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SUBJECT: Forwards info re plant licensed operator requalification program & status of corrective actions, per NRC 891222 ltr. D

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Arizona Public Service Company

PALO VERDE NUCLEAR GENERATING STATION
P O BOX 52034 • PHOENIX, ARIZONA 85072-2034

161-02831-JML/GEC
February 2, 1990

Docket Nos. STN 50-528/529/530

Mr. J. B. Martin
Regional Administrator, Region V
U. S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

- References: (A) Letter from B. H. Faulkenberry (NRC Region V) to W. F. Conway (APS) dated December 22, 1989; Subject: NRC Evaluation of Palo Verde Nuclear Generating Station Licensed Operator Requalification Program
- (B) Letter from J. N. Bailey (APS) to J. B. Martin (NRC Region V) dated November 17, 1989; Subject: Replacement Examination Report

Dear Mr. Martin:

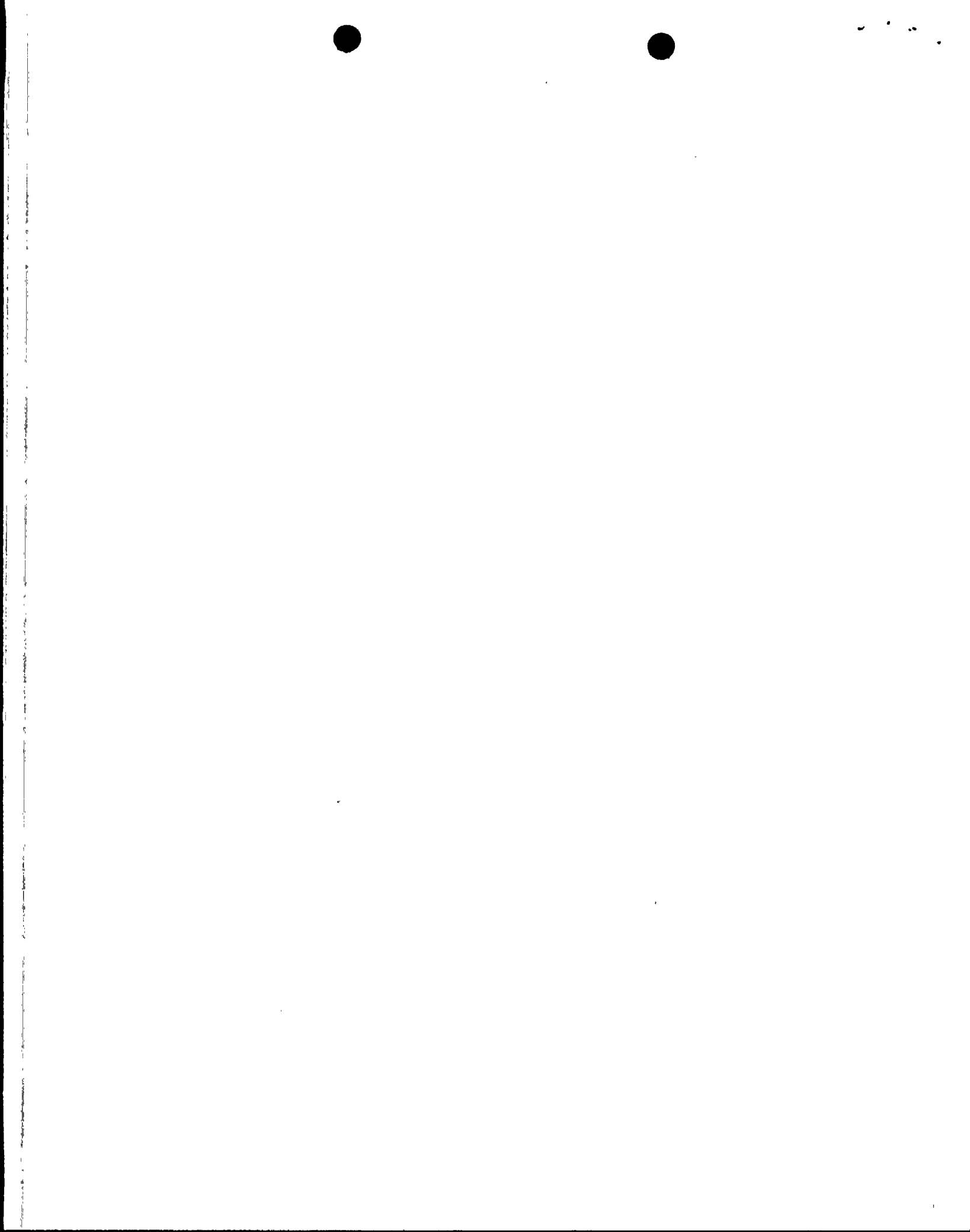
Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
PVNGS Licensed Operator Requalification Program
and Status of Ongoing Corrective Actions
File: 90-002-419.05; 90-056-026

Reference (A) documents the results of the NRC evaluation of the PVNGS Licensed Operator Requalification Program which was conducted during the period October 9, through November 3, 1989. Although the PVNGS program was evaluated as satisfactory, two concerns were identified by the NRC examination team. The first concern focused on management involvement in the Licensed Operator Requalification Examination Program. The second concern involved instances of procedural and Technical Specification noncompliance identified during the simulator portion of the Requalification Examination.

Reference (A) requests APS to provide plans to formalize procedures for managing and conducting the Licensed Operator Requalification program. A response to this request is provided in Attachment 1 to this letter. Reference (A) also requests an update of the status of corrective actions committed to in Reference (B). The status of these corrective actions is provided in Attachment 2 to this letter.

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Mr. J. B. Martin
U. S. Nuclear Regulatory Commission
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Should you have any question regarding this response, please contact me.

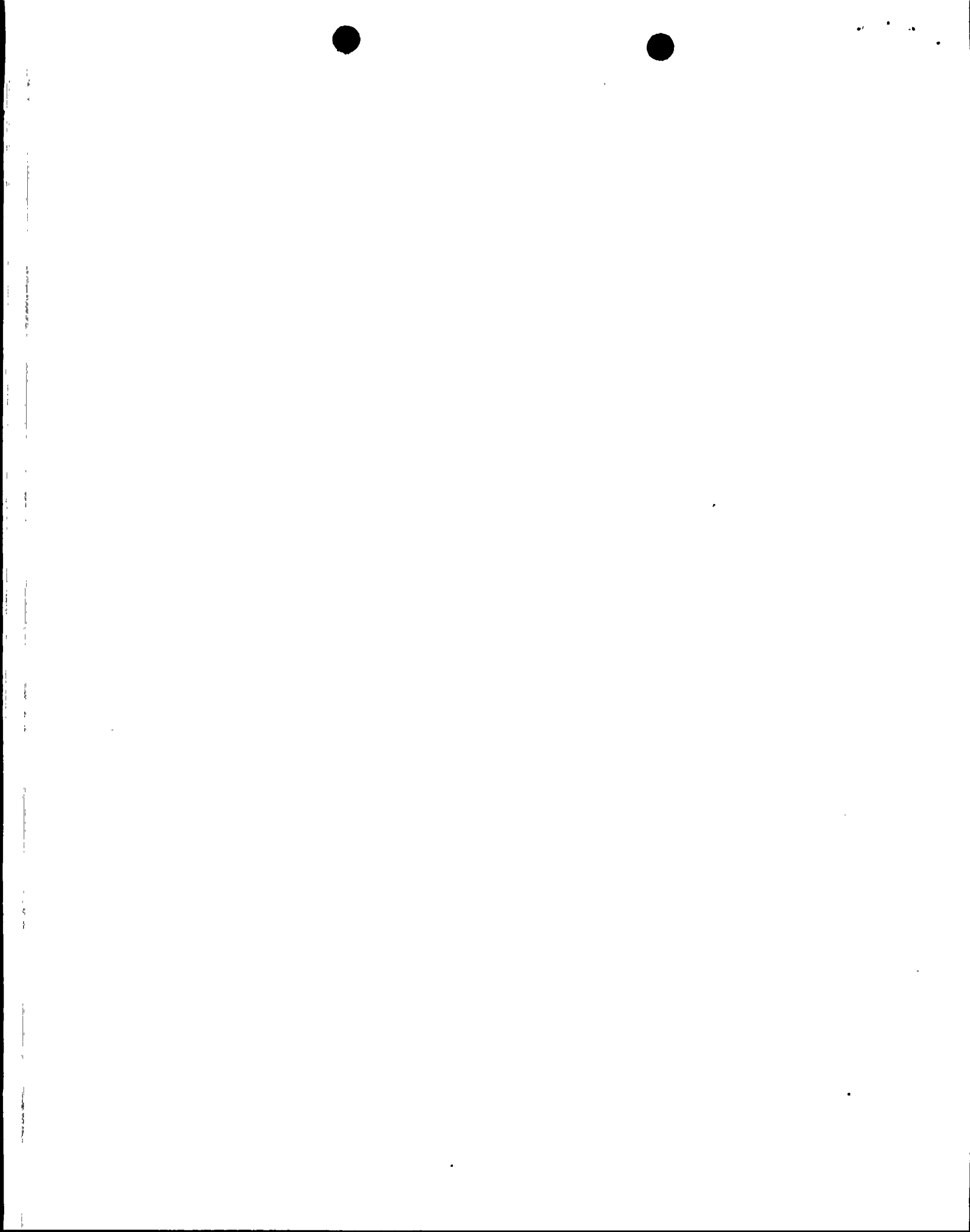
Very truly yours,



J. M. Levine
Vice President
Nuclear Production

JML/GEC/jle
Attachments

cc: W. F. Conway (9012) (all w/attachments)
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D. F. Kirsch
L. F. Miller
~~M. J. Royack~~
S. R. Peterson
D. H. Coe
A. C. Gehr
A. H. Gutterman



ATTACHMENT 1

PLANS TO FORMALIZE PROCEDURES FOR MANAGING AND CONDUCTING
THE LICENSED OPERATOR REQUALIFICATION PROGRAM

MANAGEMENT INVOLVEMENT

PVNGS acknowledges that preparation for this requalification examination was inadequate. PVNGS has developed an action plan to upgrade the overall requalification effort and prevent inadequate preparation for any future examinations. PVNGS Senior and Executive Management have directed that this upgrade be implemented in a manner that will ensure compliance with both the word and intent of NUREG 1021, Standard ES-601.

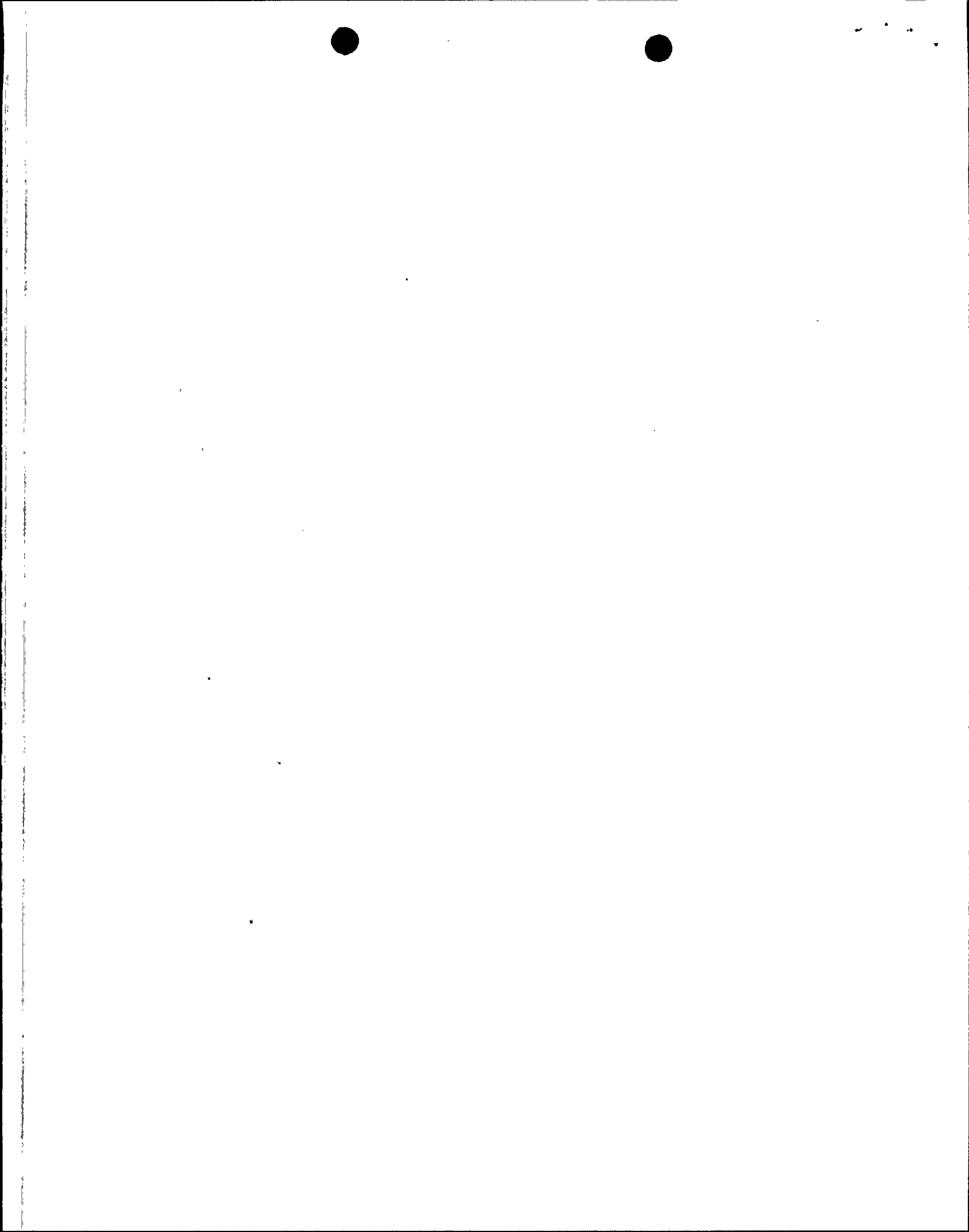
The Nuclear Training Manager has developed an action plan and has identified resources for the overall upgrade of the Licensed Requalification Program. The status of implementation of this plan is reported to the Vice President, Nuclear Production on a weekly basis. The importance of the Licensed Operator Requalification Program and the priority and concern of Senior and Executive Management for both finding and reporting problems has been reemphasized to the Training Organization and the Operating Departments.

UPGRADE OF THE LICENSED OPERATOR REQUALIFICATION PROGRAM

Table 1 contains a schedule of the milestones for the action plan to upgrade the Licensed Operator Requalification Program. This upgrade effort began on November 1, 1989, and is scheduled for completion by October 1, 1990.

This upgrade project includes:

- o Preparing a training procedure that ensures compliance with PVNGS and NUREG 1021, Standard ES-601 requirements for the examination process. This procedure, scheduled for completion during the first quarter of 1990, will also include specific instructions on NRC pre-arrival requirements.
- o Revising the PVNGS Training Department Examination Security Procedure. This procedure was revised at the end of the fourth quarter of 1989 and became effective January 1, 1990.
- o Establishing program standards for qualification and training requirements for evaluators used to implement the requalification examinations.
- o Training for evaluators which will be presented to all Licensed Operators who conduct evaluations.
- o Reviewing and revising category A and category B questions to ensure they meet Standard ES-601 criteria.



ATTACHMENT 1
(Continued)

PLANS TO FORMALIZE PROCEDURES FOR MANAGING AND CONDUCTING
THE LICENSED OPERATOR REQUALIFICATION PROGRAM

- o Reviewing and revising Job Performance Measures (JPMs) to ensure they meet Standard ES-601 criteria.
- o Evaluating simulator scenarios to ensure that they meet Standard ES-601 criteria. The simulator scenarios will be pre-run to validate critical items.
- o Surveying other utilities to determine their basis for a "sampling plan" and reformatting our information to meet the requirements of Standard ES-601.

PVNGS has contracted with PQS Incorporated to assist in completing the upgrade of the examination bank questions and JPMs.

During this period of upgrade, PVNGS intends to meet periodically with Region V Lead Examiners to review our product and provide an update to the overall progress of the effort.

EXAMINATION SECURITY

After an evaluation of three procedures from other utilities and several responses to an industry survey, the procedure for control and security of examination was revised in an effort to prevent any further occurrence of potential examination compromise. This revised procedure, effective January 1, 1990, was strengthened in the following areas:

- o Providing a more secure place to store examination materials
- o Requiring a limited access area for work on requalification examinations
- o Providing guidelines for constant control of confidential examination material
- o Improved control of personnel taking examinations
- o Consequences of cheating clearly stated
- o Special markings on confidential examination related materials



ATTACHMENT 1
(Continued)

PLANS TO FORMALIZE PROCEDURES FOR MANAGING AND CONDUCTING
THE LICENSED OPERATOR REQUALIFICATION PROGRAM

Members of the Training Department Staff with responsibility for examination handling or control, have attended a three hour course on this new procedure. Feedback from this course will be used to further strengthen this procedure.

SIMULATOR UPGRADE PROJECT

PVNGS reviewed Enclosure 4 to Reference (A) "SIMULATOR FACILITY FIDELITY REPORT" in detail. The noted malfunctions and anomalous events have been reviewed against the present, overall program for upgrade of the simulator to ensure that they are addressed. The specific malfunctions and anomalous events noted in Enclosure 4 are scheduled to be corrected and ready for the Training Department's use on the following schedule:

Second Quarter 1990

Failure of the steam bypass control system (SBCS) to actuate following a power cutback and take automatic control when required.

Heater drain pumps do not trip as required on loss of suction.

The Main Steam Isolation Valves (MSIVs) closure modeling not consistent with the units. MSIVs close faster in the simulator.

Steam Generator Pre Trip - Trip for Low Low Level did not clear after level regained.

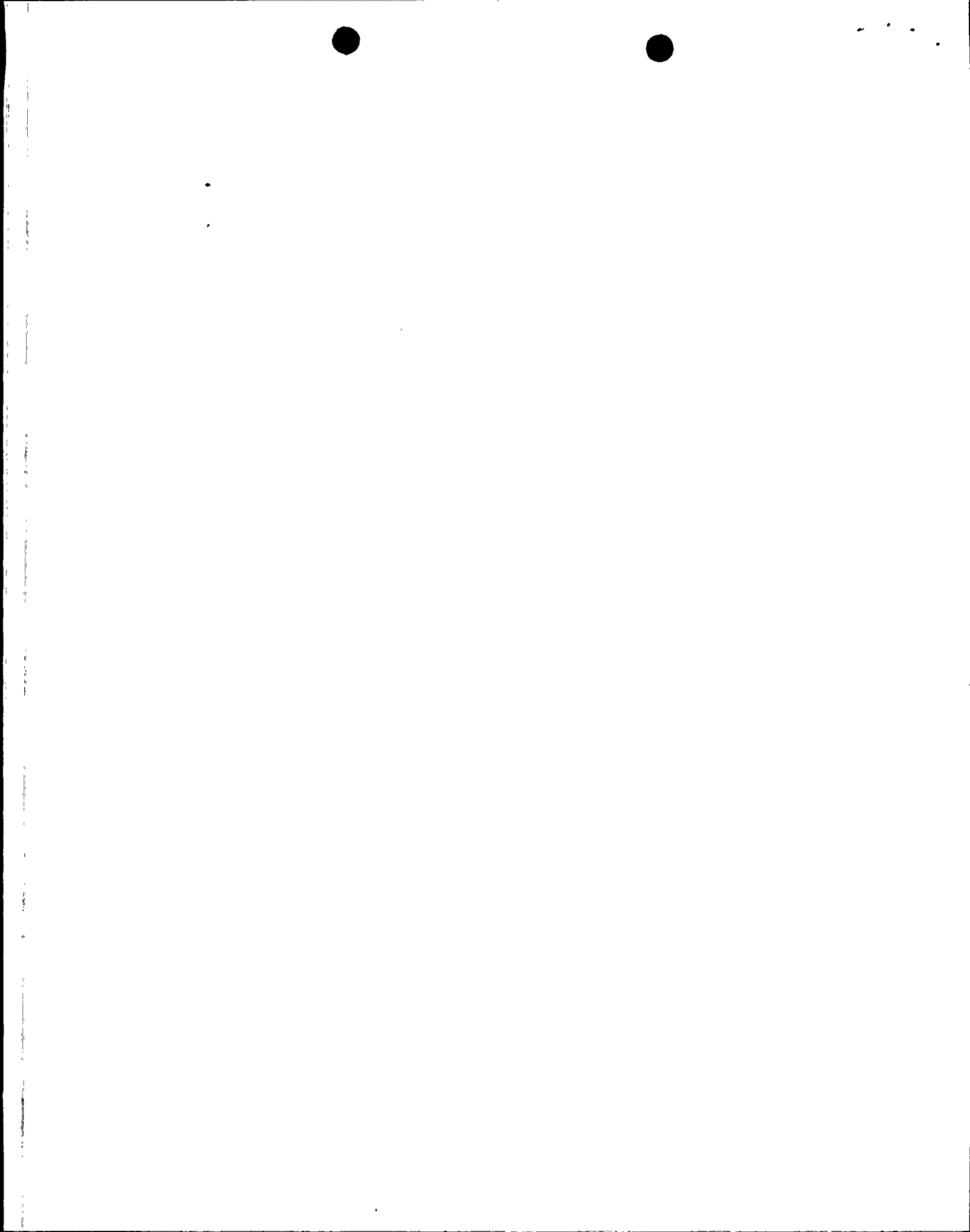
Condenser vacuum spiked low during a loss of suction

Third Quarter 1990

Pressurizer pressure/level response was not correctly modeled for extended accident conditions simulation.

Steam Generator pressure response; the steam generator repressurizes after it has been blown down to the containment.

The video trend recorder failure which required resetting by the simulator operator appears to be a hardware related spurious failure. This malfunction is being investigated and will be repaired. The spurious nature of the failure prevents a rapid correction of the problem.



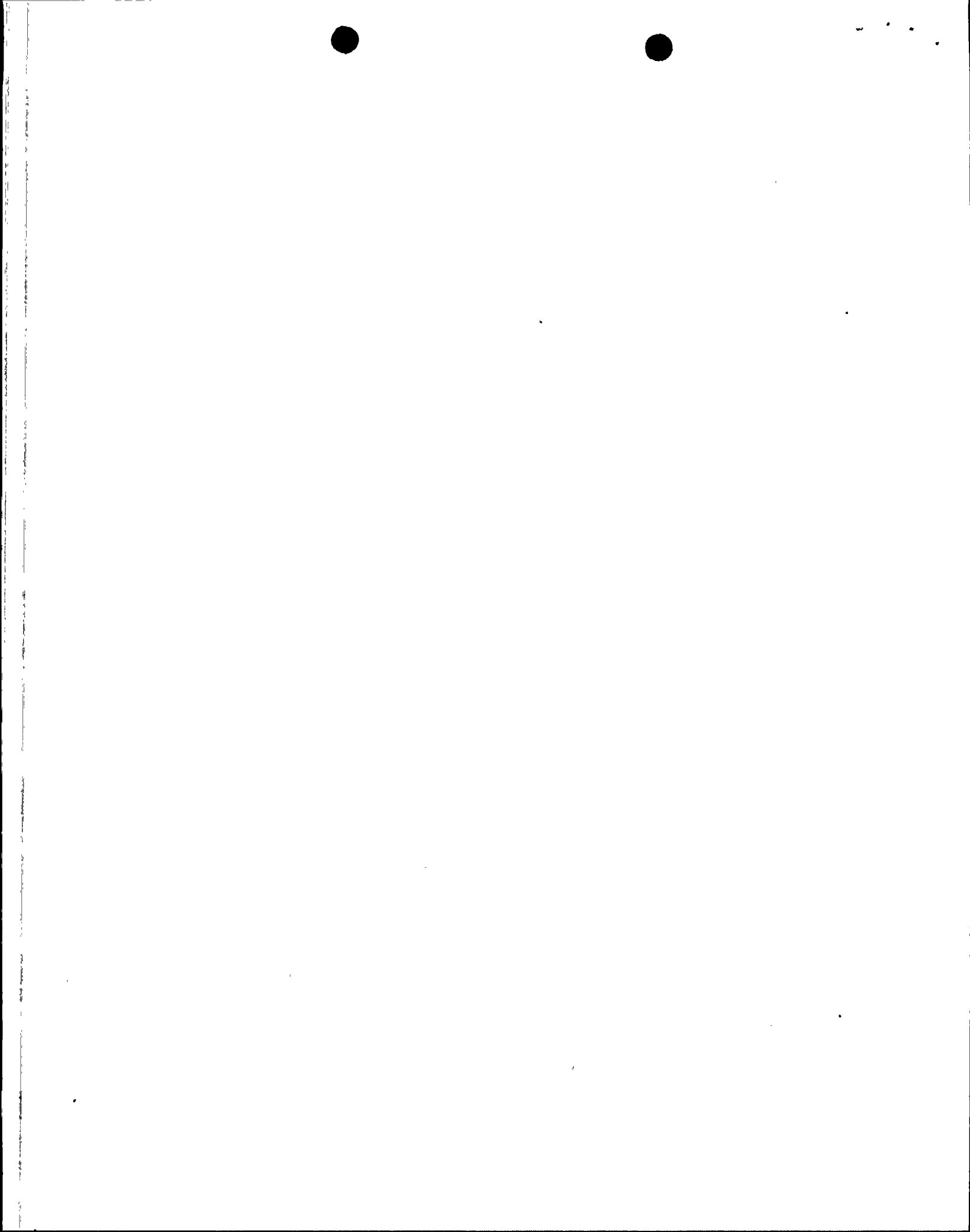
ATTACHMENT 1
(Continued)

PLANS TO FORMALIZE PROCEDURES FOR MANAGING AND CONDUCTING
THE LICENSED OPERATOR REQUALIFICATION PROGRAM

SUMMARY

PVNGS is striving to provide a well managed, comprehensive Licensed Operator Training Program to ensure that licensed operators are trained and examined to the highest standards and expectations. The Action Plan for the Licensed Operator Requalification Program upgrade is focused on a well thought out, long-term correction of existing problems as well as a systematic plan to prevent future problems.

The Simulator Fidelity issues have been well documented. The program for upgrade and certification of the simulator continues to improve simulation and Control Room fidelity of the simulator. As PVNGS approaches simulator certification, the "low level of simulator capability" noted by the NRC will be corrected.

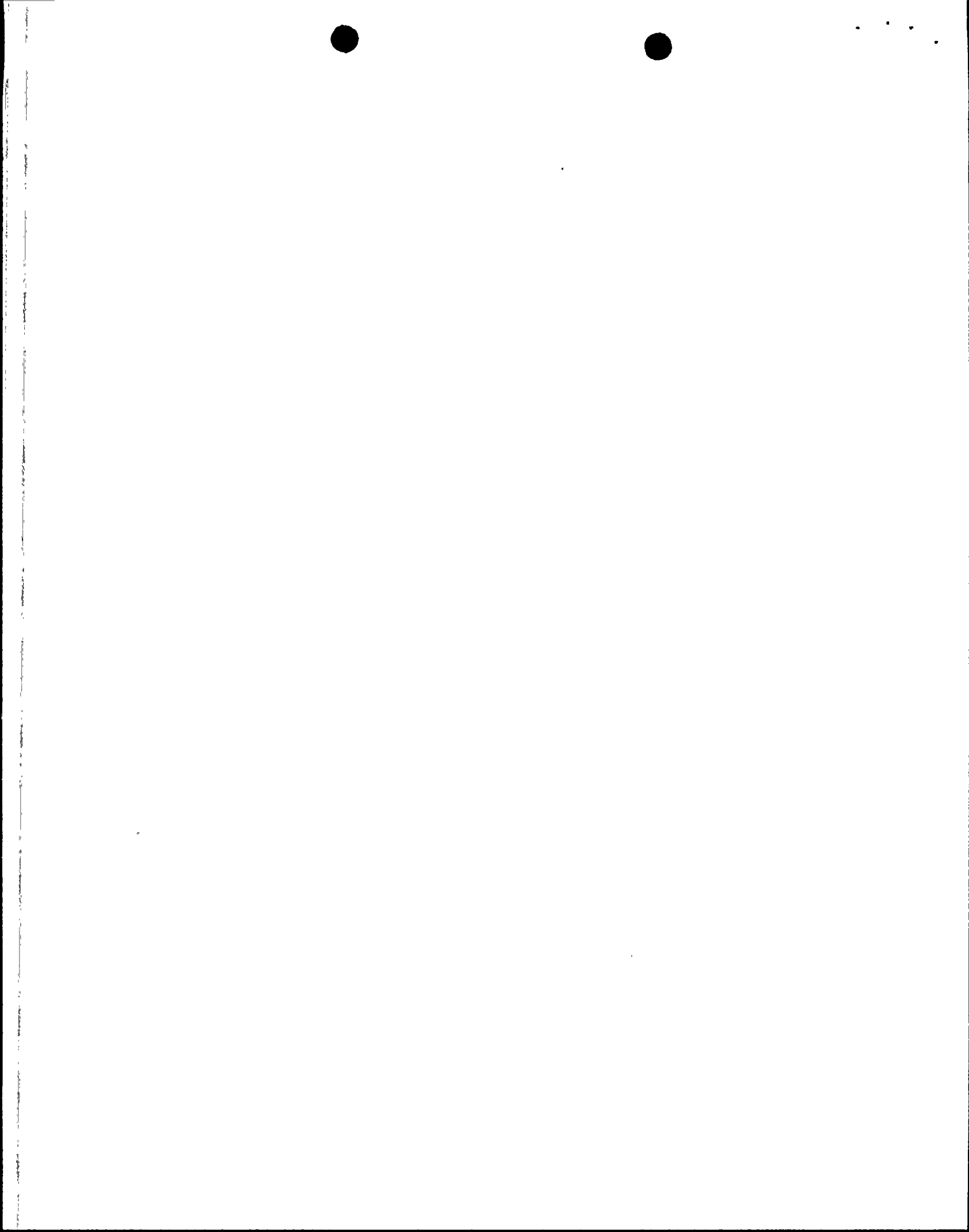


ATTACHMENT 1
TABLE 1

MILESTONES FOR THE LICENSED OPERATOR REQUALIFICATION PROGRAM
UPGRADE

Project Purpose: To modify the Licensed Operator Requalification program to ensure the development and maintenance of examination materials and the qualification of instructors to perform evaluations that meet the requirements of the NRC for Operator Requalification Examinations. Revise the Licensed Operator Requalification Training Program Description to reflect these requirements as well as the training of operators to standards of procedure use established by Plant Management.

<u>Milestones</u>	<u>Schedule</u>
Obtain Licensed Operator Requalification examination bank project development resources	Completed
Revise examination security procedure	Completed
Licensed Operator Requalification Training Program Description procedure update	To be completed in first quarter 1990
Develop and present evaluator training	To be completed in first quarter 1990
Upgrade Licensed Operator Requalification training using "Style Manual" and requirements from the examiners standard	To be completed in first quarter 1990
Examination bank review and development	To be completed in third quarter 1990
Job Performance Measures review and upgrade	To be completed in third quarter 1990
Obtain long-term Licensed Operator Requalification program maintenance resources	To be completed in third quarter 1990
Sampling Plan upgrade for the examination bank	To be completed in third quarter 1990



ATTACHMENT 2

UPDATE OF STATUS OF CORRECTIVE ACTIONS IDENTIFIED IN APS
LETTER DATED NOVEMBER 17, 1989

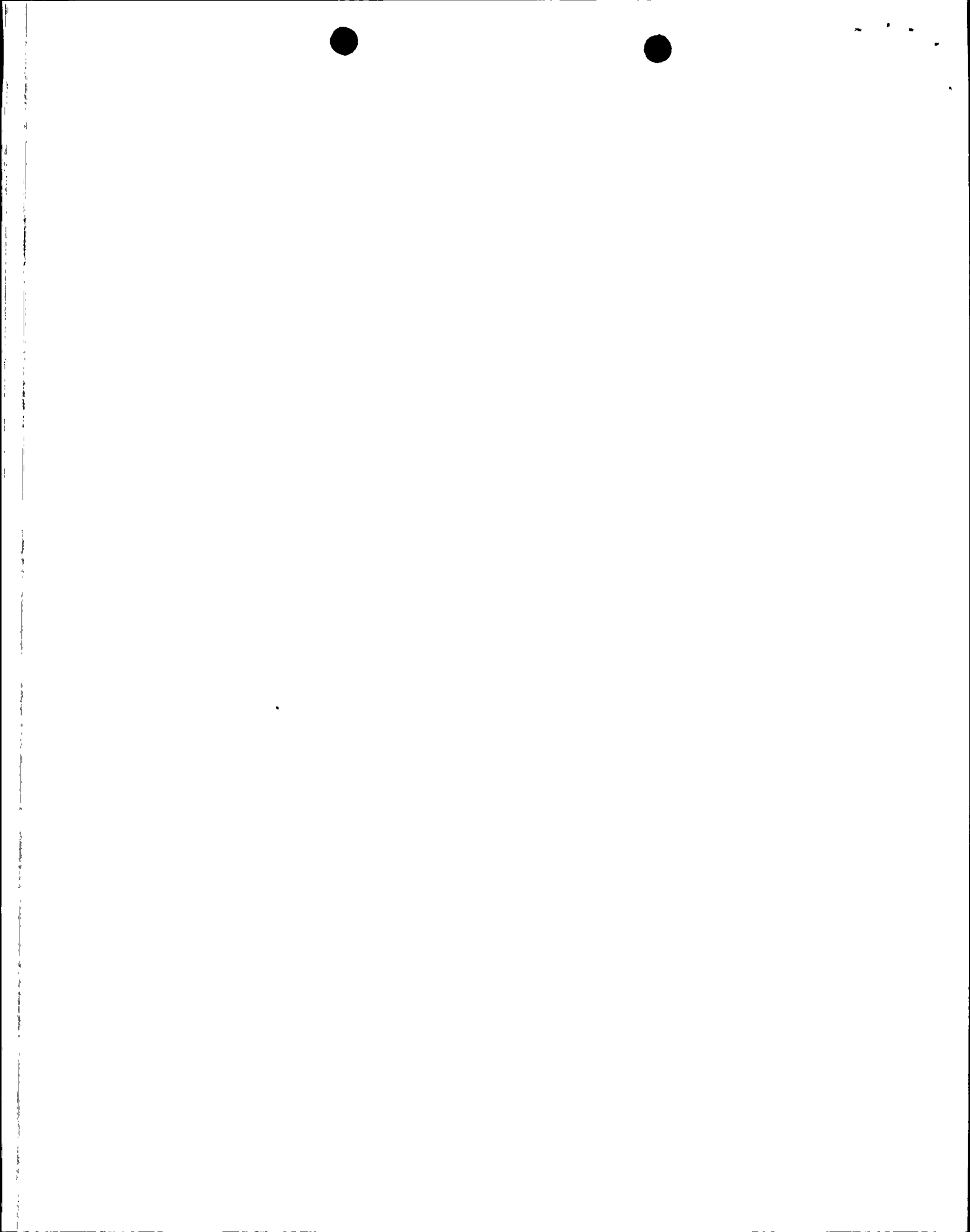
A number of PVNGS corrective actions concerning the use of procedures were addressed in APS's letter dated November 17, 1989 (Reference (B)). Following is a status of these corrective actions:

1. Administrative Procedure 40AC-90P02 "Conduct of Shift Operations" will be revised. The revision will include:
 - a. Plant activities are directed by approved, written procedures. Procedures shall be followed exactly as written.
 - b. Procedures that perform operations on safety-related equipment, non-routine operations, extensive or complicated operations, or sequence dependent operations shall be in the possession of the user and followed by the user when being performed.
 - c. For routine or frequently performed evolutions, procedures shall be out and referred to by the user.
 - d. The requirement to have procedures out when in use does not preclude qualified operators from taking the appropriate time dependent or emergency actions required to place the plant in a stable or safe condition. After these actions have been completed and a stable or safe condition established, the appropriate procedure(s) shall be consulted to verify that all actions were properly accomplished.

Status

A revision to Nuclear Administrative and Technical Manual procedure 40AC-90P02, incorporating the changes noted above, was approved on December 20, 1989, as Procedure Change Notice (PCN) 5. This procedure change was used by the Nuclear Training Department to develop training for presentation during the current Requalification Cycle. The procedure change will become effective shortly after completion of the current Requalification Cycle (scheduled to end on February 16, 1990). At the time the procedure becomes effective, all licensed operators will have been trained to the revised version. The projected effective date for PCN 5 to procedure 40AC-90P02 is February 21, 1990.

2. Training will be developed and provided to all shift crews on the foregoing revision.



ATTACHMENT 2
(Continued)

UPDATE OF STATUS OF CORRECTIVE ACTIONS IDENTIFIED IN APS
LETTER DATED NOVEMBER 17, 1989

Status

Development of this training was completed on January 10, 1990. The original intent was to provide initial, on-shift training in each unit by January 30, 1990, and to provide follow-up training during the next Requalification Cycle (scheduled to be completed by March 31, 1990). The procedure revision and training development proceeded in a timely fashion, allowing the training to be included in an earlier normal Requalification Cycle. This resulted in cancelling plans for on-shift training in each unit. The training being provided during the current Requalification Cycle is scheduled to be completed by February 16, 1990.

3. Other administrative controls will be reviewed to assure that they are consistent with the principles of revised administrative control procedure 40AC-90P02.

Status

A review of the other administrative control procedures was completed on December 15, 1989.

4. An overall policy will be promulgated by the Vice President, Nuclear Production addressing management's expectations regarding the use of procedures and procedural compliance.

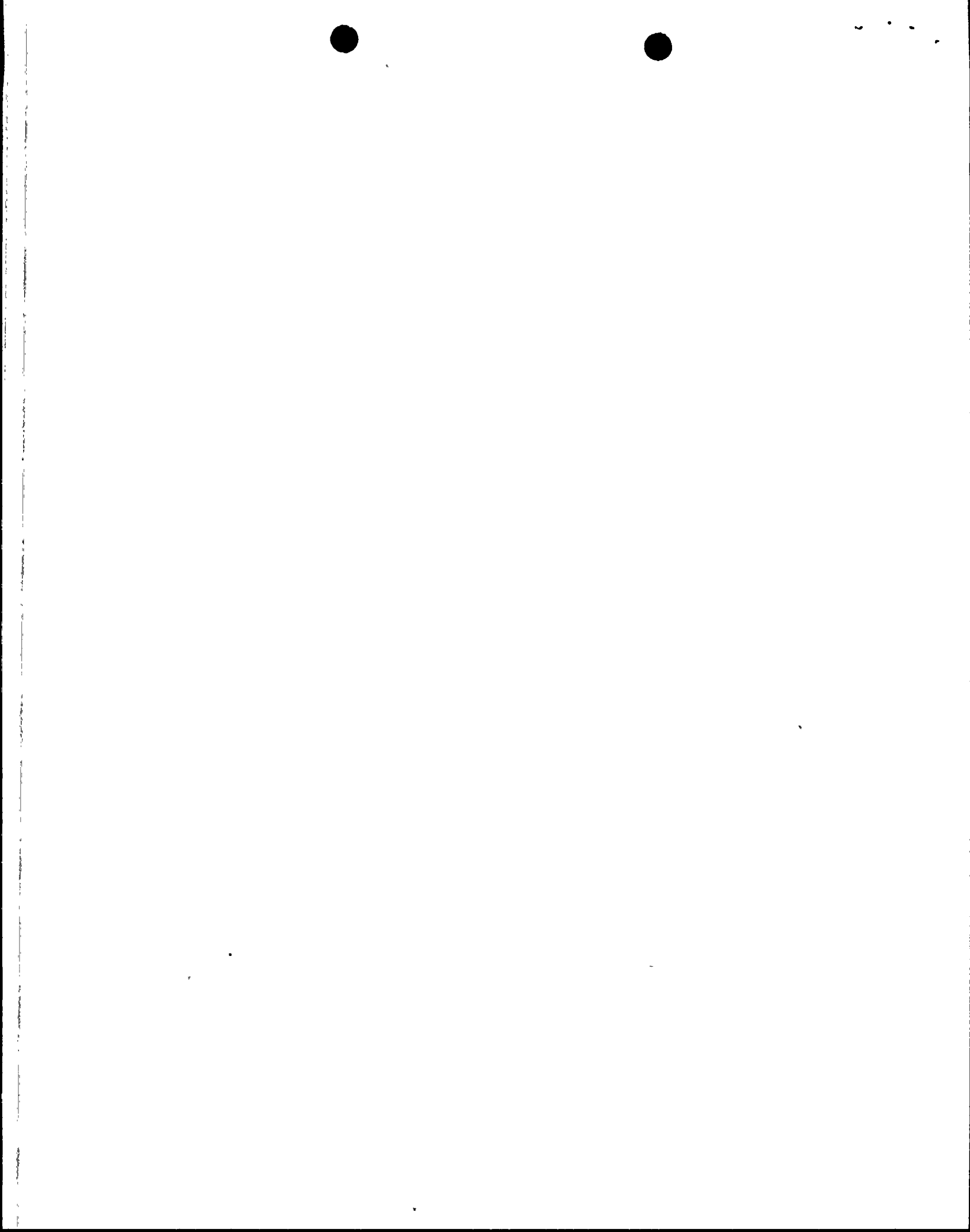
Status

A policy addressing management's expectations regarding the use of procedures and procedural compliance has been drafted and is being reviewed by the Vice President, Nuclear Production. The policy is expected to be issued by February 16, 1990.

5. Observers assigned to evaluate simulator exercises will evaluate the PVNGS operations for both the use of procedures and strict adherence to procedural controls.

Status

Simulator instructors have attended training and have been directed to evaluate operators and crews for procedural compliance. Operations Management continues to perform simulator observations (approximately 45 during 1989). The simulator observation form used during this activity contains a checkoff for procedural compliance.



ATTACHMENT 2
(Continued)

UPDATE OF STATUS OF CORRECTIVE ACTIONS IDENTIFIED IN APS
LETTER DATED NOVEMBER 17, 1989

6. PVNGS management will evaluate the established disciplinary policy and take actions as appropriate to ensure that consistent disciplinary action is taken when procedural noncompliances are identified.

Status

The disciplinary matrix that identifies the normal discipline steps currently in use was approved by the protocol committee on January 17, 1990, and later approved by the Vice President, Nuclear Production. The discipline matrix is administered by the PVNGS Human Resources Department to ensure consistent application among the PVNGS management.

