



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V

1450 MARIA LANE, SUITE 210  
WALNUT CREEK, CALIFORNIA 94596

APR 15 1991

Docket No. 50-397  
CAL No. 91-01, Revision 2

Washington Public Power Supply System  
P. O. Box 968  
3000 George Washington Way  
Richland, Washington 99352

Attention: A. L. Oxsen, Deputy Managing Director

SUBJECT: CONFIRMATORY ACTION LETTER (CAL) V-91-01, REVISION 2:  
UNSATISFACTORY LICENSED OPERATOR REQUALIFICATION TRAINING PROGRAM

The purpose of this letter is to update our understanding of those actions which you have taken or will take to ensure that deficiencies in your Licensed Operator Requalification Program are promptly corrected and that adequate proficiency of licensed operators is maintained at the Washington Nuclear Project Unit 2 (WNP-2) nuclear power plant. These problems were identified as a result of licensed operator requalification examinations administered by Region V from February 26 to March 8, 1991, and the operational evaluation administered by Region V from March 21 to 22, 1991. Based on these reviews the NRC determined that the WNP-2 Licensed Operator Requalification Program was unsatisfactory.

This letter supersedes the Confirmatory Action Letter dated March 25, 1991. It incorporates the information developed from the Operational Evaluation, the Requalification Examination, and subsequent discussions with your staff.

In letters dated March 14, March 22, April 5, April 9, April 11 (two letters), and April 12, 1991 you presented the basis for continued operation with an unsatisfactory requalification program.

In these letters you committed to implement certain actions. It is our understanding that, during the period of continued operation but prior to entering cold shutdown on April 14, 1991, you completed the following actions:

1. In accordance with your NRC approved requalification program, you removed from licensed duties the individual licensed operators and crews who failed either the NRC administered requalification examination or the operational evaluation.
2. You developed training modules and trained your operating crews regarding the four-module training program (presented in your Justification for Continued Operation, dated March 14, 1991) that focused on the lessons learned from the 1991 Licensed Operator Requalification Examination, including evaluation to ensure the lessons were, indeed, learned.

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3. You created a three-shift rotation comprised of licensed operators who have successfully demonstrated their abilities during the recent NRC Operational Evaluation. The crews worked twelve hour shifts as outlined in Attachment 1 to your March 22, 1991 letter during the period of continued operation and until you reached cold shutdown on April 14, 1991. You continued to comply with the overtime requirements specified in the WNP-2 Plant Technical Specifications. The Reactor Operator you removed from Crew E was replaced by a Reactor Operator who was evaluated and deemed qualified by the NRC.
4. You structured the crew complement to reduce the administrative duties of the required licensed operators, as detailed in your Justifications for Continued Operation, dated March 14, 1991, and March 22, 1991.
5. You provided additional support to the operating crews during the period of continued operation and until you reached cold shutdown on April 14, 1991. Specifically, as of March 23, 1991, you added an additional Senior Reactor Operator to the control room staff to provide for additional shift oversight during normal operation and for emergency flow chart support during emergency conditions. In addition, the onsite STA, described in your March 14, 1991 letter, was assigned to the Control Room (in contrast, you previously required the capability to respond to the control room in 10 minutes). The shift manning for the period up to cold shutdown on April 14, 1991 is depicted in Attachment 2 of your March 22, 1991 letter.
6. You provided increased management and quality assurance monitoring of Control Room activities, as detailed in your Justification for Continued Operation dated March 14, 1991.
7. You expanded your management oversight of control room activities described in your March 14, 1991 letter to include the new elements presented in your March 22, 1991 letter, e.g., ensure backshift coverage of shift activities.
8. You developed, submitted to the NRC and executed a remedial training program for the Control Room Supervisor on Crew E and the Shift Manager on Crew B.

Based on the WNP-2 facility being taken to cold shutdown on April 14, 1991 and on the commitments contained in the letters specified above, it is our understanding that you will complete the following actions:

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1. In accordance with your NRC approved requalification program, you will not allow individuals who failed any portion of an NRC requalification examination or operational evaluation, or crews which are substantially the same as those which failed, to resume licensed duties before successfully passing an NRC administered requalification examination.

For any operating crews other than those detailed in your April 12, 1991 letter, you will notify the NRC of the crew makeup and experience prior to assumption of shift responsibilities. This applies while the NRC deems the WNP-2 requalification program as unsatisfactory, or until the NRC determines that WNP-2 has adequately addressed program deficiencies to warrant resumption of your authority to conduct remedial evaluation of the operators.

2. You will create a four-shift rotation comprised of licensed operators who have neither failed their most recent requalification examination or the operational evaluation.

The four-shift rotation will be utilized during the refueling outage period while shutdown in Operational Modes 4 (Shutdown) or 5 (Refueling). As a minimum, each shift will have three licensed Senior Reactor Operators (SROs) (two of which are assigned to the Control Room) and two licensed Reactor Operators (ROs) assigned to the Control Room. The shift period will be 8 hours. The shift manning is depicted in Attachment 1 of your April 12, 1991 letter. We understand that your decision to use these crews is based upon the considerations provided in paragraph No. 1 of your letter dated April 12, 1991.

3. You will use Reactor Operators who are in the remediation program to provide additional support to the Control Room Operating Crew. These Reactor Operators may perform tasks for which a license is not required under 10 CFR 50.54(j), (k), and (l).
4. You will use Shift Managers who are in the remediation program to provide additional support to the Shift Manager. This support will consist of such functions as Work Package pre-approval and closure, paper closeout, and administrative restart activities.
5. You will assure that refueling floor activities, including core alterations, are observed and supervised by qualified senior reactor operators or by personnel who are licensed as senior reactor operators limited to refueling operations.
6. You will perform management oversight of Control Room activities in accordance with Paragraph 7 of your April 12, 1991 letter. We understand that the backshift surveillances (Paragraph 7b) will be performed by the management oversight group.

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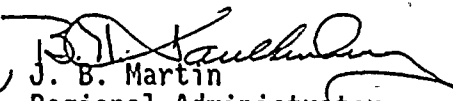
7. You will assure plant QA monitoring of Control Room activities continues on a frequency of at least one surveillance every other day during the outage period. QA will perform at least one backshift surveillance each week.
8. You will train your operating crews on the lessons learned from the deficiencies encountered in the Operational Evaluation.
9. You will identify the problems and root causes as to why the Requalification Program was unsatisfactory. In addition, you will assess the root cause of deficiencies identified during the Operational Evaluation. This analysis will identify a corrective actions program with a schedule of milestones. The root cause analyses with proposed corrective actions will be submitted to Region V by April 15, 1991.
10. You will require the Operations Manager to review the daily work schedule to ensure adequate crew staffing is available to support proposed work, and delete work activities from the schedule if the proposed work would unnecessarily burden the Operations Crew.

The WNP-2 Licensed Operator Requalification Program shall be deemed to be unsatisfactory until further correspondence from the NRC changes that status.

Issuance of this Confirmatory Action Letter does not preclude the issuance of an Order formalizing the above commitments. If your understanding differs from that set forth above, please call me immediately. The responses confirmed by this letter are not subject to the clearance procedures of the Office of Management and Budget, as required by the Paperwork Reduction Act of 1980, PL 86-511.

Thank you for your cooperation.

Sincerely,

  
For J. B. Martin  
Regional Administrator

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cc:

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