

**NIAGARA
MOHAWK**

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

June 22, 1988
NMP2L 1141

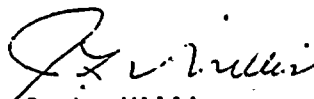
United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Re: Nine Mile Point - Unit 2
Docket No. 50-410
NPF-69

Gentlemen:


Your letter dated May 16, 1988, transmitting the Inspection Report No. 50-410/88-10, requested Niagara Mohawk to address and respond to the concern discussed in paragraph 2.4 of the Inspection Report. Our response is attached.

Very truly yours,


J. L. Willis
General Superintendent
Nuclear Generation

JLW/AZP/cia
(1235C)

Attachment

xc: Regional Administrator, Region I 
Mr. W. A. Cook, Sr. Resident Inspector
PPF

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NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT UNIT 2
DOCKET NO. 50-410
NPF-69

RESPONSE TO THE NRC CONCERN IN PARAGRAPH 2.4 OF
INSPECTION REPORT 50-410/88-10

CONCERN:

"At the exit interview, the inspector commented on the above schedule for full implementation of the training programs reviewed during this inspection. Concern was raised by the inspector that in the previous inspection (50-410/86-11) conducted in April 1986, the licensee assured the inspector that they would have an implemented INPO accredited Training Program by the next annual NRC inspection. OJT manuals for mechanics, electricians and I&C Technicians for example, were to be issued in April 1986 as noted in the previous inspection report. I&C Technicians have not received their individual OJT manuals and will instead be completing their initial indoctrination in the use of the OJT manual in June 1988. The previous reasons for the delays included expeditiously achieving commercial operation status. The concern is multiplied because the licensee is reorganizing the Site Staff and the Training Department staff has recently lost some of their training instructors. The General Superintendent of Nuclear Generation and other members of his staff acknowledged the inspector's concern and will develop a plan with milestones to expedite full implementation of their nonlicensed training programs."

BACKGROUND

In order to clarify the implementation of the Niagara Mohawk On The Job Training Program (OJT), we have detailed below the course of events that relate to our Institute of Nuclear Power Operations accreditation for On The Job Training.

In early 1985 Niagara Mohawk committed to establish and implement a training program accredited by the Institute of Nuclear Power Operations. In April of 1986 the NRC reviewed our actions in the area of non-licensed staff training. The results of that inspection are documented in your Inspection Report No. 86-11. During that inspection, the inspector was provided with the training policy and plan to obtain the Institute of Nuclear Power Operations accreditation at Unit 1. On The Job Training Manuals had been developed at that time in anticipation of accreditation of our program. On The Job Training Manuals were issued for those areas of anticipated accreditation, including Instrument & Control at Units 1 and 2. We received the Institute of Nuclear Power Operations Accreditation Report for Nine Mile Point Unit 1 on November 12, 1986, and were informed that based on the strength of the Training Program, accreditation could be granted for both Nine Mile Point Units. On May 6, 1987, accreditation for both Units was confirmed by the Institute of Nuclear Power Operations.



As noted above, Instrument & Control On The Job Training Manuals were issued as planned. Soon after the implementation of the Instrument & Control On The Job Training Manuals in 1986, it became apparent to management during the accreditation evaluation process that the diversity in the two Units was such that the effectiveness of the Instrument & Control On The Job Training Manual was insufficient to address the Unit 2 configuration. In 1986, during the accredited evaluation process for Instrument and Control OJT, it became apparent that the differences in the two units would not allow a single OJT manual to be utilized for both units. The continuing issuance of new procedures during the startup and test phase of Unit 2 contributed to these differences. Therefore, a decision was made to revise the Instrument & Control On The Job Training Manuals for Unit 2. The manual revision was completed in September, 1987. The revised manuals were reviewed and the follow-up activities were completed by February, 1988. The revised manuals and associated documents were issued and training in the revised On The Job Training Program began in April, 1988.

Niagara Mohawk defines full implementation of On the Job Training as occurring when all individuals in a job group have an On the Job Training Manual, have had OJT implementation training and OJT evaluators have been trained. All individuals do not qualify in all tasks. Many tasks are specialized and need to be accomplished only by a few individuals. As a result, few, if any, technicians or maintenance personnel are qualified in all tasks. However, all personnel are qualified on the tasks they are assigned to perform.

Niagara Mohawk defines full implementation of a Training Program as occurring when all the elements of the program, in accordance with the Systematic Development of Training (TSD) process, are in place; trainees are enrolled in the program and the progress of the trainees through the program is monitored.

CURRENT STATUS

Niagara Mohawk's status and schedule for implementation of the Training Programs which were discussed in the Inspection Report are detailed below:

- 1) On The Job Training (OJT) for electrical and mechanical maintenance individuals was fully implemented on October 30, 1986. Training for the current enrollees is continuing according to an approved matrix.

Continuing Training for electrical and mechanical maintenance personnel was fully implemented on December 11, 1986. Training sessions for each unit are currently held once each month. Station and industry issues including procedure revisions, LER's, and NRC Inspection Reports are subjects that are included in this training. The accreditation criteria only recommends this to be done quarterly.

- 2) The On the Job Training Program for Auxiliary Operators was fully implemented on April 29, 1988. Auxiliary operators can complete the entire Auxiliary OJT Training Manual in a two year period. In January, 1989, another two-year program will commence for Auxiliary Operators. Auxiliary operators receive training in current events in regular scheduled sessions.



- d. Phase III - Continued Training covers SER's, LER's, Industry or Site experience, audits, procedure changes, etc.. Continued Training was initiated in March 1987 and is currently scheduled quarterly per NTP-7. Past topics covered have been MSIV procedure changes, valving, selected Administrative Procedures, OJT implementation, and Start-up LER's.
 - e. Plant staffing at Unit II includes eighty-eight (88) regularly employed technicians/supervisors who attend various phases of I&C Training.
- 4) Currently Technical Staff and Managers Training, Nuclear Training Procedure (NTP) 8, has been implemented according to time lines that were established when the procedure was issued in July 1986. In two years, training has offered all but one (1) of the courses outlined at least once. The goal is to eliminate training backlogs over a period of five (5) years. At the end of five (5) years, the Training Department plans to be at a maintenance level for the implementation of this program. The emphasis this year has been placed on supervisory skills and related professional development training. It is anticipated that training will make substantial reductions in backlogs for these courses by the end of 1988.

When reorganization is fully implemented, training personnel will meet with the appropriate plant department heads to establish ownership and make adjustments to Nuclear Training Procedure (NTP) 8. It is planned to accomplish the revision of NTP-8 by the end of 1988.

The course that has not been completely offered is "BWR for the Technical Staff". One week of this 4 week course is called "Intro to BWR/Design Familiarization", which a large number of our management staff has already completed. Only 45 of the 266 management people are required to take this more comprehensive BWR Training which should be developed and scheduled for implementation during 1989. Three (of the 45) have attended Senior Reactor Operator Training and are exempt from the BWR Training.

A recent analysis indicates the need for additional staff to support this program. These positions are planned to be filled in late 1988.

The goal to reach the maintenance level for the Technical Staff and Managers Program is on schedule for the originally committed date of 1991.

In summary, the non-licensed technical training has been fully implemented for electrical and mechanical maintenance personnel, auxiliary operators and technical staff and managers, and partially implemented for Instrument and Control Technicians. The program for Instrument and Control Technicians will be fully implemented by October 1, 1988.

As noted in the Inspection Report, there have been number of turnovers in the training staff. Sufficient staff, supplemented by contractors is available to conduct the non-licensed technical training programs. Efforts to hire replacement instructors and to identify additional staffing needs are in progress.



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 50-410/88-10.

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- 3) a. I&C OJT Training was implemented again on April 11, 1988. Nine training sessions were held for technicians and evaluators which ended on June 6, 1988. Currently (June 17, 1988) 72 out of 80 technicians have completed OJT implementation training. Full implementation is expected by July 15, 1988

- b. The I&C Training Program per Nuclear Training Procedure (NTP) 7 consists of three (3) phases:

Phase I Initial Training offers refresher courses in Math, Physics, electronics and basic test equipment for technicians who may be weak in certain areas. (NOTE: When the Training Program started in 1981, a high school degree was required. In late 1982, a company agreement with the union changed the entry requirement to a two-year degree or equivalent in related field). Initial training also consists of generic courses for the I&C Technicians. Courses in Administrative Controls, Power Plant Systems, Print Reading, Process Measurement, Process Control, Pneumatics and Valving. Four courses which are part of Initial Training have yet to be taught. Two of these courses were added after-the-fact and address Instrument and Control Administration of Unit 1 and Unit 2. These courses are directed at newly employed technicians. The other two courses cover the subject of "pneumatics" and "valves". The "pneumatics" and "valves" lesson plans are developed, but have not yet been taught. Implementation of these two courses is scheduled for October 1, 1988.

- c. Phase II - Advanced Training I&C deals with System Components Training and Systems Training. The component training covers the process cards that are a part of Control Systems. For Unit 2 this training includes courses in Foxboro and Bailey equipment. The Foxboro course lesson plans have been developed and taught. Twenty-one technicians at Unit 2 have been trained. Courses in Bailey equipment have not been developed at this time.

System Training courses offer in-depth instruction on the technical and operational aspects of each system. I&C related procedures, associated prints, walk-throughs and training simulators are utilized as training aids to give the technicians a complete understanding of the System. Per NTP-7, each technician will receive training on five systems.

To date, selected Unit II Technicians have had training on Reactor Manual Control System (eight weeks), Recirculation System (three weeks), Reactor Redundant Control System, Redundant Control System Overview, Radiation Monitoring System, Validyne System, Endahl Vibration and Seismic System, and the Westinghouse Closed Circuit Camera System. The Feedwater System is currently scheduled for late 1988. Present commitments are for each technician to receive advanced training in at least 2 systems by December 31, 1990, in 3 systems by December 31, 1991, in 4 systems by December 31, 1992 and in 5 systems by December 31, 1993.



- d. Phase III - Continued Training covers SER's, LER's, Industry or Site experience, audits, procedure changes, etc. Continued Training was initiated in March 1987 and is currently scheduled quarterly per NTP-7. Past topics covered have been MSIV procedure changes, valving, selected Administrative Procedures, OJT implementation, and Start-up LER's.
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