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NOTE TO: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

FROM: Steven A. Varga, Director
Project Directorate #3
Division of PWR Licensing-A

SUBJECT: NRR SALP REPORT FOR COMMONWEALTH EDISON COMPANY FOR
BRAIDWOOD STATION, UNITS 1 AND 2

A copy of the NRR SALP Report addressing Commonwealth Edison's performance as owner/operator of Braidwood Station, Units 1 and 2, from December 1, 1985 to November 30, 1986 is enclosed. The report includes review ratings and summarizes significant licensing actions and activities during the evaluation period. The licensee's performance in the functional area of licensing activities is rated Category 2. Enclosed for your information is a summary of the NRR and overall ratings for the past two evaluation periods.

We plan to transmit the report to Region III on January 12, 1987. I am the assigned SES for this SALP.

151

Steven A. Varga, Director
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Enclosures:
As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Docket Nos. STN 50-456
and STN 50-457

FACILITY: Braidwood Station, Units 1 and 2
LICENSEE: Commonwealth Edison Company
EVALUATION PERIOD: December 1, 1985 to November 30, 1986
PROJECT MANAGER: Janice A. Stevens

I. INTRODUCTION

This report presents the results of an evaluation of the licensee, Commonwealth Edison Company (CECo), in the functional area of licensing activities and other related areas. It provides NPR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period December 1, 1985 to November 30, 1986.

The approach used for this evaluation was in accordance with Office Letter No. 44 which requires that each organization responsible for developing Safety Evaluation Reports also provide a SALP input with their evaluation. Additional inputs were solicited for selected review areas of particular significance. The Project Manager also provided inputs on selected licensing actions. In most cases the staff applied the SALP evaluation criteria for the performance attributes based on first hand experience with the licensee or with the licensee's submittals.

The individual SALP evaluations for each rated licensee issue were assembled into a matrix which was then used, with appropriate weighting for the importance to safety of the licensing issue, to develop the overall evaluation of the licensee's performance.

This approach is consistent with NRC Manual Chapter 0516 which specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating is to be tempered with judgment as to the significance of the individual elements.

II. SUMMARY OF RESULTS

Based on the approach described above, the performance of CECo in the functional area of licensing activities is rated Category 2.

III. CRITERIA

The evaluation criteria given in NRC Manual Chapter 0516, Table 1, were used. Weighting was used depending upon the individual licensing actions' importance to safety.

IV. PERFORMANCE ANALYSIS

Generally, the licensee's performance was evaluated using the criteria specified in Manual Chapter 0516. There was not sufficient information to allow NRR to evaluate two of the evaluation criteria, enforcement history and reporting and analysis of reportable events.

During the evaluation period there was a significant level of activity. Substantial effort was expended for the Braidwood OL hearing, which was completed on November 26, 1986. The hearing for the emergency preparedness contention spanned four days, and the hearing for the contention concerning harassment, intimidation, retaliation and other discrimination spanned 97 days. A license authorizing fuel loading and precritical testing for Braidwood Unit 1 was issued on October 17, 1986. The Technical Specifications and two Supplemental SERs were prepared in support of licensing.

A. Management Involvement and Control in Assuring Quality

The overall rating for this attribute is 2. The licensee's decision making is usually at a level that ensures adequate management review. The submittals needed to support licensing of Braidwood Unit 1 were generally timely, thorough and technically sound. However, certain issues pertaining to fire protection, technical specifications, and the initial test program should have been resolved by the licensee earlier in the review process. Therefore, management involvement could be improved.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

The overall rating for this attribute is 2. The licensee understands the technical issues and responses are generally sound and thorough. Conservatism is generally exhibited and approaches are viable. In several instances, the licensee challenged staff positions, but only when it believed safety would not be compromised.

C. Responsive to NRC Initiatives

The overall rating for this attribute is 2. In the weeks prior to the issuance of the zero power license for Braidwood Unit 1, the licensee responded to many NRC initiatives in a short period of time. The licensee's responses were generally timely, sound and thorough, however, certain issues should have been resolved by the licensee earlier in the review process.

D. Staffing

The overall rating for this attribute is 1. Key positions are clearly identified and responsibilities and authorities are well defined for both the plant staff and the licensing department. The security organization positions and responsibilities are well defined; the security staff is considered to be more than ample to implement the facility physical protection program.

E. Training and Qualification Effectiveness

The overall rating for this attribute is 1. The licensee has developed a comprehensive Shift Experience Program for Braidwood Station. The program is designed to give senior operators on shift additional supervisory training at an operating PWR. The licensee has an ample number of experienced senior operators to provide on-shift operating experience which satisfies the hot participation requirements of Generic Letter 84-16.

F. Housekeeping and Control Room Behavior

The overall rating for this attribute is 2. Although housekeeping and control room behavior is discussed elsewhere in the NRC evaluation, NRR has continuing interest in this area since good housekeeping practices are an indication that the licensee takes pride in its facilities. Visits by the Project Manager and discussions with the Resident Inspectors indicate that the licensee's housekeeping practices have improved over this SALP review period due to increased management attention.

V. CONCLUSIONS

Based on our evaluation of licensing activities, an overall rating of 2 is assessed for Commonwealth Edison's licensing performance for the period December 1, 1985 to November 30, 1986.

VI. RECOMMENDATIONS

The licensee's best areas of performance were staffing and training and qualification effectiveness. Due to the rapidly approaching low and full power licensing dates for Braidwood Unit 1, the licensee's management should continue to maintain a high level of involvement in licensing activities and should also ensure that plant cleanliness and housekeeping practices continue to improve.

Previous SALP Cycle Ratings

<u>Functional Areas</u>		<u>Rating SALP 4</u>	<u>Rating SALP 5</u>	<u>SALP 5 Trend</u>
A.	Plant Operations	X	NR	---
B.	Radiological Controls	2	2	Improved
C.	Preoperational Testing	2	2	Same
D.	Fire Protection	X	NR	---
E.	Emergency Preparedness	X	2	---
F.	Security	X	NR	---
G.	Quality Programs and Administrative Controls Affecting Quality	3	2	Improved
H.	Licensing Activities	2	2	Same
I.	Containment, Safety- Related Structures, and Major Steel Supports	2	2	Same
J.	Piping Systems and Supports	3	2	Improved
K.	Safety-Related Components - Mechanical	3	2	Improved
L.	Auxiliary Systems	2	2	Same
M.	Electrical Equipment and Cables	2	2	Same
N.	Instrumentation	2	2	Improved
O.	Braidwood Construction Assessment Program	X	1	Improved
P.	Housekeeping and Equipment Protection	X	3	Same

X = Not Rated Last Report

NR = Not Rated because of lack of activity in the area.

ENCLOSURE 2

SALP INPUTS
(DECEMBER 1, 1985 - NOVEMBER 30, 1986)

<u>BRANCH REVIEWER</u>	<u>LICENSING ACTION</u>	<u>MANAGEMENT INVOLVEMENT</u>	<u>APPROACH TO RESOLUTION</u>	<u>RESPON- SIVENESS</u>	<u>STAFFING</u>	<u>TRAINING</u>	<u>OVERALL</u>
EOB, Romney	Reactor Trip System Reliability, 4/21/86	--	1	1	--	--	1
EICSB, Kramer	Post-Trip Review, 4/28/86	2	--	2	--	--	2
EICSB, Burrows	Charging Pump Dead- heading, 5/6/86	--	1	3	--	--	2
EICSB, Lasher	Review of GL 83-28, Item 2.1, 6/27/86	--	1	1	--	--	1
FOB, Samworth	Review of FSAR Amend. 47, 8/20/86	1	--	1	--	--	1
PSB, Katze	Envir. Effects of HELB, 8/21/86	3	3	1	--	--	3
PSB, Li	Envir. Effects of MSLB, 9/25/86	--	1	1	--	--	1
FOB, Hickman	Initial Test Program, 9/25/86	2	2	2	--	--	2
FOB, Orr, Lapinsky	Procedure Gen. Package, 10/2/86	1	1	1	--	--	1
EB, Bagchi	Seismic/Dynamic Qual. of Mech. & Elec. Equip., 10/3/86	--	2	1	--	--	2

<u>BRANCH REVIEWER</u>	<u>LICENSING ACTION</u>	<u>MANAGEMENT INVOLVEMENT</u>	<u>APPROACH TO RESOLUTION</u>	<u>RESPON- SIVENESS</u>	<u>STAFFING</u>	<u>TRAINING</u>	<u>OVERALL</u>
EB, Johnson, Lee	Preservice Inspec., 10/7/86	--	2	1	--	--	2
PSB, Singh	Fire Protec., 10/8/86	3	2	3	--	--	3
FOB, Hickman	Initial Test Program, 10/10/86	--	3	2	--	--	2
EB, Elliot	Eval. of Compliance w/ 10 CFR 50.55a(a)(3), 10/15/86	1	1	1	2	--	1
EICSB, Walker	Envir. Qual., 10/15/86	--	2	2	--	--	2
EICSB, Weiss	Human Factors Eng., 10/17/86	2	2	2	--	--	2
RSB, Chatterton	Core Physics TS, 10/23/86	2	2	1	--	--	2
NMSS, Skelton	Physical Security, 11/10/86	1	2	1	1	--	1