

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-220/88-11

Docket No. 50-220

License No. DPR-63

Licensee: Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Facility Name: Nine Mile Point, Unit 1

Inspection at: Scriba, New York

Inspection Conducted: April 11-15, 1988

Inspector: Michelle H Evans 6-15-88
for Frank J. Crescenzo, Senior Resident Inspector date
Shoreham Nuclear Power Station
Division of Reactor Projects

Approved by: Allen D. Howe 6-16-88
David J. Lange, Chief date
Boiling Water Reactor Section
Operations Branch, Division of Reactor Safety

Inspection Summary: Inspection on April 11-15, 1988 (Inspection Report No. 50-220/88-11)

Areas Inspected: A special, unannounced safety inspection was conducted to review the facility's licensed Operator and Senior Operator requalification programs. This inspection was focused on the licensee's actions in response to Confirmatory Action Letter (CAL) 88-13, dated March 28, 1988. Additionally, inspections were conducted of the programmatic changes and the Quality Assurance programs associated with licensed operator training programs. The inspection consisted of a review of training records, programmatic changes, and interviews with personnel.

Results: No violations were identified. The licensee had completed most of the remedial actions necessary to comply with commitments made in Confirmatory Action Letter (CAL) 88-13. The licensee's proposed actions to prevent recurrence of previously identified problems were found to be programmaticaly adequate; however, senior management attention will be required to ensure proper implementation of these actions.



DETAILS

1.0 Persons Contacted:

Nigara Mohawk Power Corporation

- J. Willis, General Superintendent
- *R. Abbott, Station Superintendent, Unit 2
- *T. Roman, Station Superintendent, Unit 1
- *K. Zollitsch, Superintendent, Training
- *B. Blanda, Assistant Operations Superintendent, Unit 1
- *H. Barrett, Assistant Operations Superintendent, Unit 1
- *R. Seifried, Assistant Superintendent, Training
- *C. Beckham, Manager, Quality Assurance, Operations
- *M. Boyle, Compliance and Verification
- *D. Straka, Supervisor, Operations Training
- *G. Weimer, Supervisor, Operations Training
- *D. Johnson, Corporate Audits
- *S. Agarwal, Lead Licensing Engineer
- *T. Egan, Licensing Engineer
- B. Connally, Quality Assurance

New York State

- *P. Eddy, PSC

US Nuclear Regulatory Commission

- *W. Cook, Senior Resident Inspector, Nine Mile Point
- *W. Schmidt, Resident Inspector, Nine Mile Point

*Denotes those present at the exit meeting on April 15, 1988

2.0 Inspection of the licensee's actions in response to Confirmatory Action Letter 88-13.

Confirmatory Action Letter (CAL) 88-13 documented commitments made by the licensee which were to be completed prior to restart of the Nine Mile Unit 1 facility. These included the following:

- a. Completion of all requalification training for Unit 1 personnel required for the last 24 month requalification cycle.
- b. Licensee verification that those individuals who renewed licenses since May 26, 1987 had completed all training documented on NRC Form 398 submittals.
- c. Licensee verification that the Unit 2 requalification program is in compliance with station and NRC requirements.



The inspector reviewed training records for all individuals identified as requiring additional training. These persons were identified by the facility licensee during an audit of the training records which was conducted as discussed in Inspection Report 50-220/88-10. The inspector reviewed several selected training files to further verify completeness of the training program and to verify the accuracy of the facility licensee's audit results. The materials presented in the makeup sessions were reviewed and interviews were conducted with persons who received makeup training to determine the effectiveness of the training received.

- 2.1 Inspection Findings: The results of the training file review revealed that the licensee has essentially completed the requalification training program requirements described in CAL 88-13 and NRC Inspection Report 50-220/88-10.

As of April 15, 1988, two individuals had not completed the required retraining identified as necessary to comply with requalification program completion requirements. Of these two, one will no longer maintain a license and the other is scheduled to complete the retraining by April 22, 1988. The status of these individuals was made known to senior station management as required by Nuclear Training Procedure (NTP-11).

It was noted by the inspector that the majority of training missed was in the "Continuing Training" area. The material presented in this training consisted of reviews of pertinent industry or stations events and other general topics that cannot be fit into specific requalification lectures. Significant industry events which have specific applicability to a particular system or topic are usually addressed in other requalification lessons as applicable.

A review of lesson plans and training attendance forms indicated that Continuing Training sessions usually last one to two and one-half hours. Most of the licensed personnel requiring makeup training had missed one, two or three of these sessions. The training was not completed as required prior to the end of the requalification period. Also, some individuals had missed additional classroom or simulator sessions. It was also noted that a few individuals were more delinquent in training than others. These individuals had been maintaining licenses for both the Nine Mile facilities or were filling staff positions. The inspector was informed by the General Superintendent that these double licenses would no longer be maintained.

The inspector also reviewed the training files for several Unit 2 licensed operators. No discrepancies were noted during this review. The licensee completed an audit of all licensed operator training files and concluded that the Unit 2 requalification program was in compliance with station requirements.



2.2 Conclusions: The results of interviews, with licensed personnel who had received retraining, indicated that the retraining was adequate and effective. The persons who were interviewed stated that they had been adequately retrained and in some instances described the makeup training as of better quality than the normal cycle training. The materials presented during these makeup sessions were also reviewed and found to be of adequate quality. As noted above, the majority of these materials consisted of Licensee Event Reports and industry event materials from various sources.

3.0 Review of the Licensee's proposed programmatic improvements

The inspector reviewed the licensee's proposed improvements to the training and qualification programs. These improvements were to be formalized by changes to NTP-11, the development of procedures to control completion of NRC Form 398, and the establishment of programs to improve the overall quality of the requalification program. The inspector also discussed the proposed changes with senior training staff members and the General Superintendent.

3.1 Inspection Findings: The inspector found the proposed changes to NTP-11 to be adequate to assure future compliance with station and NRC requirements. This finding was made with the assumption that the changes would be properly implemented and management oversight would continue beyond the implementation stages.

The proposed changes will emphasize the definition of required training documentation and will clearly describe actions to be initiated for those persons delinquent in training status. Required training in this context will be defined as that which is necessary to comply with 10CFR55 licensed operator requalification programs. By clearly defining those lessons which are required, the licensee intends to eliminate confusion as to the definition of a "complete program." Licensed personnel receive training on a variety of topics during requalification cycles and much of this training may not be required for license requalification. Previously, because Continuing Training was integrated into the requalification program, it was not always clear to the persons involved what was required to be made up, if missed. As a result makeup training was, in some instances, not given the proper emphasis by station personnel and management. With the proposed changes, it should be clear to those involved, which training lessons are required to be made up, when missed.



The licensee further intends to upgrade the process by which it documents training received and overall program status. This process has already been improved upon by the addition of status check sheets to document requalification status. These sheets are in all licensed operator training journals and are used to document the completion of each cycle of the requalification program. When an individual completes the required core cycle, a training supervisor will sign the check sheet indicating completion of the cycle and will provide comments, if applicable, to aid auditors. All the required training for each cycle must be completed prior to signoff, and all the cycles must be signed off to consider the requalification program for an individual as complete. The licensee eventually intends to implement a computerized records management system; however, these plans were preliminary, and did not allow adequate assessment by the inspector.

Along with the improved documentation, the proposed revision to NTP-11 will require that the status of the licensed operator requalification program be reported to senior site management at the completion of each cycle. Those persons who miss training or otherwise do not complete a regularly scheduled cycle will be held accountable to the General Superintendent. The General Superintendent will not be given authority to dismiss an individual from the training but must ensure the makeup training is completed. Previously, persons were allowed to miss training provided the applicable station superintendent was notified. In many instances following station superintendent notification, sufficient actions were not taken to ensure makeup training was completed. In other instances, the missed training was not reported as required (see NRC Inspection Report 50-220/88-10). These instances indicated that increased management attention would be necessary to ensure future compliance with program requirements.

Additionally, NTP-11 will specifically state that those license holders who do not complete the required training by the end of the requalification period be removed from licensed duties and that this action be reported to the NRC.

A new procedure will be developed to specify the methods by which the licensee will prepare and submit NRC Form 398. Key attributes to be included in the procedure were discussed with licensee management. These will include specific definitions and instructions for preparing the form in an accurate and consistent manner. Also, an independent verification of each submittal will be required by a training department staff person and a final independent check will be performed by the facility licensee's Nuclear Compliance and Verification group prior to



submittal. The inspector found these proposed actions to be adequate if properly implemented. The inspector also requested the licensee to provide additional training to each license holder on his responsibilities with respect to complete and accurate submittals of these forms.

The licensee intends to formulate methods to improve the Licensed Operator requalification program. These actions are in response to the perception by licensed personnel that much of the requalification program is repetitive and is not effective in training the operator to perform job-related activities. To combat this perception, the licensee has proposed to form a task group, comprised equally of training and operations personnel, to discuss ways to improve the scope and quality of the training provided to licensed operators. Recommendations resulting from these discussions will be presented to the General Superintendent for action. The effectiveness of this task force could not be assessed by the inspector, however, improved communication between operations and training personnel was viewed as a necessary component to improve the overall quality of the requalification program.

- 3.2 Conclusion: In summary, the licensee's corrective actions appear appropriate. A complete assessment of their effectiveness cannot be made until after implementation. The inspector noted that all of the improvements discussed involve increased management attention to training program effectiveness and compliance. As such, a continued commitment on the part of senior management will be required to ensure proper and adequate implementation.

4.0 Review of Quality Assurance programs related to training

The inspector reviewed the licensee's quality assurance program to assess its effectiveness in revealing previous, or future breakdowns, in training program effectiveness and compliance. The review included previous and ongoing Quality Assurance audits of the training department and interviews with Quality Assurance personnel.

- 4.1 Inspection Findings: The inspector reviewed Niagara Mohawk audit report #SY-RG-IN-87006 which documented findings resulting from an audit conducted in April 1987. The report updated two previously identified "recommendations" concerning inadequate documentation of requalification training received. These concerns were closed by the inclusion into training journals, of requalification "Summary Sheets," designed to identify specific



topics covered in each training session. These sheets are not the newly implemented status check sheets discussed in section 3 above. These findings indicate that records management problems had been previously identified at Nine Mile Point. At the time of the audit stringent requalification program attendance requirements were not in effect. These requirements did not become effective until implementation of the 10CFR55 rule change in May 1987. Because of this, the inspector determined that it was a reasonable conclusion on the part of the licensee's audit group that program attendance requirements were being complied with.

Concurrent with the inspectors review of the training program, the facility licensee was conducting an in-depth Quality Assurance audit of the training programs. The inspector reviewed the scope of the audit and discussed the preliminary findings with the Quality Assurance team leader and department manager. The inspector found the scope to be extensive and thorough. One example was the complete review of all licensed operator training files for compliance with station procedures, which resulted in the auditors checking approximately 2500 attributes. The audit findings were mostly minor in nature but sufficient to warrant training department action. In several instances, the training department had responded to the audit findings and had incorporated the corrective actions in the NTP-11 changes discussed in section 3 above. The licensee committed to providing the final results of this most recent audit to the NRC for review. Additionally, the licensee has committed to conducting an additional audit of the training department in six months. The normal frequency of training audits is yearly. The licensee also committed to providing the results of this future audit to the NRC for review.

5.0 Exit Meeting

Management was informed of the purpose and scope of the inspection at the entrance interview. The findings of the inspection were periodically discussed with station management throughout the inspection period and were summarized at the exit meeting on April 15, 1988.

Attendees at the exit meeting are listed in section 1.0 of this report.

