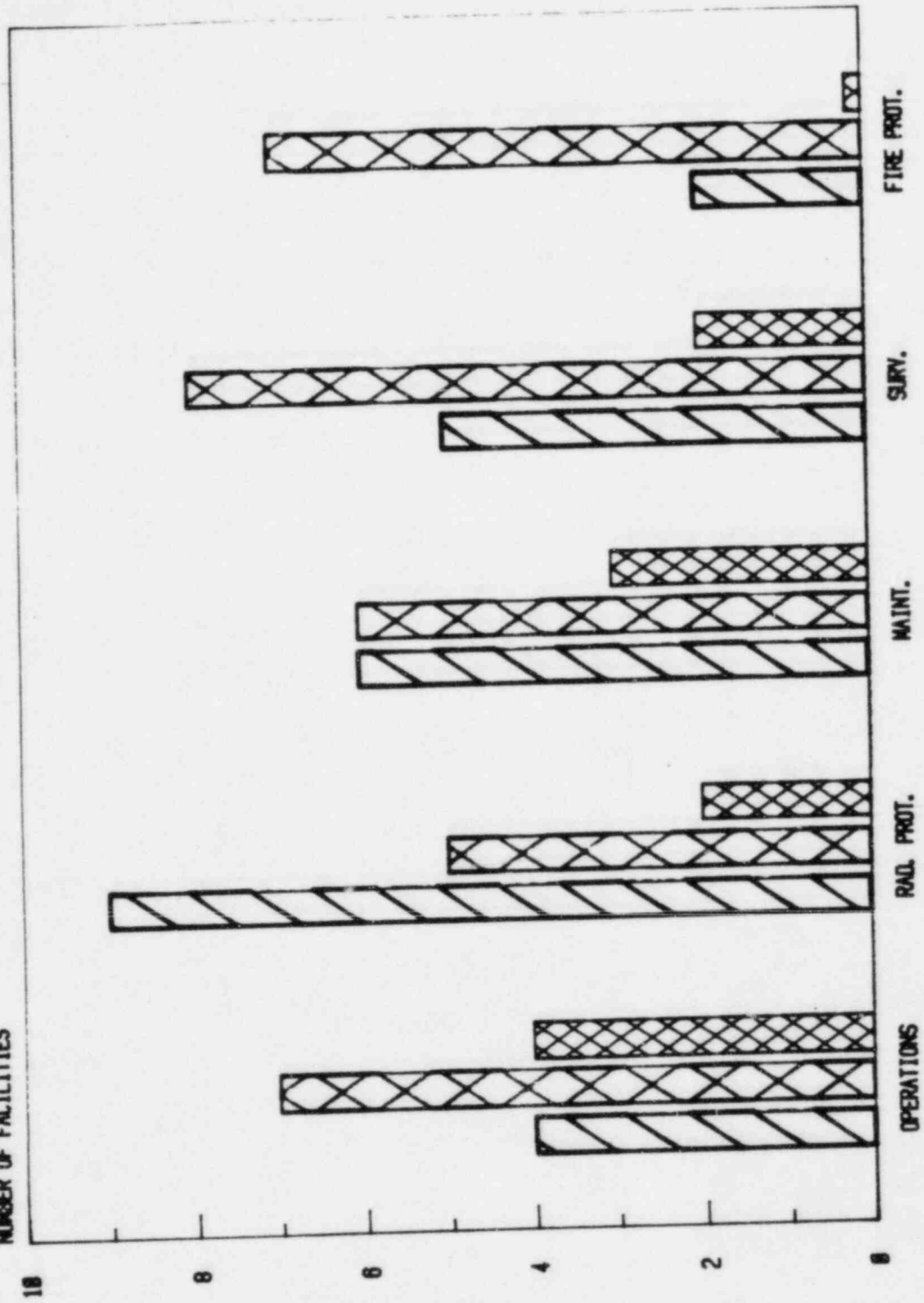
SALP PROCESS

1. NRC STAFF DRAFTS SALP BOARD REPORT
2. SALP BOARD MEETING
3. SALP BOARD REPORT ISSUED
4. MEETING WITH LICENSEE
5. RECEIPT OF LICENSEE COMMENTS
6. ISSUE SALP BOARD REPORT APPENDIX

FUNCTIONAL AREA COMPARISON

OPERATIONS

NUMBER OF FACILITIES



FUNCTIONAL AREAS

CATEGORY 1



CATEGORY 2

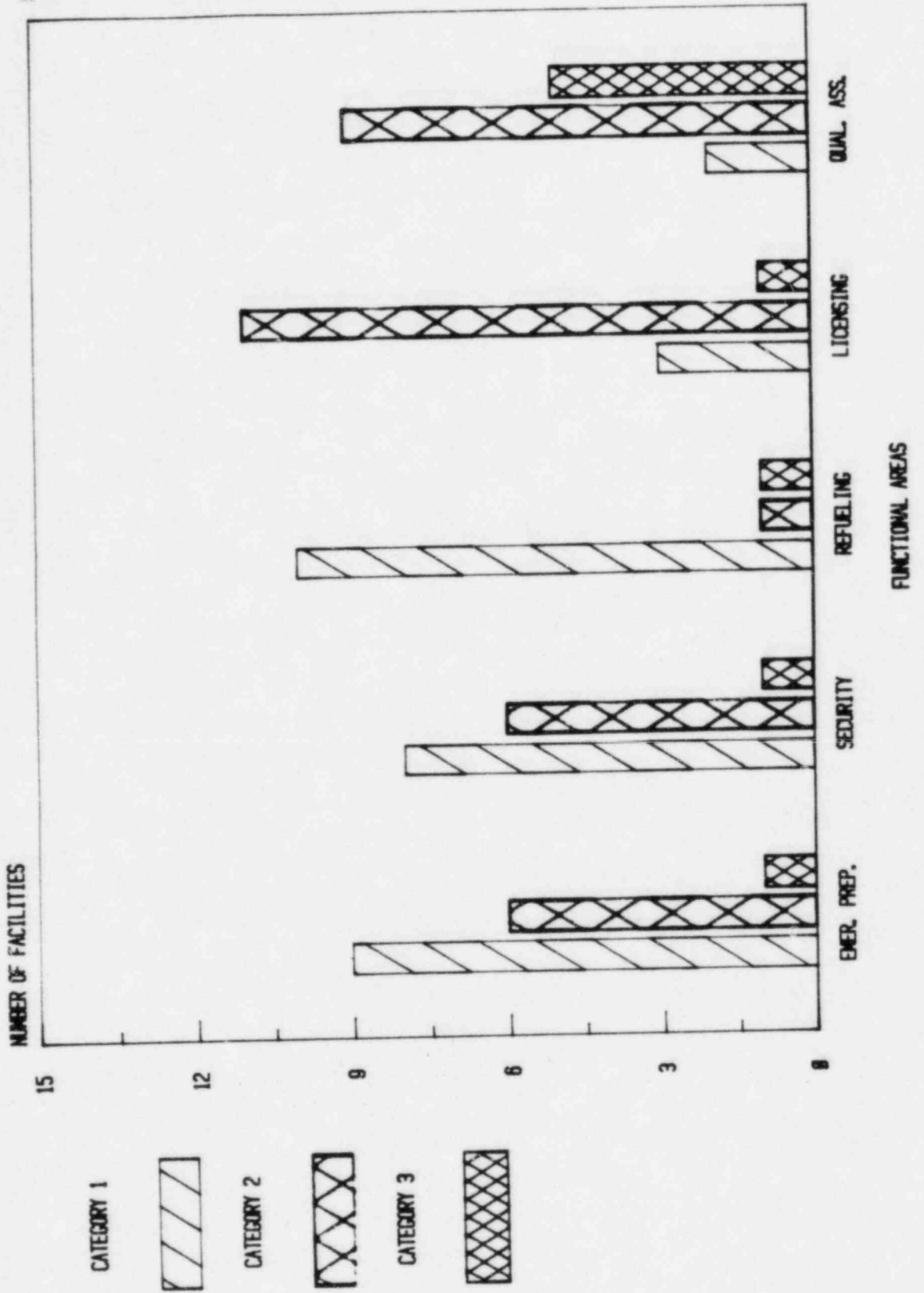


CATEGORY 3



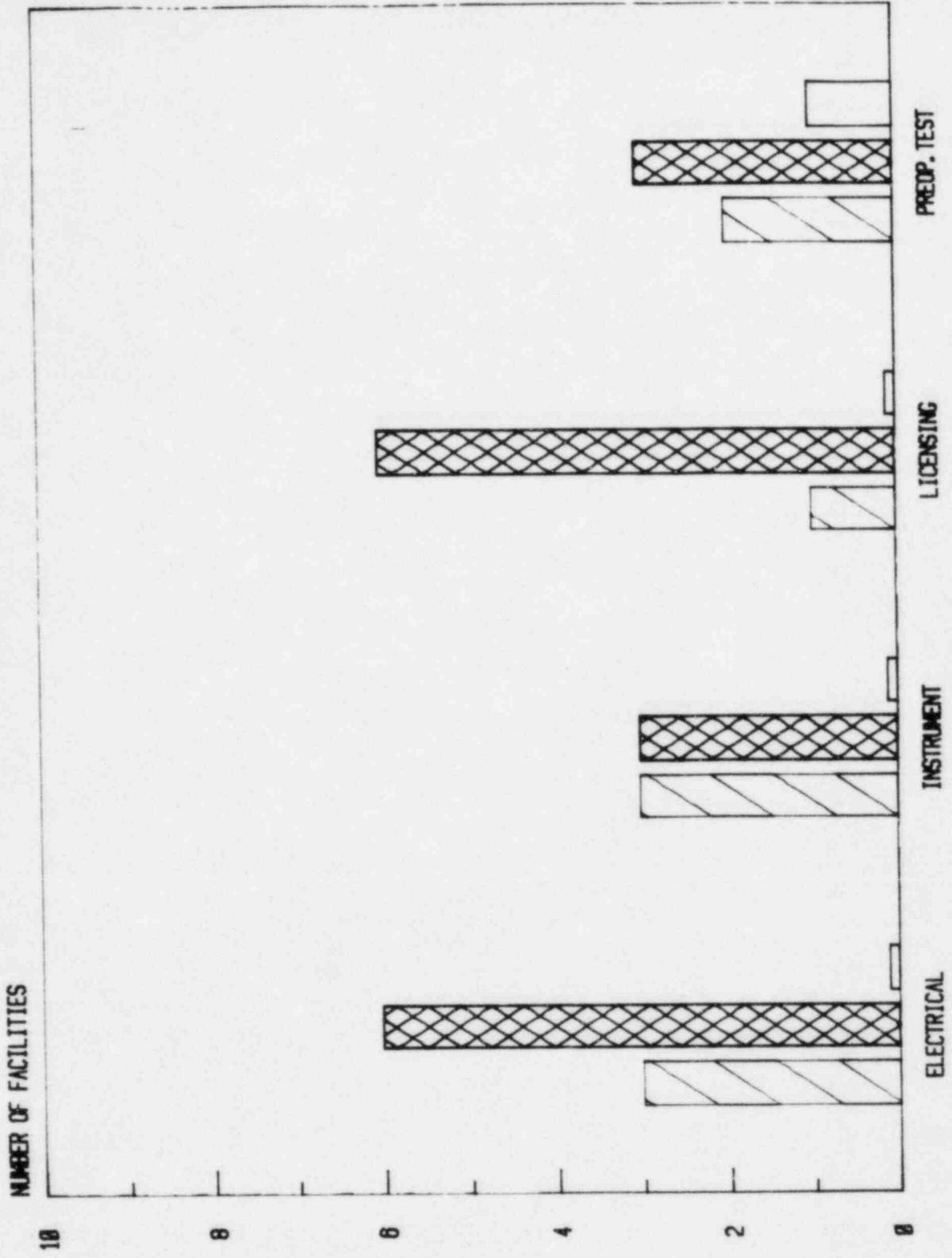
FUNCTIONAL AREA COMPARISON

OPERATIONS



FUNCTIONAL AREA COMPARISON

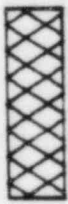
CONSTRUCTION



CATEGORY 1



CATEGORY 2

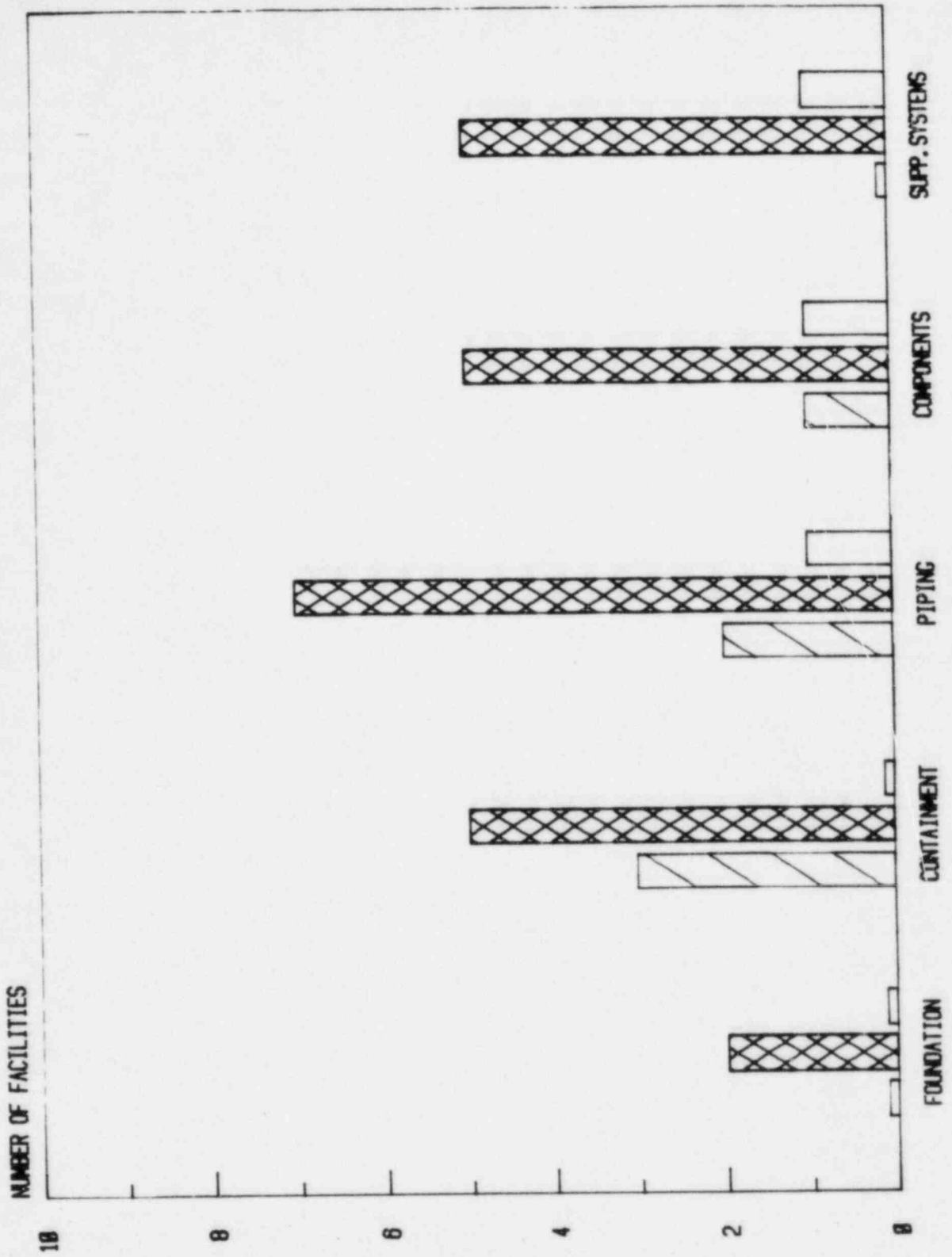


CATEGORY 3



FUNCTIONAL AREA COMPARISON

CONSTRUCTION



ENFORCEMENT ASPECTS OF
LICENSEE COMMUNICATIONS WITH THE NRC

A. WRITTEN COMMUNICATIONS

1. MATERIAL FALSE STATEMENT

A. DEFINITION

(1) MATERIAL

DID THE STATEMENT HAVE THE CAPABILITY TO INFLUENCE
THE DECISION MAKING PROCESS OF A REVIEWER?

(2) FALSE

2. SAFETY SIGNIFICANCE

THE ISSUE MUST HAVE SAFETY SIGNIFICANCE, BUT DEGREE IS NOT SIGNIFICANT.

3. REGULATORY SIGNIFICANCE

THAT A MATERIAL FALSE STATEMENT WAS MADE IS OF REGULATORY SIGNIFICANCE.
SEVERITY LEVEL DEPENDS UPON HOW STATEMENT CAME TO BE MADE.

A. SEVERITY LEVEL I

KNOWING AND WILLING

B. SEVERITY LEVEL II

CARELESS DISREGARD

C. SEVERITY LEVEL III

ALL OTHER

B. VERBAL COMMUNICATIONS

1. DEFINITION

2. NEED FOR DOCUMENTATION

A. TO NRC

B. FROM NRC

HANDLING OF EMPLOYEE IDENTIFIED PROBLEMS

REGION II HANDLING OF EMPLOYEE IDENTIFIED CONCERNS/ALLEGATIONS

- REGION II GENERAL POLICY

REGION II PROCESSING OF ALLEGATIONS

- RECEIPT OF ALLEGATIONS
- RESOLUTION OF ALLEGATIONS
- CONFIDENTIAL SOURCES

NEED FOR LICENSEE PROGRAMS TO DEAL WITH EMPLOYEE CONCERNS/ALLEGATIONS

- IMPORTANCE
- FOLLOW THROUGH/RESOLUTION

IMPACT ON LICENSING

- DETAILED REVIEW/INVESTIGATION
- IMPORTANCE OF DOCUMENTATION

LICENSEE PROGRAM RELATIONSHIP TO NRC PROGRAM

- PREFERENCE FOR LICENSEE ACTION REGARDING CONCERNS
- NRC MONITORING OF LICENSEE ACTIONS

IMPORTANCE OF MANAGEMENT AWARENESS CONCERNING ALLEGATIONS

- CORPORATE LEVEL INVOLVEMENT
- MID LEVEL MANAGEMENT INVOLVEMENT
- WORK FORCE INVOLVEMENT

TECHNICAL SPECIFICATION INSPECTION FOR NTOLS

POSITION:

- FACILITY TECHNICAL SPECIFICATIONS ISSUED WITH THE OPERATING LICENSE SHALL BE ACCURATE, UNDERSTANDABLE TO THE OPERATORS, AND ENFORCEABLE.

METHODS TO ACCOMPLISH:

1. ESTABLISH EARLY A FORMAL MANAGEMENT CONTROL SYSTEM FOR TS DEVELOPMENT AND REVISION.
2. ENSURE EXTENSIVE INPUT OF PLANT OPERATIONS IN TS DEVELOPMENT.
3. FORMALIZE INFORMATION EXCHANGE WITH NRC DURING TS DEVELOPMENT.

TS DEVELOPMENT:

- APPLICANT SUBMITS MARKED UP STANDARD TECHNICAL SPECIFICATION (STS) TO NRR.
- INFORMATION EXCHANGE BETWEEN APPLICANT AND NRR TO AGREE ON DRAFT TS.
- NRR ISSUES PROOF AND REVIEW TS FOR COMMENT TO NRC STAFF AND APPLICANT.
- FINAL DRAFT OF TS ISSUED BY NRR.
- NRR REQUESTS CERTIFICATION FROM APPLICANT OF ACCEPTABILITY OF TS.
- TS ISSUED AS APPENDIX A TO OPERATING LICENSE.

TS INSPECTIONS FOR NTOLS, CONT'D.

REGIONAL ACTIONS:

- REVIEW PROOF AND REVIEW TS AND RETURN COMMENTS TO NRR.

- CONDUCT ON-SITE TEAM INSPECTION TO COMPARE TS TO AS-BUILT PLANT.

- DOCUMENT FINDINGS IN INSPECTION REPORT TO APPLICANT AND FORWARD COPY OF REPORT TO NRR.

REFERENCES TO NRC INSPECTION REPORTS

- 50-390/84-50
- 50-416/84-06
- 50-482/84-42
- 50-413/84-38

SURVEILLANCE TESTING PROGRAM FOR NTOLS

POSITION:

SURVEILLANCE REQUIREMENTS ARE TO PROVIDE TESTING, CALIBRATION, MONITORING, AND INSPECTION IN SUFFICIENT SCOPE, DEPTH, AND FREQUENCY TO PROVIDE ASSURANCE THAT EQUIPMENT, SYSTEMS AND PROCESS VARIABLES ARE WITHIN LIMITING CONDITIONS FOR OPERATION.

- THERE SHALL BE A WRITTEN APPROVED PROCEDURE FOR PERFORMING, EVALUATING AND DOCUMENTING EACH SURVEILLANCE TEST REQUIRED BY TECHNICAL SPECIFICATIONS.

USNRC REGULATORY GUIDE 1.33, REV. 2, APPENDIX A, PARAGRAPH 8.B.

ANSI N18.7-1976/ANS 3.2 PARAGRAPHS 5.2.8, 5.3.7, 5.3.10

MANAGEMENT CONTROL SYSTEM FOR PROCEDURE DEVELOPMENT

A. ESTABLISH EARLY AND REFINE

B. METHODS:

1. ASSIGNMENT OF CLEAR RESPONSIBILITIES FOR ENSURING ALL TS SURVEILLANCES COVERED BY PROCEDURE
 - TRAIN PERSONNEL IN SURVEILLANCE WRITING REQUIREMENTS/TECHNIQUES
 - PROVIDE A USEABLE CROSS-REFERENCE INDEX RELATING TS TO SURVEILLANCE PROCEDURES
2. FORMALIZE METHODS FOR REVIEW AND APPROVAL OF PROCEDURES AND CONTROL OF REVISIONS
3. ESTABLISH METHODS TO ACCOMMODATE LATE CHANGES TO DRAFT TS, INCLUDING TRAINING

SURVEILLANCE TESTING, CONT'D.

4. COORDINATE OTHER PROGRAMS WITH SURVEILLANCE PROCEDURES
 - TAGOUT SYSTEM
 - CONTROL OF LIFTED LEADS
 - INDEPENDENT VERIFICATION
 - LCO TRACKING

SURVEILLANCE DEVELOPMENT PRIOR TO OL

- A. TEST RUN COMPLICATED SURVEILLANCES IN THE FIELD DURING PREOP. (INVOLVE OPERATING STAFF).
- B. REQUIRE FORMAL FEEDBACK OF FIELD EXPERIENCE FOR REVISIONS.
- C. CONDUCT TRAINING ON SURVEILLANCE PROCEDURES AND PROCEDURAL ADHERENCE.
- D. IMPLEMENT USE OF PROCEDURES PRIOR TO OL.
- E. DEVELOP DETAILED MASTER SURVEILLANCE SCHEDULES.

REGIONAL ACTION

PRIOR TO OL, REGION II WILL CONDUCT A TEAM INSPECTION OF ALL PLANT PROCEDURES. SURVEILLANCE PROCEDURES ARE A MAJOR PART OF THAT INSPECTION EFFORT.

NOTE: READINESS FOR LICENSING LETTER SHOULD INCLUDE EXCEPTIONS WRT UNAPPROVED/UNWRITTEN SURVEILLANCE PROCEDURES.

AT AND BEYOND OL

- A. WHILE PROCEDURES ARE REQUIRED WHEN NEEDED, LACK OF ATTENTION TO DETAIL HAS RESULTED IN:
 - MISSED SURVEILLANCES (NO PROCEDURE OR INADEQUATE SCHEDULING/TRACKING)
 - TECHNICALLY INADEQUATE SURVEILLANCE
 - PLANT UNAVAILABILITY
 - ENFORCEMENT ACTION

SURVEILLANCE TESTING, CONT'D.

B. DISCIPLINE OF OPERATIONS - SURVEILLANCE

1. ESTABLISH RELIABLE METHOD FOR OPERATORS TO VERIFY ALL NECESSARY SURVEILLANCES ARE CURRENT PRIOR TO A MODE CHANGE.
2. ENCOURAGE STAFF TO IMPROVE PROCEDURES AND DEMAND PROCEDURAL ADHERENCE OR CORRECTION PRIOR TO PROCEEDING.
3. ESTABLISH ADMINISTRATIVE CONTROLS TO ENSURE USE OF CURRENT PROCEDURES.
4. ENSURE DETAILED EVALUATION OF SURVEILLANCE RESULTS BY RESPONSIBLE PLANT STAFF. CLEAR DOCUMENTATION OF OFFNORMAL RESULTS AND PROMPT EVALUATION OF SYSTEM OPERABILITY.

- C. ESTABLISH ADMINISTRATIVE CONTROLS TO RAPIDLY AND ACCURATELY REVISE SURVEILLANCES WHEN TS CHANGE.

REGIONAL ACTION:

AFTER OL, RESIDENT AND REGIONAL BASED INSPECTORS REVIEW/OBSERVE SURVEILLANCE ACTIVITIES AND REVIEW MANAGEMENT CONTROLS.

REFERENCES:

50-324 AND 325/82-28

50-416/82-55

50-369/84-10 AND 84-15

IE NOTICES 83-53, 84-37, 84-46, 84-51

OPERATOR LICENSING

- REGIONAL MEETING WITH UTILITY TRAINING GROUPS, OCTOBER 11 - 12, 1984 (MEETING SUMMARY SENT TO ALL ATTENDEES) WILL BE REPEATED OCTOBER 1985
- CHANGE TO 10 CFR 55 PUBLISHED IN FEDERAL REGISTER OCTOBER 24, 1984
(ELIMINATES EXEMPTION TO 10 CFR 55.25(B))
- PROPOSED RULE, 10 CFR 50 AND 55 PUBLISHED IN FEDERAL REGISTER NOVEMBER 26, 1984
(COMMENT PERIOD EXPIRES FEBRUARY 25, 1984)
- DRAFT REG. GUIDE 1.8, 1.134, 1.149 PUBLISHED IN DECEMBER 21, 1984
(TRAINING, MEDICAL AND SIMULATOR GUIDANCE)

COLD LICENSING CHRONOLOGY

- ESTABLISH TENTATIVE EXAMINATION DATES
TIME: MORE THAN ONE YEAR PRIOR TO FUEL LOADING

- SEND CORPORATE NOTIFICATION LETTER
TIME: 90 DAYS PRIOR TO EXAM

- REVIEW APPLICATIONS (FORM 398)/DETERMINE ELIGIBILITY
TIME: < 60 DAYS PRIOR TO EXAM

- REVIEW REFERENCE MATERIAL SUPPLIED
TIME: 30 - 60 DAYS PRIOR TO EXAM

- COLD LICENSE EXAMS (USUALLY 2 SETS)
TIME: 2 - 6 MONTHS PRIOR TO FUEL LOADING

- HOT EXAMINATIONS
TIME: PLANT REACHES AT LEAST 20% POWER

PLANT PROCEDURES FOR NTOLS

POSITION:

- 10 CFR 50, APPENDIX B, CRITERION V, REQUIRES WRITTEN PROCEDURES FOR ACTIVITIES AFFECTING QUALITY.

- TECHNICAL SPECIFICATION 6.8.1 REQUIRES THAT WRITTEN PROCEDURES SHALL BE ESTABLISHED, IMPLEMENTED, AND MAINTAINED COVERING THE ACTIVITIES REFERENCED BELOW:
 1. THE APPLICABLE PROCEDURES RECOMMENDED IN APPENDIX A OF REGULATORY GUIDE 1.33, REVISION 2, FEBRUARY 1978.
 2. THE EMERGENCY OPERATING PROCEDURES REQUIRED TO IMPLEMENT THE REQUIREMENTS OF NUREG-0737 AND SUPPLEMENT NO. 1 TO NUREG-0737 AS STATED IN GENERIC LETTER NO. 82-33.

METHODS TO ACCOMPLISH:

1. ESTABLISH EARLY A MANAGEMENT CONTROL SYSTEM FOR PROCEDURE DEVELOPMENT.
2. EMPHASIZE TO ALL STATION PERSONNEL THE NEED TO ADHERE TO PROCEDURES.
3. PUT IN PLACE EFFECTIVE ADMINISTRATIVE PROCEDURES TO ESTABLISH, IMPLEMENT, AND MAINTAIN PLANT PROCEDURES.
4. ENCOURAGE STAFF TO INITIATE CHANGES TO IMPROVE PROCEDURES.
5. IMPLEMENT USE OF PROCEDURES PRIOR TO ISSUANCE OF OL.
6. IMPLEMENT INDEPENDENT VERIFICATION
7. TRAIN PERSONNEL ON PROCEDURES

PLANT PROCEDURES FOR NTOLS, CONT'D.

REGIONAL ACTION:

- PRIOR TO OL REGION II WILL CONDUCT A TEAM INSPECTION OF PLANT PROCEDURES TO VERIFY READINESS.

REFERENCES TO NRC INSPECTION REPORTS

- 50-390/84-73
- 50-389/83-11, 83-22, 83-29
- 59-482/84-56
- 50-413/84-53

OPERATIONAL READINESS INSPECTION FOR NTOLS

POSITION:

- FACILITY SHALL BE OPERATIONALLY READY BEFORE PROCEEDING TO EACH PLATEAU IN PLANT STARTUP AND POWER ESCALATION.

METHODS TO ACCOMPLISH:

1. ENSURE ADEQUATE NUMBER OF FULLY TRAINED PERSONNEL FOR PLANT OPERATIONS.
2. HAVE SUFFICIENT LICENSED OPERATORS AND SENIOR OPERATORS TO ALLOW TRAINING.
3. ESTABLISH, IMPLEMENT, AND MAINTAIN PLANT PROCEDURES (EMERGENCY, ANNUNCIATOR, OFF NORMAL, OPERATING, SURVEILLANCE, MAINTENANCE, ETC.),
4. ESTABLISH PLANT REVIEW COMMITTEES REQUIRED BY LICENSE.
5. CONDUCT TRAINING ON OPERATING LICENSE AND TS.
6. ESTABLISH MAINTENANCE PROGRAM WITH ADMINISTRATIVE CONTROL ALLOWING OPERATIONS TO MAINTAIN CONTROL OF PLANT.
7. PROVIDE SUPPORT TO OPERATING STAFF TO RELIEVE ADMINISTRATIVE BURDEN.
8. IMPLEMENT INDEPENDENT VERIFICATION PROGRAM.
9. IMPLEMENT MANAGEMENT PHILOSOPHY OF DISCIPLINE OF OPERATIONS IN THE CONTROL ROOM AND THROUGHOUT THE FACILITY.
10. PROVIDE ADEQUATE LABELING OF COMPONENTS THROUGHOUT THE PLANT.
11. IMPLEMENT REQUIREMENTS FOR ADEQUATE SHIFT RELIEF AND TURNOVER.
12. ESTABLISH ADEQUATE SHIFT LOGS, TAG SYSTEM, JUMPER AND LIFTED LEAD SYSTEM.
13. ENSURE PLANT MANAGEMENT AWARENESS AND INVOLVEMENT IN DAY-TO-DAY ACTIVITIES.

REGIONAL ACTIONS

- RESIDENT AND REGIONAL BASED INSPECTORS WILL CONFIRM THESE ITEMS DURING ROUTINE INSPECTIONS.
- SPECIAL TEAM INSPECTION MAY BE PERFORMED TO ASSESS OPERATIONAL READINESS.

READINESS REVIEW

INTRODUCTION

THE PURPOSE OF THIS SESSION IS TO FAMILIARIZE YOU WITH THE REASONS FOR THE QUALITY PROBLEMS EXPERIENCED BY SEVERAL PLANTS IN THE LATTER PORTIONS OF CONSTRUCTION AND TO FAMILIARIZE YOU WITH THE POTENTIAL OF THE READINESS REVIEW CONCEPT TO PROVIDE EARLY RESOLUTION OF THESE PROBLEMS.

READINESS REVIEW, CONT'D.

RESULTS OF QA REPORT TO CONGRESS (NUREG-1055, MAR 84)

- STUDY UNDERTAKEN TO DETERMINE THE REASONS FOR DESIGN AND CONSTRUCTION PROBLEMS AT A NUMBER OF PLANTS IN CONSTRUCTION PHASE AND NEARING OPERATIONAL PHASE
- ADDRESSED PLANTS WITH DESIGN AND/OR CONSTRUCTION QUALITY PROBLEMS
- IDENTIFIED TYPES OF QUALITY PROBLEMS ENCOUNTERED
- IDENTIFIED CAUSES OF QUALITY PROBLEMS
 - LACK OF MANAGEMENT OVERSIGHT
 - FAILURE TO IMPLEMENT QUALITY ASSURANCE CONTROLS
 - INADEQUATE STAFFING
 - LACK OF MANAGEMENT SUPPORT FOR QUALITY PROGRAMS
 - FAILURE TO ADEQUATELY ADDRESS EMPLOYEE IDENTIFIED QUALITY PROBLEMS
 - LACK OF APPRECIATION OF ASME CODES
 - LACK OF UNDERSTANDING OF NRC ROLE
 - TENDENCY TO VIEW NRC REQUIREMENTS AS PERFORMANCE GOALS
 - INABILITY TO RECOGNIZE RECURRING QUALITY PROBLEMS AS PROGRAMMATIC DEFICIENCIES
 - FAILURE TO RECOGNIZE AND ADJUST TO CHANGES
 - FAILURE TO USE QUALITY ASSURANCE AS A TOOL
- ROOT CAUSES OF QUALITY PROBLEMS
 - LACK OF NUCLEAR EXPERIENCE
 - INADEQUATE MANAGEMENT CAPABILITY

READINESS REVIEW, CONT'D.

QUALITY PROBLEMS ENCOUNTERED WITH OPERATIONAL PROGRAMS

- INADEQUATE PROCEDURES
- INADEQUATE TECHNICAL SPECIFICATIONS
- OPERATOR QUALIFICATIONS INSUFFICIENT

READINESS REVIEW, CONT'D.

GEORGIA POWER COMPANY'S READINESS REVIEW PROGRAM

- WHAT IS READINESS REVIEW?

- WHY WAS IT IMPLEMENTED?
 - IMPROVED PLANNING WHICH WILL ENHANCE THE EFFECTIVE USE OF RESOURCES

 - IMPROVED PREDICTABILITY RESULTING FROM EARLY NUCLEAR REGULATORY COMMISSION DETERMINATION OF PROGRAM ADEQUACY

 - ENHANCED ASSURANCE OF THE OVERALL PROGRAM ACCEPTABILITY RESULTING FROM GEORGIA POWER COMPANY'S SELF ASSESSMENT COMBINED WITH THE PHASED INDEPENDENT PROGRAM ACCEPTANCE

 - IMPROVED STABILITY BY MINIMIZING THE POTENTIAL FOR LAST MINUTE IDENTIFICATION OF MAJOR PROGRAMMATIC PROBLEMS

READINESS REVIEW, CONT'D.

GEORGIA POWER COMPANY'S READINESS REVIEW PROGRAM

- PROGRAM INCLUDES A RELOOK AT PAST PERFORMANCE IN THE DESIGN AND CONSTRUCTION AREAS AS WELL AS OPERATIONAL READINESS

- GPC FUNCTIONALLY DIVIDED INTO FIVE FUNCTIONAL AREAS: CIVIL, MECHANICAL, ELECTRICAL, INSTRUMENTATION AND OPERATIONS

- FOR EACH AREA GPC IS PERFORMING A REVIEW TO DETERMINE THAT:
 - ALL REQUIREMENTS AND COMMITMENTS HAVE BEEN IDENTIFIED
 - A PROGRAM AND ORGANIZATION WAS ESTABLISHED TO ENSURE THAT THE REQUIREMENTS WERE MET
 - THE PROGRAM WAS IMPLEMENTED IN ACCORDANCE WITH THE REQUIREMENTS
 - DESIGN WAS ACCOMPLISHED IN ACCORDANCE WITH THE REQUIREMENTS AND COMMITMENTS

- GPC MANAGEMENT OVERVIEW

READINESS REVIEW, CONT'D.

SUMMARY

- PROGRAM IS VIEWED AS EXPERIMENTAL

- MUST BE OBJECTIVELY EVALUATED TO DETERMINE REAL BENEFITS

- PRIMARILY LOOKING FOR BETTER METHODS TO ASSURE HEALTH AND SAFETY OF PUBLIC

- EARLY IDENTIFICATION AND RESOLUTION OF PROBLEMS