

U.S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket/Report Nos.: 50-220/98-007

License Nos.: DPR-63

Licensee: Niagara Mohawk Power Corporation

Facility: Nine Mile Point, Units 1 and 2

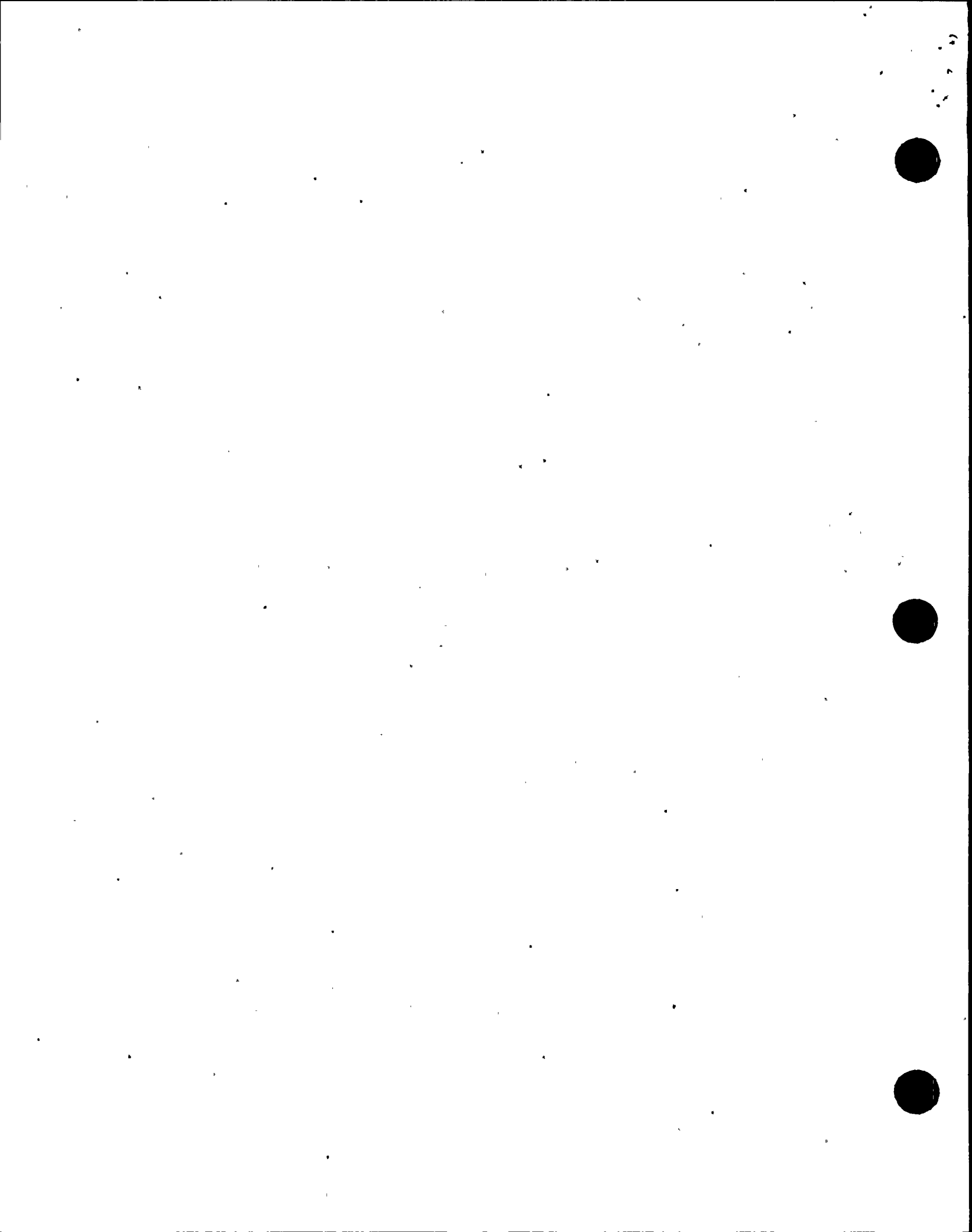
Location: King of Prussia, PA

Date: March 19, 1998 (In Office Review-Meeting)

Inspectors: Carl Sisco, Operations Engineer
Accompanied By: John Munro, Office of Nuclear Reactor Regulation

Approved by: Richard J. Conte, Chief
Operator Licensing and
Human Performance Branch
Division of Reactor Safety

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Report Details

Background

In a series of NRC inspections, the NRC staff identified low testing standards at Nine Mile Point (NMP) in the following areas: in the licensed operator requalification program (Unit 1, 97-04); an inadequate written examination submittal of a Unit 2 (97-08)(OL); and an inadequate initial licensed operator examination for Unit 1 (98-03)(OL). The Niagara Mohawk Power Corporation (NMP) management attended a meeting in the Regional office on March 19, 1998 to discuss their assessment and root cause determination concerning these areas.

Findings

NMPC management presented the results of their root causes, contributing causes and corrective/preventive actions to the staff (Appendix). The NMPC identified root cause for the lack of quality of examination submittals was attributed to change management. Specifically, NMPC accepted the responsibility for initial license examination development without recognizing the significance of that effort and the need for adequate management controls to ensure a quality exam product. Contributing causes were also identified. Corrective actions will include a project management approach to the initial exam development process including an independent verification of the final exam product. In addition, the licensed operator requalification exam banks will be revised to be consistent with NRC expectations as stated in NUREG 1021.

Conclusions

The root cause review appears to have been comprehensive and the corrective actions appear to be sound. The effectiveness of the corrective actions in this area is subject of review in future inspections or examinations.

MEETING ATTENDEES

Licensee

John Mueller, Chief Nuclear Officer
Carl Terry, Vice President, NSAS
Bob Tessier, Training Manager
Jim Reid, General Supervisor, OP, Training
Jim Bunton, QA Manager
W. David Baker, Licensing Supervisor

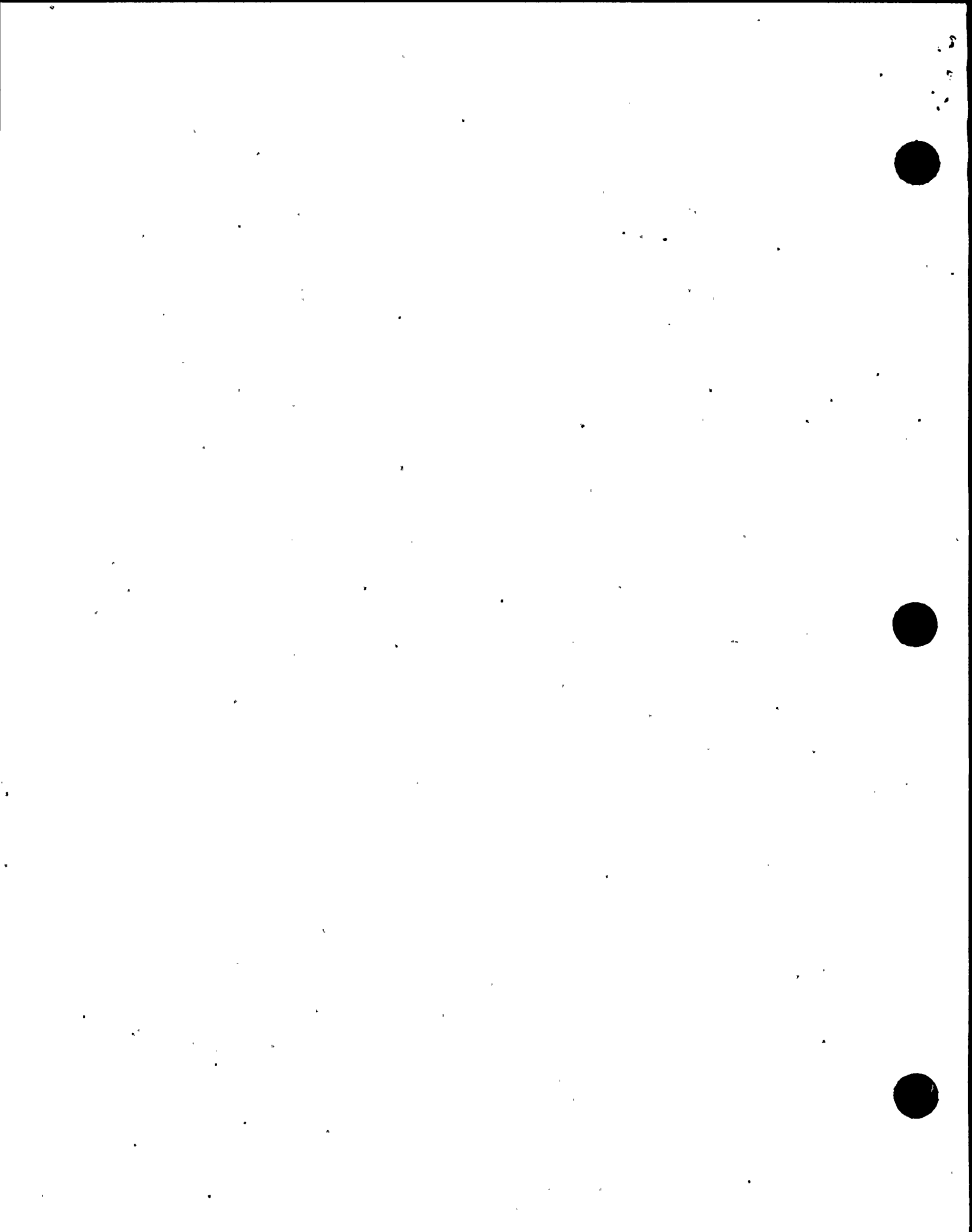
NRC

R. Conte, Chief, Operator Licensing and Human Performance Branch (OLHP)
C. Sisco, Operations Engineer, OLHP
D. Florek, Senior Operations Engineer, OLHP
J. Munro, Office of Nuclear Reactor Regulation

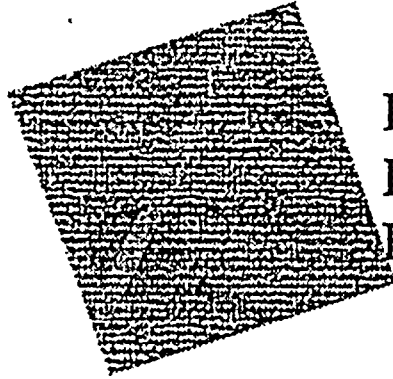


APPENDIX

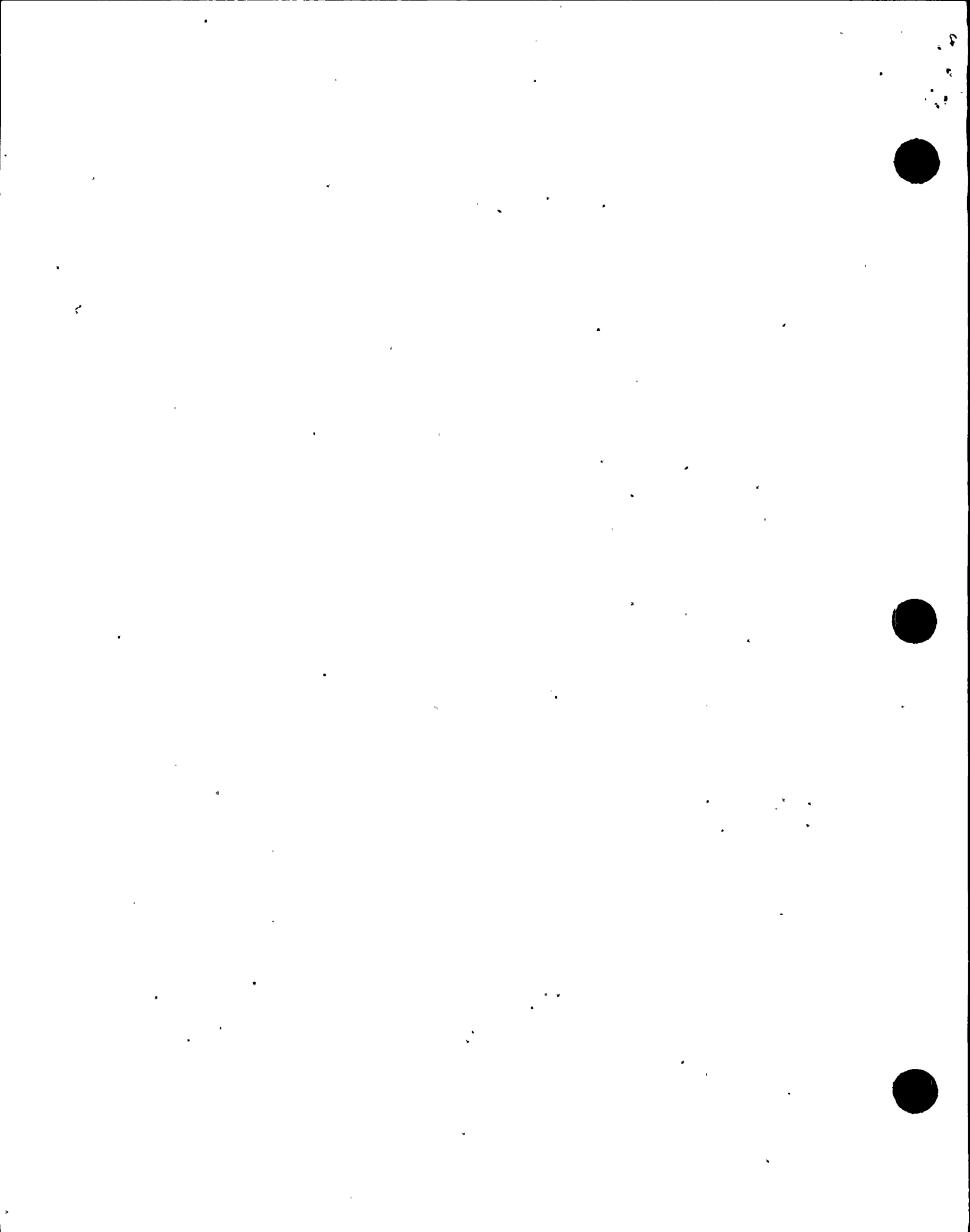
NIAGARA MOHAWK POWER CORPORATION MEETING HANDOUTS



Nine Mile Point Nuclear Facility



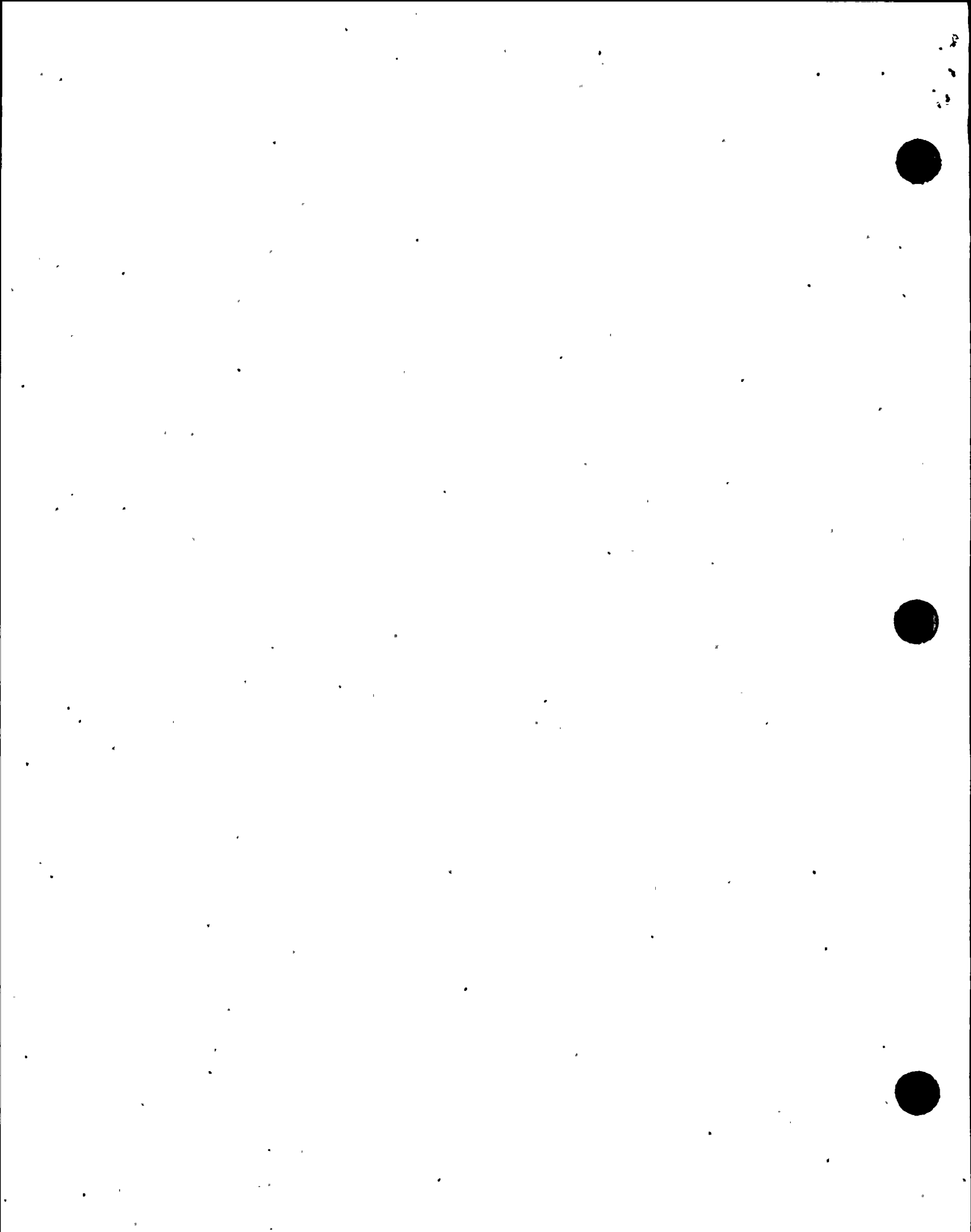
Preventing
Recurrence of
Examination Denial



Presentation Content

- Time Line of Related Events
- Root/Contributing Cause(s)
- Corrective Actions
- Preventive Actions
- Lessons Learned

Notes:



Time Line of Related Events

- May 1997 - Unit 1 LORT Program Inspection
 - Written exams were acceptable, however, the level of difficulty was low
- June 1997 - Unit 2 RO Retake Exam
 - Exam prepared IAW NUREG 1021 rev. 7 & pilot letter guidance
 - Deficiencies with sample plan and question construction
 - Exam administered 6/6/97

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Time Line of Related Events

- October 1997 --Unit 2 LORT Program Inspection
 - Exam report concluded that the program was effective
 - Level of difficulty of written exam was good
- January 1998 - Unit 1 Initial SRO Exam
 - Exam prepared IAW NUREG 1021 rev. 8 (draft)
 - Deficiencies with written exam
 - Exam postponed to 1/20/98

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Root Cause

- *Change Management* - NMPC accepted the responsibility for initial license examination development without recognizing the significance of that effort and the need for adequate management controls to ensure a quality exam product
 - Significance of responsibility for developing initial exams not recognized in early 1997
 - 1/22/97 voluntary pilot letter
 - Project management controls not implemented

Notes:



Contributing Causes

- *Managerial Methods*
 - NMPC became overly involved in the mechanics of exam preparation and under emphasized performance standards with regard to implementing NUREG 1021 rev. 8 (draft)
 - NMPC relied too much upon NRC examiner feedback and comments for completing the final exam

Notes:

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Contributing Causes

- *Managerial Methods (cont.)*
 - NMPC assessed the final product based on a benchmark comparison with other exams, focusing on format & construction instead of the necessary process to ensure a quality exam
 - NMPC did not correctly identify the root cause for the Unit 2 RO retake exam problem
 - NMPC did not provide adequate oversight or establish additional expectations regarding a new process for initial exam development

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Corrective Actions

- NMPC met with NRC on 12/3/97 to discuss details of the exam denial and gain a better understanding of NRC expectations regarding exam development
- Written exam was modified based on NRC comments from 12/3/97. Revised exam material was re-submitted on 12/12/97 and met the criteria for a quality exam

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Preventive Actions

- Establish a process which incorporates the key attributes necessary for development of a quality exam
- Perform a validation of the revised exam development process to ensure a quality exam product (trial run) prior to the next initial license examination

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Preventive Actions

- Apply this process to all future exams utilizing management & project controls similar to those used for other major projects
 - Project manager assigned
 - Project plan developed/resources dedicated
 - Independent verification of final exam

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Preventive Actions

- The requal exam bank project undertaken as a corrective action to the Unit 1 LORT inspection is providing operations instructors experience in writing exam questions consistent with NUREG 1021 rev. 8 requirements and NMPC procedures

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Lessons Learned

- Importance of early/comprehensive evaluation when implementing new initiatives
- Apply project management controls for new initiatives
- Relationship between change and management oversight

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