

March 23, 2006

MEMORANDUM TO: Christine Lipa, Chief
Projects Branch 6
Division of Reactor Projects

FROM: Hironori Peterson, Chief **/RA/**
Operations Branch
Division of Reactor Safety

SUBJECT: D. C. COOK NUCLEAR POWER PLANT
DRS INPUT TO INTEGRATED REPORT 50-315/06-03;
50-316/06-03

Attached is the report input for D. C. Cook Nuclear Power Plant, Inspection Report 50-315/06-03; 50-316/06-03. I have reviewed this input and have determined it is ready for distribution to the licensee and dissemination to the public.

Post Inspection Data Input to Inspection Report 50-315/06-03; 50-316/06-03

Procedure Status and Sample Size:

IP 71111.11B (Biennial Licensed Operator Requalification Training Program Inspection)
Status = Not Applicable
Sample size = 0 (None: sample size of 1 entered in odd years for biennial inspections)

Attachment: Input to Inspection Report 50-315/316/2006-03

CONTACT: Bruce Palagi, DRS
(630) 829-9611

DOCUMENT NAME:G:\DRS\Work in Progress\DCCook Input Report 50-316-06-03 BBP.wpd

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Cover Letter

X No Input, no significant findings.

Title Page

Inspectors: B. Palagi, Senior Operations Engineer (Lead Inspector)
C. Moore, Operations Engineer

SUMMARY OF FINDINGS

ADAMS boilerplate - Inspectable Area: Licensed Operator Requalification Program

A. Inspector-Identified and Self-Revealed Findings

Cornerstone: Mitigating Systems

No findings of significance were identified.

B. Licensee-Identified Violations

No findings of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Mitigating Systems

1R11 Licensed Operator Requalification Program (71111.11)

.1 Facility Operating History

a. Inspection Scope

The inspectors reviewed the plant's operating history from January 2004 through January 2006 to identify operating experience that was expected to be addressed by the Licensed Operator Requalification Training (LORT) program. Then it was verified that the identified operating experience had been addressed by the facility licensee in accordance with the station's approved Systems Approach to Training (SAT) program to satisfy the requirements of 10 CFR 55.59(c), "Requalification program requirements."

b. Findings

No findings of significance were identified.

.2 Licensee Requalification Examinations

a. Inspection Scope

The inspectors performed a biennial inspection of the licensee's LORT test/examination program for compliance with the station's SAT program which would satisfy the requirements of 10 CFR 55.59(c)(4), "Evaluation." The operating examination material reviewed consisted of four operating tests, each containing two dynamic simulator scenarios and five job performance measures (JPMs). The written examinations reviewed consisted of four written examinations, each containing 37 questions. The inspectors reviewed the annual requalification operating test and biennial written examination material to evaluate general quality, construction, and difficulty level. The inspectors assessed the level of examination material duplication from week-to-week during the current year operating test and written examinations. The inspectors reviewed the methodology for developing the examinations, including the LORT program 2-year sample plan, probabilistic risk assessment insights, previously identified operator performance deficiencies, and plant modifications.

b. Findings

No findings of significance were identified.

.3 Licensee Administration of Requalification Examinations

a. Inspection Scope

The inspectors observed the administration of a requalification operating test to assess the licensee's effectiveness in conducting the test to ensure compliance with 10 CFR 55.59(c)(4), "Evaluation." The inspectors evaluated the performance of three crews in parallel with the facility evaluators during six dynamic simulator scenarios and evaluated various licensed crew members concurrently with facility evaluators during the administration of several JPMs. The inspectors assessed the facility evaluators' ability to determine adequate crew and individual performance using objective, measurable standards. The inspectors observed the training staff personnel administer the operating test, including conducting pre-examination briefings, evaluations of operator performance, and individual and crew evaluations upon completion of the operating test. The inspectors evaluated the ability of the simulator to support the examinations. A specific evaluation of simulator performance was conducted and documented under Section 1R11.8, "Conformance With Simulator Requirements Specified in 10 CFR 55.46," of this report.

b. Findings

No findings of significance were identified.

.4 Examination Security

a. Inspection Scope

The inspectors observed and reviewed the licensee's overall licensed operator requalification examination security program related to examination physical security

(e.g., access restrictions and simulator considerations) and integrity (e.g., predictability and bias) to verify compliance with 10 CFR 55.49, "Integrity of examinations and tests." The inspectors also reviewed the facility licensee's examination security procedure, any corrective actions related to past or present examination security problems at the facility, and the implementation of security and integrity measures (e.g., security agreements, sampling criteria, bank use, and test item repetition) throughout the examination process.

b. Findings

No findings of significance were identified.

.5 Licensee Training Feedback System

a. Inspection Scope

The inspectors assessed the methods and effectiveness of the licensee's processes for revising and maintaining its LORT Program up to date, including the use of feedback from plant events and industry experience information. The inspectors reviewed the licensee's quality assurance oversight activities, including licensee training department self-assessment reports. The inspectors evaluated the licensee's ability to assess the effectiveness of its LORT program and their ability to implement appropriate corrective actions. This evaluation was performed to verify compliance with 10 CFR 55.59 (c) "Requalification program requirements" and the licensee's SAT program.

b. Findings

No findings of significance were identified.

.6 Licensee Remedial Training Program

a. Inspection Scope

The inspectors assessed the adequacy and effectiveness of the remedial training conducted since the previous biennial requalification examinations and the training from the current examination cycle to ensure that they addressed weaknesses in licensed operator or crew performance identified during training and plant operations. The inspectors reviewed remedial training procedures and individual remedial training plans. This evaluation was performed in accordance with 10 CFR 55.59 (c) "Requalification program requirements" and with respect to the licensee's SAT program.

b. Findings

No findings of significance were identified.

.7 Conformance With Operator License Conditions

a. Inspection Scope

The inspectors reviewed the facility and individual operator licensees' conformance

with the requirements of 10 CFR Part 55. The inspectors reviewed the facility licensee's program for maintaining active operator licenses and to assess compliance with 10 CFR 55.53 (e) and (f). The inspectors reviewed the procedural guidance and the process for tracking on-shift hours for licensed operators and which control room positions were granted watch-standing credit for maintaining active operator licenses. The inspectors reviewed the facility licensee's LORT program to assess compliance with the requalification program requirements as described by 10 CFR 55.59 (c). Additionally, medical records for 14 licensed operators were reviewed for compliance with 10 CFR 55.53 (i).

b. Findings

No findings of significance were identified.

.8 Conformance With Simulator Requirements Specified in 10 CFR 55.46

a. Inspection Scope

The inspectors assessed the adequacy of the licensee's simulation facility (simulator) for use in operator licensing examinations and for satisfying experience requirements as prescribed in 10 CFR 55.46, "Simulation Facilities." The inspectors also reviewed a sample of simulator performance test records (i.e., transient tests, scenario test and discrepancy resolution validation test), simulator discrepancy and modification records, and the process for ensuring continued assurance of simulator fidelity in accordance with 10 CFR 55.46. The inspectors reviewed and evaluated the discrepancy process to ensure that simulator fidelity was maintained. Open simulator discrepancies were reviewed for importance relative to the impact on 10 CFR 55.45 and 55.59 operator actions as well as on nuclear and thermal hydraulic operating characteristics. The inspectors conducted interviews with members of the licensee's simulator staff about the configuration control process and completed the IP 71111.11, Appendix C, checklist to evaluate whether or not the licensee's plant-referenced simulator was operating adequately as required by 10 CFR 55.46 (c) and (d).

b. Findings

No findings of significance were identified.

9 Annual Operating Test Results

a. Inspection Scope

The inspectors reviewed the pass/fail results of individual written tests, and the operating and simulator tests (required to be given per 10 CFR 55.59(a)(2)) administered by the licensee during calendar year 2006. The overall written examination and operating test results were compared with the significance determination process in accordance with NRC Manual Chapter 0609, Appendix I, "Operator Requalification Human Performance Significance Determination Process."

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA5 Other Activities

(Closed) Violations 05000315/316/2005006-01, 02, and 03 "Failure to Accurately Report Completion of Corrective Actions from a Previous Severity Level III Violation," "Failure to Provide Complete and Accurate Information about Operators' Health Status", and "Failure to Report a Change in Operator Medical Status"

Corrective actions associated with NRC issued Notice of Violation (NOV) EA-05-171 were reviewed. On November 23, 2005, the NRC issued a Notice of Violation EA-05-171 and proposed a Civil Penalty of \$60,000 to the Indiana Michigan Power Company associated with two violations of 10 CFR 50.9, "Completeness and Accuracy of Information," and one violation of 10 CFR 50.74, "Notification of Change in Operator or Senior Operator Status". The violations were identified during an NRC inspection (NRC Inspection Report No. 05000315/2005006) conducted at D.C. Cook in the spring and summer of 2005 to review the plant's reactor operator licensing program. NRC inspectors identified three violations: (1) the utility had provided the NRC with incomplete and inaccurate information. The utility stated that a complete review of all operator medical records had been conducted and that no records that would require restrictions to operator licenses for medical reasons had been found. However, NRC inspectors identified three licensed operators who had medical conditions that would require their licenses to be restricted; (2) the utility had failed to notify the NRC about licensed operators experiencing a permanent illness within 30 days. Two NRC-licensed operators at the plant were diagnosed with potentially disqualifying medical conditions in 1998 and 2003. However, the NRC was not notified of these facts until 2005; and (3) the utility also failed to provide the NRC with complete and accurate information on NRC reactor license applications. Applications submitted to the NRC for new, renewed and amended NRC licenses did not describe the individuals' recently diagnosed medical conditions that would affect the conditions of these licenses. The licensee has implemented corrective actions and the NRC evaluated the effectiveness of those corrective actions during this inspection. The corrective action were evaluated as having been effective based on a review of current operator training material, medical records, and reporting practices. Therefore, violations VIO 05000315/316/2005006-01 (Failure of the licensee to accurately report the completion of corrective actions from a previous SLIII violation in 2004.); VIO 05000315/316/2005006-02 (Failure to provide accurate and complete information about operators' health prior to the NRC performing a licensing action.); and VIO 05000315/316/2005006-03 (Failure of the licensee to report the change in operator medical status.) will be closed.

4OA6 Meeting(s)

.1 Interim Exit Meetings

Interim exit meetings were conducted for:

Biennial Operator Requalification Program Inspection with Mr. J. Jensen, Site Vice President, on March 10, 2006.

Annual Operator Requalification Examination Results Inspection with Mr. T. Vriezema, Operations Requalification Training Supervisor, on March 20, 2006.

KEY POINTS OF CONTACT

Licensee

L. Bush, Operations Supervisor

R. Gillespie, Operations Training Manager

T. Veirzema, Operations Requalification Training Supervisor

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Closed

05000315/200506-01 05000316/200506-01	VIO	Failure to Accurately Report Completion of Corrective Actions from a Previous Severity Level III Violation
05000315/200506-02 05000316/200506-02	VIO	Failure to Provide Complete and Accurate Information about Operators' Health Status
05000315/200506-03 05000316/200506-03	VIO	Failure to Report a Change in Operator Medical Status

LIST OF DOCUMENTS REVIEWED

Condition Reports associated with Notice of Violation EA-05-171, CR #'s 05109063, 05111059, 05112045, 051122049, 05216067, 05223020, 05224028, 05322029, 0534276
Lesson Plan RQ-C-3040, "LOR Period 3004 Ops Review"
TI-TROP-02 Rev. 8, "Administrative Requirements for NRC License and Medical Requirements"
OHI-2071 Rev. 9, "Reporting Reassignment, Yermiation, and Conditions Potentially Affecting Performance of Licensed Duties"
TPD-600-LOR Rev. 11, "LICENSED OPERATOR REQUALIFICATION TRAINING PROGRAM DESCRIPTION"

LIST OF ACRONYMS USED

CFR	Code of Federal Regulations
DRS	Division of Reactor Safety
IP	Inspection Procedure
JPM	Job Performance Measure
LORT	Licensed Operator Requalification Training
SAT	Systems Approach to Training