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SUBJECT: Responds to programmatic concerns identified in Exam Rept
 50-263/OL-89-01.

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April 4, 1989

Geoffrey C Wright, Chief
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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Response to Programmatic Concerns Identified in
Examination Report No. 50-263/OL-89-01

In response to your letter of March 16, 1989, which transmitted Examination Report No. 263/OL-89-01, the following information is offered.

Programmatic Concern #1

All the Senior Reactor Operators (SRO) are not trained in all areas of their license responsibilities including Emergency Operating Procedures (EOP).

Discussion

During the NRC administered requalification exams, one SRO, who is a control room operator and who holds an inactive SRO license, did not demonstrate adequate proficiency with the EOPs when required to perform as a Shift Supervisor during one dynamic simulator scenario. Four other SROs, who hold positions other than that of Shift Supervisor, did demonstrate adequate proficiency with the EOPs during the NRC administered requalification exams. In addition, two SROs who do hold the position of Shift Supervisor also demonstrated adequate proficiency with the EOPs during the NRC administered requalification exams. Therefore, six of the seven SROs who were administered the requalification examination demonstrated proficiency with the EOPs.

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G C Wright
April 4, 1989
Page 2

As a related issue, the NRC examination report also discussed the NRC Emergency Operating Procedures Inspection held in July, 1988, where one individual who had recently been promoted to the Shift Supervisor position did not demonstrate adequate proficiency with use of the EOP flow charts which had been recently implemented. This individual was proficient using the actual procedures, but had not received additional training on use of the flow charts prior to being promoted to Shift Supervisor. Administrative procedures were put in place in 1988 to assure that additional training is provided to individuals who change job classifications.

Corrective Action

It is now clearly understood that all Senior Licensed Operators are required to demonstrate proficiency in each area for which they are licensed. This requirement is independent of actual job position, independent of status of the license (i.e., active or inactive) and independent of utility administrative controls which provide for additional training prior to job classification changes. As a result, approximately 16 hours of simulator time has been added to the requalification program to provide Senior Licensed control room operators additional time to train in the Shift Supervisor position.

Programmatic Concern #2

Crew training to help overcome individual errors or weaknesses is not adequate.

Discussion

During the dynamic simulator scenario where the individual performing as Shift Supervisor did not demonstrate adequate EOP proficiency (see Discussion - Concern #1 above), the crew did not adequately compensate for the individual weakness. The crew had performed two previous dynamic simulator scenarios with two different SRO individuals performing as Shift Supervisor and the crew performance was acceptable. The tendency of the crew members, under examination conditions, has been to provide maximum opportunity for another crew member to pass the examination as an individual. During simulator training exercises, crew performance is emphasized and there is no reluctance to provide assistance to other crew members to demonstrate proper control of the plant. As discussed at the exit meeting, during one of the crew's previous scenario critiques, an NRC comment was made suggesting that too much assistance was provided to others by one of the crew members.

G C Wright
April 4, 1989
Page 3

It is felt that this led to a reluctance, during the third scenario, of the crew to step in and compensate for the individual weakness. Also discussed at the exit meeting, was the situation associated with the scenario in question, where an additional critical task had been determined to be appropriate by the NRC personnel on the examination team. The fact that this determination was not communicated to the facility members of the examination team led to the disagreement on the team failure.

NUREG 1021, ES 601, is quite specific in stating that such changes should be reviewed with the facility representatives on the examination team. If the facility evaluators had been aware of the additional critical task, it is our determination that there would not have been a disagreement on the team failure.

Corrective Action

The training program has been revised to assure that crew performance is emphasized during the examination process. The first priority during the examination process is to demonstrate proper crew performance.

Programmatic Concern #3

Licensed operators responded to known similar malfunctions in lieu of responding to indications in the simulator.

Discussion

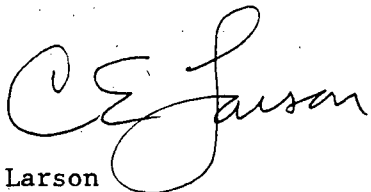
During the one dynamic simulator scenario, where the individual performing as Shift Supervisor did not demonstrate adequate EOP proficiency (see Discussion - Concern #1), the individual did not immediately use two individual drywell temperature points in lieu of the drywell average temperature to determine the need for Emergency Depressurization. The EOPs specifically require the use of drywell average temperature for this determination. The drywell average temperature point was not available due to a simulated loss of offsite power. Previous experience with this and similar malfunctions indicated that the drywell average temperature did not exceed the action point specified by the EOPs. The SRO did take the proper actions in response to the individual points, however, this action could have been taken in a more timely manner.

G C Wright
April 4, 1989
Page 4

Corrective Action

The training program has been modified to emphasize to licensed operators and the facility evaluators that actions should be taken based upon actual plant conditions using the indications available to them and procedures addressing those conditions. Operators are currently being trained to use the best available indications and take conservative, timely, actions in response to those indications. Operators are cautioned not to use experience with similar simulator malfunctions to determine the proper course of action.

Please contact us if you have any questions relating to the information we have provided.



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