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 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAN, E. G. BWR Project Directorate 3

SUBJECT: Forwards marked-up revised pages to FSAR, Chapter 13, in response to util concerns expressed during 860827 meeting w/ NRC. Revised pages supercede changes submitted by 860724 ltr.

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In the second section, the author details the various methods used to collect and analyze the data. This includes both manual and automated techniques. The goal is to ensure that the information gathered is both reliable and comprehensive.

The third part of the document focuses on the results of the analysis. It shows that there is a clear trend in the data, which suggests that the current approach is effective. However, there are still some areas that need further investigation.

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The data shows a significant increase in activity over the period. This is consistent with the expectations set at the beginning of the study. The following table provides a more detailed breakdown of the findings.

The results indicate that the system is performing well overall. There are a few minor issues that have been identified, but they are being addressed as a matter of priority.

August 28, 1986
NMP2L 0855

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

This letter transmits marked-up revised pages to Chapter 13 of the Nine Mile Point Unit 2 (NMP2) Final Safety Analysis Report (FSAR). These changes are a result of and address staff concerns expressed during a meeting with the NRC on August 27, 1986. They supersede the corresponding Final Safety Analysis Report pages submitted by Niagara Mohawk letter NMP2L-0795 dated July 24, 1986

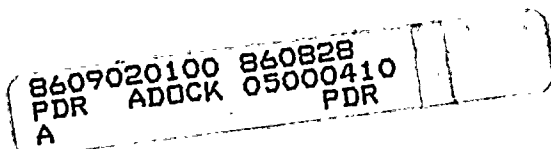
Typed copies of these changed pages will be provided as soon as possible. These changes will be included in a subsequent Final Safety Analysis Report update.

Very truly yours,

C. V. Mangan
C. V. Mangan
Senior Vice President

Enclosure

xc: W. A. Cook, NRC Resident Inspector
Project File (2)



Boo
11

Office of the Secretary
Washington, D.C.

Very truly yours,
Secretary

Enclosure

Reference is made to the report of the Secretary of the Board of Directors of the United States Steel Corporation, dated June 15, 1954, and to the report of the Secretary of the Board of Directors of the United States Steel Corporation, dated June 15, 1954, and to the report of the Secretary of the Board of Directors of the United States Steel Corporation, dated June 15, 1954.

The Board of Directors of the United States Steel Corporation is authorized to make the following statement:

Very truly yours,
Secretary

Enclosure

Very truly yours,
Secretary

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Niagara Mohawk Power Corporation)
(Nine Mile Point Unit 2))

Docket No. 50-410

AFFIDAVIT

C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C. V. Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 28th day of August, 1986.

Christine Austin
Notary Public in and for
Onondaga County, New York

My Commission expires:

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4787687
My Commission Expires March 30, 1987

CHRISTINE AUSTIN
Notary Public in the State of New York
Qualified in Onondaga Co. No. 4701631
My Commission Expires March 30, 2011

Nine Mile Point Unit 2 FSAR

CHAPTER 13

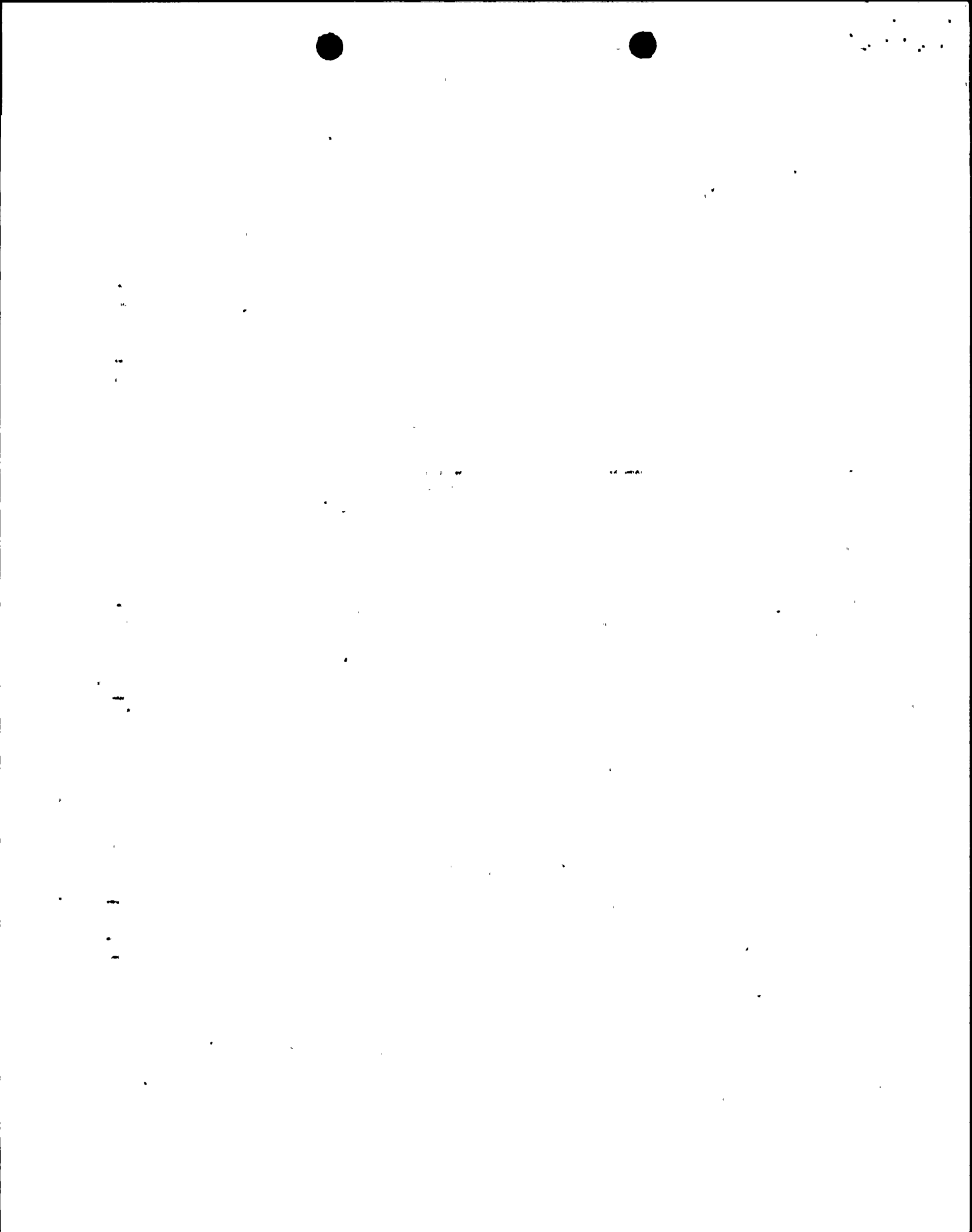
CONDUCT OF OPERATIONS

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members of the permanent or nonpermanent training staff who are responsible for teaching technical subjects such as reactor theory, heat transfer, fluid mechanics, thermodynamics, health physics, chemistry, and instrumentation are exempt from the senior reactor operator criterion. Guest lecturers who are considered subject matter experts and are used on a limited basis are also exempt from the senior reactor operator criterion; however, they shall be monitored by a qualified instructor.

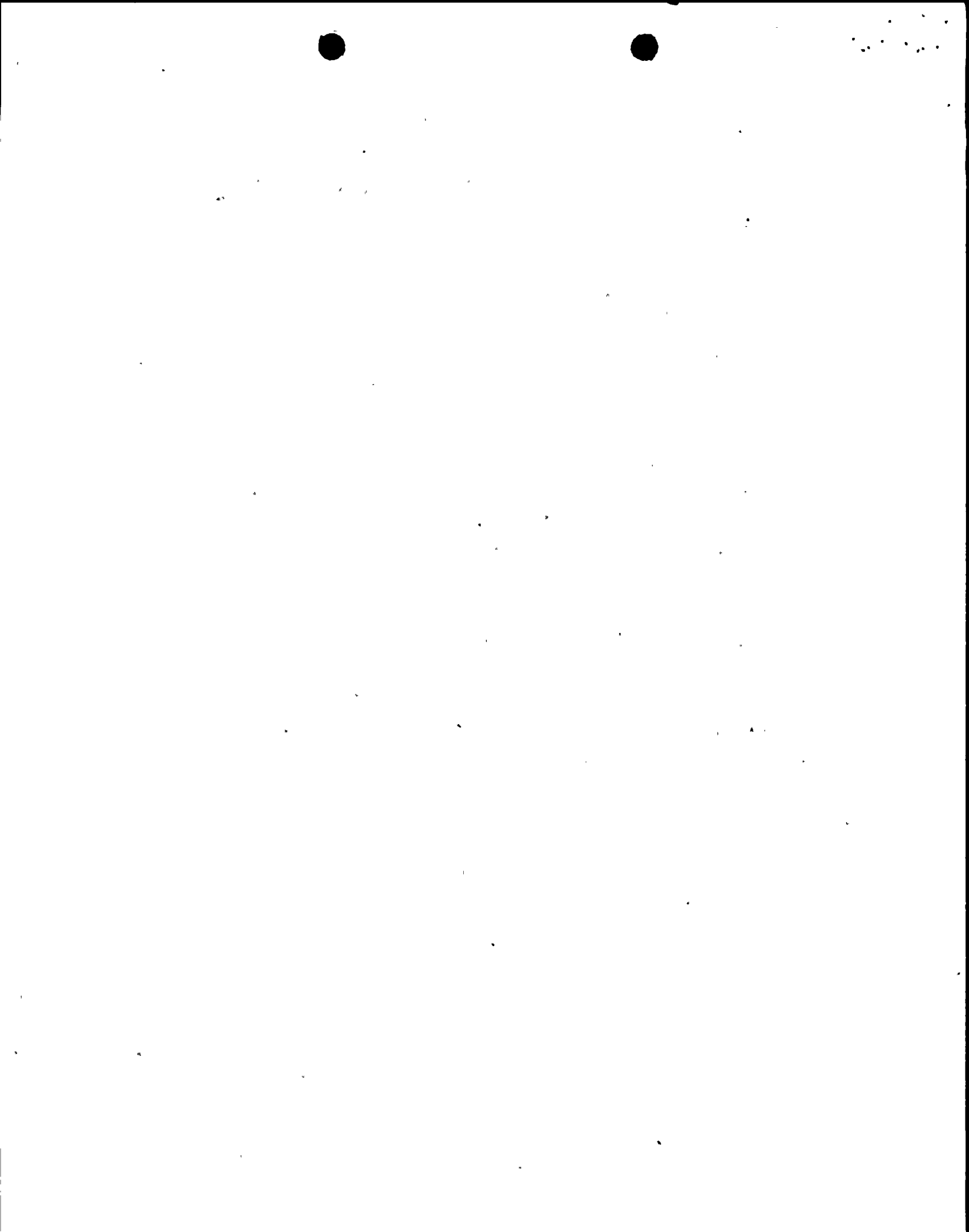
13.2.1.3 ADMINISTRATION OF ON THE JOB TRAINING

Personnel shall receive the necessary knowledge base training prior to task qualification/certification. Individuals shall not perform those tasks for which they are not qualified/certified except as follows. Personnel may perform those tasks for which they are not qualified/certified if the task is performed under the direct supervision of another individual who is task qualified.

13.2.1.4 CONTINUING TRAINING/RETRAINING

Personnel shall receive training in those areas listed below to maintain and improve those skills and knowledges essential to proper job performance. This training will include as a minimum the following:

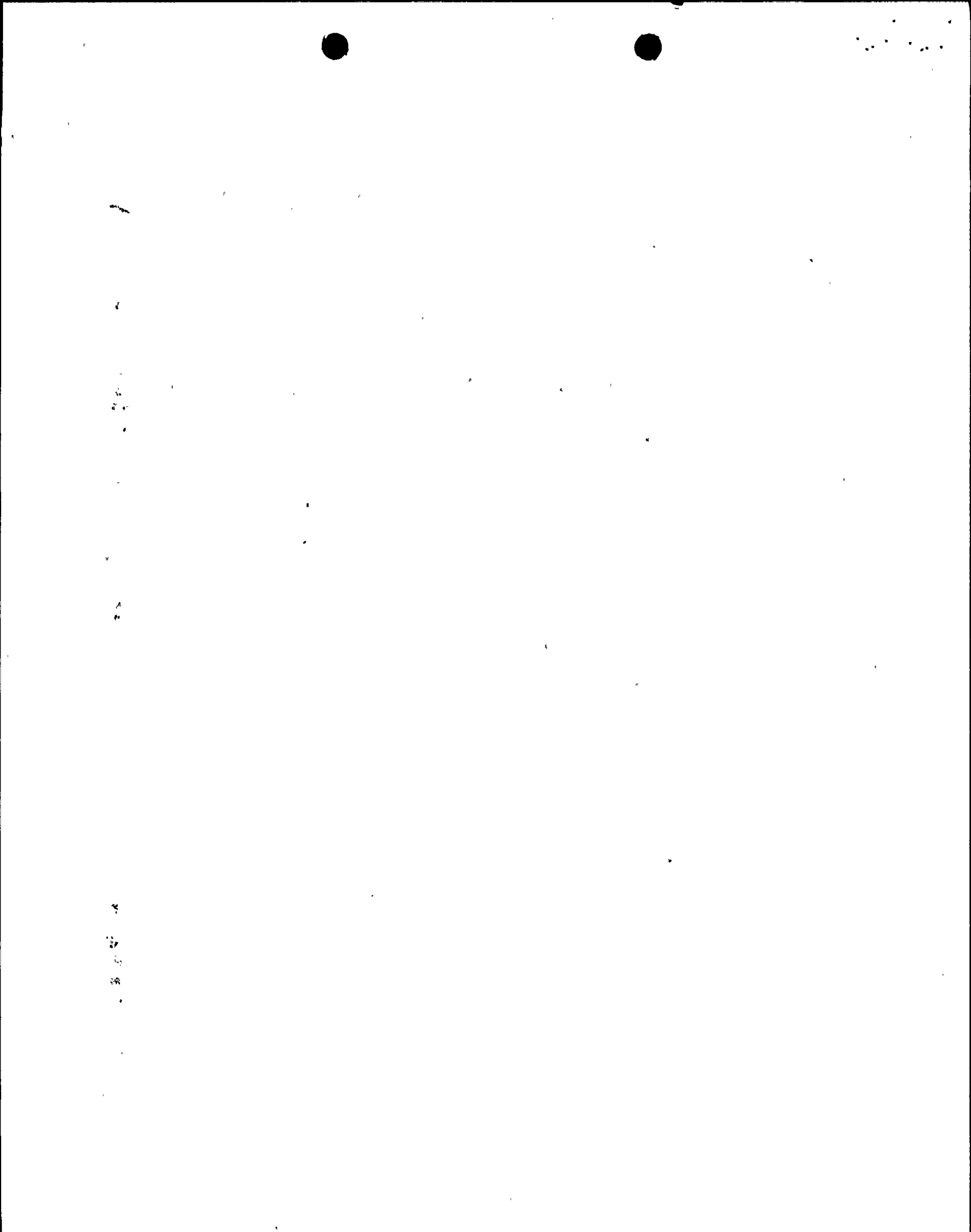
1. Significant industry events
2. Licensee event reports (LER's)
3. Nine Mile Point Occurrence Reports
4. Plant modifications
5. Changes to procedures
6. Other items identified through the feedback process from the plant.



13.2.2 Training of Unlicensed Operators (NTP-12) Up to
24 Months

This course is structured to teach fundamental nuclear reactor plant technology including a review of fundamental mathematics and science. The subject matter provides the student with the prerequisite knowledge for understanding

13.2-2a



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13.2.6.1.2 Nuclear Security Orientation

Annually, all site personnel and nonsite personnel granted unescorted access to the Security Protected Area shall attend a nuclear security orientation that shall review the portions of the security plan and procedures with which they must be familiar.

13.2.6.1.3 Quality Assurance Training

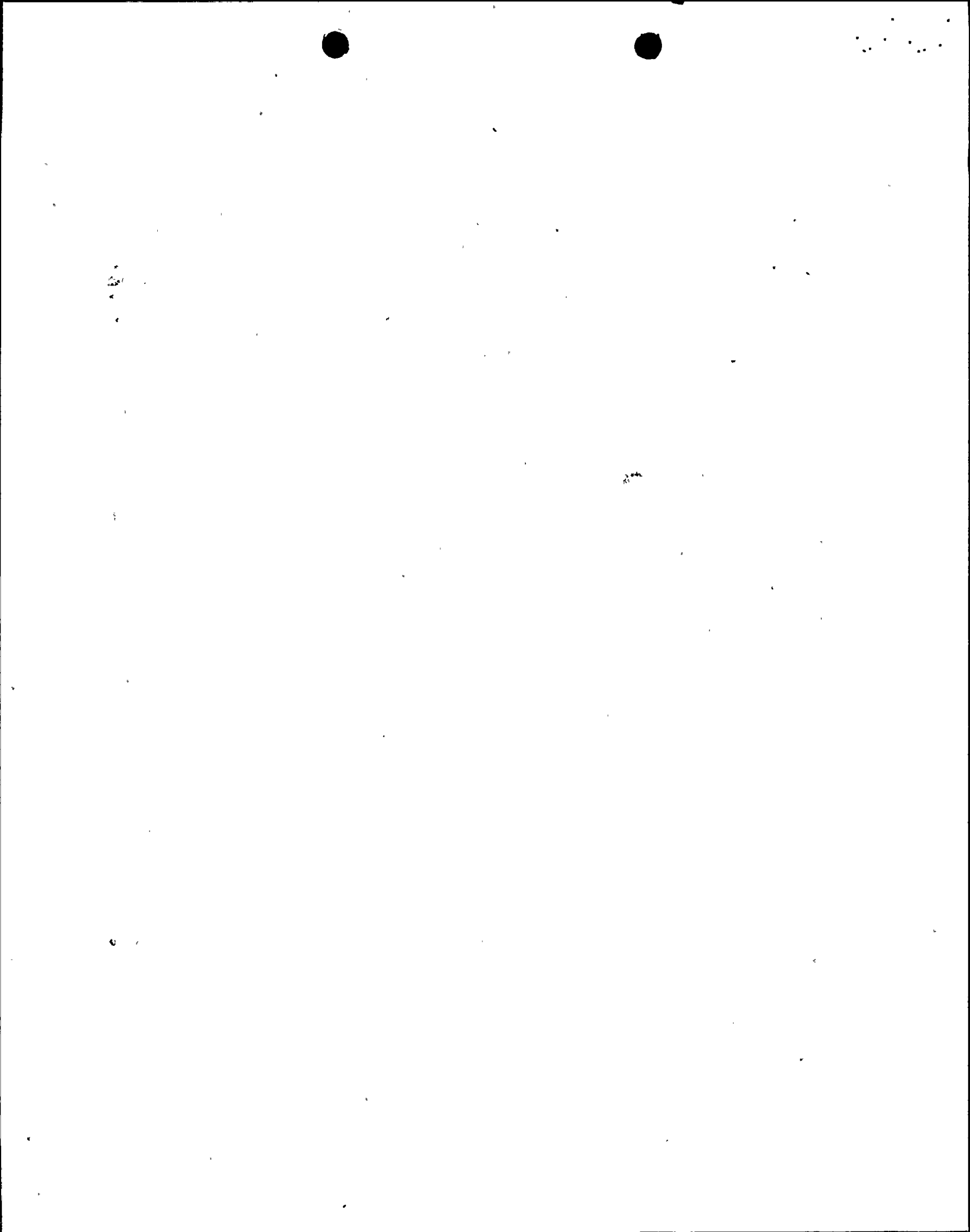
1. Annually, all site personnel shall attend a quality assurance training class which shall review the objectives of the quality assurance program, the duties of individuals and groups in connection with the program, and the importance of cooperation in the performance of work.
2. Personnel not licensed in accordance with 10CFR55, who perform quality-related inspections, examinations, and tests shall be qualified and certified in accordance with NQA-1 and AP 1.3.1. Certification of these personnel shall be retained in the individual's training file maintained by the Training Superintendent.
3. Personnel who are licensed according to 10CFR55 may be considered certified for the surveillance tests and inspections assigned to operators without further documentation in accordance with NQA-1 and AP 1.3.1.

13.2.6.1.4 Site Emergency Plan and Procedures Training

Annually, all site personnel and nonsite personnel granted unescorted access to the security protected area shall receive site Emergency Plan and procedures training to review the actions they should take in an emergency. This includes personnel actions as detailed in the Emergency Plan implementing procedures, response to station alarms, evacuation routes and assembly areas, and evacuation to an assembly area offsite.

13.2.6.1.5 Industrial Safety Training

Annually, all site personnel and nonsite personnel granted unescorted access to the security protected area shall attend an industrial safety training class based upon the NMPC Manual of Accident Prevention Rules. Additionally, each job incumbent shall receive industrial safety training commensurate with 13.2-19 his/her job responsibilities:



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Annually, they shall be trained in their actions required by procedure.

13.2.8 Instrument and Control Technician - Nuclear Training Program (NTP-7)

13.2.8.1 Technical Training

Training for Technicians - Instrument and Control - Nuclear shall consist of the following classroom training and/or laboratory sessions, and in addition, will include, as appropriate, the following:

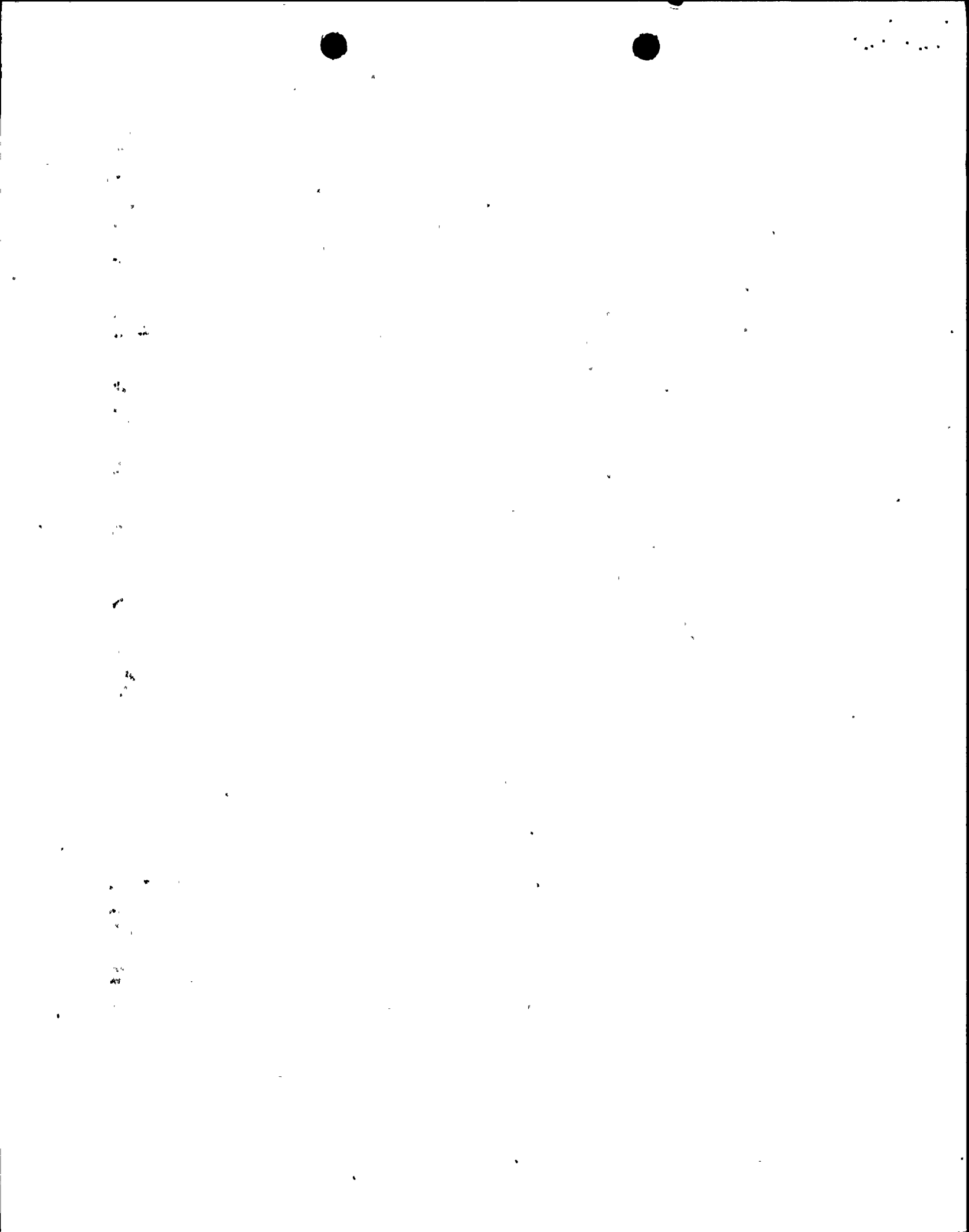
1. Technical Specifications and Administrative Procedures
2. Instrument and Control Procedures
3. On-the-job training (OJT) orientation.

13.2.8.1.1 Initial Training

General technical training provides the technician with generic technical knowledge as follows:

- *1. Math
- *2. Physics
3. Electricity and electronics
 - a. Dc electronics
 - b. Ac electronics
 - c. Semiconductor devices
 - d. Electronic circuits/troubleshooting
 - e. Operational amplifiers
 - f. Digital electronics/troubleshooting
 - g. Introduction to computers
4. Tools and test equipment
 - a. Gauges, indicators
 - b. Calibrators (voltage and current)
 - c. Power supplies
 - d. Meters and recorders
 - e. Bridges
 - f. Generators, counters, and analyzers

*Required prerequisite by job specification; may be required by supervisor.



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Qualification Manual shall contain training modules for on-the-job training and qualification.

Technicians will be given assignments by the Supervisor, Chemistry and Radiation Protection or his designee, providing for regular participation in chemistry and radiochemistry technician tasks to complete required qualification modules.

Technicians participating in the on-the-job qualification program may also be administered written examinations and/or oral examinations.

Chemistry and radiochemistry technicians in qualification may perform responsible work if:

1. The work is performed under the direct supervision of a qualified chemistry and radiochemistry technician, who is responsible for and signs for the work accomplished, or
2. The individual has satisfactorily performed work and has been verified as proficient in a specific qualification element pertaining to that work. The work will be reviewed and countersigned by the Supervisor, Chemistry and Radiation Protection or his designee, if required by procedure.

The Training Supervisor, Chemistry and Radiation Protection or his designee will review each individual's Qualification Manual quarterly and arrange with the Supervisor, Chemistry and Radiation Protection to schedule job assignments so that the technician may complete qualification modules on a timely basis.

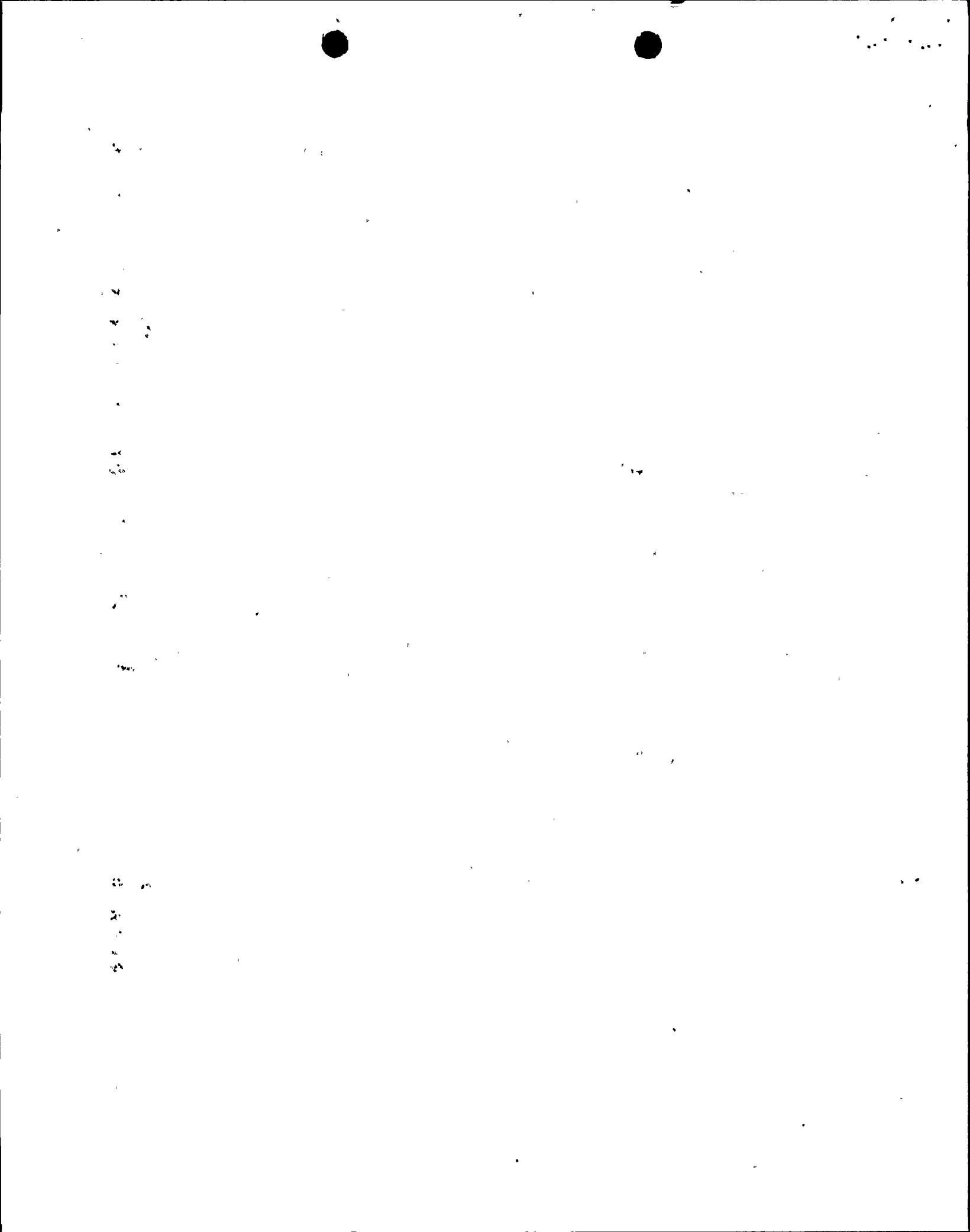
13.2.9.1.5 Examinations and Quizzes

Examinations and quizzes will be used to evaluate the effectiveness of the chemistry and radiochemistry technician training program.

Additional reading assignments and/or attendance at repeat classroom lectures will be made on the basis of the test results.

Demonstration of competency of an individual will be accomplished by satisfactory completion of the chemistry and radiochemistry technician training program with a minimum grade of 80 percent in each subject.

Revised



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Technician B, Chemistry and Radiochemistry to Technician C,
Chemistry and Radiochemistry

Upon satisfactory completion of 2 yr as a Technician B, Chemistry and Radiochemistry, satisfactory completion of company school, and certification by qualified supervisors of satisfactory performance of each of the routine procedures, measurements, and calibrations basic to chemistry and radiochemistry, the employee will be promoted to Technician C, Chemistry and Radiochemistry. Assignment as Technician C; Chemistry and Radiochemistry may be subject to certification and recertification with periodic reviews if required by NRC or industry standards.

Chief Technician, Chemistry and Radiochemistry

This position must have completed 2 yr as a Technician C, Chemistry and Radiochemistry and demonstrated satisfactory completion of company requalification training and task assignments required for the Technician C, Chemistry and Radiochemistry.

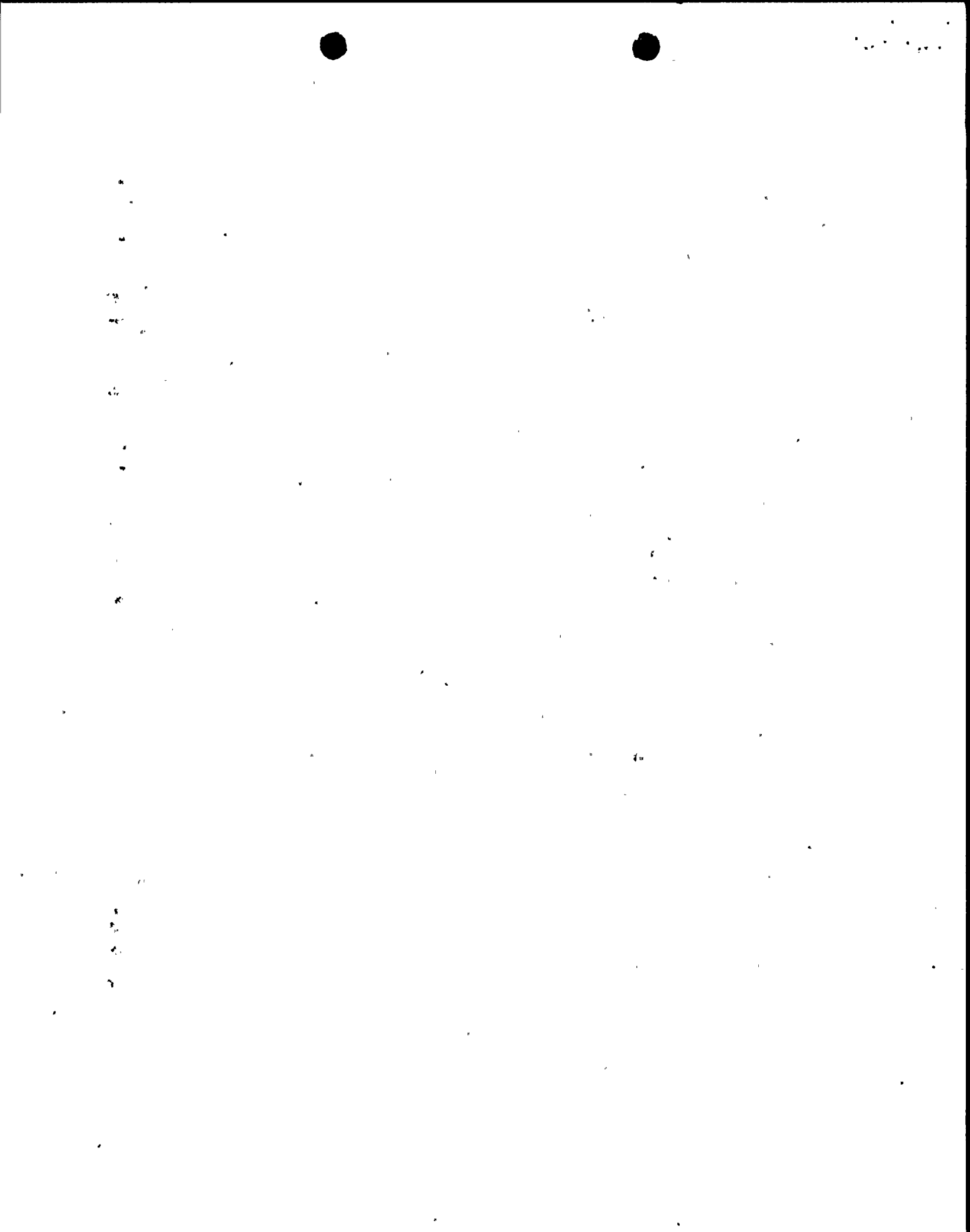
Chief Technician, Chemistry and Radiochemistry must have knowledge of reactor and power plant operation sufficient to analyze problems, make necessary calculations, prepare comprehensive reports, draw conclusions, and prepare recommendations. Assignment as Chief Technician, Chemistry and Radiochemistry may be subject to certification and recertification, with periodic reviews (if required) by NRC or industry standards. He must be able to assign and direct the work of others and be physically capable of performing assigned duties.

delete

Personnel may be provisionally advanced to a higher grade without meeting the company-school requirement if compensating qualification for assigned duties can be identified by the Supervisor, Chemistry and Radiation Protection.

13.2.9A Training and Continued Training of Radiation Protection Technicians (NTP-14)

This program is structured to provide a comprehensive technical and practical program for radiation protection technician training and continued training. This program will be taught by members of the Nine Mile Point training staff, or by a qualified vendor under the supervision of the General Training Superintendent Nuclear.



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Technicians participating in the on-the-job Qualification Program may also be administered written examinations and/or oral examinations.

Radiation Protection Technicians in qualification may perform responsible work if:

1. The work is performed under the direct supervision of a qualified Radiation Protection Technician, who is responsible for and signs for the work accomplished, or
2. The individual has satisfactorily performed work and has been verified as proficient in a specific qualification element pertaining to that work. The work will be reviewed and countersigned by the Supervisor, Chemistry and Radiation Protection or his designee, if required by procedure.

The Training Specialist, Chemistry and Radiation Protection or his designee will review each individual's Qualification Manual semiannually. He will arrange with the Supervisor, Chemistry and Radiation Protection to schedule job assignments so that the technician may complete qualification modules on a timely basis.

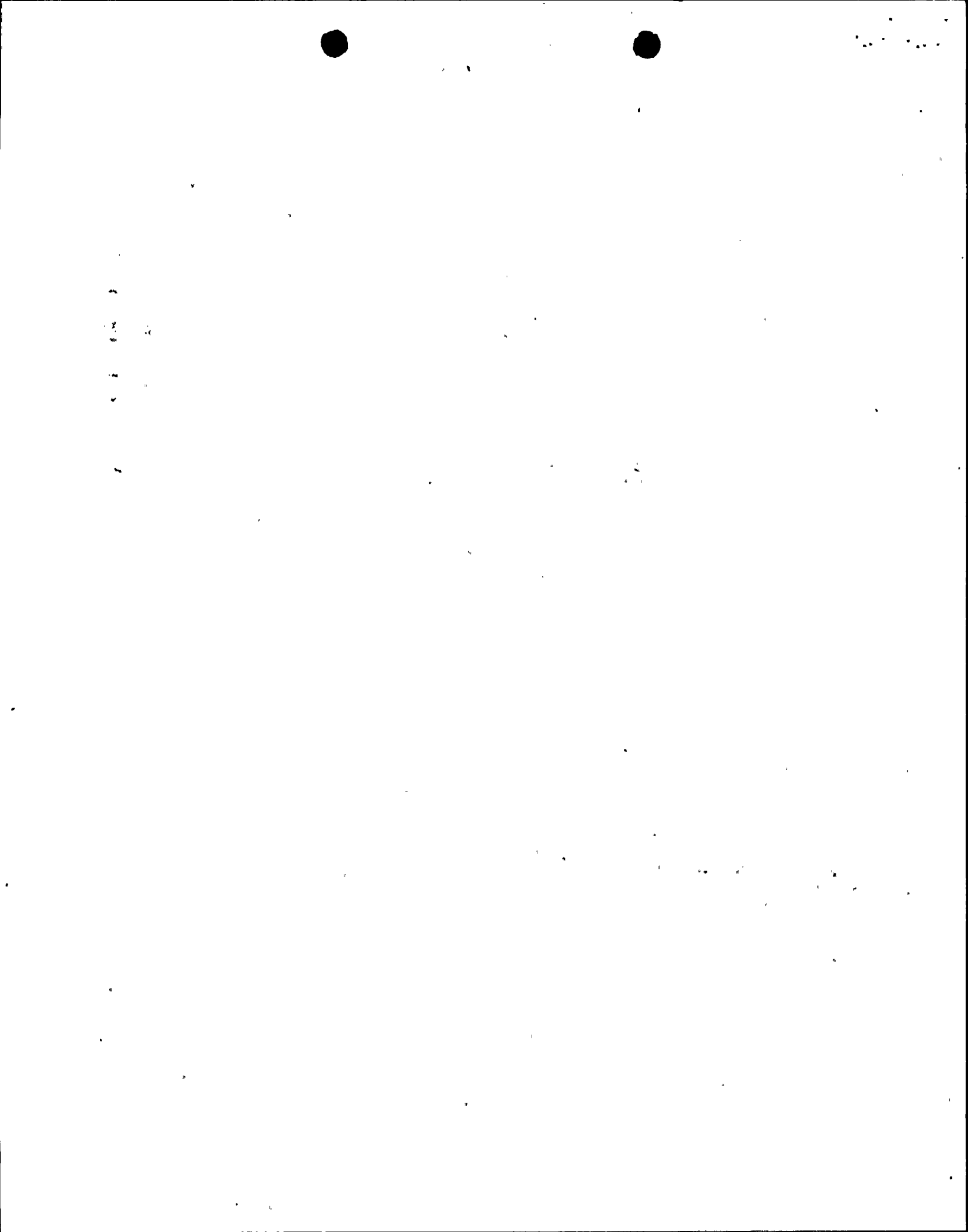
13.2.9A.1.5 Examinations and Quizzes

Examinations and quizzes will be used to evaluate the effectiveness of the radiation protection technician training program. Additional reading assignments and/or attendance at repeat lectures will be made on the basis of the test results. Demonstration of competency of an individual will be accomplished by satisfactory completion of the radiation protection technician training program with a minimum grade of 80 percent in each subject.

13.2.9A.1.6 ~~Exemptions~~ ^{Exceptions} ~~stet~~

^{stet} ~~Exemptions~~ from attending specific presentations will be approved by the Supervisor, Chemistry and Radiation Protection if the individual demonstrates expertise in that area by academic performance or on-the-job performance.

The Supervisor, Chemistry and Radiation Protection will approve all technical training lesson plans and the station practical training program.



Nine Mile Point Unit 2 FSAR

others and be physically capable of performing assigned duties.

delete

~~Personnel may be provisionally advanced to a higher grade without meeting the company school requirements if compensating qualification for assigned duties can be identified by the Supervisor, Chemistry and Radiation Protection.~~

13.2.10 Training of Maintenance Mechanics (NTP-9)

This course is structured to provide a comprehensive technical and practical program for mechanical maintenance training. This course will be taught by members of the Nine Mile Point Training Staff, or by a qualified vendor under the supervision of the Training Superintendent Nuclear.

13.2.10.1 Mechanical Maintenance Training

Mechanical maintenance training is divided into three categories:

1. Initial training
 - a. Mechanic Helper School
 - b. Mechanic A School
 - c. Mechanic B School.
2. Continued training
 - a. Routine training
 - b. Nonroutine training.
3. On-the-job training (OJT).

Any or all of these categories may involve the use of:

1. Classroom training
 - a. Lecture, and/or
 - b. Videotape, and/or
 - c. Work booklets, and/or
 - d. Demonstrations, and/or
 - e. Assigned reading



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Thermal Insulation
Machine Shop Familiarization
Maintenance Work Practices - Part I
Document Control Computers - Part II
Storeroom Computers - Part II
Bolting and Fastening
Brazing and Braze Welding Overview
Principles of TIG
Plasma - Arc and Air Carbon Arc Overview
Hazardous Substances

3. Mechanic 'B' School

Successful completion of Mechanic 'B' School, with its associated shop practicals and on-the-job training, as described in the individual's training manual, is required before a mechanic is considered a fully qualified journeyman level mechanic (Mechanic C). Mechanic 'B' School is conducted twice each 3-yr cycle and consists of:

'A' School Review
Plant Systems Part III
Advanced Rigging

- Overhead Crane Certification
- Lift-A-Loft Certification
- Information only - Cherry Picker Qualification, as appropriate

Advanced Valves and Piping
Advanced Pumps
Alignments/Vibration
Mechanical Seals
Snubbers/Restraints
Basic Diesel Generator
Bearings - Roller/Sliding
Heat Exchangers/Condensers
Turbine Generators
Heating and Air Conditioning
Use of Organic Compounds
Mechanical Modifications
Technical Specifications - Mechanical
OJT Orientation
QA Requirements for Mechanics
Emergency Training
Maintenance Work Practices - Part II
Surveillance Procedures

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Upon satisfactory completion of Mechanic 'B' School, the candidate becomes a fully qualified journeyman level mechanic, which allows him to work independently as a lead man on any mechanical job at Unit 2.

Nine Mile Point Unit 2 FSAR

Limited qualifications may be authorized by meeting specified requirements and demonstration of abilities for any task in the program from the time an individual enters the program until he becomes fully qualified.

Mechanics who have not demonstrated a particular task, but have been evaluated by Maintenance Supervision to possess the knowledge and basic skills necessary to do the job, can perform the job, providing controls are in place to ensure the work has been completed satisfactorily (i.e., detailed work package, added work group hold points, or sufficient testing to ensure the job has been completed in a manner consistent with its importance).

Any person, regardless of training status, may perform tasks or procedures requiring demonstrated skill under the direction of a trained mechanic, factory representative, or Maintenance Supervisor. Direction specifically means having one of these persons either physically present or in communication with the person performing the work to provide direction.

13.2.10.1.2 Continued Training

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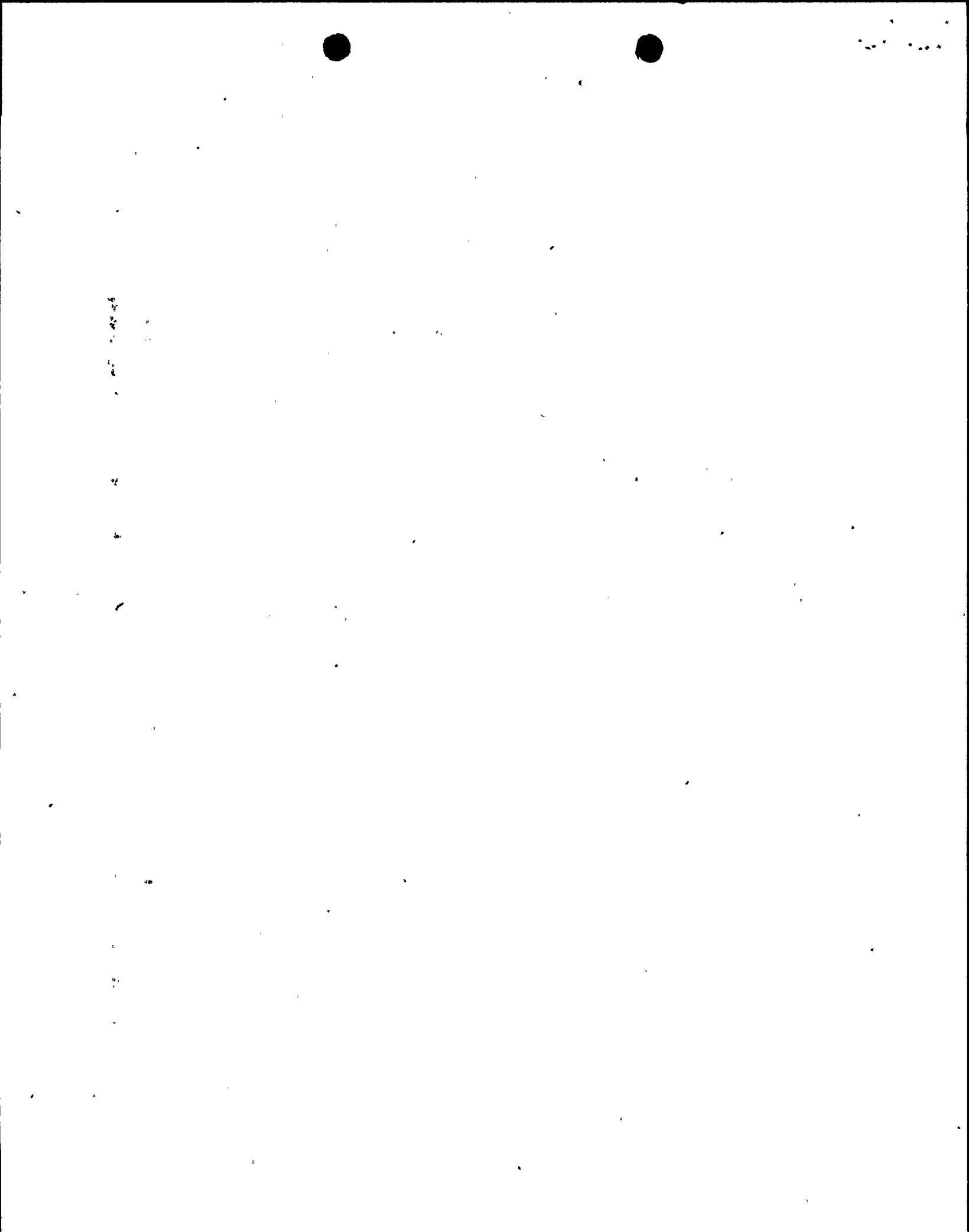
The continued training program is established to ensure that essential job-related knowledge and skills are maintained and improved. The appropriate categories of continued training are entered into upon completion of Mechanic 'B' School. The Continued Training Program consists of two categories: routine training and nonroutine training.

Routine training is training normally required on a specified time basis. This training typically consists of:

1. General employee training
2. Radiation work training
3. Emergency Plan training
4. Self-contained breathing apparatus training
5. Hearing testing
6. Eye examinations.

Additionally, routine training shall incorporate:

1. Industry events



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Electricians who have not demonstrated a particular task, but have been evaluated by Maintenance Supervision to possess the knowledge and basic skills necessary to do the job, can perform the job, providing controls are in place to ensure the work has been completed satisfactorily (i.e., detailed work package, added work group hold points, or sufficient testing to ensure the job has been completed in a manner consistent with its importance).

Any person, regardless of training status, may perform tasks or procedures requiring demonstrated skill under the direction of a trained electrician, factory representative, or Maintenance Supervisor. Direction specifically means having one of these persons either physically present or in communication with the person performing the work to provide direction.

13.2.11.1.2 Continued Training

The Continued Training Program is established to ensure that essential job-related knowledge and skills are maintained and improved. The appropriate categories of continued training are entered into upon completion of Electrician 'B' School. The Continuing Training Program consists of two categories: routine training and nonroutine training.

DELETE

Routine training is training normally required on a specified time basis. This training typically consists of:

1. General employee training
2. Radiation work training
3. Emergency Plan training
4. Self-contained breathing apparatus training
5. Hearing testing
6. Eye examinations.

Additionally, routine training shall incorporate:

1. Industry events
2. License event reports (LERs)
3. Nine Mile Point occurrence reports
4. Plant modifications update



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3. Training on complex systems, systems modifications, or equipment changes.

Methods of implementing the Continued Training Program consist of any combination of the following:

1. Classroom - Lectures, self-study, demonstrations, written examinations, oral examinations, or computer-assisted training.
2. Shop Practice - Hands-on pass/fail practicals, written examinations, or checkoff sheet procedural testing.
3. OJT - In-plant task performance grades by an evaluator to predetermined criteria.

Continued training may be accomplished by attending initial training, on-the-job training, or specially developed training.

13.2.11.1.3 On-the-Job-Training (OJT)

On-the-job training is conducted in conjunction with Electrician Helper School, 'A' School, and 'B' School, as appropriate.

Additionally, OJT is utilized when conducting continued training.

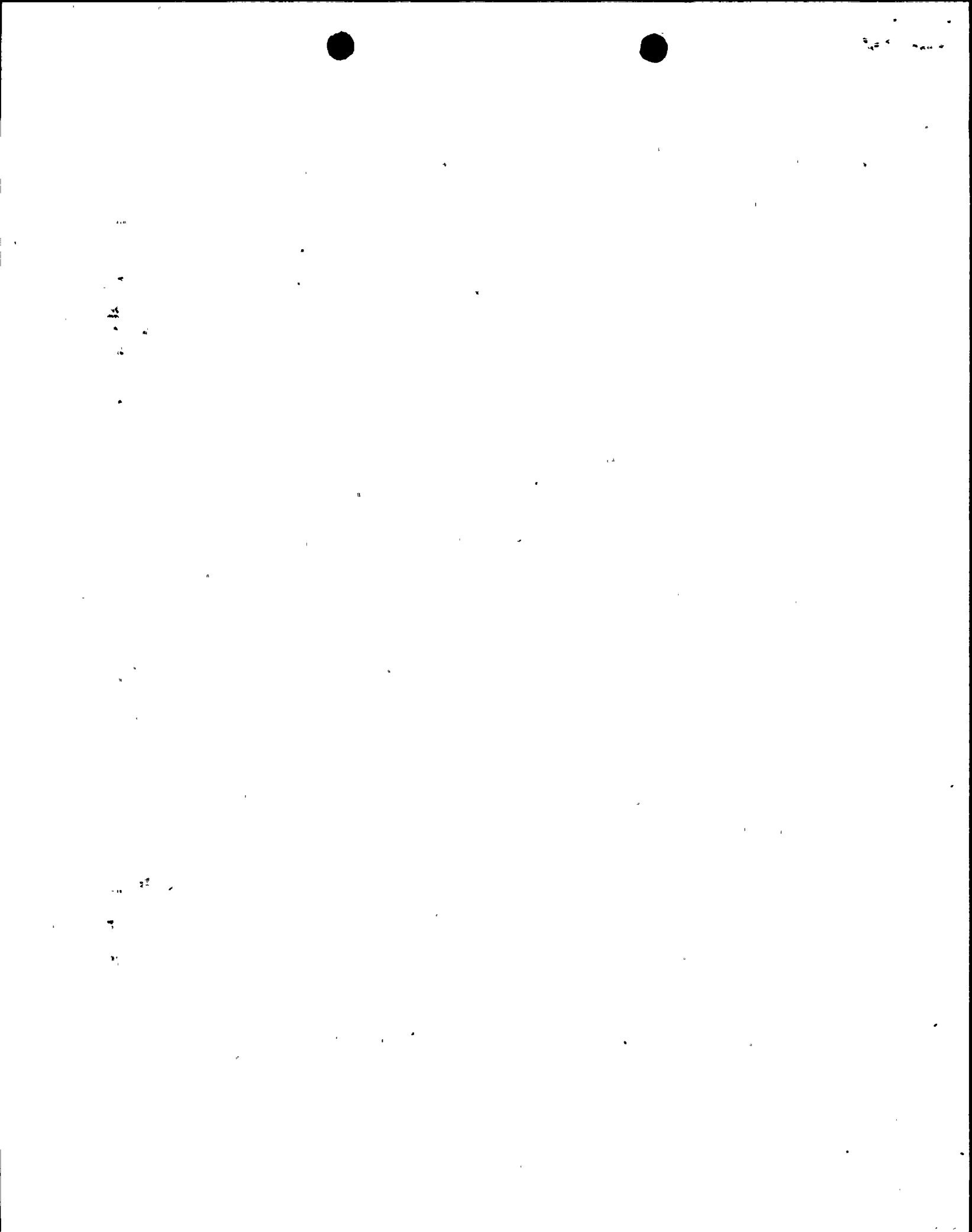
The Training Department, in cooperation with plant maintenance management, assumes the responsibility of analyzing the recognized tasks and incorporating those tasks, as appropriate, along with the appropriate references, into the training manual.

The Maintenance Department designates the evaluators, and the Training Department trains the evaluators.

The Maintenance Department has the overall responsibility for implementing the OJT program with a Generation Specialist from the Training Department, assuming the responsibility of reviewing the electricians' completed OJT tasks on a quarterly basis, and supplying updates and modifications to the training manuals, as required.

Periodically, and at least after completion of a level, the manual will be photocopied and filmed for plant records by Training.

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13.2.14.2 Quality Control Personnel

The Director Quality Assurance is responsible for the training and proficiency of those NMPC quality control personnel active on site. | 14

13.2.14.3 Quality Control Duties of Station Personnel

Each supervisor shall be responsible that all personnel assigned to him who perform specific quality control functions such as NDT examinations shall be properly trained and certified for the performance of these functions.

Personnel attending these programs are, but may not be limited to, those persons designated by the General Superintendent Nuclear Generation, Station Superintendent, or Training Superintendent Nuclear.

13.2.15 Training Program Records

13.2.15.1 Records

An individual training file shall be maintained for each individual. This file shall contain the following materials:

1. ~~Checklist listing~~ *A record of* the formal training lectures presented, length of the lecture, instructor presenting the lecture, and date of attendance.
2. *EVALUATIONS (TESTS, EXAMS, ORALS etc.)*
A log of ~~tests~~ administered which shall include the general subject or system covered and the specified items if applicable. Results shall be recorded as to whether the candidate has mastered the subject or requires further study.
3. A log of reading assignments.
4. A checklist of the manipulation or evolutions that the individual is required to demonstrate or simulate. ~~This record may be obtained from the technicians training manual or on the job training.~~
5. Transcript of offsite training and results.
6. ~~Certification of qualification if required.~~

Documentation of task certification/qualification

