

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

November 18, 1985

IE INFORMATION NOTICE NO. 85-88: LICENSEE CONTROL OF CONTRACTED SERVICES
PROVIDING TRAINING

Addressees:

All nuclear power facilities holding an operating license (OL) or a construction permit (CP).

Purpose:

This information notice is provided to emphasize to licensees their responsibility for the content of safety-related training courses and materials provided by consultants to utility employees. It is expected that recipients will review the information for applicability to their facilities and consider actions, if appropriate, to preclude the occurrence of similar problems at their facilities. However, suggestions contained in this information notice do not constitute NRC requirements; therefore, no specific action or written response is required.

Discussion:

In August 1985, the NRC learned that potentially misleading course material was presented to licensee employees by a consulting firm as part of a training course on containment leak rate testing. This material appeared to suggest and/or condone practices that could be misleading in the conduct of an NRC inspection. The following are some excerpts from the training course material entitled "Interactions With the NRC."

Should the utility inform the NRC of contemplated program changes? This is debatable.

Alerting NRC opens up utility for comments and second thoughts.

Springing changes on NRC has benefit of surprise.

Encourage [NRC] inspector to witness a Type C test, but... don't be foolish:

Note: *Perform demo on an "easy" valve which has traditionally not been a "problem leaker."

*NRC will want to concentrate on past problem areas and pet peeves.

Traditional industry approach to ILRT testing problems has been predicated on not stating to NRC:

When the test began (thus allowing for repairs after pressurization commenced)

The "Type A" test failed (since some smooth talkers have managed to get out of failures)

We'll do it over (since it has been possible to obtain NRC agreement with statements such as, "you saw the test before and didn't comment; why this time when we've done it even better?")

*These statements appeared in the revised (March 1984) version of the course as well as the November 1983 version.

During an inspection of the consulting firm, which took place after the NRC became aware of the problem, it was found that the development and presentation of this course material was an isolated instance. However, the inappropriateness of this material would have been detected had the consulting firm's management reviewed the quality of their product or had the licensee's management reviewed the training material before it was presented to their employees. Further, although several of the licensee's employees raised concerns (through course evaluation forms) to the consulting firm about the appropriateness of the presentation on interactions with the NRC, these concerns were apparently not brought to the attention of licensee management in a timely fashion.

Licenses are responsible for the correctness of the material presented in training courses at their facilities. All information and points of view should accurately reflect a licensee's position. As a result of the described incident, in addition to specific corrective actions, the involved licenses are reviewing their internal controls over contractor-provided training and training material. Although during NRC followup the licenses involved and the consultant's training organization have stated that it was not their intent to tell the licensee's personnel how to mislead the NRC, the course attendees may have received this impression. Because open and honest communications with the NRC are a cornerstone of the regulatory process, it is imperative that licenses assure themselves that all safety-related training materials accurately reflect their position and philosophy.

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No specific action or response is required by this information notice. If you have any questions regarding this notice, please contact the Regional Administrator of the appropriate NRC regional office or the technical contact listed below.



Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

Technical Contact: E. W. Merschoff, IE
301-402-9045

Attachments: List of Recently Issued IE Information Notices

LIST OF RECENTLY ISSUED
IE INFORMATION NOTICES

| Information Notice No. | Subject | Date of Issue | Issued to |
|------------------------|---|---------------|--|
| 85-87 | Hazards Of Inerting Atmospheres | 11/18/85 | All power reactor facilities holding an OL or CP; and fuel facilities |
| 85-86 | Lightning Strikes At Nuclear Power Generating Stations | 11/5/85 | All power reactor facilities holding an OL or CP |
| 85-85 | Systems Interaction Event Resulting In Reactor System Safety Relief Valve Opening Following A Fire-Protection Deluge System Malfunction | 10/31/85 | All power reactor facilities holding an OL or CP |
| 85-84 | Inadequate Inservice Testing Of Main Steam Isolation Valves | 10/30/85 | All power reactor facilities holding an OL or CP |
| 85-83 | Potential Failures Of General Electric PK-2 Test Blocks | 10/30/85 | All power reactor facilities holding an OL or CP |
| 85-82 | Diesel Generator Differential Protection Relay Not Seismically Qualified | 10/18/85 | All power reactor facilities holding an OL or CP |
| 85-81 | Problems Resulting In Erroneously High Reading With Panasonic 800 Series Thermoluminescent Dosimeters | 10/17/85 | All power reactor facilities holding an OL or CP and certain material and fuel cycle licensees |
| 85-80 | Timely Declaration Of An Emergency Class Implementation Of An Emergency Plan, And Emergency Notifications | 10/15/85 | All power reactor facilities holding an OL or CP |
| 85-17 Sup. 1 | Possible Sticking Of ASCO Solenoid Valves | 10/1/85 | All power reactor facilities holding an OL or CP |

OL = Operating License
CP = Construction Permit