

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9001180064    DOC.DATE: 90/01/10    NOTARIZED: NO    DOCKET #  
 FACIL:50-410 Nine Mile Point Nuclear Station, Unit 2, Niagara Moha    05000410  
 AUTH.NAME    AUTHOR AFFILIATION  
 BURKHARDT,L.    Niagara Mohawk Power Corp.  
 RECIP.NAME    RECIPIENT AFFILIATION  
                  Document Control Branch (Document Control Desk)

SUBJECT: Responds to questions raised in Requalification Remediation  
 Exam Rept 50-410/89-18.

DISTRIBUTION CODE: M003D    COPIES RECEIVED: LTR 1 ENCL 1    SIZE: 2+23  
 TITLE: Operator Requalification Program

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-1 LA	1 0	PD1-1 PD	1 1
	MARTIN,R.	1 1	BENEDICT,R	1 1
INTERNAL:	ACRS	6 6	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	NRR/DLPO/LHFB11	1 1
	NRR/DLPO/LOLB10	1 1	NUDOCS-ABSTRACT	1 1
	<u>REG FILE</u> 01	1 1	RGN1	1 1
EXTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 20 ENCL 19

*Jan 15/89*

R  
I  
D  
S  
/  
A  
D  
S  
/  
A  
D  
D  
S  
/  
A  
D  
D  
S



1950

1950

1950

# NIAGARA MOHAWK

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

Lawrence Burkhardt, III  
Executive Vice President  
Nuclear Operations

January 10, 1990  
NMP2L 1223

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

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

Gentlemen:

This letter responds to a question raised in the Regualification Remediation Examinations Report No. 89-18, dated November 8, 1989. That report provided the results of the NRC administered re-examinations of Unit 2 licensed operators during the week of September 18, 1989. The report also addressed the NRC review of Niagara Mohawk responses to NRC concerns regarding the initial Regualification Action Plan. A request to extend the time for filing this response was made by Niagara Mohawk on December 13, 1989.

The specific inquiry for which a reply was requested related to the reasons why the Company's Quality Assurance Program was not a factor in detecting problems with the regualification program and whether that organization can now accurately assess the adequacy of the regualification program.

In accordance with the philosophy of the Quality Assurance Program, the primary responsibility for assuring quality in the development, implementation, and evaluation (e.g., detection of problems) of the Regualification Program lies with plant and training line management. When the ES 601 Formatted Regualification Training Program was determined not to have met its objectives, a comprehensive evaluation was made of the reasons for the program's shortcomings. We concluded that training and line management failed to provide adequate oversight of the validation of the exam. Additional discussion of these concerns, other contributing factors and specific planned enhancements addressing the deficiencies are contained in the attached revised Regualification Training Action Plan. In addition, a number of initiatives taken as part of the Nuclear Improvement Program relating to training NIP items 3.1.8, 3.1.8A, 3.1.10, 3.2.2, 3.2.3,

9001180064 900110  
PDR ADOCK 05000410  
V PDC

M023  
11



Handwritten marks and symbols in the top right corner, including a checkmark and several small dots.

124

2

22

24

25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100

101  
102  
103  
104  
105  
106  
107  
108  
109  
110  
111  
112  
113  
114  
115  
116  
117  
118  
119  
120  
121  
122  
123

3.1.17, 3.3.1, 3.3.6, 4.2.4, 4.2.5, and 5.1.8 will help assure that a similar situation would not recur.

The Quality Assurance Department, along with other groups such as the Safety Review and Audit Board, provides an overview to ensure that the plant and training organizations adhere to established procedures, standards, guidelines, and requirements such as those contained in 10 C.F.R. §55.59. Quality Assurance audits and surveillances, through observations and record reviews, verify that the Operator Regualification Program is being carried out in accordance with established requirements.

Within the past year, the Quality Assurance Department has begun to conduct performance-based evaluations of the Operator Regualification Training Program as part of its activities. Several SRO trained and licensed personnel have taken positions within the Quality Assurance organization. This has improved the Quality Assurance Department's ability to do performance-based evaluations in the Operator Training area.

The Quality Assurance Department assesses the adequacy of the regualification program through its routine surveillances and through joint Quality Assurance/Safety Review and Audit Board audits of the regualification training program performed annually. By using outside technical experts as necessary in the plant operations field during that joint audit, Niagara Mohawk can accurately assess the adequacy of the Regualification Program.

In response to a request of the NRC staff, Revision 2 of the Regualification Action Plan is attached. Changes in commitment descriptions and due dates are included in this revision.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



L. Burkhardt, III  
Executive Vice President  
Nuclear Operations

LB/bwr  
(a:b#5.nlr)

xc: Regional Administrator, Region I  
Mr. R. A. Capra, Director  
Mr. R. E. Martin, Project Manager  
Mr. W. A. Cook, Resident Inspector  
Records Management



Handwritten marks and symbols in the top right corner, including a small 'f' and several dots.