



UNITED STATES  
 NUCLEAR REGULATORY COMMISSION  
 REGION II  
 101 MARIETTA ST., N.W., SUITE 3100  
 ATLANTA, GEORGIA 30303

Report No. 50-302/79-23

Licensee: Florida Power Corporation  
 - 3201 34th Street, South  
 St. Petersburg, Florida 33733

Facility Name: Crystal River Nuclear Plant 3

Docket No. 50-302

License No. DPR-72

Inspection at Crystal River Site near Crystal River, Florida

Inspectors:	<u><i>[Signature]</i></u>	<u>7/5/79</u>
	for W. A. Ruhlman	Date Signed
	<u><i>[Signature]</i></u>	<u>7/5/79</u>
	H. D. Jenkins	Date Signed
Approved by:	<u><i>[Signature]</i></u>	<u>7/5/79</u>
	W. A. Ruhlman, Acting Section Chief, RONS Branch	Date Signed

SUMMARY

Inspection on June 14-15, 1979

Areas Inspected

This routine, announced inspection involved 23 inspector-hours on site in the areas of training and retraining programs (non-licensed plant personnel); requalification training; and licensee response to IE Bulletin 79-05 and 79-10.

Results

Of the three areas inspected, no apparent items of noncompliance or deviations were identified in one area; four apparent items of noncompliance were found in two areas (Infraction - decreasing time allotted to the requalification program - Paragraph 6.b; deficiency - failure to attend required lectures - Paragraph 6.c; deficiency - failure to follow procedure AI-800 - Paragraph 6.d; deficiency - inadequate 10 CFR 19.12 training - Paragraph 5.b).

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## DETAILS

### 1. Persons Contacted

#### Licensee Employees

- G. Beatty, Plant Manager
- \*W. Cross, Operations Engineer
- \*P. Griffith, Training Supervisor
- \*L. Hill, Nuclear Compliance Auditor
- T. Miller, Training Specialist
- \*W. Stephensen, Plant Engineer
- \*G. Westafer, Maintenance Superintendent (Acting Plant Manager at Exit)
- \*G. Williams, Compliance Plant Engineer

Other licensee employees contacted included craftsmen, technicians, operators, mechanics, and office personnel.

\*Attended exit interview.

### 2. Exit Interview

The inspection scope and findings were summarized on June 15, 1979, with those persons indicated in Paragraph 1 above. With respect to the items of noncompliance discussed in Paragraphs 5.b, 6.b, 6.c, and 6.d and one (1) unresolved item discussed in Paragraph 5.c the Acting ~~Plant~~ Manager acknowledged the inspector's findings.

### 3. Licensee Action on Previous Inspection Findings

(Open) Item (302/79-04-23): Failure to provide training for Compliance Engineers, Mechanics, and Electricians in accordance with Section 1.4 of AI-100 and Criterion II of Appendix B. The licensee's program establishing training requirements for Compliance Engineers has been developed. However, due to the extended outage and brevity of the time committed for implementation of defined training for mechanical and electrical craftsmen, this item is being extended in time to July 31, 1979, as committed to by the Acting Plant Manager. Additionally, the implementation/documentation of an on-the-job training program for I&C Technicians is being added to this item for subsequent NRC inspections. This item remains open.

### 4. Unresolved Items

Unresolved items are matters about which more information is required to determine whether they are acceptable or may involve noncompliance or deviations. A new unresolved item identified during this inspection is discussed in paragraph 5.c.

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5. Training and Retraining Program; Non-licensed Plant Personnel

- References:
- a) AI-800, Conduct of Administrative Services, Section 7.0, Revision 5, dated December, 1978
  - b) RP-101, Radiation Protection Manual, Revision 7, dated February, 1979
  - c) AI-600, Conduct of Maintenance, Sections 2.0 and 6.0, Revision 7, dated 4/79

a. Review Conducted

The changes made to the licensee's training procedures since the last inspection of this area were reviewed with respect to maintaining the implementation of the licensee's commitments for

- (1) General employee training for new employees
- (2) General employee retraining
- (3) Temporary employee training
- (4) On-the-job training for: auxiliary/craftsmen; technicians; QA/QC personnel; and technical staff

The inspector reviewed training records for two individuals in each category above to verify that the described training program was provided. The inspector interviewed one employee from each category above to verify that the individual actually received the training which was documented in the training records.

As a result of the above review, one (1) item of noncompliance, one (1) unresolved item and one (1) open item were identified as discussed in Paragraph 5.b through 5.d below.

b. Inadequate 10 CFR 19 Training

The inspector identified that the lesson plan for General Employee Training lacked the requisite 10 CFR 19.12 instruction to employees concerning the reporting to the licensee of any condition which may cause or lead to a violation of Commission regulations. He additionally interviewed six (6) workers to determine the extent to which 10 CFR 19.12 information was disseminated. One (1) of the six (6) workers interviewed stated that he was unaware of this requirement.

This failure to provide complete instruction to all employees of the content of 10 CFR 19.12 constitutes an item (302/79-23-04) of noncompliance.

c. Incomplete QC Training Program

The inspector identified an incomplete QC inspector/examiner training program as required by AI-600 and ANSI N45-2.6, as committed to by his accepted QA Program. This item is currently identified as an outstanding audit item on FPC Compliance audit 79-3, dated March 29, 1979, Item 2.

Until the licensee revises, approves, and implements a QC inspector training program consistent with AI-600 and ANSI N45.2.6, this item (302/79-23-05) is unresolved.

d. Inadequate Retraining Program for Non-Licensed Personnel

During his review of the training programs for the craftsmen and technicians, the inspector identified no retraining plan in effect which would ensure that non-licensed personnel not only achieve proficiency, but maintain it. The rotation of mechanical craftsmen through the required PMS program appears adequate to maintain proficiency, but no documentation existed as of June 14, 1979, to manage the rotation; ensuring each individual was assigned each PMS item per cycle.

Until the licensee develops, approves and implements a documented retraining program to maintain proficiency of mechanical, electrical and I&C personnel, this item (302/79-23-06) is open. An implementation date of September 30, 1979 was committed to at the exit.

6. Licensed Operator Requalification Training

- References: a) AI-800, Enclosure B, Revision 3 dated August, 1978  
b) Appendix 12C of the Crystal River 3 FSAR

a. Review Conducted

There were no changes made to the licensee's requalification program since the last inspection of this area. The implementation of the accepted requalification training program was reviewed to assure the licensee has: prepared a schedule for conducting lectures; prepared lesson plans or equivalent for three lecture topics reviewed; including material in the requalification lecture series on subjects identified as deficient by evaluation of the annual examinations. The inspector determined which licensed operators: failed all or portions of the annual examinations; received unsatisfactory performance evaluations; did not perform licensed duties for a period of four months or longer. The inspector verified the completion of appropriate follow-through action for all or a representative sample of these individuals. The inspector reviewed the training records for six (6) NRC licensed personnel to verify that each included: copies of annual written examinations and the individuals responses; documentation of attendance at all required lectures; documentation of required control manipulations; the results of performance evaluations; documentation of

required additional training to satisfy deficient performance; documentation of completion of required procedure reviews and/or self study. Additionally, the inspector interviewed three (3) licensed personnel to verify that the training records reflect the actual training received.

As a result of this review, three (3) items of noncompliance and one open item were identified as discussed in Paragraphs 6.b through 6.e below.

b. Decreasing Time Allotted to the Requalification Program

10 CFR 50.54 (i-1) states that the licensee shall not make a change to an approved operator requalification program by which the time allotted to the program, the frequency of conducting different parts or the scope of the program is reduced unless such changes are approved by the Commission. The accepted requalification program (reference b) was reduced without Commission approval with the issuance of AI-800. Section 5.1.3 required backup licensed operators to spend five days every four months on an operating shift. Enclosure 5 to AI-800, item 3.6 reduced that requirement to two days every 3 months. For the period from 1/1/78 until 4/1/79, eight (8) licensed backup operators failed to make the lower AI-800 requirement, thus also failing to meet the accepted requalification program.

This reduction of the time allotted to requalification training without prior Commission approval is an item of noncompliance (302/79-23-01).

c. Failure to Attend Required Lectures

10 CFR 55, Appendix A, requires that lectures be conducted where performance on annual examination indicated that emphasis is needed. The accepted requalification program (reference b) requires licensees who score less than 80% in an area on the annual examination to attend lectures in that area. In reviewing results of the 1978 annual examination (given in January 1978), the inspector found one Reactor Operator and one Senior Reactor Operator who scored less than 80% in an area and did not attend a lecture given in that area.

This failure to attend required lectures, two examples, is an item of noncompliance (302/79-23-02).

d. Failure to Follow Procedure AI-800

Technical Specification 6.8.1 requires that procedures be written and followed. Item 6.1 requires that each Shift Supervisor submit a report semiannually which contains an evaluation of the performance and competency of each licensed operator and backup licensee. The inspector found that eight (8) backup licensee's lacked one or both evaluations for 1978. In addition, the inspector noted that the responsibilities for conducting the evaluations as delineated in AI-800 was different from that defined in Appendix 12C of the FSAR.

This failure to follow procedure AI-800 is an item of noncompliance (302/79-23-03).

e. Revision of Recordkeeping System

Many of the items identified by the inspector could not be easily identified from the records currently maintained by the licensee. The responsible manager acknowledged that where a licensee was known to be deficient in a particular training area, memoranda were generated to alert the individual to his deficient area (the inspector was shown memoranda of this nature). The licensee further stated that the recordkeeping system would be revised by September 30, 1979, so that management would be able to determine on an established review frequency the current status of each licensee participating in the requalification training program.

Until the licensee completes the revision of his recordkeeping system to allow the determination of each participant's current status, this item (302/79-23-07) is open.

7. Licensee Response to IE Bulletin 79-05 and 79-10

a. Review Conducted, 79-05

The inspectors conducted a review of licensee actions to verify the effectiveness of operator training conducted in response to IE Bulletin 79-05. The inspectors reviewed: emergency procedures (3) related to a small break LOCA; management controls implemented to incorporate plant modifications into the operator training and requalification programs; management controls implemented to incorporate the operational knowledge gained from the Three Mile Island incident into the operator training and requalification programs; management controls implemented to increase the standard of operator knowledge required in the area of plant transient responses; management controls implemented to assess the effectiveness of the training conducted, including, but not limited to, auditing of training presentations, examination content, and examination grading. The inspectors interviewed three (3) reactor operators/senior reactors operators to establish the operators' subjective evaluations of the effectiveness of training received in conjunction with incidents at the same or other facilities. The inspector also attended a portion of a training class being given on the events at Three Mile Island.

As a result of the above review, no items of noncompliance or deviations were found.

b. Review Conducted, 79-10

In reviewing the licensee's response to Bulletin 79-10, the inspector found that several of the data entries were incorrect. The incorrect data were based on the licensee's interpretation of his requalification

program. After discussions with responsible licensee management, the licensee stated that a new response to Bulletin 79-10 would be issued by June 22, 1979.

Until the new response to Bulletin 79-10 has been received, this item (302/79-23-08) is open.

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