



**CHANGES TO REQUALIFICATION
INSPECTION PROCEDURE
71111.11**

**Raymond Keith Walton
NRC, RIII, OLB**

INSPECTION OBJECTIVES:

- 01.01 To evaluate licensed operator performance during the conduct of requalification examinations, other examinations, training exercises, and in the actual plant/main control room.
- 01.02 To assess the facility licensee's ability to evaluate the performance of their licensed operators during the conduct of requalification examinations, other examinations, and training exercises.
- 01.03 To assess the facility licensee's ability to properly develop and administer requalification annual operating tests and biennial written examinations.
- 01.04 To assess the performance of the control room simulator, and the facility licensee's testing and maintenance of the control room simulator.
- 01.05 To assess the facility licensee's effectiveness in ensuring that the individuals who are licensed to operate the facility satisfy the conditions of their licenses as specified in 10 CFR 55.53 and 10 CFR 55.59.
- 01.06 To assess the facility licensee's effectiveness in identifying and resolving problems related to licensed operator performance.



WHY A NEED TO CHANGE IP 71111.11?

Recent Operational Events

- Operator Performance weaknesses increased since 2008. (INPO IER 11-3, “Weakness in Operator Fundamentals”)
- The experience level of operating crews has begun to diminish as more seasoned operators retire or move to other positions in the organization.
- Newer operators tend to be less familiar with and less sensitive to system response and integrated plant response than more experienced operators.
- Being unfamiliar with how the plant responds when operator actions are performed can sometimes result in unintended consequences.



WHY NEED TO CHANGE IP 71111.11?

Events

- Millstone 2 – 2/2011 While performing turbine valve testing, control room operators mis-operated turbine controls resulting in an inadvertent power increase from 88% to 96%
- Pilgrim – 5/2011 Control room operators failed to implement reactivity standards during startup which contributed to an unrecognized sub-criticality followed by an unrecognized return to criticality and subsequent reactor scram.
- HB Robinson – 3/2010 Failure to monitor important indications resulted in auto SI, uncontrolled cooldown, and challenge to RCP seal cooling.
- HB Robinson – 3/2010 Failure to ensure that procedure was applicable for existing conditions resulted in re-energizing faulted bus
- South Texas Project – 10/2010 Missed procedure step results in Auto Scram



WHAT CHANGED IN IP 71111.11?

- Not many changes to what we presently inspect during the biennial inspections:
 - *written and operating test quality,*
 - *observing how the operating tests are administered and how the crews are evaluated,*
 - *checking exam security,*
 - *checking operator license conditions (medicals, proficiency, reactivations), and*
 - *inspecting the simulator.*
- How we inspect has changed.
- Inspection activities more predictable/repeatable/prescribed by use of Appendices to IP 71111.11.



WHAT CHANGED IN IP 71111.11? PI&R!

- Licensee-identified issues associated with licensed operator errors or other licensed operator performance problems occurring in the plant/main control room will be reviewed using a P&IR method of review.
- Licensee to provide list of issues (CR's) affecting operator performance in the plant.
- Inspectors review selected samples to IP 71152 attributes to determine if identification, classification, corrective actions were IAW licensee procedures and Regulatory Requirements.
- Document IAW, MC 0612, Appendix D, PI&R Guidance. More latitude in documentation.



LICENSEE FEEDBACK TO IP 71111.11?

- Qualitative attributes in Appendix C are on a per scenario basis, and not a scenario set as is NUREG 1021, ES-604.
- Even though Appendix C does not include EOP contingency procedure usage, we still expect exams to include these.
- Appendix B, does not review written questions for RO/SRO applicability.
- Difficult to identify which questions are “direct lookup” in an open book exam without having procedures available.



RIII OPTIONAL INSPECTION ACTIVITIES

Region III includes additional optional inspection activities during 71111.11B including:

- Review of last QA Audit of Training Program
- Review program for maintaining UFSAR EOP Time critical operator actions. PRA time assumptions?
- SRI Items of concern from last requalification inspection report.
- Open allegations or unresolved items associated with operations activities.



INSPECTION RESOURCES

- Region III has sent a third inspector for most recent 71111.11B inspections.
- Region III is planning to inspect per 71111.11B during the “off” year with one inspector (~2 days).



QUESTIONS??

