



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

June 14, 1991

Docket No. 50-397
CAL No. 91-01, Revision 3

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 3:
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, the operational evaluation administered by Region V from March 21 to 22, 1991, and the requalification examination retakes administered by Region V on June 5 and 6, 1991. Based on the Requalification Examination results, the NRC determined that the WNP-2 Licensed Operator Requalification Program was unsatisfactory.

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 a letter dated May 16, 1991, you presented your Licensed Operator Requalification Training Program Corrective Action Plan.

This letter supersedes the Confirmatory Action Letter dated April 15, 1991. It incorporates the information developed from the Operational Evaluation, the Requalification Examination, requalification simulator examination retakes by certain of your operators on June 5 and 6, 1991, subsequent discussions with you and your staff, and the commitments contained in the letters and discussions specified above. It is our understanding that you will complete the following actions:

1. In accordance with your NRC approved requalification program, you do not intend to allow individuals who failed any portion of their most recent 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.

2. As a result of the requalification simulator examination retakes, conducted on June 5 and 6, 1991, Crew X is considered qualified for all modes of operation by the NRC. Based upon our discussions with you on June 7, 1991, you will use Crew X in your shift rotation under shutdown conditions.

The four crews identified in your April 12, 1991 letter and Crew X will be utilized to provide at least a four shift rotation while shutdown in Operational Modes 4 (Shutdown) or 5 (Refueling). The shift period will be 8 hours. The crew manning includes those crews which are depicted in Attachment 1 of your April 12, 1991 letter and Crew X which passed the requalification simulator examination retake on June 5, 1991. 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. For any shift crews other than those detailed above, you will notify the NRC of the crew makeup and experience prior to assumption of shift responsibilities.

As discussed in our letter dated May 10, 1991, you intend that Crew B will receive additional training and an operational evaluation by the NRC prior to being used for conducting power operations.

3. You will identify the crew manning for the five crews that will be utilized upon restart from this outage; i.e. upon exiting operational Modes 4 and 5. Any crew which is not substantially the same as the crew that passed the requalification examination, the two crews that passed the operational evaluation, or the crew that passed the requalification examination retake will be considered a newly constituted crew. Any newly constituted crew will be comprised of individuals who have passed their most recent requalification examination, will be provided appropriate crew training, and will receive an operational evaluation by the NRC prior to being placed on shift in Modes 3, 2 or 1. This applies while the NRC deems the WNP-2 requalification program 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.
4. 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.
5. 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 in accordance with Paragraph 8 of your April 12, 1991 letter. QA will perform at least one backshift surveillance each week.

6. You will conduct a root cause evaluation of the circumstances which resulted in the failure of two crews and three operators during the requalification simulator examination retakes on June 5 and 6, 1991, and specify a corrective action plan and schedule in accordance with discussions between you, your staff and NRC staff on June 6 and 7, 1991. You will describe why your May 16, 1991 Licensed Operator Training Program Corrective Action Plan was not effective in identifying and preventing the problems which occurred in the retake examinations. Further, you will submit your root cause analysis with your proposed corrective actions to the NRC and present the results of your analysis and corrective action plans to the NRC at a mutually agreeable date, prior to restart of WNP-2. Your presentation will include your program for assessing the effectiveness of your corrective action plans, and the results of these effectiveness assessments to date.
7. Prior to entry into Operational Mode 3, you will complete actions on the significant deficiencies identified in the requalification examination, Operational Evaluation and the requalification simulator examination retakes. You will notify the Regional Administrator when you have completed these actions.

The WNP-2 Licensed Operator Requalification Program remains unsatisfactory until further correspondence from the NRC changes that status. That change of status will be based on a determination that your short and intermediate term corrective actions have been completed effectively and verified by the NRC.

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, P.L. 86-511.

Thank you for your cooperation.

Sincerely,


for J. B. Martin
Regional Administrator

cc:

Mr. J. W. Baker, WNP-2 Plant Manager
Mr. A. G. Hosler, WNP-2 Licensing Manager
Mr. G. D. Bouche, Director, Assurance & Licensing
Mr. G. C. Sorensen, Manager of Regulatory Programs
Mr. G. E. Doupe, Esq., WPPSS
State of WA (Curtis Eschels)
Mr. M. H. Philips, Esq.
Winston & Strawn
1400 L Street, NW
Washington, D.C. 20005-3502

bcc:

J. H. Sniezek, EDO
 J. Lieberman, OE
 T. E. Murley, NRR/DONRR
 J. G. Partlow, NRR/ADPR
 J. E. Dyer, NRR/DRSP
 P. L. Eng, NRR/PD5
 B. Boger, NRR
 M. Virgilio, NRR
 R. Gallo, NRR
 J. Scinto, OGC
 L. Chandler, OGC
 J. Goldberg, OGC
 P. Johnson, RV
 C. Sorenson, RV
 S. Richards, RV
 T. Sundsmo, RV
 L. Miller, RV
 D. Kirsch, RV
 J. Martin, RV
 R. Zimmerman, RV
 K. Perkins, RV

RV/jk

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
KIRSCH <u>K</u>	LMILLER <u>K</u>	PERKINS <u>UB</u>	ZIMMERMAN <u>RZ</u>	FAULKENBERRY <u>J. MARTIN</u>
6/13/91	6/13/91	6/13/91	6/14/91	6/14/91

REQUEST COPY
YES / NO

MBLUME WS

6/13/91

SEND TO PDR
YES / NO

B GALLO UP per phone call
 6/12/91
 M Virgilio UP per phone call
 6/13/91

BF Discussed
 This with Don MAZUO
 on 6/14.

called & confirmed
 w/ Baker at 2:50
 6/14/91
go