

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

REGION III

Report No. 50-255/81-16

Docket No. 50-255

License No. DPR-20

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49201

Facility Name: Palisades Nuclear Generating Plant

Inspection At: Covert, MI

Inspection Conducted: July 17-20, 1981

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

9/2/81

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

9/3/81

Inspection Summary

Inspection on July 17-20, 1981 (Report No. 50-255/81-16)

Areas Inspected: Routine, unannounced inspection of Palisades training and operator requalification training. The inspection involved 32 inspector-hours onsite by one NRC inspector.

Results: Of the two areas inspected, no apparent items of noncompliance were identified in one area, and one item of noncompliance was identified in the other area (failure to maintain training records as required by Technical Specifications - Paragraph 3).

DETAILS

1. Persons Contacted

*R. Montross, General Plant Manager
*N. Hough, Training Administrator
*W. Burgess, Instructor, Licensed Operator Requalification Program
*K. Mitchell, QA Analyst
P. Elbert, Director Nuclear Operations Training, Consumers Power Company
R. Doan, General Staff Supervisor, Nuclear Operations Training Department

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

*Denotes those present at the exit interview on August 20, 1981.

2. Licensee Action on Previous Inspection Findings

(Open) Noncompliance (50-255/80-09-01): Failure to adhere to procedures for training and documentation. As discussed in Paragraph 3, the licensee's actions to prevent recurrence appear to be insufficient.

3. Training

The inspector attended six 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 Initial General Employee Training Program (Administrative Procedure 13.1).

The inspector verified by direct questioning and record review of two new and five existing employees that administrative controls and procedures, radiological health and safety, industrial safety, controlled access and security procedures, emergency plan, and technical specifications training were provided as required. Determined by direct questioning of two craftsmen and four technicians whether on-the-job training, formal technical training commensurate with job classification, and fire fighting training were provided.

a. Documentation Reviewed

- Chapter 13 of the Administrative Procedures.
- Training Records.
- Consumers Power Company letter from D. Hoffman to J. Keppler dated December 19, 1978, in response to Inspection Report No. 50-255/78-26.
- Consumers Power Company letters from D. Hoffman to J. Keppler dated October 6, 1980, and March 16, 1981, in response to Inspection Report No. 50-255/80-09.
- Chapter 6 of the Technical Specifications.

b. Findings

Noncompliance 50-255/81-16-01-06

In May of 1977 a revision to Chapter 13 of the Administrative Procedures added numerous training requirements in the area of Departmental Training. These internal commitments were made even though the training department staff was too small to meet the additional demand. Inspection Report No. 78-26 listed five examples of areas in which records failed to show that the training to which the licensee committed was conducted. The licensee responded in a letter from D. Hoffman to J. Keppler dated December 19, 1978. In Inspection Report No. 80-09 the inspectors judged the licensee's corrective actions to be ineffective, and listed more examples of Departmental Training which was not conducted. The licensee's response is found in letters from D. Hoffman to J. Keppler dated October 6, 1980, and March 16, 1981. There has been no substantial change in the conduct of the Departmental Training program, and examples of failure to conduct training, and to keep records as specified in Section 6.10.1.e of the Technical Specifications follow:

<u>Employee Position</u>	<u>Required Training Not Properly Conducted/Documented</u>
Secretary	Quarterly Job Related Industrial/Fire Safety
Office Clerk	Quarterly Job Related Industrial/Fire Safety Periodic Department Procedures Periodic Administrative Procedures
Craftsman	Quarterly Job Related Industrial/Fire Safety Annual CPCo Tagging Procedures Biennial Crane Safety Biennial Scaffolding/Rigging
Craftsman	Quarterly Job Related Industrial/Fire Safety Periodic Administrative Procedures Biennial Use of Forklifts Biennial Scaffolding/Rigging
Technician	Quarterly Job Related Industrial/Fire Safety Annual CPCo Tagging Procedures
Technician	Quarterly Job Related Industrial/Fire Safety Annual Controlled Material Procedures Periodic Technical Specification Senior Chem Tech Training

c. Discussion

The inspector conducted interviews with the Plant Manager and with two corporate Nuclear Operations Department Training personnel to

determine the extent and effectiveness of the actions the licensee has taken to correct long-outstanding training deficiencies.

The licensee has re-organized the corporate structure to create a Nuclear Operations Training Department, the director of which reports to the Vice President of Nuclear Operations. Onsite training staff now are in the line authority of this department and no longer report directly to the plant manager. The Nuclear Operations Training department is comprised of a staff of 64 persons, 13 of which are budgeted for the Palisades Plant. The plant staff has added several full time employees, and contracted educational services have increased the effective plant training staff size to the budgeted amount of 13. Ground has been broken for a corporate training center in Midland, Michigan.

Generic company procedures are being written to provide the framework for plant revisions to Chapter 13 and Departmental Training procedures. Drafts of the company and plant Chapter 13 revisions are scheduled to be submitted for review on September 1, 1981. Drafts of company and plant Departmental Training procedures are scheduled for January 1, 1982.

While it appears that significant organizational changes have been made or are in progress, training and training documentation appear to have been largely unaffected thus far. It is recognized that changes of the magnitude needed at the Palisades Plant do not occur overnight, however, the inspector stressed that the programmatic changes must actually affect the training and its documentation, and that point has not yet been reached.

4. Requalification Training

The inspector verified that any changes made to the requalification program were in conformance with requirements and commitments; and verified through record review of two control room operators holding NRC Reactor Operator Licenses, and three supervisors holding NRC Senior Reactor Licenses, the availability and adequacy of copies of most recent annual written examination and the individuals' performance evaluations, required procedure reviews, and oral exams. In addition, the inspector attended two hours of requalification lectures.

a. Documentation Reviewed

- Administrative Procedure 13.3.6B - NRC Licensed Operator Requalification Training
- Consumers Power Company letter from D. Hoffman to D. Crutchfield, dated August 6, 1980
- Licensed Operator Training Records

b. Findings

No apparent items of noncompliance or deviations were identified.

c. Discussion

The inspector attended two one-half hour audio visual presentations on Electrical Generation, Distribution and Control. These consisted of slide presentations automatically keyed by tape-recorded lectures. Both presentations moved at a rapid pace, which made comprehension difficult, and strong overhead lighting in the room made the slides difficult to see. During part of the second presentation, the slide and tape recording were not synchronized, which distracted the students. These presentations need considerable improvement. A one hour lecture on thermodynamics presented by the training staff was also observed and was considered adequate.

The problems with the slide presentation were brought to the attention of the Requalification Training Instructor and were discussed. It is the understanding of the inspector that the licensee will consider how these presentations can be improved.

5. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on August 20, 1981. The inspector summarized the purpose and the scope of the inspection and the findings.