UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report Nos.: 50-250/86-19 and 50-251/86-19

Licensee: Florida Power and Light Company
9250 West Flagler Street
Miami, FL 33102

Docket Nos.: 50-250 and 50-251 License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: March 19-22, 1986

Inspectors: D. P. Falconer — 4-29-86
D. P. Falconer — Date Signed

S. D. Stadler — 4-29-86
S. D. Stadler — Date Signed

D. P. Loveless — 4-29-86
D. P. Loveless — Date Signed

Approved by: Bruce A. Wilson — 5/5/86
B. Wilson, Acting Section Chief — Date Signed
Operational Programs Section
Division of Reactor Safety

SUMMARY

Scope: This routine, unannounced inspection involved 66 inspector-hours on site in the areas of NRC Form 398 review and licensed operator requalification program review.

Results: In the areas inspected, apparent violations were identified; however, as a result of the current NRC policy statement on training and qualification of nuclear power plant personnel, these items will be carried as unresolved pending further NRC evaluation.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*C. Baker, Plant Manager (Nuclear)
*W. Waylett, Manager Nuclear Training
*B. Miller, Training Superintendent (Nuclear)
*D. Grandage, Operations Superintendent (Nuclear)
*L. Goeble, Instructor
*G. Hollinger, Instructor

Other licensee employees contacted included operators and office personnel.

NRC Resident Inspectors

T. Peebles
*R. Brewer

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on March 22, 1986, with those persons indicated in paragraph 1 above. The inspector described the areas inspected and discussed in detail the inspection findings. No dissenting comments were received from the licensee. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Licensee Action on Previous Enforcement Matters

This subject was not addressed in the inspection.

4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve violations or deviations. Two new unresolved items identified during this inspection are discussed in paragraph 6.

5. Review of NRC Form 398 Applications

The inspectors reviewed selected NRC Form 398 license applications submitted by Hot License Class (HLC) X operator license applicants to verify that information contained on the forms accurately portrayed the applicant's training and experience. For the most part, Form 398s reviewed provided an accurate compilation of the applicant's training and experience. One example was identified in which an applicant's Form 398 did not indicate that the applicant had been a late entry into HLC X and as a result, had missed the first 15 days of classroom instruction. The applicant was

subsequently required to undergo structured self-study in the subjects missed. The licensee is required to provide complete and accurate disclosure pursuant to 10 CFR 55.10(d); however, the inspectors consider that the failure to note the applicant's self-study in lieu of the first 15 days of HLC X instruction would not have impacted the NRC's decision to administer his operator license examination.

During the review of HLC X license candidates, the inspectors noted that approximately ten of the successful candidates have been performing only off-shift duties for the past two months. In that these operators will hold new licenses, the inspectors consider that the potential exists for a substantial loss in control board proficiency during the interim. Prior to placing these newly licensed operators on-shift, the licensee should evaluate each operator to determine the extent, if any, of their control room board proficiency loss and provide a sufficient period for deficient operators to refamiliarize themselves with the control room board and shift operations prior to manning Technical Specification required watch stations. This item will be identified as an inspector followup item (250/86-19-01, 251/86-19-01).

6. Review of the Licensed Operator Requalification Program

The inspectors reviewed portions of the licensed operator requalification program to identify potential contributors to the poor performance of Turkey Point licensed operators on NRC requalification examinations administered February 3-11, 1986. The inspectors concluded that, overall, the licensee's requalification program has improved since the last NRC training assessment conducted on August 13 - September 7, 1984. As a result of increased administrative controls and responsibilities, the administration of the requalification program appears to have become too cumbersome for the training staff presently allocated to conduct the requalification program. The inspectors also identified deficiencies in the difficulty of examination questions and the control of the remedial training process. The participation of off-shift licensed operators was determined to be a significant licensed operator requalification program deficiency and directly contributed to the poor performance on the NRC administered requalification examinations.

Remedial Training and Retesting

Remedial training of licensed operators who have failed requalification cycle and annual examinations is conducted in a structured manner consisting of examination review with an instructor and operator self-study in the areas determined to have been deficient; however, several examples were identified in which the retest contained the same questions as the original test and is considered to be an unsatisfactory practice. Apparently, the instructors were simply teaching the retest during the review period and therefore, the retest did not positively determine that the deficient areas were corrected by the remedial training prescribed.

An example of this unsatisfactory practice involved a licensed operator who had failed to pass a category of the 1984/1985 annual requalification examination on February 15, 1985. It was not until April 15, 1985, that the operator was identified by memorandum to operations as not being available for on-shift operator duties due to his required participation in accelerated requalification (remedial training) pursuant to 10 CFR 55, Appendix A, paragraph 4.e. On April 17, 1985, the operator was provided remedial training which consisted of only a review of the failed category with the instructor. The retest which was administered at the conclusion of this review contained the same questions as the annual requalification examination category that the operator had failed on February 15, 1985. The licensee's reevaluation of the operator's deficient areas of knowledge was insufficient to determine if these deficient areas were corrected; in that the operator was readministered the same questions as those in Category 5 of the 1984/1985 annual requalification examination.

Administrative Procedure 0301, Licensed Operator Requalification Program, step 8.5.2.2 requires that a score of less than 70% on any section of the annual requalification examination shall require that the individual be placed in an intensive training program until he achieves proficiency and that proficiency shall be demonstrated by successfully passing another examination. Contrary to this procedural requirement, the operator who had failed Category 5 of the 1984/1985 annual requalification examination was administered a retest consisting of the same questions as Category 5 of the 1984/1985 requalification examination. The licensee's failure to follow Administrative Procedure 0301 will be an unresolved item (250/86-19-02, 251/86-19-02) pending evaluation pursuant to the NRC training policy statement.

Administrative Procedure 0301, Licensed Operator Requalification Program, does not adequately address the remake of cycle examinations (e.g., segment quizzes). The licensee only requires that, for operators who do not take the cycle examinations administered at the end of the requalification cycle (segment), remake examinations should be administered prior to the end of the requalification year on March 31. This can result in the untimely identification of deficient knowledge areas. The inspectors identified three examples in which the licensee failed to provide prompt remake examination to operators who were not administered 1985/1986 requalification cycle examinations. In two of these examples, the licensed operators were not administered the 1985/1986 requalification Cycle II examination in late spring of 1985 and as of this inspection, remake examinations had not been administered. The inspectors consider this to be an excessive delay in the evaluation of the proficiency of these two licensed operators in the Cycle II knowledge areas. The third example involved a licensed operator who was not administered the Cycle I requalification examination in the early spring of 1985 and demonstrates how potentially deficient knowledge areas have been allowed to exist for significant periods. On October 2, 1985, the operator was administered a Cycle I remake examination on which he achieved a score of only 75.8% (80% is passing). In this case, the deficient knowledge areas were not identified until six to seven months after the conclusion of the 1985/1986 Cycle I requalification sessions. The inspectors consider that the licensee's delay in evaluating the licensed operator's proficiency in Cycle I knowledge areas was excessive.

Furthermore, as of March 22, 1986, this licensed operator had not been administered a retest for the failed October 2, 1985 examination; therefore, the potential knowledge area deficiency has been allowed to exist for approximately one year. The inspectors consider this inordinate delay in the identification and correction of proficiency deficiencies to be inadequate.

Administrative Procedure 0301, step 8.5.1 requires that a score of less than 80% on periodic examinations administered each cycle shall require further study and completion of an additional examination within 60 days of the previous examination date. Contrary to this procedural requirement, a reexamination was not administered within 60 days to a licensed operator who had failed a Cycle I remake examination on October 2, 1985. This will be identified as an unresolved item (250/86-19-03, 251/86-19-03) pending evaluation pursuant to the NRC training policy statement.

Licensed Operator Requalification Participation

During the review of requalification attendance records, the inspectors identified an excessive occurrence of requalification class absenteeism by off-shift licensed operators. The rate of absenteeism for off-shift licensed operators was approximately 33 percent as compared to the less than ten percent for on-shift licensed operators. This high rate of absenteeism appears to have been a contributor to the poor performance of off-shift licensed operators on the NRC administered examinations. The inspectors consider that the licensee should either require mandatory requalification lecture attendance for all operators and provide structured and timely makeup training for missed lectures or formally determine which portions of the requalification program should be excluded for licensed operators who maintain licenses for the purpose of providing backup capability to the operating staff pursuant to 10 CFR 55, Appendix A.

Examination Process

The inspectors reviewed the cycle and annual requalification examinations to determine their adequacy in evaluating licensed operator proficiency in retraining knowledge areas. The following concerns were identified:

a. The inspectors and regional licensed operator examiners evaluated the difficulty of the annual examination and determined that the questions were not sufficiently challenging to ensure operator proficiency in the knowledge areas examined. The average score of licensed operators on the 1984/1985 annual requalification examination was 94 percent. The inspectors consider that the examination process should be revised to provide a more evaluative determination of student proficiency in light of recent results on the NRC administered requalification examinations.

b. The inspectors identified several minor inconsistencies in examination grading. Inconsistent grading may be the result of the licensee's program not requiring grading QC (grading verification by a second person).

c. Past annual examinations and cycle examinations administered to different requalification shifts had a greater than 95 percent question repeatability. This high repeatability rate increases the probability of compromising the examination. The licensee should reduce this high repeatability rate to ensure that licensed operators do not inadvertently reveal examination content to licensed operators who have not been examined.