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Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 910226 ltr documenting exam results contained in Exam Rept 50-400/OL-91-01 administered in Jan 1991.Training unit instruction re preparation for exams written to provide details for setting up simulator.

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SEP 11 1991

G. E. VAUGHN
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
RESPONSE TO NRC EXAMINATION REPORT NO. 50-400/OL-91-01

Gentlemen:

Carolina Power & Light Company (CP&L) has reviewed your letter dated February 26, 1991, which documents the examination results and a number of items related to the reference material provided for the SRO License Examinations given in January 1991. CP&L is committed to working constructively with NRC examiners in facilitating examination preparation and administration. Therefore, we have reviewed this matter and implemented appropriate changes. The enclosure to this letter responds to the specific items in your examination report and identifies actions to improve the quality of reference material.

Please refer any questions regarding this submittal to Mr. Steven Chaplin at (919) 546-6623.

Yours very truly,

G. E. Vaughn

GEV/LSR/jbw (1186AHNP)

Enclosure

cc: Mr. S. D. Ebneter
Mr. A. F. Gibson
Ms. B. L. Mozafari
Mr. J. E. Tedrow (NRC-SHNPP)

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RESPONSE TO NRC CONCERNS
SRO EXAMINATION REFERENCE MATERIAL

CP&L has reviewed the concerns expressed in your letter. It is our intention to correct material and exam process deficiencies and provide the best possible assistance to the NRC prior to and during exams. The following identifies each NRC concern described in the inspection report followed by CP&L's reply:

3.a Generic weaknesses were found in the area of simulator operations as follows:

1) Simulator operators displayed some lack of efficiency with simulator operations. One operator was unfamiliar with the simulator malfunction book provided in the simulator booth. This was identified when he asked where the simulator event malfunction numbers came from. To find a particular malfunction, the simulator operators would page through the display console. This was noted to be very time-consuming. When the simulator operator was asked to insert CFW-18 ("B" MDAFW pump fails to start), he stated that the malfunction could not be inserted without alerting the applicants. The examiner informed the simulator operator that this was not indicated in the malfunction book. The malfunction was subsequently inserted without compromising the intent of the malfunction.

CP&L Response

The two simulator operators mentioned above had been recently qualified to operate the simulator console. We have reviewed simulator instructor training needs and will include the identified items in continuing training for all simulator instructors. This will be completed by 9/30/91.

2) Neither the yellow sticker from PI-455 nor the green plastic bars from three annunciator windows were removed following a scenario which had pressurizer pressure Channel PT-455 Out of Service (OOS). These were subsequently noted by the crew on the next scenario. This occurred again following a scenario which had a feedwater flow transmitter (FT-477) OOS.

CP&L Response

A Training Unit instruction (II-23, Preparation for Exams at SHNPP) was approved on April 18, 1991 to provide details for setting up the simulator. This instruction contains a checklist for restoration of the simulator from a completed scenario to a clean condition prior to the start of the next scenario. The checklist was used during the July NRC observed LOR exams with positive comments from the simulator instructors.

3) Excessive time was taken to set up for each scenario. The examination was planned to start at 7:30 a.m. Simulator staging for the first scenario was not completed until 8:15 (45-minute delay). Similar delays occurred between Set 1, Scenarios 2 and 3 (44 minutes), between Sets 1 and 2 (32 minutes), between Set 2, Scenario 1 and 2 (25 minutes).

CP&L Response

During setup for the first scenario, the Radiation Monitoring System (RMS) computer would not synchronize with the simulator. Our investigation revealed that the RMS computer (RM-11) was overloading. A reduction in the number of monitors actively displayed on the simulator's RMS computer is planned in 1992. Also, a simulator computer upgrade is scheduled for completion in December 1991. The two planned actions should resolve the overloading problem.

It is the normal practice of CP&L to wait until the examiner on the simulator floor has completed questioning the candidates and the examiner indicates that the simulator can be set up for the next scenario.

The computer synchronization problem and the simulator operator waiting for the examiner to complete the questioning of the candidates were the major causes of exam delays. To reduce the delay time between scenarios, CP&L will better coordinate with the NRC examiners when the next scenario can proceed simultaneously with the questioning of the candidates.

3.d Several procedure to Job Performance Measures (JPM) interface problems were identified as follows:

1) OST-1034 (Operations Surveillance Test) contained several valve nomenclature errors. For example, the "Containment Normal Purge Inlet Valve" in the procedure is listed as 1CP-9. In facility JPM No. 34, Revision 2 (Perform Area Radiation Monitoring Instrumentation Functional Test), the valve is listed as OP-B1 SA.

CP&L Response

It is our policy to update JPMs prior to use. The JPM nomenclature discrepancies were due to a recent change made to valve nomenclature in plant Procedure OST-1034. JPM No. 34 was selected as a last-minute substitute in the exam and we failed to fully validate it. In the future, JPMs selected for the exam will be fully validated before being used. JPM No. 34 has been updated.

2) Numerical inconsistencies were identified between the System Descriptions, the Setpoints Document, and the facility Technical Specifications.

CP&L Response

Accurate setpoints and values are contained in controlled setpoint documents such as controlled operating procedures and Technical Specifications. System Descriptions (SDs) provide basic descriptions of plant systems and are not used to control the operation of the plant. SDs are updated on a two-year cycle and contain the following notation:

CAUTION

"Setpoints given in this SD are for reference only. Actual values should be obtained from a controlled setpoint document."

A cover letter will be used to explain that System Descriptions should not be used for setpoint information.

The Westinghouse Precautions, Limitations, and Setpoints (PLS) document that was sent was an outdated copy. The current version will be sent in the future.

3) The examiners identified during the JPM walkthroughs that Procedure AP-007, "Loose Article Control in the Fuel Handling Areas," was incorrectly numbered AP-619.

CP&L Response

A second review of these procedures confirmed that AP-619 is the SHNPP procedure for Loose Article Control in the Fuel Handling Area and AP-007 addresses Temporary and Advance Changes to Plant Procedures.

4) When two candidates were asked JPM Question 1-007-018-3, "Describe the Fuel Handling Building (FHB) normal exhaust radiation monitor," they both stated that there were no such monitors when, in fact, SD-118 Paragraph 4.2.8 and AOP-005 indicate they do exist.

CP&L Response

The FHB normal exhaust radiation monitors are located in the FHB ventilation system as described in SD-118 and are in service. The two candidates have received additional training regarding these monitors.

3.e Several problems were identified to the licensee concerning the reference material. The licensee acknowledged these discrepancies.

1) Reference material provided to examiners for the development of the exam contained many handwritten and/or highlighted notes in the lesson plans without explanation.

CP&L Response

Some of the lesson plans provided were duplications of working copies used by the instructors. The working copies contained instructor annotations. CP&L will in the future provide copies of the master lesson plans only.

2) Lesson plan learning objectives were lined out. The NRC was not made aware of the basis for this action.

CP&L Response

The Harris Training Unit utilizes one set of lesson plans as the basis for 1) systems instruction in the Reactor Operator (RO) Program and 2) review in the Senior Reactor Operator (SRO) Program. In the SRO Program, the class is a refresher on malfunctions and required actions, Technical Specifications, procedural use, etc. The student is expected to already possess the required basic system knowledge. Therefore, when the lesson plans are used for SRO review, the lesson plans are modified by lining out material that is not to be emphasized during the SRO review. The marked-up lesson plan is reviewed, approved by the Manager - License Training, and becomes the "augmented" lesson plan in accordance with Harris Training Unit instructions.

The use of augmented lesson plans will be explained in the cover letter for future exams.

3) System description material contained setpoints and values that differed from that contained in procedures and/or Technical Specifications. Subsequently, exam validation and conformation was difficult as evident by the pre-exam reviews.

CP&L Response

The System Descriptions (SDs) are updated on a two-year cycle and may not contain the latest information as explained in the response to 3.d.2 above.

4) Reference material sent to the NRC was incomplete in that many transparencies referenced in the lesson plans and electrical drawings were not provided.

CP&L Response

All transparencies pertaining to each lesson plan will be provided in the future.

Due to an oversight, the electrical drawings were not provided. The drawings of the plant electrical busses and their interconnections will be provided in the future.

5) The index for the reference material was vague. For example, Reactor makeup was indexed as "RCSMV-LP-3.0," Mitigating Core Damage was indexed "MCD-LP-2.1," and Transient and Accident Analyses was indexed as "T&AA-LP-2.9." Subsequently, the index had to be redefined prior to usage.

CP&L Response

Indexing for the material provided used standard Harris Training Unit acronyms and terminology. In the future, the Harris Training Unit will submit indexes using full text to describe the material rather than acronyms.

6) Examiners were not notified of procedural changes which effected the technical content of some of the questions.

CP&L Response

The procedural changes in question occurred after the reference material was sent to the NRC. In the future, procedural changes will be provided to the NRC when we review the exam in Atlanta (or when the exam team conducts a preparation week).

7) A lack of attention to detail was identified with respect to the packing and binding of exam reference material. Approximately 75 percent of the binders were either open upon receipt or the material was loose within the binder.

CP&L Response

In the future, CP&L will use a pressed board style of binder that is not vulnerable to opening during shipment. This type of binder was agreed to as acceptable during the LOR preparatory meeting with the NRC in Atlanta on 5/13/91.