CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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AUTH.NAME AUTHOR AFFILIATION
MARCHI,M.L. Wisconsin Public Service Corp.
RECIP.NAME RECIPIENT AFFILIATION
Records Management Branch (Document Control Desk)

SUBJECT: Responds to NRC 980609 ltr re violations noted in insp rept 50-305/98-06 on 980427-0501.Corrective actions:contacted medical svc provider & reinforced expectation for completeness in records.

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CATEGORY 1 DOCUMENT

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NRC-98-70

Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)
600 North Adams Street
P.O. Box 19002
Green Bay, WI 54307-9002
1-920-433-5544 fax

July 9, 1998

10 CFR 2.201

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Reply to Notice of Violation, Inspection Report 50-305/98006

Reference: 1) Letter from J.A. Grobe (NRC) to M.L. Marchi (WPSC) dated June 9, 1998 (NRC Special Inspection Report 50-305/98006 (DRS) and Notice of Violation)

In reference 1, the Nuclear Regulatory Commission (NRC) provided Wisconsin Public Service (WPSC) with the results of the NRC special inspection activities conducted April 27 through May 1, 1998.

During the inspection, NRC identified one Severity Level IV violation. The violation was cited due to incomplete documentation of medical qualification data for licensed senior operators. The violation was noted to be contrary to 10 CFR 55.27. Attachment 1 is our response to the notice.

The inspection report also included an NRC request for additional information concerning evaluations of senior reactor operators. Attachment 2 provides the requested information concerning evaluation of senior reactor operators, particularly shift supervisors. If you should have any questions with regard to this response, please contact me or a member of my staff.

Sincerely,

for Mark L. Marchi
Site Vice President - Kewaunee Plant

GIH
Attach.
cc: US NRC Senior Resident Inspector
US NRC Region III

ATTACHMENT 1

Letter from M. L. Marchi (WPSC)

to

Document Control Desk (NRC)

Dated

July 9, 1998

Re: Reply to Notice of Violation, Inspection Report 98-006

NRC Notice of Violation 98-006-02

10 CFR 55.27 states, in part, the licensee shall document and maintain the results of medical qualification data and each senior operator's medical history for the current license period. The licensee shall retain this documentation while an individual performs the functions of senior operator.

Contrary to the above, during the week of April 27, 1998, inspectors identified that during a medical physical on March 11, 1998, one of the senior operator's vision examination results identified that his depth perception was unacceptable, although the medical cover form did not identify the deficiency and was not signed-off by the physician. The inspectors also identified that during a medical physical on February 4, 1998, another senior operator's respiratory record indicated a problem with lung capacity, but the pass/fail results, physician signature, and date at the bottom of the form were blank, although the medical cover form was signed-off as acceptable by the physician.

WPSC Response

Wisconsin Public Service Corporation (WPSC) does not contest this violation. Our assessment of the condition revealed no challenge to public health and safety. The operators in question remained physically suited to perform licensed duties consistent with regulatory requirements. Therefore, there is no safety significance to the condition found. Additionally, in order to respond to the violation and to ensure we (NRC and WPSC) have a common understanding of the nature of the documentation which was noted to be deficient, we feel it is necessary to make clarifications to the NRC identified problem statement.

The medical cover form for the senior operator's vision examination results was identified by NRC as not identifying a deficiency, and that the form was not signed-off by the physician. This statement is incorrect. Exhibit 1 (attached and referred to in the Notice of Violation as "medical cover form") is entitled "AMERICAN NATIONAL STANDARD INSTITUTE - American National Standard 3.4-1983 - MEDICAL CERTIFICATION OF NRC LICENSED PERSONNEL." It identifies, for the senior operator in question, that corrective lenses be worn when performing licensed duties, and that it was signed-off by the attending physician.

WPSC has accepted this form (Exhibit 1) as meeting the documentation requirements of a physician certifying that an individual meets the medical requirements contained in ANSI/ANS 3.4-1983 for a U.S. NRC Reactor Operator/Senior Reactor Operator License. This form is attached to Form NRC-396 when submitted by the facility for license applications and renewals.

The discrepancies identified by the inspectors involved incomplete test results forms. The test results forms are internal forms to our contracted medical service provider, Maritime Healthworks. These forms are identified by Maritime Healthworks as "Occupational Health Screening Results - Vision" and "Occupational Health Screening Results - Pulmonary" (referred to in the Notice of Violation as "vision examination results" and "respiratory record," respectively). They are used to document test results and provide the attending physician with data for making the determination of an individual's capacity to perform the functions of an operator. It is WPSC's understanding that these forms are not documents of qualification but are inputs to a physician for decision making. For example, as stated by ANSI/ANS 3.4-1983, "Pulmonary function studies that include a forced vital capacity and forced expiratory volume at 1 second would be helpful to the examining physician in determining the candidate's ability to perform assigned work." The medical certification form (Exhibit 1) is used to document qualification and both were completed appropriately. Test results are maintained on-site in accordance with 10CFR 55.27.

Reason For Violation

The violation occurred because the contracted medical service provider's test results forms were incomplete. The medical certification form (Exhibit 1) is considered the document of record and test results are supporting data. Because the test results forms currently contain signature blanks, they should have been completed. Whether or not signature blanks need to be on test results data forms needs to be resolved with the medical provider.

Corrective Actions

Immediate corrective actions included contacting the medical service provider and reinforcing the expectation for completeness in records. In both cases, the medical service provider physician was contacted and asked to resolve the incomplete forms (the vision examination results and the respiratory record). The physician was able to re-review the respiratory test results of the senior operator in question and returned a completed form with a clarifying statement. In the case of the senior operator with the depth perception comment, since ANSI/ANS 3.4-1983 does not detail testing criteria and therefore no specific test results were available to re-review, the physician requested that the individual be retested. The individual was retested and passed with acceptable depth perception.

Future actions to be taken include additional discussions with the NRC to clarify what administrative requirements (signatures) are needed on test result data forms and then to hold follow-up conversations with our medical service provider to ensure the documentation forms are designed and completed in accordance with regulatory expectations.

Compliance Schedule

To prevent future occurrence, the requirement for record design and completion will be clarified and completed by August 30, 1998.

ATTACHMENT 2

Letter from M.L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

July 9, 1998

Re: Reply to NRC Request For Information Concerning Evaluation of Senior Reactor Operators, Particularly Shift Supervisors, URI 50-305/98006-01 (DRS)

NRC Request For Information Concerning Evaluation of Senior Reactor Operators, Particularly Shift Supervisors, URI 50-305/98006-01 (DRS)

We request that you provide us with information concerning your evaluation of senior reactor operators, particularly shift supervisors. Your training procedure states that each individual will be observed performing, walking through, and/or discussing normal, abnormal, and emergency situations during each requalification cycle. Your procedure also discusses rotating senior reactor operators into the control room supervisor or shift supervisor positions. Please include in the information you provide your specific evaluation practices and rationale.

WPSC Response

We are formatting our response to the requested information based upon the observations as they are characterized in the inspection report. We feel this is necessary to ensure we (NRC and WPSC) have an equal understanding of the issues. Additionally, we may not have been clear in our explanations to the inspectors during their visit as to what our program basis is and how we evaluate licensed individuals in regard to their licensed responsibilities.

NRC Observation

The inspectors observed the licensee administer three dynamic scenarios. The minimum crew manning in the simulator consisted of four licensed operators in the positions of SS, CRS, NCO-R, and NCO-T, and a non-licensed shift technical advisor (STA). Two of the three licensed SROs were rotated into the CRS position to allow evaluation of their ability to direct licensed activities and EOPs. However, the licensed SRO in the SS position was never rotated to the CRS position throughout administration of the dynamic scenario examination.

Response

WPSC's OPS-TP Operations Training Program, Appendix D, section 6.6.4.H, states, "Each licensed Senior Reactor Operator (SRO) shall rotate into the Control Room Supervisor or Shift Supervisor positions during training and evaluation sessions. This allows the SRO in the CRS position to demonstrate his ability to direct licensed activities of the operators and to implement the Emergency Operating Procedures. This also allows the SRO in the SS position to demonstrate

his ability to direct licensed activities, overall direction in the use of the Emergency Operating Procedures, and to perform as the Emergency Director."

WPSC's program is consistent with NUREG 1021, Examiner Standards, ES-604, Section B, which states, "To meet the requirements of 10 CFR 55.59 (a)(2), it is the facility licensee's responsibility to conduct its annual operator performance evaluations on the dynamic simulator in accordance with the requirements of its requalification program."

WPSC conducts its programs in accordance with OPS-TP, Operations Training Programs, Appendix D, Section 6.6.4.E which states, "Licensed individuals should be trained and evaluated in the same crew configuration with which they normally operate the plant. Crew size should not exceed five operators. A larger crew size may be considered on a case-by-case basis. A Shift Technical Advisor may be added to the crew during the examination if the STA is used during training."

WPSC's program is consistent with NUREG 1021, Examiner Standards, ES-604, Section D.1.f., which states, "The members of the operating crew should maintain the same operating positions as during facility requalification evaluations. The crew members should rotate between positions in the manner identical to the facility's rotation practices for evaluations specified in the facility's requalification program."

NRC Observation

The inspectors asked the training staff if the actual plant SSs were ever evaluated in the CRS position during the training cycle and the licensee stated that they were not. The licensee stated that the SS's ability to direct licensed activities and EOPs could be evaluated based on the SS's oversight position during the scenarios. For instance, if the CRS directed an incorrect EOP action and the SS did not correct the direction, then both the SS and the CRS would be held culpable, and considered unsatisfactory. Conversely, if the SS corrected the CRS, then the SS would be considered satisfactory. The licensee's training program procedure, OPS-TP, Appendix H, Form

H-5, Attachment 3, "SRO Grading Summary Guide," items 4 (a), (b), and (c) described competency and rating factors for the compliance and correct use of procedures, including emergency operating procedure entry and immediate actions. Items 7 (a), (b), (c), and (d) described competency and rating factors for directing shift operations. The SS was an oversight position that did not direct licensed activities or EOPs during abnormal or emergency situations.

Response

WPSC has defined the Shift Supervisor (SS) as the required Senior Reactor Operator position. Kewaunee's Technical Specifications, Item 6.2.b states:

1. Each on duty shift complement shall consist of at least:
   A. One Shift Supervisor (SRO)
   B. Two licensed Reactor Operators
   C. One Auxiliary Operator
   D. One Equipment Operator
   E. One Radiation Technologist

2. While above COLD SHUTDOWN, the on-duty shift complement shall consist of the personnel required by TS 6.2.b.1 and an additional SRO.

Kewaunee's Nuclear Administrative Directive (NAD) 2.2.1, Operations Group Organization, Rev. B, July 2, 1996, section 4.6.3 states, in part, that the Shift Supervisor's responsibilities include, "directing operations to cope with the situation until relieved." Section 4.7.1 states that the CRS is, "Responsible to the Shift Supervisor for the safe and reliable operation of the plant."

NUREG-1262, Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses, Q&A #252, page 72, although not specific to KNPP issue, is clear in its answer statement that, "...the individual who is on shift directing the activities is the one who's in the position required by Technical Specifications."

Rulemaking intended not to specify who was by title the responsible SRO that directs the ROs, rather, its intent was to have each station define this position in its' Technical Specifications and that the Licensed Operator Requalification (LRQ) Training Program be written to implement Technical Specifications. Our LRQ Training Program is consistent with KNPP Technical Specifications, and specifies how responsibilities are implemented at KNPP.

OPS-TP, Operations Training Program is consistent with NUREG-1262, Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses, Q&A #351, page 96, Question: If an SRO directs the proper action, does that satisfy the ability to perform the actions necessary? Answer: Yes.

OPS-TP, Operations Training Program, Appendix D, section 6.6.4.H., also identifies the Control Room Supervisor (CRS) position as a position requiring a Senior Reactor Operator license and a position from which an SRO can demonstrate SRO level skills and knowledge. OPS-TP, Operations Training Program, Appendix D, section 6.6.4.H., states, "Each licensed Senior Reactor Operator (SRO) shall rotate into the Control Room Supervisor or Shift Supervisor positions during training and evaluation sessions. This allows the SRO in the CRS position to demonstrate his ability to direct licensed activities of the operators and to implement the Emergency Operating Procedures. This also allows the SRO in the SS position to demonstrate his ability to direct licensed activities, overall direction in the use of the Emergency Operating Procedures, and to perform as the Emergency Director."

NRC Observation

The inspectors observed the licensee's evaluations of individual and crew competencies subsequent to the dynamic scenario examination. The licensee's evaluation of the SS's ability to direct licensed activities and EOPs during each of the three scenarios was never discussed. Furthermore, the licensee did not hold the SS culpable for the mistakes of the CRS because weaknesses attributed to the CRS position for EOP direction were not applied to the SS during the evaluation discussion, or in the final paperwork evaluations. Other than testing their EOP knowledge on

written examinations, the licensee did not evaluate the SS's ability to direct licensed activities and EOPs during the entire requalification training cycle.

10 CFR 55.59(a)(2)(ii) states, in part, that the operating test will require the senior operator to demonstrate the ability to perform the actions necessary to accomplish a comprehensive sample of items specified in 55.45(a)(2) through (13) inclusive to the extent applicable to the facility. 10 CFR 55.45(a)(12) requires that the senior operator demonstrate the knowledge and ability as appropriate to the assigned position to assume the responsibilities associated with the safe operation of the facility. OPS-TP, Appendix D, Section 6.6.4, "Module 2 - Simulator Training," Step L, states, "Each licensed person shall be individually observed and evaluated to determine his overall ability to perform activities for which he is licensed. Each individual will be observed performing, walking through, and/or discussing normal, abnormal, and emergency situations during each requalification cycle." Step H states, "Each licensed Senior Reactor Operator (SRO) shall rotate into the Control Room Supervisor or Shift Supervisor positions during training and evaluation sessions. This allows the SRO in the CRS position to demonstrate his ability to direct licensed activities of the operators and to implement the Emergency Operating Procedures. This also allows the SRO in the SS position to demonstrate his ability to direct licensed activities, overall direction in the use of the Emergency Operating Procedures, and to perform as the Emergency Director." This item will be reviewed pending receipt of additional information from the licensee (URI 50-305/98006-01(DRS)).

Response

During the annual operating exams, the SS is evaluated using the competencies and anchors identified in the Licensed Operator Requalification Training Program. These competencies and anchors are modeled after those found in NUREG 1021, Examiner Standards, ES-303, Form ES-303-4. The following three competencies are specifically used to evaluate the SS in demonstrating his ability to direct licensed activities of the operators and to provide overall direction in the use of the Emergency Operating Procedures.

1) COMPLIANCE WITH AND USE OF PROCEDURES
2) COMMUNICATE AND INTERACT WITH THE CREW AND OTHER PERSONNEL
3) DIRECTING SHIFT OPERATIONS.

Contrary to the discussion provided by the inspectors, the evaluation team did discuss the SS involvement in EOP direction. During the KNPP Lead Evaluator's discussion concerning the simulator exam with Operations Training Evaluators, STA Evaluator and NRC Inspectors in attendance, the following comments were discussed:

- SS and CRS discussed step in FR-H.1 for starting FW pumps and decided not to and go directly to establishing FW flow from the condensate pump.
- Did not refer to background document.
- Starting FW pump would have ensured the ability to maintain FW flow to S/Gs.
- Condensate flow to S/G was established.

During the discussion it was identified that further Operations Management input was required prior to finalizing the comment. Following the discussion, the Lead Evaluator contacted the Superintendent - Plant Operations for input into this observation and the procedure usage associated with FR-H.1. He concurred that the FW pumps would be the preferred option, not going directly to condensate flow. The Superintendent had observed the scenario in question. Comments were documented on the Annual Evaluation Form H-5 (Exhibit 2 - attached), for both the SS and CRS in this scenario. Additionally, the comments were discussed at the crew critique that took place on Friday afternoon of the exam week. Operations Training Evaluators, Crew, STA and the STA Evaluator were in attendance.

In summary, during the annual operating exams the SS is evaluated along with the CRS for the implementation of the Emergency Operating Procedures. If the CRS makes a mistake in the implementation of the emergency procedures and it is not corrected by the SS, the SS is held accountable the same as the CRS. If the SS corrects the procedure error, then only the CRS will receive a comment on the evaluation. The SS is held accountable unless the CRS has failed to inform him of the procedure problem or questions associated with the implementation of the procedure.

EXHIBIT ONE

MARITIME HealthWorks

Aurora Medical Group

Aurora HealthCare

Tel (414) 683-9950
Fax (414) 683-9960

AMERICAN NATIONAL STANDARD INSTITUTE

American National Standard 3.4-1983

MEDICAL CERTIFICATION OF NRC LICENSED PERSONNEL

EMPLOYEE'S NAME: [redacted]

DATE OF PHYSICAL EXAMINATION: 3-11-98

_____ NO RESTRICTIONS

K CORRECTIVE LENSES BE WORN WHEN PERFORMING LICENSED DUTIES

_____ HEARING AID BE WORN WHEN PERFORMING LICENSED DUTIES

_____ RESTRICTED LICENSE OR EXCEPTION
(Medical Evidence Attached for NRC Review)

I certify that the above named individual meets the medical requirements contained in ANSI/ANS 3.4-1983 for a U.S. NRC Reactor Operator/Senior Reactor Operator License.

PHYSICIAN'S NAME: Mary Jo Capodice DO, MPH

SIGNATURE: [signature] DATE: 3/11/98

STATE OF LICENSE: WI

LICENSE NUMBER: 34116

COPY

EXHIBIT TWO

RO (SRO) EVALUATION SUMMARY

EXAMINEE: [redacted] CLASS/CREW: F

WRITTEN EXAM				
EXAM #	DATE TAKEN	TOTAL POINTS	POINTS SCORED	FINAL GRADE
LRQ-C12Y2-SRO-A5	5-1-98	20	19	89
LRQ-C12Y2-SRO-B5	5-1-98	25	21	

SIMULATOR EXAM			
EXAMINER(S): D. Karst		DATE: 4/29/98	
SCENARIO #	POSITION		
O-LRQ-Exam DYN-020 (1)	SS		
O-LRQ-Exam DYN-026 (2)	SS		
O-LRQ-Exam DYN-021 (3)	SS		
OVERALL		(SAT)	UNSAT

JPM EXAM			
EXAMINER(S): Krogh / Piste		DATE: 4-30-98	
AREA	GRADE (%)	SAT	UNSAT
1. ADMINISTRATIVE TOPICS (N/A FOR LRQ)			
2. CONTROL ROOM/SIMULATOR & IN-PLANT	100%	X	

a.rr.pmm

Permanent Document: Individual File

LOQ SRO GRADING SUMMARY

EXAMINEE:

Competencies/Rating Factors	3.0	2.0	1.0	Grade (S/U)	Comment Page#
1. Alarms/Annunciators					
A. Prioritize	3.0	2.0	1.0	S	—
B. Interpret	3.0	2.0	1.0		—
C. Verify	3.0	2.0	1.0		—
2. Diagnosis					
A. Recognize	3.0	2.0	1.0	S	—
B. Accuracy	3.0	2.0	1.0		—
C. Diagnose	3.0	2.0	1.0		—
D. Crew Response	3.0	2.0	1.0		—
3. System Response					
A. Interpret	3.0	2.0	1.0	S	—
B. Attentive	3.0	2.0	1.0		—
C. Plant Effects	3.0	2.0	1.0		1
4. Procedures					
A. Reference	3.0	2.0	1.0	S	—
B. Correct Use	3.0	2.0	1.0		1
C. Crew Implementation	3.0	2.0	1.0		—
5. Control Board Operations					
A. Locate	3.0	2.0	1.0	S	—
B. Manipulate	3.0	2.0	1.0		—
C. Response	3.0	2.0	1.0		—
D. Manual Control	3.0	2.0	1.0		—
6. Communications					
A. Clarity	3.0	2.0	1.0	S	—
B. Crew Informed	3.0	2.0	1.0		1
C. Receive information	3.0	2.0	1.0		—
7. Directing Operations					
A. Timely Action	3.0	2.0	1.0	S	—
B. Safe Direction	3.0	2.0	1.0		1
C. Oversight	3.0	2.0	1.0		—
D. Crew Feedback	3.0	2.0	1.0		—
8. Technical Specifications					
A. Recognize	3.0	2.0	1.0	S	—
B. Locate	3.0	2.0	1.0		—
C. Compliance	3.0	2.0	1.0		—

SIMULATOR FOLLOW-UP QUESTIONS

OPERATOR:	EVALUATOR:	SCENARIO #:

QUESTION:	
ANSWER:	

WAS THE QUESTION RESPONSE SATISFACTORY? _____

QUESTION:	
ANSWER:	

WAS THE QUESTION RESPONSE SATISFACTORY? _____

QUESTION:	
ANSWER:	

WAS THE QUESTION RESPONSE SATISFACTORY? _____

JOB PERFORMANCE MEASURE SUMMARY

EXAMINEE:	DATE:

A. ADMINISTRATIVE TOPICS (N/A LRQ)		EVALUATION (S OR U)	COMMENT PAGE NUMBER
1.	CONDUCT OF OPERATIONS		
2.	EQUIPMENT CONTROL		
3.	RADIATION CONTROL		
4.	EMERGENCY PLAN		

B.1 SIMULATOR/CONTROL ROOM JPM #	SAFETY FUNCTION (N/A LRQ)	JPM GRADE (S OR U)	QUESTION GRADE (N/A LRQ) (S OR U)	SYSTEM GRADE (S OR U) (N/A LRQ)	COMMENT PAGE NUMBER
O-LRQ-JPM-011		S			
O-LRQ-JPM-056		S			
O-LRQ-JPM-082		S			
B.2 IN-PLANT					
O-LRQ-JPM-075		S			
O-LRQ-JPM-095		S			

RO/SRO OPERATIONAL EXAM COMMENTS

Competency/ Anchor/Rating	Scenario #	Comment
6(b)2	020	SS CALLED OUT CC PUMP IS WAS STARTED AT 100 PSIG AND NO-ONE RESPONDED NOR WAS COMMUNICATION DIRECTED.
3(c)2	026	DID NOT KNOW WHAT BISTABLES WOULD TRIP IN WHEN CONTROL POWER WAS TURNED OFF FOR N-42.
4(b)2	026	SS AND CRS DISCUSSED STEP 7a IN FR-H.1 FOR STARTING FW PUMP AND DECIDED NOT TO ADD SG DIRECTLY TO ESTABLISHING FW FLOW FROM COND PUMP. DID NOT REFER TO BACKGROUND DOCUMENT. STARTING FW PUMP WOULD HAVE ENSURED THE ABILITY TO MAINTAIN FW FLOW TO SIGS. COND FLOW TO SIG WAS ESTABLISHED.
7(b)2	026	DISCUSSED PLACING RHR IN SERVICE IN FR-H.1. DIRECTION WAS TO ATTEMPT PLACING RHR IN SERVICE. SI WAS IN OPERATION AND RCS PRESSURE WAS 400 PSIG AND INCREASING.
6(b)2	020, 026, 021	OVERALL COMMUNICATIONS DID NOT FOLLOW THE EXPECTATIONS OF THE COMMUNICATIONS STANDARD. COMMUNICATIONS WERE NOT DIRECTED CONSISTENTLY AND THERE WAS LIMITED USE OF PARAPHRASED REPEAT-BACKS.

Permanent Document: Individual File

Rev. Orig