U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos.

50-206/85-27, 50-361/85-26, 50-362/85-25

Docket No.

50-206, 50-361, 50-362

License No.

DPR-13, NPF-10, NPF-15

Licensee:

Southern California Edison Company

P. O. Box 800

2244 Walnut Grove Avenue Rosemead, California 91770

Facility Name:

San Onofre Units 1, 2 and 3

Inspection at:

San Clemente, California

Inspection conducted:

July 22-26, 1985

Inspector:

P. Narbut, Project Inspector

8/12/85 Date Signed

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Approved By:

P. H. Johnson, Chief

Reactor Projects Section No. 3

8/12/85

Date Signed

Summary:

<u>Inspection during period of July 22-26, 1985 (Report Nos. 50-206/85-27 50-361/85-26 and 50-362/85-25)</u>

Areas Inspected: Unannounced inspection by a regional inspector of licensed and non-licensed personnel training requirements. The inspection involved 37 inspection hours by one inspector. During this inspection, Inspection Procedures 41400, 41700 and 41701 were utilized.

Results: No violations or deviations were identified.

DETAILS

1. Individuals Contacted

*R. W. Krieger, Station Manager

*M. J. Kirby, Training Administrator, Unit 1

*R. J. Mette, Supervisor of Operations Training, Units 2/3

*J. R. Tate, Assistant Manager Operations, Units 2/3

*G. K. Noel, Supervisor of Technical Training Units 2/3

*E. Williams, Training Coordinator

*D. Gruber, Maintenance Training Administrator

*W. C. Kingsley, Training Administration

*P. King, Operations QA Supervisor

*J. Grosshart, QA Engineer

- *D. E. Shull, Maintenance Manager
- *C. Kergis, Lead Compliance Engineer
- J. Wambold, Manager, Nuclear Training
- R. Joyce, Maintenance Manager, Units 2/3
- S. Atkins, I&C Training Instructor
- E. Williams, I&C Training Instructor

*Denotes those personnel in attendance at the exit interview on July 26, 1985.

2. Examination of Training and Retraining Activities for Licensed and Non-Licensed Licensee Staff

General

The inspector examined the area of licensee staff training and retraining including licensed and non-licensed personnel.

The examination concentrated in the non-licensed staff area due to time limitations and included procedure review, interviews with craftsmen and technicians, and the review of selected records.

a. Procedure Review

The inspector examined a selection of licensee manuals and procedures which describe the approved training program and found them to be in essential conformance with federal requirements and licensee commitments as reflected in the licensees approved training program, the license technical specifications, 10 CFR 55, NUREG-0737, and referenced Regulatory Guides and ANSI Standards. The procedures reviewed included the Training Administrative Manual, Training Division procedures (S0123-XXI Series), Training Program Descriptions and Qualification Guides.

The inspector noted that the Licensed Operator Requalification program (Training Program Description OP5, Revision 0), which implemented January 1, 1985, was submitted to the NRC, Division of Licensing, on January 22, 1985. In a separate letter dated November 8, 1984, the program had been provided to Region V and was

affirmed by the licensee at that time not to be substantially changed per the approval criteria of 10 CFR 50.54(i-1).

b. <u>Personnel Interviews</u>

The inspector interviewed a number of randomly selected mechanics and technicians who performed maintenance or operation of safety-related equipment. The personnel interviewed consisted of three Instrumentation and Control (I&C) technicians, two mechanical maintenance technicians, two electricians, and two non-licensed Nuclear Plant Equipment Operators (NPEO's). The personnel interviewed were selected by the inspector from licensee rosters and, generally, an experienced and a new staff member from each group was selected. In the I&C area, a contractor was selected in addition to SCE personnel.

Also, in the I&C area, unsolicited opinions were received by telephone anonymously.

Generally, the personnel interviewed considered the training they received to be adequate to perform their jobs. In the I&C area, a number of solicited and unsolicited people indicated that there was insufficient systems training. None related significant problems encountered as a result of lack of training but rather indicated that they were uncomfortable with their level of system knowledge.

The inspector reviewed the amount of training available to I&C technicians reflected in the Nuclear Instrument Technician Interim Training Plan, Revision 0. The Training Plan lists an impressive number of courses available to I&C technicians. However, the amount of mandatory training is limited and the optional system courses are held when requested by maintenance supervision.

The inspector reviewed the computer printout training records of two I&C technicians and determined each had received significant amounts of training on a regular basis. The records generally substantiated the training goal of about three days of training per month per employee. This includes time devoted to industrial safety topics, radiological controls, quality assurance, administrative procedure controls and technical subjects such as a spray valve workshop, the plant protection system (PPS), and Victoreen systems.

The amount of training provided to I&C technicians at San Onofre does not appear to be abnormal compared to other sites. There is a lack of specific regulatory requirements for the training of technicians. As is discussed later, the licensee is seeking INPO accreditation for the training of all staff. Therefore, in view of the INPO efforts, the NRC has adopted a "hands-off" policy in the area of training, on an interim basis.

At the exit interview, the inspector discussed the perceived dissatisfaction within the I&C organization (with the amount of system training given). The licensee management stated the matter would be considered.

c. INPO Accreditation

The inspector reviewed the status of INPO accreditation with the licensee's training management.

The INPO guidelines for training include programs for operations and maintenance and technical areas. INPO establishes guidelines for utilities to meet and requires both a self evaluation and a team evaluation.

The licensee intends to have the ten accreditation programs completed by the end of 1986. Each of the programs is currently in various stage of completion. In the operations area, the INPO team visit is being planned for accomplishment near the end of 1985.

d. Observations

In the conduct of the inspection the inspector observed the following points which were related to licensee management at the exit interview:

- Maintenance personnel are hired at the journeyman level. The screening process includes a written examination and interviews with knowledgeable craft supervision.
- Work assignments for maintenance personnel are made by supervision. There are minimal formal qualification requirements. The decision as to whether a mechanic is capable is primarily that of the supervisor. Employees are instructed to notify their supervisor (without fear of retribution) if they have misgivings about their ability to perform a job safely. On-the-job training is used heavily.
- Nuclear Plant Equipment Operators (NPEOs) are non-licensed operators. Their training and qualification program appears to be well structured. The NPEO position is generally viewed as a pathway to becoming a licensed operator. SCE initiated an innovative program, utilizing a local college, which attracts local high school graduates to enter a program of education with pay leading to a career as a licensed operator. The NPEO task is used as a pathway for this program.
- The training facilities are impressive in that they are isolated, extensive and devoted for training.
- There is a impressive selection of courses available in each discipline.
- The inspector inadvertently observed an informal question and answer session between NPEOs and a licensed operator. The inspector was impressed with the seriousness of the demeanor of the participants.

The inspector noted that the licensee has state-of-the-art training methodology including computer orientated teaching and testing (the Plato programs). These programs are used for initial and requalification training and examination.

e. Conclusions

In general, the inspector concluded that the licensee has placed a significant amount of resources and attention to the training area. The effort to obtain INPO accreditation is resulting in an increased and changing training program. The subject of training does not appear to lack management attention of San Onofre.

3. <u>Exit Interview</u>

An exit interview was conducted on July 26, 1985 with the persons denoted in paragraph 1. The scope of inspection and findings as described in this report were discussed.