

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report Nos. 50-315/81-17; 50-316/81-20

Docket Nos. 50-315; 50-316

License Nos. DPR-58; DPR-74

Licensee: American Electric Power Service Corporation
Indiana & Michigan Power Company
2 Broadway
New York, NY 10004

Facility Name: D. C. Cook Nuclear Plant, Units 1 & 2

Inspection At: D. C. Cook Site, Bridgman, MI

Inspection Conducted: July 28-31, 1981

M. M. Holzmer
Inspector: M. M. Holzmer

8/14/81

K. R. Baker
Approved By: K. R. Baker, Chief
Management Programs Section

8/19/81

Inspection Summary

Inspection on July 28-31, 1981 (Report Nos. 50-315/81-17; 50-316/81-20)

Areas Inspected: Routine unannounced inspection of Units 1 & 2 training and requalification training. The inspection involved 25 inspector-hours onsite by one NRC inspector.

Results: No apparent items of noncompliance or deviations were identified in one area. Two items of noncompliance were identified in the other area (failure to train licensed operators on design, facility, facility license and procedure changes; and inadequate lesson plans - Paragraph 2).

DETAILS

1. Persons Contacted

- *D. Shaller, Plant Manager
- *B. Svensson, Assistant Plant Manager
- *L. Matthias, Administration Supervisor
- *C. Murphy, Production Supervisor - Operations
- *J. Stietzel, Quality Assurance Supervisor
- *D. Nelson, Training Coordinator

The inspector also interviewed several other licensee employees including reactor operators, shift operating engineers, instructors, training staff personnel, craftsmen, technicians and clerks.

*Denotes those present at the exit interview on July 31, 1981.

2. Regualification Training

The inspection was conducted to determine that any changes made to the regualification program were in conformance with requirements and commitments; that the licensee has a prepared schedule for conducting required lectures, the licensee has prepared lesson plans or other documentation which adequately describe the scope and depth of the lectures, and that the licensee has evaluated the results of the most recent annual examinations and identified deficient areas to be covered in the lecture series, the determination was made by a review of: records of four control room operators holding NRC Reactor Operator licenses and three supervisors holding NRC Senior Reactor Operator licenses, copies of the most recent annual written examination and the individuals' response and documentation of attendance at all required lectures, records of required control manipulations, performance evaluations, records of additional training received in identified deficient areas, required procedure reviews, and documented oral exams. The inspector did not attend any regualification lectures since no regualification lectures are given during the summer.

a. Documentation Reviewed

Licensed Operator Retraining Program (Revised July 24, 1981).

Indiana and Michigan Electric Company letter dated August 4, 1980, from R. S. Hunter to J. G. Keppler in response to IE Inspection Reports No. 50-315/80-11 and No. 50-316/80-09.

Completed on-shift Review Forms (Form 0-5) revised July 1980.

Completed facility design, procedure and facility license change review forms (Form G-4).

Training records.



Lesson plans for:
Heatup and cooldown limits
Auxiliary Feed System

b. Findings

(1) Noncompliance (50-315/81-17-01; 50-316/81-20-01)

10 CFR 55, Appendix A requires that licensed operators and Senior operators be cognizant of design changes, procedure changes, and facility license changes; and that they review the contents of all abnormal and emergency procedures on a regularly scheduled basis.

The D. C. Cook Licensed Operator Requalification Program requires that all licensed operators "review on a continuous basis all changes in facility design, operating procedures and the facility license." These reviews shall be conducted by formal lectures, individual review, or shift group discussion. In addition, "Abnormal and emergency procedures shall be reviewed on a regularly scheduled basis as assigned by the Training Coordinator."

Contrary to the above, thirty-four cases of failure to complete design, facility or license change reviews by one or more licensed operators occurred between the dates of July 1, 1980 and May 29, 1981. In addition, five licensed operators failed to complete the scheduled reviews of abnormal and emergency procedures. This second item is a repetitive item of noncompliance. A similar item was identified previously in NRC Inspection Report 50-315/80-11, and 50-316/80-09, dated July 10, 1980.

(2) Noncompliance (50-315/81-17-02; 50-315/81-20-02)

10 CFR 55, Appendix A states in part, "The requalification program shall include preplanned lectures ... in those areas where annual operator and senior operator written examinations indicate that emphasis in scope and depth of coverage is needed in the following subjects."

Contrary to the above, of three requalification lesson plans requested for review, one could not be found and the other two showed neither evidence of planning nor indication of scope and depth of coverage.

c. Discussion

- (1) The licensee's requalification program states that facility design, license and procedure change reviews may be conducted in formal training lectures, shift group discussion, or by individual review. The training Coordinator or cognizant



department head determines the depth of review required. The training coordinator assembles the documents to be reviewed under the cover sheet, form G-4. Seven copies of this package are then routed to the different groups for review. When review is completed by each person in the group listed on form G-4, that form is returned to the Training Coordinator for filing. If the form has not been returned to the Training Coordinator, either the review was not completed by one or more persons, or the review was completed by all and the form was lost. The following is a list of all issues of change reviews and the shift or group who failed to complete the review and return the cover sheet:

<u>Change Review Issue Number</u>	<u>Date Issued</u>	<u>Group Failing To Complete Review</u>
346	7/1/80	B Shift
347	7/3/80	B Shift
348	7/7/80	B, C, D, Shifts
349	7/10/80	B Shift
350	7/14/80	C Shift
351	7/18/80	C Shift
352	7/25/80	C Shift; Shift Technical Advisors (STA)
353	7/30/80	B, C Shifts
354	8/3/80	C Shift
355	8/12/80	A, C Shift
356	8/13/80	C Shift
357		C Shift
358	8/18/80	C Shift
365	9/25/80	STA
366	9/25/80	STA
374	11/11/80	STA; Staff
377	12/4/80	C Shift
379	12/12/80	C Shift
388	3/4/81	C Shift
390	3/27/81	Staff
391	4/13/81	STA
392	4/20/81	STA
393	5/1/81	STA
394	5/4/81	STA
396	5/14/81	STA
397	5/26/81	A Shift; STA
398	5/29/81	A Shift

Shift Technical Advisors are not licensed operators, but their requalification program requirements for facility design, license and procedure change reviews are essentially identical to those for licensed operators, and are managed under the same administrative system. For this reason, their inclusion in the foregoing list provides additional examples of the problem.



Abnormal and emergency procedure reviews are administrated by means of On-Shift Review Form (0-5) which contains a list of materials to be reviewed. Signed forms 0-5 indicate completion of review and are sent to the Training Coordinator for filing. Forms 0-5 are issued approximately monthly normally during September through May. Examples of failures to complete these reviews are listed below (Approximately 50 operators sampled):

<u>Position</u>	<u>Month for which review was not complete</u>
Equipment Operator (RO)	
#1	March, April, May, 1981
#2	April, May, 1981
#3	April, May, 1981
#4	March, April, 1981
Staff (Manager)	May, 1981

The significance and repetitive nature of abnormal and emergency procedure review delinquency was discussed with the plant management at the exit interview on July 31, 1981. The magnitude of the change review problem was also stressed. The inspector discussed with the plant management possible actions to prevent future noncompliance. The licensee did not commit to any specific action during the exit. Most ideas discussed concerned improved administration of the system for required reviews with a followup system to prevent shifts or individuals from falling behind. The inspector emphasized that corrective action which fails to employ a vigorous followup system or whose scope is no greater than the actions stated in the Indiana and Michigan Electric Company letter dated August 4 1980, which was written in response to the 1980 training inspection would probably be unacceptable.

- (2) The utility of lesson plans was discussed with the Requalification Program Instructor and at the exit interview. The licensee felt that the use of lesson plans would add an additional and excessive paperwork, typing and administrative burden to the training staff. The inspector stated that neatly hand written, well organized outlines would probably have been acceptable. Evidence of planning by means of outlines and learning objectives could not be found in the two Requalification lectures examined, even though both of these techniques are used with positive effect by the licensee in General Employee Training. Preplanned lectures defining scope and depth of coverage of required lectures are required by 10 CFR 55 Appendix A and evidence of such is expected.



3. Training

The inspector attended three hours of the licensee's General Employee Training and verified that lesson plan objectives were met and that training was in accordance with the objectives of the General Employee Training Program as revised in October 1980.

The inspector verified by direct questioning and record review of two new, one temporary, and four existing employees that administrative controls and procedures, radiological health and safety, industrial safety, controlled access and security procedures, emergency plan, and quality assurance training were provided as required by the licensee's technical specifications; verified by direct questioning of 3 craftsmen and 1 technician that on-the-job training, formal technical training commensurate with job classification, and fire fighting training were provided.

a. Documentation Reviewed

PMI - 2070, Training, Revision 6, September 5, 1979.

OHI - 2070, Training, Revision 2, November 13, 1980.

General Employee Training Program, Revision 1, October, 1980.

Site Specific Training Program, Revision 0, December, 1980.

Operator Replacement Training Program, Revision 0, March, 1980.

Shift Technical Advisor Training Program, Revision 0, October, 1980.

Shift Technical Advisor Requalification Training Program, Revision 0, December, 1980.

RO/SRO Upgrade Program, Revision 3, February, 1981.

Utility Operator Training Program, Revision 1, June, 1981.

b. Findings

No apparent items of noncompliance were identified.

4. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on July 31, 1981. The inspector summarized the purpose, scope and findings of the inspection.

