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UNITED STATES

#### NUCLEAR REGULATORY COMMISSION

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611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76013-8064

May 23, 1996

Siemens Power Corporation ATTN: B. N. Femreite, Vice President Engineering and Manufacturing 2101 Horn Rapids Road P.O. Box 130 Richland, Washington 99352-0130

SUBJECT: PERFORMANCE REVIEW OF LICENSED ACTIVITIES AND MEETING ANNOUNCEMENT

On May 10, 1996, managers and staff from Region IV and the Office of Nuclear Material Safety and Safeguards met to conduct an assessment of your performance of licensed activities. This Licensee Performance Review is part of a pilot program initiated by the NRC to give us a better perspective of your performance in order to facilitate planning and allocation of inspection resources. This initial Licensee Performance Review of your facility included evaluation of licensee event reports, findings from NRC inspections. enforcement actions, and other interactions between Siemens and the NRC during the period of February 1, 1994, through January 31, 1996. The areas reviewed and the results are outlined in the enclosure. As confirmed in a May 20, 1996, telephone discussion between Mr. Vaughn of your staff and Mr. Wenslawski of this office, this review will be discussed with you in a meeting at the Siemens facility on June 18, 1996, at 9 a.m. This meeting will be open for interested members of the public to attend as observers pursuant to the "Staff Meetings Open to the Public; Final Policy Statement" (September 20, 1994; 59 FR 48340).

Our review indicates that you have exhibited a good level of performance with attention to safety. It is noted that administrative improvements are warranted in the area of material control and accounting. As a result of the review, we will continue the inspection program at the normal level with special focus on the startup and operation of the new dry conversion facility.

In accordance with 10 CFR 2.790 of NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

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

Sincerely,

Callan

Regional Administrator

Docket: 70-1257 License: SNM-1227

Attachment: Licensee Performance Review

cc w/attachment: Siemens Power Corporation ATTN: L. J. Maas, Manager Regulatory Compliance 2101 Horn Rapids Road P.O. Box 130 Richland, Washington 99352-0130

State of Washington

## LICENSEE PERFORMANCE REVIEW

#### SIEMENS POWER CORPORATION

Review Period: 2/1/94 through 1/31/96

## **1 PLANT OPERATIONS**

**PROGRAM STRENGTHS:** 

- Enhanced operating procedures and operator training program.
- Prompt evaluation and management involvement of abnormal events.
- Operators and shift supervisors acknowledge their responsibilities and do not hesitate to stop operations if safe operations appear to be compromised.

PROGRAM CHALLENGES:

 Carryover of current effective program to start-up and operation of the Dry Conversion Facility (DCF).

## 2 CRITICALITY SAFETY

**PROGRAM STRENGTHS:** 

- Licensee has completed the major portion of updating and improving their Criticality Safety Analyses (CSAs).
- New CSAs are well formatted, control parameters for ensuring double contingency are clearly defined and documented in Criticality Safety Specifications (CSSs), analysis methodology is clearly described, and team approach used for evaluating accident scenarios.
- Effective self-assessment and corrective action tracking program.

PROGRAM CHALLENGES:

- Continue the effort to question and verify the assumptions that are integral to individual CSAs.
- Ensure effective implementation of the criticality controls established by the CSAs.

#### 3 MAINTENANCE/SURVEILLANCE/ENGINEERING

#### **PROGRAM STRENGTHS:**

- Well established, comprehensive computerized preventative
- maintenance (PM) and instrumentation calibration program (IRM).
- Good continuity between CSAs and CSSs, and the PM and IRM programs.
- Maintenance performed through a documented work permit system.
- Configuration control program well established.
- Rotational assignments of well qualified system engineers.

#### **PROGRAM CHALLENGES:**

- Continue implementation of the work control process with planned expanded site activities.
- Continue configuration control in light of considerable ongoing plant changes.
- Continued management emphasis to assure proper implementation of the engineering change notice (ECN) process, which provides for consideration of operating and safety implications of design changes.

#### 4 RADIOLOGICAL CONTROL

#### PROGRAM STRENGTHS:

- Effective self-assessment programs
- Quality and quantity of staff
- Effective engineering controls for airborne radioactivity
- Occupational doses are ALARA
- Comprehensive computerized airborne exposure tracking system

PROGRAM CHALLENGES:

Keeping abreast of new site activities and program changes

#### 5 CHEMICAL SAFETY

No basis for evaluation

#### 6 EMERGENCY PREPAREDNESS/FIRE PROTECTION

**PROGRAM STRENGTHS:** 

- Comprehensive emergency preparedness and pre-fire plans
- Emergency facilities and equipment well maintained
- Emergency scenarios and exercises well developed and executed
- Site wide fire detection system with ties to the local fire department

**PROGRAM CHALLENGES:** 

Continue effort to improve interaction with off-site agencies.

#### 7 ENVIRONMENTAL/WASTE MANAGEMENT

**PROGRAM STRENGTHS:** 

- Radiological effluents releases are ALARA.
- Comprehensive waste management program in place (minimization and reduction).

### **PROGRAM CHALLENGES:**

- Startup and operation of incinerator
- Lagoon decommissioning
- Continue radwaste inventory reduction

### 8 MATERIAL CONTROL & ACCOUNTING

**PROGRAM STRENGTHS:** 

None noted

PROGRAM CHALLENGES:

- Management attention to assure that the following elements of the material control and accounting (MC&A) program are adequately implemented:
  - Fundamental Nuclear Material Control Plan (FNMCP) is consistent with actual plant operations.
  - Non-Destructive Analysis (NDA) measurement of waste is appropriate.
  - Management properly reviews and assesses performance of the MC&A program.

# 9 SECURITY

No basis for evaluation

## 10 LICENSING ISSUES

PROGRAM STRENGTHS:

None noted

PROGRAM CHALLENGES:

• Need to resolve technical issues regarding renewal

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