

NMC > Sites > Point Beach - Action Request > Corrective Actn Program (CAP) AR  
Section 1

Activity Request Id: CAP065250  
Activity Type: CAP Submit Date: 6/21/2005 3:30:00 PM

One Line Description: BOP Testing methodology of PAT may not meet 2003 AA/FFD order.

Detailed Description: 6/21/2005 3:30:00 PM - ANDERSON, RENEE G.:  
During security inspections of NMC facilities, inspectors questioned the BOP (behavior observation program) portion of the GAT testing methodology and were concerned that it may not meet the intent of the 2003 AA/FFD order.

The Behavior Observation Program (BOP) is a required element of NRC regulations and orders on access authorization and Fitness For Duty (FFD). NMC currently covers BOP training as part of Plant Access Training (PAT) and/or FFD training. The NRC questioned if a separate test on BOP responsibilities, or a separate grading of BOP portions of a comprehensive PAT examination, is required to meet NRC BOP training requirements. Ultimately the NRC issued green findings for Kewaunee and DAEC based on the BOP testing methods in PAT but determined that neither a separate test on BOP or grading of BOP portions of a comprehensive PAT examination are is required provided the training adequately covers required BOP training elements and the licensee has implemented a method to ensure the training has achieved the desired results. This may be accomplished through testing. If testing is used, licensee should determine effective means of remediation for exam failures and incorrect responses to questions.

Initiator: ANDERSON, RENEE G. Initiator Department: TT Training Technical (RP/Chem/EP)  
PB

Date/Time of Discovery: 6/21/2005 3:23:16 PM Date/Time of Occurrence: 6/21/2005 3:23:16 PM

Identified By: External Other System: (None)

Equipment # (1st): (None) Equipment Name (1st): (None)

Equipment # (2nd): (None) Equipment Name (2nd): (None)

Equipment # (3rd): (None) Equipment Name (3rd): (None)

Site/Unit: Point Beach - Common

Why did this occur?: 6/21/2005 3:30:00 PM - ANDERSON, RENEE G.:  
NRC inspection of two NMC plant's FFD training programs.

Immediate Action Taken: 6/21/2005 3:30:00 PM - ANDERSON, RENEE G.:  
To satisfy the BOP concerns identified by the NRC, NMC agreed to formalize the exam analysis process and BOP testing methods. To ensure this occurs the NMC GAT team made the following changes in Rev. 2 of the GAT Training Program Description:

3.1.4  
Fleet GAT TAC is responsible for performing exam analysis per Training Fleet Procedure (FP-T-SAT-40) Implementation Phase, annually (not to exceed 15 months).

3.4.7  
The Plant Access Training (PAT) examination shall consist of 50 multiple-choice questions based on PAT learning objectives. 10-15 of the 50 questions shall be based on Fitness For Duty (FFD) learning objectives with a minimum of 5 questions based on Behavior Observation Program (BOP) objectives.

The NMC GAT team also verified that the electronic testing for PAT through LMS is programmed to ensure at least 5 questions are included from BOP objectives.

Recommendations: 6/21/2005 3:30:00 PM - ANDERSON, RENEE G.:  
Close to actions taken. Each site is initiating a cap to document the actions taken in response to the NRC Green Finding

SRO Review Required?: N

Section 2

Operability Status: NA Compensatory Actions: N

Basis for Operability: 6/21/2005 4:04:11 PM - HILL, CLAY:

CC-47

Admin issue only.

⊗ Unplanned TSAC Entry: N

⊗ External Notification: N