

January 5, 1996  
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SECY-96-

FOR: The Commissioners

FROM: James M. Taylor /s/  
Executive Director for Operations

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

PURPOSES:

1. To inform the Commission of the status of the revised Systematic Assessment of Licensee Performance (SALP) program two years after its implementation and of recent minor changes to the program.
2. To provide the results of the staff's solicitation of public comments on the revised SALP program.

BACKGROUND:

On May 19, 1993, the Commission approved the changes to the SALP program contained in SECY-93-090, "Systematic Assessment of Licensee Performance." These changes included: (1) increasing Nuclear Regulatory Commission (NRC) management involvement in the SALP program and restricting SALP boards to Senior Executive Service (SES) members only, (2) reducing the number of functional areas from seven to four, (3) emphasizing recent (within the preceding six months) licensee performance when determining the SALP category ratings, and (4) reducing the length of the SALP reports and focusing on the most significant issues in each functional area to promote clearer communications with the licensees and the public. Implementation of the revised program began for assessment periods ending after July 19, 1993.

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On December 2, 1994, the staff forwarded SECY-94-293, "Systematic Assessment of Licensee Performance," to the Commission. In this paper, the staff discussed the status of the revised SALP program one year after its implementation as well as discussed minor changes to the program. It also committed to solicit public comments after the revised SALP process had been implemented for two years and to inform the Commission of the results.

On April 3, 1995, in response to Commission direction, the staff revised the SALP program for plants that meet the criterion for receiving recognition of superior performance: achieving Category 1 ratings in all functional areas. The revision extends the assessment period to 24 months and requires the regional office to conduct a review to determine if a reduction of planned inspection resources is warranted.

#### DISCUSSION:

##### STATUS OF THE REVISED SALP PROGRAM AND RECENT MINOR CHANGES

During the first two years of implementation, the staff has conducted approximately 90 SALPs under the revised process. The improvements, detailed in SECY-94-293, have continued. Briefly, they include the following:

(1) SALP reports generally focus on significant issues of licensee performance; (2) most SALP reports are clear and concise; (3) involvement of regional administrators and SES board members in the SALP process is significant and beneficial; (4) changes in the SALP meeting format result in somewhat better discussions between NRC and licensee managers, but public attendance at these meetings is minimal; and (5) participation in the SALP observation program has increased - about one-half of the SALP boards are observed and critiqued to promote uniform implementation on a national basis.

During fiscal year (FY) 1995, the staff issued 44 SALP reports. Seven plant sites (consisting of 11 reactors) received SALP Category 1 ratings, superior level of safety performance, in all four functional areas. Because of their superior level of performance, the staff extended the SALP evaluation frequency for these plants to 24 months. In addition, they will receive an appropriate level of reduced NRC inspection. Six plant sites (10 reactors) received at least one SALP Category 3 rating, acceptable level of safety performance. The staff will focus increased inspection on the plant functional areas that were rated SALP Category 3.

The revised SALP program has resulted in an approximately 20 to 25 percent savings in resources expended on SALP activities. This estimate is based on a comparison of FY 94/FY 95 (after the revision) Regulatory Information Tracking System (RITS) data with

FY 93/FY 92 RITS (before the revision) data. The resource savings are a result of a more efficient process resulting in a significantly shorter and more focused report, and improved licensee performance resulting in extended SALP assessment periods (fewer SALPs per year).

Recently, the staff made minor changes to the SALP program. On August 18, 1995, the Office of Nuclear Reactor Regulation (NRR) issued interim guidance on changes in SALP board membership. The SALP board membership requirement was changed from four SES members to three (two regional, one NRR) in parallel with the regional reorganizations that moved all operating reactor responsibilities to the Division of Reactor Safety and the Division of Reactor Projects. Implementation of the new guidance began for SALPs with SALP board meetings scheduled after October 1, 1995.

#### RESULTS OF THE STAFF'S SOLICITATION OF PUBLIC COMMENTS ON THE REVISED SALP PROGRAM

On August 1, 1995, the staff published a Federal Register notice soliciting comments on the revised SALP program and its implementation over the past two years. The notice was mailed directly to licensees, States, and public interest groups (see Attachment 1). The staff received and evaluated 22 responses from NRC licensees and the Nuclear Energy Institute (NEI). In addition to the questionnaire in the notice, the staff sought licensee feedback directly through interviews with licensee managers. Three groups of senior licensee managers were interviewed shortly after their facilities received their most recent SALP reports. Significant comments from these interviews are summarized in Attachment 3 of this Commission paper.

In general, comments received indicate that most respondents believe that the changes to the SALP program have resulted in an improved program that results in focused assessments that licensees clearly understand. However, many commenters strongly recommended eliminating SALP scores because of a poor understanding of the meaning of the scores by the public, the financial community, and State and local government officials. This observation is not new, as it has been provided by several licensees to the Commission for over seven years. In each case, the Commission decided that the benefits of using numerical scores outweighed any negative side effects. Also, several commenters recommended that the SALP program be eliminated because they perceived it as being similar to other NRC programs such as the Integrated Performance Assessment Process (IPAP) and the senior management meeting process. The staff is working to ensure that all processes used to evaluate licensee performance are efficiently coordinated. The staff issued a new draft NRC

management directive that clearly articulates the goals, objectives, and interrelationships between the various NRC licensee assessment processes and programs. The draft management directive will be finalized after the staff gains about one year of experience implementing it.

The public comments are discussed in detail below.

## 1. GENERAL INFORMATION

The 22 respondents to the Federal Register notice are listed in Attachment 2. Licensees prepared 21 of the responses and NEI prepared the only non-licensee response. The 21 licensee respondents operate 65 U.S. commercial nuclear power plants (approximately two-thirds of all U.S. plants). No States, public interest groups, or individual members of the public responded to the notice.

Response scope varied considerably from respondent to respondent. Some respondents addressed all subjects in the questionnaire, while others wrote general letters that did not specifically address the question in the Federal Register notice. Because of the variety of responses, the staff chose to capture general comments from the responses (primarily extracted from the text of the letters) as well as specific responses to the questionnaire. The general comments are summarized below and are provided in Attachment 3. The detailed responses to the questionnaire are summarized below and are provided in Attachment 4. Copies of the original responses are provided in Attachment 5 for reference.

## 2. SUMMARY OF COMMENTS ON SALP PROGRAM CHANGES

This section summarizes comments directly related to the May 19, 1993, revisions of the SALP program.

### General Comments

About two-thirds of the respondents viewed the May 1993 SALP program changes as an improvement. They stated that they were favorably impressed with the revisions to the SALP process, that the revised program was a significant improvement over the previous process, and that the changes generally enhanced communication.

The remaining respondents viewed the changes as having no major effect. Most of these respondents recommended that either numerical SALP scores be eliminated or the SALP program be eliminated in its entirety. They stated that the SALP program should be eliminated because (1) the SALP

report was typically a regurgitation of information of which the licensee was already aware, (2) the SALP program was largely duplicative of other regulatory activities, (3) it was slow in identifying items of regulatory significance, and (4) it created regulatory pressures to conduct end-of-SALP-period inspections that divert NRC and utility resources from more important safety concerns.

None of the respondents viewed the changes as negative.

#### A. Functional Areas

The majority of the respondents stated that the revised four functional areas were an improvement over the previous seven functional areas and that the plant support functional area messages were clear. However, some respondents stated that the grades for plant support had no meaning (see "Numerical SALP Scores," below). A few respondents also stated that the area of safety assessment and quality verification was not receiving enough attention.

#### B. Management Involvement

About two-thirds of the respondents stated that NRC management involvement either had improved or was maintained at an appropriate high level. This helped ensure clear licensee understanding of SALP results.

All 14 respondents who replied to the Federal Register question on public understanding of the SALP results stated that the May 1993 SALP program changes were not effective in improving public understanding. The most frequently stated reason for poor public understanding was the numerical SALP scoring system. Respondents also noted that public attendance at SALP meetings was minimal. Once again, it is important to note that no individual members of the public or public interest groups

responded to the Federal Register notice questionnaire.

Several respondents stated that communication between NRC senior management and licensee management should be increased by increasing the number of SALP board member site visits.

#### C. Assessment Period

Most respondents stated that the length of the SALP assessment period should be based on licensee performance. There was no clear consensus on how long the SALP periods should be for good, average, and poor performing plants.

A few respondents stated that SALP periods should be based on licensee operating cycles; that is, they should encompass a full fuel cycle including a refueling.

One respondent cautioned that some members of the financial community use length of SALP periods as an indicator of plant performance.

#### D. SALP Report

Over four-fifths of the respondents stated that the shorter SALP reports were better than the previous lengthy reports. However, several respondents stated that more detail should be included to support the conclusions in the report and that the report should not merely state a conclusion with little support.

The majority of the respondents stated that the revised SALP reports appropriately focused on safety-significant issues.

About one-half of the respondents stated that the revised SALP reports reflected a balanced assessment of licensee performance. The rest of the respondents stated that the revised SALP reports were too negative. For example, one licensee stated that the NRC tended to offset any positive comment with a negative one.

The majority of respondents (about two-thirds) stated that their latest SALP reports focused on the last six months of performance and that this was appropriate. This improved the currency of the SALP.

### 3. SUMMARY OF ADDITIONAL COMMENTS

This section summarizes comments that were outside the scope of the May 19, 1993, SALP program revisions.

#### A. Numerical SALP Scores

Even though numerical SALP scores were not specifically addressed in the Federal Register questionnaire, they were addressed by over one-half of the respondents. The common theme was that the scoring system (Categories 1, 2, and 3) was a factor contributing to public, State, and financial community misunderstanding and misuse of SALP results. Respondents recommended modifying or eliminating the SALP scoring system. Specific comments included the following: (1) licensees too often perceived SALP scores as either the granting or the withholding of a mark of favor by agency management, (2) the SALP process established grades based on opinion rather than on established and consistent criteria, and (3) the numerical ratings were highly subjective.

In addition, several respondents stated that the grade for plant support was baseless and meaningless because it was a rating of unrelated areas.

#### B. SALP Program Relationship with the Integrated Performance Assessment Process (IPAP)

Even though the relationship between the new IPAP program and the SALP program was not specifically addressed in the Federal Register questionnaire, it was addressed by about one-third of the respondents. Most of these commenters expressed concern that the programs appeared to be redundant in both function and scope. Two respondents viewed IPAP as a potential enhancement to the present SALP process because of increased inclusion of a licensee's self-assessment results. They stated that this would have the dual benefit of reducing the demand on NRC resources and increasing the number and quality of licensee self-assessments.

#### CONCLUSION:

The staff will discuss the comments received and consider possible revisions to the SALP program, as appropriate, to address significant areas of concern and the changing regulatory environment at the next Senior Management Meeting. Proposed changes will be reflected in a draft revision to NRC Management Directive 8.6 and provided to the Commission for approval.

James M. Taylor  
Executive Director  
for Operations

Attachments:

1. Federal Register, Vol. 60, No. 147, Pgs. 39193-39194, August 1, 1995, "Review of Revised NRC Systematic Assessment of Licensee Performance (SALP) Program"
2. List of Respondents
3. Responses to Federal Register, Vol. 60, No. 147, Pgs 39193-39194 - Summary of General Comments
4. Responses to Federal Register, Vol. 60, No. 147, Pgs 39193-39194 - Summary of Detailed Responses to Questionnaire
5. Responses to Federal Register, Vol. 60, No. 147, Pgs 39193-39194 - 22 Original Public Responses

**Responses to Federal Register, Vol. 60, No. 147, Pgs 39193-39194,  
"Review of Revised NRC Systematic Assessment of Licensee  
Performance (SALP) Program" - Summary of General Comments**

The numbers in parentheses, following the comments, refer to the respondents (copies of original responses are contained in Attachment 5). Please note that numbers 14 and 17 were not used because these responses were duplicates to response numbers 11 and 2, respectively.

I. POSITIVE COMMENTS - GENERAL

- Favorably impressed with the revisions to the SALP process. More properly distributed the functional areas into four relatively equal components. Favorably impressed with the directness of the abbreviated SALP report and the candid dialogue at the SALP presentation meetings. (1)
- Found the SALP program as revised to be improved and significantly more performance based. (4)
- Is a significant improvement over the previously existing process and has been effective in focusing SALP reports on significant performance issues. (6)
- Current SALP methodology as an improvement over earlier versions. (10)
- The changes made to the SALP program in 1993 have generally enhanced communication, and thus represent real improvement in the overall program. (11)
- Believes that the current SALP program is very good, and provides valuable insight and feedback on regulated activities. Also supports the rating system of the current SALP process. (15)
- The revisions have generally been effective in more correctly focusing the SALP reports on significant performance issues. (18)
- We believe the process has been fair, objective, and conducted in a professional manner. (21)
- Providing the inspection plan with the SALP report is good. It allows the licensee to understand where the NRC is coming from and allows the licensee to propose doing the team inspections as self-assessments. (licensee management interview)

II. NEGATIVE COMMENTS - GENERAL

- Although we have provided in the attachment responses to specific questions related to improvement of the SALP assessment process, we do not believe it can be sufficiently improved so long as it includes issuance of numerical scores. To the contrary, we recommend that the process, insofar as it involves issuance of scores, either be abandoned

or justified as within the authority of the NRC through an appropriate rulemaking. (2)

- The SALP program was initially established to prioritize and focus NRC inspection resources. Since the program was established, the SALP has been used for significantly different purposes. The NRC staff and Commission should, again, reevaluate the fundamental elements of the SALP and strongly consider discontinuing the SALP program. (5)
- The SALP process, as currently implemented, remains subjective. (7)
- The SALP report is typically a regurgitation of information of which the licensee is already well aware. We believe that the revisions of the SALP program implemented on May 19, 1993 are essentially cosmetic in nature and have not addressed the root deficiencies of this activity. At a time when both licensee and Commission resources are declining, an in-depth, objective review of the real need for and value of the SALP program is imperative. Our experience as a licensee leads us to conclude that the SALP program is in large measure duplicative of other regulatory activities; is slow in identifying items of regulatory significance (many of which have already been resolved); and creates regulatory pressures to conduct end of SALP period inspections only for the purpose of the report. Such activities divert NRC and utility resources from more important safety concerns. (12)
- We cannot conclude that the revisions have given the public a better understanding of our SALP results. (18)

Items III through VI were not directly addressed by the Federal Register questionnaire, but due to the high number of respondents that addressed these issues they are grouped together here.

### III. SALP SCORES

- SALP scores are too often perceived by licensees as either the granting or withholding of a mark of favor by the agency management. (You get either a "one" or a "two" in most functional areas for many licensees). (2)
- The SALP process establishes grades based on opinion rather than on established and consistent criteria. The SALP ratings of 1, 2, or 3 are levels of performance that are in complete compliance with the NRC regulations; however, a licensee that receives a SALP 3 rating is viewed as a poor performer. This rating level results in negative impacts that span the financial community as well as the NRC and the

- public. (5)
- Highly subjective in assigning numerical ratings. (6)
  - Subject to misunderstanding and misuse by financial entities and public utility commissions. (7)

- Since the scores themselves are unnecessary to achieve the purpose of the SALP program, their use should be discontinued. (9)
- Amend the scoring system to use performance terms (i.e. superior, good, acceptable) to describe the results of the assessment in each SALP area. These performance terms would help to more accurately communicate the NRC's findings to the public. (11)
- Although the Commissioner's (Rogers) comment is well-intentioned, we sincerely doubt that it will have a widespread or lasting effect and clearly, it is the licensee, not the Commission nor the staff, that bears the burden of the misunderstandings and misuses of these ratings. We believe that the fair and obvious solution to this problem is to discontinue the numerical rating system. We believe that the single most effective improvement (to the SALP program) would be to discontinue the practice of assigning numerical grades. (12)
- The use of numerical scores has proven to be punitive particularly from an economic perspective. Because of this, the tendency is to focus on the rating instead of the substance of the report. It seems a process without scores that evaluates and assesses areas as doing well or needing improvement would be a more effective approach. (16)
- Recommends that the NRC consider re-evaluating or discontinuing the practice of assigning a grade or score for the functional areas. (20)
- The numerical rating system should be discontinued since it is subject to misinterpretation and tends to overshadow the more meaningful textual conclusions and observations. (22)
- The NRC should evaluate the benefits of an integrated plant rating. (23)
- SALP would be improved by the elimination of numerical grades. SALP report numerical scores continue to carry a "1/2/3 = Good/Fair/Fail" connotation that is inappropriately used by the financial community, state regulators, and the press - mainly to the detriment of the licensees. This is in spite of NRC and industry attempts to properly define the scores. The true assessment message and impact of the SALP is in the worded performance critique rather than the scores. (24)
- The SALP program should be objective and predictable. Licensees should be able to evaluate their own performance

and predict what SALP grades they will receive. (licensee management interview)

IV. RELATIONSHIP TO THE INTEGRATED PERFORMANCE ASSESSMENT PROCESS (IPAP)

- SALP process and the new Integrated Performance Assessment Program (IPAP) appear to be redundant in both the function and scope. (1)
- IPAP provides an innovative alternative to current practices. A systematic assessment process that includes the licensee's own self-assessments as part of the NRC's overall evaluation process will have the dual benefit of reducing the demand on NRC resources and increasing the number and quality of licensee self-assessments. We strongly urge the NRC to consider consolidating the most effective elements of both the SALP and IPAP assessment programs. (3)
- The IPAP is seen as a potential enhancement to the present SALP process. (4)
- Other processes are in place, such as the NRC's new Integrated Performance Assessment Program (IPAP), to more accurately portray a balanced view of licensee performance. (5)
- The IPAP will cost a utility ~\$185,600.00 in NRC fees alone (not including licensee costs) (7)
- The NRC should be wary of creating new programs, without considering dismantling existing ones. (9)
- With due allowance for the fact that the IPAP is just getting underway, this process gives every evidence of meeting the regulator's goal of developing an integrated perspective of licensee strengths and weaknesses, and thereby obviating any rationale for continuation of the SALP process. (12)
- The relationship between the SALP process and the recently implemented Integrated Performance Assessment Process (IPAP) is unclear. The processes seem duplicative. The purpose and format of the SALP process should be re-evaluated as the IPAP is implemented. (23)
- The SALP process and the NRC's Integrated Performance Assessment Program (IPAP) appear very similar in scope and intent. Although the IPAP uses a grading method that can also be misinterpreted, it appears to provide a more

balanced and objective picture of licensee performance than the SALP. (24)

V. SALP PROGRAM INFLUENCE

- The fact that it (a SALP Category 1 score) can be granted or withheld on grounds which necessarily cannot be made objective means that NRC staff and management can exert influence on licensee employees comparable and parallel to that of licensee management. In the vast majority of cases, the influence exerted through the SALP assessment is consistent with the desired direction of both NRC and licensee management. However, the problem is that this is not always the case, particularly as regards priorities and emphasis. (2)
- Program has been used to exert pressure on licensees to comply with NRC staff demands and expectations beyond those required by the regulations. SALP provides the NRC staff with tremendous leverage over the licensee which far exceeds the intent of the regulatory authority. This results in the SALP process inappropriately involving the NRC staff in the daily utility management decision-making process. (5)
- Exceeds the NRC's regulatory requirement of determining if licensees are meeting license requirements. (7)

VI. MEETINGS WITH THE LICENSEE

- There has been some reluctance in the past for the NRC to meet with the licensee during the SALP period to discuss the licensee's own self-assessment effort. Licensees feel especially obligated to share self-assessment results during the last six months of the SALP period since the NRC is primarily focused on this period in the SALP program reviews. (4)
- It would be beneficial for members of the SALP board to visit the power plant more frequently during the SALP period to observe first hand the licensee's continuing performance. (6)
- The practice of focusing on the last six months of the SALP period enhances the applicability of the SALP report to current licensee status, and is therefore an overall positive change to the program. However, the end of period focus, when coupled with the NRC's policy of not discussing SALP related issues during the last three months of the SALP period and the elimination of the draft SALP report, can limit a licensee's ability to address performance issues during this critical part of the SALP period. We suggest

reevaluation of this issue to ensure that there are adequate opportunities to discuss performance issues during the last six months of the period. (11)

**LIST OF RESPONDENTS  
(REPRESENTING 65 PLANTS)**

| <u>#</u> | <u>Respondent</u>                     | <u># Plants</u> |
|----------|---------------------------------------|-----------------|
| 1        | Texas Utilities Electric Company      | 2               |
| 2/17     | Southern California Edison Company    | 2               |
| 3        | Nuclear Energy Institute              | 0               |
| 4        | Omaha Public Power District           | 1               |
| 5        | Southern Nuclear Operating Company    | 2               |
| 6        | GPU Nuclear Corporation               | 2               |
| 7        | Arizona Public Service Company        | 3               |
| 8        | Entergy Operations, Incorporated      | 5               |
| 9        | Duke Power Company                    | 7               |
| 10       | Carolina Power & Light Company        | 4               |
| 11/14    | Pennsylvania Power & Light Company    | 2               |
| 12       | Yankee Atomic Electric Company        | 0               |
| 13       | Tennessee Valley Authority            | 5               |
| 15       | Niagara Mohawk Power Corporation      | 2               |
| 16       | Florida Power Corporation             | 1               |
| 18       | Baltimore Gas & Electric Company      | 2               |
| 19       | Commonwealth Edison Company           | 12              |
| 20       | Philadelphia Electric Company         | 4               |
| 21       | Virginia Electric & Power Company     | 4               |
| 22       | Consolidated Edison Company           | 1               |
| 23       | Iowa Electric Light & Power Company   | 1               |
| 24       | Public Service Electric & Gas Company | 3               |

**Responses to Federal Register, Vol. 60, No. 147, Pgs 39193-39194,  
"Review of Revised NRC Systematic Assessment of Licensee  
Performance (SALP) Program" - Summary of  
Detailed Responses to Questionnaire**

**A. Functional Areas.**

1. Are the current four functional areas (operations, maintenance, engineering, and plant support) an improvement compared to the previous seven functional areas?

**Yes - 16 respondents**

No - 3 respondents

2. Are the plant support functional area messages clear in characterizing individual elements (radiological controls, emergency preparedness, security, fire protection, chemistry, and housekeeping)?

**Yes - 10 respondents**

No - 2 respondents

Comments:

- the plant support grade is baseless and meaningless because the individual elements do not have any commonality

3. Are additional improvements needed for the designation of functional areas? What types of improvements?

Yes - 7 respondents

No - 5 respondents

Comments:

- reevaluate plant support functional area and grading
- safety assessment and quality verification (SA/QV) is not receiving enough attention

**B. Management Involvement.**

1. Did increased NRC management involvement in the SALP program result in program improvements and improved communication with licensee management?

**Yes - 6 respondents**

No - 3 respondents

**No change (remained positive) - 3 respondents**

No change - 2 respondents

2. Did the SALP program changes result in better licensee and public understanding of the SALP results?

**Licensee understanding**

Yes - 2 respondents

No - 3 respondents

**No change (remained positive) - 6 respondents**

**Public Understanding**

Yes - 0 respondents

**No - 14 respondents**

Comments:

- public only gets "sound bites" from the SALP meeting
- public only understands the tone of the SALP meeting
- numerical SALP scores are not clearly understood

3. Did increased involvement of the regional administrator or deputy at the SALP meeting result in improved communication with licensee management?

**Yes - 4 respondents**

No - 2 respondents

**No change (remained positive) - 6 respondents**

4. Was the change in SALP presentation meeting format - from a presentation to more of a discussion - effective in improving communication with licensee management?

**Yes - 6 respondents**

No - 3 respondents

**No change (remained positive) - 4 respondents**

Comments:

- SALP presentation meeting adds little safety value
- SALP presentation meeting does not substantially add to improving communications with licensee management
- few, if any, members of the public attend the SALP presentation meeting

5. Are additional improvements needed in the areas of communications with licensee management and licensee and public understanding of SALP results? What types of improvements?

**Yes - 10 respondents**

No - 3 respondents

Comments:

- expand the SALP report to provide more detail as to the basis for the conclusions
- increase the number of SALP board member site visits (across the SALP period)
- increase communication between NRC senior management and licensee management
- use performance terms instead of numbers (SALP scores) - discuss safety directly
- explain the scores better to the public
- an interim feedback mechanism is needed for licensees - prior to issuance of the final report

**C. Assessment Period.**

1. What bases should be considered when determining SALP period length and how should they be applied?

**Performance - 10 respondents**

In sync with operating cycles - 4 respondents

Does not need to vary - 3 respondents

As long as possible - 1 respondent

At Regional Administrator discretion - 1 respondent

2. SALP assessments currently range from 12 to 24 months (nominally 18 month average). Is this variation in practice appropriate?

**Yes - 9 respondents**

No - 1 respondent

Comments:

- Wall Street ratings put unwarranted merit on differences in SALP period length

3. How long should the SALP assessment period be for good, average, and poor performing plants?

24, 18, and 12 months - 6 respondents

Multiples or fractions of operating cycles - 4 respondents

Same for all plants (18-24 months) - 3 respondents

36, 24, and 18 months - 1 respondent

**D. SALP Report.**

1. Are the new, shorter SALP reports more effective in

communicating the results of the NRC's assessment of safety performance than the previous, more lengthy reports?

**Yes - 17 respondents**

No - 2 respondents

Comments:

- detail should be added to discuss the basis for conclusions
- INPO reports are better

2. Are SALP reports appropriately focused on safety issues and do they deliver a clear message?

**Yes - 12 respondents**

No - 5 respondents

Comments:

- trends should always be discussed - it is always appropriate and helpful to licensees
- minor issues still show up in SALP reports

3. Do SALP reports provide a balanced assessment of licensee safety performance (and are positive aspects of licensee safety performance appropriately considered)?

Yes - 8 respondents

No - 9 respondents

Comments:

- integrate more performance and risk based elements and place less emphasis on responsiveness
- there is a tendency to offset any positive comment with a negative comment

4. Do SALP reports consistently focus on the last six months of performance? Is this practice appropriate?

**Focus**

**Yes - 8 respondents**

No - 4 respondents

**Appropriate**

**Yes - 9 respondents**

No - 2 respondents

Comments:

- this was the most positive and meaningful difference

between the old  
and new processes

5. Is the level of detail in the SALP report appropriate?

Yes - 10 respondents

No - 5 respondents

Comments:

- the report needs to discuss the basis for concluding that a trend exists
- a number of performance judgements are rendered with no supporting references, examples, or context

6. Are SALP report conclusions well-supported by documented facts?

Yes - 6 respondents

No - 6 respondents

Comments:

- scores did not represent recent performance
- scores versus data can not be duplicated by licensees
- IPAP might be used to normalize SALP evaluation inputs

7. Are SALP report cover letter messages consistent with the associated SALP report messages?

**Yes - 12 respondents**

No - 2 respondents

Comments:

- much improvement in this area
- do not focus on scores in the cover letter

8. Are licensee self-assessment efforts adequately recognized in the SALP report and cover letter?

Yes - 9 respondents

No - 5 respondents

Comments:

- SA/QV assessment is weak - more emphasis is needed in report
- level of NRC recognition of licensee self-assessments is disappointing

9. Are additional improvements needed in the SALP reports?  
What types of improvements?

**Yes - 14 respondents**

No - 0 respondents

Comments:

- eliminate numerical scores (11 respondents)
- add more detail to support conclusions
- follow INPO format: criteria, comments, assessment

**E. Additional Comments.**

In addition to the above issues, commenters are invited to provide any other views on the NRC SALP program that could assist the NRC in improving its effectiveness.

Comments:

- NRC should hold more meetings with the licensee
- public involvement at SALP meetings has been negligible
- assure that important NRC findings or concerns are consistently addressed in both the SALP report and public meeting presentation
- older plants seem to be at a disadvantage because they must contend with many more obstacles (e.g., older designs, higher contamination levels, older equipment, etc.) which has a tendency to affect perceptions that activities may not be as good as a newer, less challenged plant
- provide more recognition of the role of the resident inspector
- IPAP and SALP are redundant
- streamline the efforts required for a licensee's self-assessments to qualify for reduced scope inspections

Responses to Federal Register, Vol. 60, No. 147, Pgs 39193-39194,  
22 Original Public Responses