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MEMORANDUM FOR: James G. Keppler
Regional Administrator, Region III

THROUGH: Richard C. DeYoung, Director
Office of Inspection and Enforcement

FROM: James M. Taylor, Director
Division of Quality Assurance,
Safeguards, and Inspection Programs
Office of Inspection and Enforcement

SUBJECT: PROGRAM ASSESSMENT OF REGIONAL IMPLEMENTATION -
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)

Original Signed By R. C. DeYoung

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DCS EXEMPT

The Operating Reactor Programs Branch, Division of Quality Assurance, Safeguards, and Inspection Programs, has completed an assessment of Region III's implementation of the Systematic Assessment of Licensee Performance (SALP) program for operating reactors, which is one of the program areas identified in the IE plan for regional assessment (reference R. C. DeYoung memorandum to Regional Administrators, dated August 23, 1982). The assessment findings and conclusions are described in the enclosed report.

Any comments which you have concerning the enclosed assessment report should be submitted to this office by June 9, 1983. Your comments, if any, and the regional assessment report will be included in a summary report addressing the SALP program. We expect that the summary report will be issued by June 1983, after we have completed our assessment in each region.

We would like to thank you and your staff for their assistance and cooperation in this effort and we trust that our involvement will serve to improve the SALP program.

Original signed by
James M. Taylor

James M. Taylor, Director
Division of Quality Assurance,
Safeguards, and Inspection Programs
Office of Inspection and Enforcement

Enclosure:
Program Assessment of Regional
Implementation - SALP, Region III

cc: T. Tambling, RIII

Distribution:

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PROGRAM ASSESSMENT OF REGIONAL IMPLEMENTATION - SALP

REGION III

DQASIP Members Conducting the Assessment

Phillip F. McKee

James P. Kearney

Enclosures:

1. Assessment Activities
2. SALP Assessment Criteria
3. Region III SALP Process

PROGRAM ASSESSMENT OF REGIONAL IMPLEMENTATION - SALP

I. SCOPE

The Operating Reactor Programs Branch, Division of Quality Assurance, Safeguards, and Inspection Programs (DQASIP), Office of Inspection and Enforcement (IE), conducted an assessment of Region III's implementation of the Systematic Assessment of Licensee Performance (SALP) program for operating reactors, which is one of the program areas identified in the IE plan for regional assessment (reference August 23, 1982 memorandum, R. C. DeYoung to Regional Administrators). The purpose of the assessment was to:

1. determine if the program objectives are being met;
2. evaluate the implementation of the program for completeness, uniformity, and consistency; and
3. provide an input to a summary report addressing the SALP program.

II. ASSESSMENT ACTIVITIES

The assessment was conducted from September 13, 1982 through May 12, 1983. A summary of activities involved with the assessment is provided as Enclosure 1.

The assessment was accomplished by:

1. Review of data and documentation available at Headquarters;

2. Discussions with regional office staff;
3. Observation of a SALP Board; and
4. Observation of a SALP meeting with the licensee.

Data and documentation reviewed in-house consisted primarily of 766 data, inspection reports, and SALP reports. An outline of the assessment criteria which was used to assess the Region is presented in Enclosure 2.

III. ASSESSMENT FINDINGS

Based on the review group's evaluation and observation of Region III's implementation of the SALP program, the following strengths, weaknesses, and general observations were identified.

1. Strengths

- a. The use of region-based inspection specialists to address the SALP Board in their respective areas provides important insights into a licensee's performance.
- b. The inclusion of an Executive Summary as part of the SALP report is very effective in highlighting a licensee's significant strengths, weaknesses, and performance trends.

2. Weaknesses

- a. Based on observation of the Quad Cities SALP Board, the Board members did not apply the evaluation criteria in a systematic manner when rating a functional area.

- b. The SALP board generally discusses the need to increase, decrease or maintain the status quo of inspection activities in a functional area based on SALP findings. Although specific concerns identified during the SALP process are followed up by inspection, the Region does not develop a specific inspection action plan based on SALP findings. This is based on a review of 766 data, inspection reports for Quad Cities, Dresden, Big Rock Point, and LaCrosse, and discussions with the Region.

3. General Observations

(The observations will be used to support a summary report, particularly with respect to findings of consistency and uniformity among Regions.)

- a. The SALP Board meeting occurs approximately 67 days after the end of the assessment period. This period is based on T. N. Tambling's November 1, 1982 memorandum on schedules for SALP Board meetings in Region III.
- b. The SALP licensee meeting occurs approximately 107 days after the end of the assessment period. This period is based on T. N. Tambling's November 1, 1982 memorandum on schedules for SALP Board meetings in Region III. For the Quad Cities licensee meeting, the meeting was held 132 days after the end of the assessment period.
- c. The Regional Administrator's letter to the licensee issuing the SALP report is issued approximately 58 days after the meeting with the licensee. This is based on a review of recently issued SALP reports.

- d. Confirmatory Measurements and Environmental Monitoring, and Quality Activities are normally included as separate functional areas. In addition, functional areas are added as deemed necessary by the SALP Board to highlight a specific area. This is based on a review of SALP reports and discussions with the Region.
- e. The NRC and licensee participants at the licensee meeting are not listed in the Regional Administrator's cover letter issuing the SALP report. This is based on a review of recent SALP report transmittal letters.
- f. The Supporting Data and Summaries section of the SALP report contains a summary table of Licensee Event Reports (LERs) which shows a licensee's LER history during both the current and previous SALP evaluation periods. Recently, the region has initiated the practice of including a statement (in the Supporting Data and Summaries section) regarding INPO evaluation findings, if an INPO evaluation was conducted during the assessment period.
- g. Regional management does not have a written policy or instruction on how the Region implements the SALP program. However, the Region's assignment of a single SALP Coordinator has resulted in consistent implementation of the SALP program.

IV. ASSESSMENT CONCLUSIONS

The SALP program is being adequately implemented in Region III. However, a written regional policy on the mechanics of the SALP process would enable regional management to ensure program consistency should the present SALP Coordinator be reassigned to other duties.

ASSESSMENT ACTIVITIES

I. DQASIP Members Conducting Assessment:

Phillip F. McKee

James P. Kearney

II. Date of Regional Visit:

March 7-8, 1983

III. Persons Contacted:

J. A. Hind

R. Walker

N. J. Chrissotimos

T. N. Tambling

M. J. Jordan

IV. SALP Board Observation:

James P. Kearney and Phillip F. McKee observed the SALP Board conducted on March 7, 1983 for the Quad Cities plant.

V. SALP Meeting with the Licensee:

Phillip F. McKee observed the SALP meeting with the licensee for the Commonwealth Edison plants conducted on May 12, 1983.

SALP ASSESSMENT CRITERIA

I. SALP Objectives

- A. Is the SALP process providing a basis for allocating NRC resources? (NRCM 0516-02)
- B. Does the SALP process provide meaningful guidance to licensee management, and thus, improve licensee performance? (NRCM 0516-02)

II. SALP Implementation

- A. Are SALP evaluations conducted on an annual basis for each power reactor licensee? (NRCM 0516 Part I.8)
- B. Are NRR, AEOD, and NMSS notified at least 30 days before their inputs are needed by the SALP Board? (NRCM 0516 Part III.1.a)
- C. Does the SALP Board consist of a senior regional manager, NRR project manager, and resident inspector? (NRCM 0516 Part III.4)
- D. Does the SALP Board evaluate all of the functional areas listed in NRCM 0516? (NRCM 0516-043)
- E. Are the SALP Board members prepared to discuss all the functional areas before the Board? (NRCM 0516 Part III.3)
- F. Does the SALP Board categorize a functional area utilizing Table 1 of NRCM 0516 Part II? (NRCM 0516 Part III.4)
- G. Does the SALP Board recommend changes to the reallocation of inspection resources or adjustment of the inspection program in frequency, scope, or depth? (NRCM 0516 Part III.4)
- H. Does the SALP Board meet within a reasonable period of time after the assessment period? (Subjective - 45 days)
- I. Does the licensee meeting occur within a reasonable period of time after the assessment period? (Subjective - 60 days)
- J. Does the licensee receive a copy of the SALP Board's report at least one week before the meeting? (NRCM 0516 Part IV.3)
- K. Are the NRC representatives at the licensee meeting in accordance with NRCM 0516 Part IV.4? (NRCM 0516 Part IV.4)
- L. Are the licensee representatives at the licensee meeting in accordance with NRCM 0516 Part IV.2? (NRCM 0516 Part IV.2)

- M. Are the topics presented during the licensee meeting consistent with the SALP Board's findings? (NRCM 0516 Part IV.5)
- N. Is the Regional Administrator's letter to the licensee issued in a timely manner? (Subjective - 40 days after the licensee meeting)
- O. Does the Regional Administrator's letter to the licensee reflect consideration of the licensee's oral and written comments? (NRCM 0516 Part V)
- P. Is the SALP report written in the proper format? (NRCM 0516 Part VI)

REGION III SALP PROCESS

On an annual basis, the SALP Coordinator issues a memorandum establishing the assessment period, SALP Board input due dates, SALP Board meeting dates, and licensee meeting dates. This memorandum is sent to the Office of Nuclear Reactor Regulation (NRR) and the Office of Inspection and Enforcement (IE).

Approximately 2 months before the SALP Board, the SALP Coordinator gathers all inputs for a report to be reviewed by the SALP Board. These inputs include LER data; investigation and allegation review activity; enforcement actions; management conferences; licensee activities; inspection activities; NRR licensee evaluation; NMSS licensee evaluation; AEOD licensee evaluation; and regional inputs. The SALP Coordinator, in conjunction with the cognizant Section Chief, assemble, integrate, and edit the inputs listed above into a SALP Board report. This report is distributed to the SALP Board members before the SALP Board meeting.

The SALP Board consists of the Director, Division of Emergency Preparedness and Operational Support (DEPOS); Director, Division of Project and Reactor Programs (DPRP); Director, Division of Engineering and Technical Programs (DETP); cognizant DPRP Branch Chief; cognizant DPRP Section Chief; NRR Project Manager; Resident Inspector; and the SALP Coordinator. During the SALP Board meeting, the SALP report is reviewed and each functional areas is evaluated by the Board members. The functional areas evaluated are Plant Operations; Radiological Controls; Environmental Protection and Confirmatory Measurements; Maintenance; Surveillance and Inservice Testing; Fire Protection and Housekeeping; Emergency Preparedness; Security and Safeguards; Refueling; Licensing Activities; Quality Activities; and other areas as deemed necessary by the SALP Board to highlight a weak area. To aid in the Board's evaluation, Region-based Inspection Specialists and Section Chiefs address the Board

in their respective areas. At the conclusion of the SALP Board meeting, the SALP Coordinator and the cognizant DPRP Section Chief make the necessary changes to the SALP report. The SALP report is then reviewed by regional management and sent to the licensee at least a week before the SALP meeting with the licensee.

The SALP meeting with the licensee occurs approximately 6 weeks after the SALP board meeting. In the case of the Quad Cities meeting, the meeting was delayed and was held on May 12, 1983 (9 weeks after the SALP board meeting). The NRC representatives at the meeting normally consist of the Regional Administrator or Deputy Regional Administrator; Branch Chief, DPRP; Section Chief, DPRP; the NRR Licensing Project Manager; and the Senior Resident Inspector. The Licensee representatives consist of senior corporate management officials, the site manager, and management officials responsible for the major functional areas.

The licensee has 20 days after the licensee meeting to comment on the SALP report. After due consideration of the oral comments made by the licensee at the SALP meeting, and any written comments provided within the 20 days after that meeting, the report is issued under a cover letter, signed by the Regional Administrator, which addresses the report, and the licensee's comments. The licensee's comments are incorporated into the SALP report as a separate section.