



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W., SUITE 3100
 ATLANTA, GEORGIA 30303

Report No. 50-261/79-12

Licensee: Carolina Power and Light Company
 411 Fayetteville Street
 Raleigh, North Carolina 27602

Facility Name: H. B. Robinson

Docket No. 50-261

License No. DPR-23

Inspection at H. B. Robinson Nuclear Plant near Hartsville, S.C.

Inspectors:	<u><i>E. J. Ford Jr</i></u>	<u>7-2-79</u>
	W. A. Ruhlman	Date Signed
	<u><i>H. D. Jenkins</i></u>	<u>6-29-79</u>
	H. D. Jenkins	Date Signed
Approved by:	<u><i>W. A. Ruhlman</i></u>	<u>7-3-79</u>
	W. A. Ruhlman, Acting Chief, RONS Branch	Date Signed

SUMMARY

Inspection on June 12-13, 1979

Areas Inspected

This routine, announced inspection involved 25 inspector-hours onsite in the areas of training and retraining programs (non-licensed plant personnel); requalification training; and licensee response to IE Bulletins 79-06A and 79-10.

Results

In the three areas inspected, no apparent items of noncompliance or deviations were identified.

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DETAILS

1. Persons Contacted

Licensee Employees

- *C. Crawford, Operations Supervisor
W. Dorman, OQA
- *B. Garrison, QA Supervisor
- *F. Lowery, Training Coordinator
- *R. Starkey, Jr., Plant Manager
- *W. Taylor, Administrative Supervisor
- *H. Zimmerman, Maintenance Supervisor

Other licensee employees contacted craftsmen, technicians, operators, mechanics, and office personnel.

*Attended exit interview.

2. Exit Interview

The inspection scope and findings were summarized on June 13, 1979, with those persons indicated in Paragraph 1 above. Those open items identified in Paragraphs 5.b, 5.c., 5.e., 5.f., 5.g., 6.b through 6.d, were committed by the plant manager to be completed no later than September 15, 1979. The unresolved items discussed in paragraph 5.d., was acknowledged by the Plant Manager.

3. Licensee Action on Previous Inspection Findings

Not inspected.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. A new unresolved item identified during this inspection is discussed in Paragraph 6.d.

5. Training and Retraining Programs; Non-licensed Plant Personnel

- References:
- a) TI-100, Retraining and Replacement Training for Non-licensed Operating Personnel, Revision 3, dated 2/79
 - b) TI-101, Replacement Training for Instrumentation and Control Technicians and Electricians, Revision 2, dated 2/79
 - c) TI-102, Replacement Training for Mechanics, Revision 2, dated 2/79

- d) TI-104, Qualification Program for Auxiliary Operators
- e) TI-300, General Employee Training, Revision 3, dated 2/79
- f) TI-301, Training Reports, Revision 2, dated 2/79
- g) QAP-3A, Indoctrination, Training, and Certification of Surveillance and Inspection Personnel, Revision 1, dated 7/76
- h) QAP-4, Training, Examination and Certification of NDT Personnel, Revision 0, dated 10/74

a. Review Conducted

The changes made to the licensee's training procedures since the last inspection of this area were reviewed with respect to maintaining the implementation of the licensee's commitments for:

- (1) General employee training for new employees
- (2) General employee retraining
- (3) Temporary employee training
- (4) On-the-job training for: auxiliary/craftsmen; technicians; and QA/QC personnel

The inspector reviewed training records for two individuals in each category above to verify that the described training program was provided. The inspector interviewed one employee from each category above to verify that the individual actually received the training which was documented in the training records.

As a result of this review, five (5) open items were identified as discussed in Paragraphs 5.b, .5c, 5.e, 5.f, and 5.g below. One unresolved item was identified as discussed in Paragraph 5.d below.

b. Inadequate Training Evaluation

As part of the General Employee Training, the Commission's requirement to disseminate employee information contained in 10 CFR 19.12 was not evaluated to determine the extent to which the personnel understood. The inspector identified this inadequacy during personnel interviews.

Until a method is provided to evaluate the General Employee Training with regard to the dissemination of 10 CFR 19.12, this item (261/79-12-01) is open.

c. Incomplete 10 CFR 19.12 Training

A recent change in the General Employee Training presentation covering 10 CFR 19.12 was implemented on May 2, 1979, and was identified as being incomplete. Seven (7) plant employees have received the indoctrination course since the newly implemented presentation. Up until this time, the correct information was presented by lecture.

Until those seven (7) new employees hired since May 2, 1979, who have received indoctrination using the newly implemented video tape are reindoctrinated to meet all the requirements of 10 CFR 19.12, this item (261/79-12-02) is open.

d. Inadequate Proficiency Training Program

During his review of the non-licensed personnel training program the inspector identified a deficiency area with regard to the maintenance of proficiency for those individuals who were already "qualified". ANSI N45.2 -1971, which is committed to by the licensee's accepted QA Program, states in part that a program shall provide training of personnel performing activities affecting quality to ensure that suitable proficiency is achieved and maintained. This item was previously identified by the licensee in his audit item OQAI-79-20.

Until the licensee develops and implements a formal proficiency training program for non-licensed personnel to ensure that proficiency is maintained, this item (261/79-12-03) is unresolved.

e. No Method for Following Training Status

Those personnel involved in the replacement training program are issued specific checklists, but are not assigned completion dates or progression rates. Consequently, the burden of tracking an individual's progress is dependent upon supervisory review. The inspector interviewed foremen from the respective disciplines and identified three (3) of six (6) maintenance personnel whose status of training is unknown by either his supervisor or the training department.

Until a method is developed to provide the documenting of an individual's progress through his training program, this item (261/79-12-04) is open.

f. Failure to Comply with ANSI N45.2.6-1973

The inspector identified that QAP-3A erroneously specified inspector/examiner recertification to occur every three(3) years, vice the two (2) year requirement of ANSI-N45.2.6-1973, as committed to by the licensee's accepted QA program. This item was reported by the licensee in item OQAI 79-20.

Until a revision to QAP 3A is implemented to ensure that inspector/examiner recertification occurs every two (2) years, this item (261/79-12-05) is open.

g. Inadequate QA Inspector Training Program

The inspector reviewed the QA training program and identified that no specific plan existed to describe the method by which QA inspectors were to be trained. There was a description of the requirements necessary for the QA inspector to be certified, but the program by which an inspector would achieve the requirements was inadequate. The inspector discussed this item with the QA Supervisor and determined that the training received by the QA Inspector appeared to be adequate but was not documented.

Until a QA Inspector Program is developed, approved, implemented and documented, this item (261/79-12-06) is open.

6. Licensed Operator Requalification Training

- Reference:
- a) TI-200, Robinson Plant Operator Retraining Program, Revision 3, dated 2/8/79
 - b) Administrative Instruction 10.2, Operator Requalification Program dated 12/4/75

a. Review Conducted

There were no changes made to the licensee's requalification program since the last inspection of this area. The implementation of the accepted requalification training program was reviewed to assure the licensee has: prepared a schedule for conducting lectures; prepared lesson plans or equivalent for three lecture topics reviewed; included material in the requalification lecture series on subjects identified as deficient by evaluation of the annual examinations. The inspector determined which licensed operators: failed all or portions of the annual examinations; received unsatisfactory performance evaluations; did not perform licensed duties for a period of four months or longer. The inspector verified the completion of appropriate follow through action for all or a representative sample of these individuals. The inspector reviewed the training records for six (6) NRC licensed personnel to verify that each included: copies of annual written examinations and the individual's responses; documentation of attendance at all required lectures; documentation of required control manipulations; the results of performance evaluations; documentation of required additional training to satisfy deficient performance; documentation of completion of required procedure reviews and/or self study. Additionally, the inspector interviewed three (3) licensed personnel to verify that the training records reflect the actual training received.

As a result of this review, three (3) open items were identified as documented in Paragraphs 6.b through 6.d below.

b. Evaluation During Abnormal/Emergency Conditions

The licensee's Administrative Instruction 10.2 currently specifies periodic oral examinations and a report documenting the shift foreman's judgment of each operator's familiarity with information contained in Emergency Instructions and Abnormal Procedures. 10 CFR 55, Appendix A, items 4.c and 4.d require evaluation during actual or simulated abnormal/emergency conditions. While all operators reviewed met this requirement while attending simulator training, such training or its equivalent is not called for in AI 10.2. The licensee stated that AI 10.2 would be revised to stipulate how the requirements of 10 CFR 55, Appendix A, item 4.c and 4.d were being met.

Until this action is completed, this item (261/79-12-07) is open.

c. Review of Changes

All currently licensed personnel are included on shift routing or they are members of the Plant Nuclear Safety Committee or they are members of the training department. Personnel included on shift routing routinely receive changes to procedures, to plant systems and to the facility license as part of a required reading file. Members of the PNSC review these items during scheduled meetings. These same changes are routed to the training department for review for training program inclusion. However, these reviews are not based on meeting the requirements of the operator requalifications program (item 3.c of 10 CFR 55, Appendix A) and thus it is not included in reference b). Since personnel with NRC licenses could be placed in classifications where changes were not made available and since a required change could be reviewed by the PNSC when a member holding a licensee was not present, the current systems do not assure that all personnel will at all times review all required changes to preclude inadvertent lack of a required review, appropriate procedures or instructions will be revised to assure that required changes to procedures, pertinent modifications, and significant changes to the facility license are reviewed by all licensed personnel.

Until this action is completed, this item (261/79-12-08) is open.

d. Dissemination of Information

Circular 76-07 addressed the dissemination of significant safety-related information on inappropriate or undesirable events occurring at facilities to appropriate members of the licensee's staff. The inspector found the Plant Operating Experiences and LER's were routed to operations personnel. However, the mechanism for review and dissemination of information obtained by the facility relative to nonoperations personnel was informal and not documented. The licensee stated that an integrated

system would be described based on the current systems in use and responsibilities would be assigned for review, selection and dissemination of significant events to appropriate personnel.

Until this action is completed, this item (261/79-12-09) is open.

7. Licensee Response to IE Bulletins 79-6A and 79-10

a. Review Conducted

The inspectors conducted a review of licensee actions to verify the effectiveness of operator training conducted in response to IE Bulletin 79-6A. The inspectors reviewed: emergency procedures related to Reactor Coolant System Depressurization; management controls implemented to incorporate plant modifications into the operator training and requalification programs; management controls implemented to incorporate the operational knowledge gained from the Three Mile Island incident into the operator training requalification programs; management controls implemented to increase the standard of operator knowledge required in the area of plant transient responses; management controls implemented to assess the effectiveness of the training conducted, including, but not limited to, auditing of training presentations, examination content, and examination grading. The inspectors interviewed reactor operators, senior reactor operators, and auxiliary feed pump operators to establish the operator's subjective evaluations of the effectiveness of training received in conjunction with incidents at the same or other facilities.

The inspectors reviewed one modification and setpoint revision - Pressurrizer Level Removal from SI Actuation, Revision 7, dated 5/79.

The information on Bulletin 79-10 was checked against plant records on a sampling basis.

As a result of these reviews, one (1) open item was identified as discussed in Paragraph 7.b below.

b. Steam-Driven Auxiliairy Feedwater Pump Casualty Training

During interviews with operators, the inspector found some misconceptions with regard to the operation of the steam driven auxiliary feedwater pump during various casualty conditions such as loss of AC, loss of DC, and loss of the auxiliary oil pump associated with the turbine. The licensee stated that the operation of the steam driven auxiliary feedwater pump would be covered with all licensed personnel by September 15, 1979.

Until this additional training has been completed, this item (261/79-12-10) is open.