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SUBJECT: Responds to NRC 921203 ltr re violations noted in insp of facility training rept 50-397/92-27.C/As: requalification instructors, mgt & Operations Liaison have participated in training & evaluation of initial license candidates.

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March 22, 1993

G02-93-067

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
NRC INSPECTION OF FACILITY TRAINING  
(REPORT NO. 50-397/92-27) ACTION STATUS**

- References:
- 1) Letter G02-92-255 dated November 19, 1992, J.V. Parrish (SS) to U.S. Nuclear Regulatory Commission, "WNP-2 Operating License NPF-21 NRC Inspection of Facility Training (Report No. 50-397/92-27)"
  - 2) Letter dated December 3, 1992, L.F. Miller (NRC) to A.L. Oxsen (SS), "WNP-2 Response to NRC Inspection Report No. 50-397/92-27"

The subject inspection was an evaluation of various aspects of facility training. Three weaknesses were identified in this inspection which required a response detailing the planned actions to be taken to address them. The WNP-2 response to these issues was forwarded by my letter of November 19, 1992 (Reference 1).

The committed actions are in progress and we have completed evaluation of all of the issues addressed in the inspection report weaknesses. This letter is intended to provide an interim status update to apprise you of our progress in this area of extreme importance to the continued improvement of the Supply System.

**Commitment:** Modify the operations liaison responsibility instruction (LTI 7.4) to formally define the necessary qualification level by March 1, 1993, and qualify the incumbent accordingly by July 1, 1993.

**Status:** The enclosed department instruction defining the responsibilities of the Operations Liaison (LTI 7.4) has been revised to formally define the necessary qualification level for this position. Actions to qualify the incumbent accordingly are in progress. This training is planned to be complete by the original date specified, July 1, 1993.

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**NRC INSPECTION OF FACILITY TRAINING  
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**Commitment:** Incorporate a formal means of assuring an ongoing sharing of skills and knowledge between the requalification and initial license training programs within our applicable department instructions by March 1, 1993.

**Status:** We have chosen to not implement this commitment as stated. Instead, our efforts to ensure the sharing of skills from the requalification training area to the initial license area have taken the form of:

- \* Initial license instructors attend requalification train-the-trainer sessions.
- \* Requalification instructors, management, and the Operations Liaison have participated in the training and evaluation of the initial license candidates to a significant degree.

Further review indicates that formalizing this sharing of instructional resource will add little benefit if organizational constraints preclude effective implementation. Therefore, we are evaluating our organizational structure and intend to implement appropriate changes to accomplish this objective by June 1, 1993.

**Commitment:** Revise our internal processes to enhance the effectiveness of industry events training by July 1, 1993.

**Status:** The enclosed letter defines an assessment process which will commence in April, 1993. The results of this process will be used to enhance industry events training which should create effective responsiveness to industry lessons learned and improve overall performance at WNP-2.

Additional actions are being taken beyond those previously committed to provide a better focus on injecting lessons learned into our training programs. The training staff has been informed through the enclosed letter of their critical role in establishing a culture that believes "it can happen here" with an urgency to prevent recurrence. We intend to enhance the visibility of related industry experience in our training materials. In addition, we plan to conduct instructor skills training on the INPO "case study approach" as an enhancement technique for effective industry events training. All actions are scheduled for completion by the original schedule of July 1, 1993.

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A recent example, the Supply System response to the recent issue concerning BWR reactor vessel level anomalies during transients, demonstrates our training process for industry feedback. Also included in the following are the actions taken based upon a review of our plant experience with this issue.

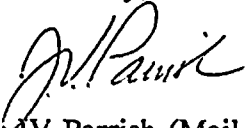
- \* Requalification cycle 92-6 contained classroom training covering rapid depressurization and notching indications.
- \* BWROG source documents transmitted to all licensed operators via required reading. Operations night orders required the Shift Managers to train their crews on this information.
- \* A Maintenance and Operations bulletin was prepared and distributed detailing how this industry experience could impact WNP-2.
- \* Requalification cycle 93-1, which concluded on 2/19/93, contained classroom training and dynamic simulator scenarios containing rapid depressurization indications. This also included viewing a GE video tape on RPV level determination following rapid depressurization.
- \* The initial licensed operator class, examined the week of 3/8/93, has had training on depressurization and notching indications included in EOP training.
- \* The recent WNP-2 Problem Evaluation Request concerning observed notching was distributed as required reading prior to assuming licensed duties.
- \* Formal training on this event was conducted during the last week of February, 1993, for all licensed personnel.
- \* A follow-up quiz is planned for the subsequent requalification cycle.

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If you have any questions or require any additional information, please contact Mr. Myron Baird, Manager, Licensed Operator Requalification Training, at (509) 377-8266.

Sincerely,



JV Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

DRK/bk

cc: JB Martin - NRC RV  
NS Reynolds - Winston & Strawn  
JW Clifford - NRC  
DL Williams - BPA/399  
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