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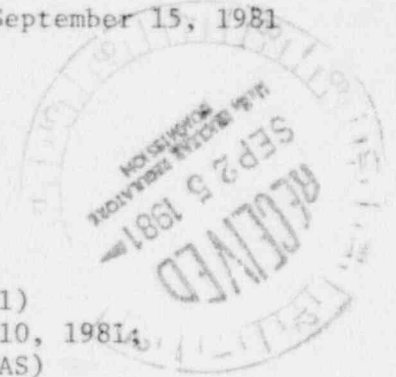
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September 15, 1981

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Victor Stello, Jr., Director
Office of Inspection and Enforcement

- References:
- (a) License No. DPR-28 (Docket No. 50-271)
 - (b) USNRC Letter to VYNPC, dated August 10, 1981, Management Appraisal, 50-271/81-3 (PAS)
 - (c) USNRC Letter to VYNPC, dated August 12, 1981, and Inspection Report 50-271/81-08



Dear Sir:

Subject: Response to Management Appraisal Inspection 50-271/81-3 (PAS)

The referenced report provides the results of a management appraisal inspection conducted by members of the Performance Appraisal Section of the NRC's Division of Program Development and Appraisal during the period April 7-May 1, 1981. Of the nine functional areas inspected, two areas were considered by the NRC to be below average. For these two areas, Vermont Yankee was requested to submit a response describing the actions that have been taken, or will be taken, to improve the management controls.

The NRC's summary of the inspection results for the affected areas, along with the Vermont Yankee plant and Corporate (Yankee Nuclear Services Division) responses are provided below.

Non-licensed Training:

A written training program which included schedules, goals and objectives, and methods to evaluate the effectiveness of training had not been established for corporate personnel. The plant Training Department had not provided direction and guidance for departmental training programs. Some departments had not completed their training program. A written training program had not been developed for non-licensed operators. (W)

RESPONSE

(Off-Site):

The Yankee organization has retained the services of a personnel manager who will have the responsibility for developing and coordinating a comprehensive corporate training program. To ensure that the program under development will be responsive to the needs of the entire organization, all Yankee managers have contributed to a management needs analysis recently conducted by a training consultant. Utilizing this information, proposals are being solicited from local colleges and universities. As presently conceived, the training will be two to three weeks in length and involve 10 to 15 individuals per year; it is expected that the sessions will commence by early 1982.

The personnel manager has also been assigned the responsibility of reviewing the existing job descriptions for accuracy and adequacy. This review is currently in progress.

With regard to corporate Health Physics training, the training curriculum is based primarily on vendor supplied video tapes. Because these tapes are duplicates of tapes used in the on-site program, including 10 CFR 19.12 information, compatibility was assumed. Commencing in 1982, it is Yankee's intent to include Health Physics Training in the corporate audit program to ensure that compatibility is maintained.

Observations dealing with Quality Assurance Department training are discussed in the succeeding response.

(On-Site):

Item 2.a(2)(a)

The Training Department has not provided direction and guidance for the various departmental training programs. The Training Department had only limited involvement with departments such as Maintenance, Instrumentation and Control (I&C), Stores, Reactor Engineering, and Chemistry and Health Physics.

The Training Department has not assisted in the development and review of department training programs. The lack of direction and guidance has resulted in the formation of a variety of department training programs. Some of these, including security and shift technical advisor programs, were well organized, high quality programs. However, other programs such as maintenance were poorly organized and administered. (W)

A uniform method had not been established regarding the retention of training records by the Training Department and other on-site departments. There was considerable variation in the format and content of training records. Some records were fragmented and incomplete. (W)

Response: Vermont Yankee has only had a dedicated plant training department since June, 1980, and the position of a Plant Training Supervisor, reporting directly to the Plant Manager, was not filled until March, 1981. Since March, much work has been underway to establish better means to develop, control, evaluate and document departmental training. Procedure AP 0004, "Plant Staff Training" will be rewritten to address the items specified in Item 2.a.(2)(a). It is our intent to issue the revised procedure before March, 1982.

Item 2.a(2)(b) Department Procedure (DP) 0204, Maintenance Department Training, Revision 2, required maintenance department personnel to participate in an annual review of specified subject areas. However, maintenance department training records indicated that seven individuals had not completed the required training since the procedure was issued in 1979. (W)

Response: Reference (c) describes actions taken regarding this item. It is now documented that the seven individuals have received the required training. Efforts, as outlined in our response to Item 2.a.2(a) above, will provide better control of Maintenance Department Training.

Item 2.a.(2)(c) Administrative Procedure (AP) 0004, Plant Staff Training, Revision 2, and most of the individual departmental training procedures were narrowly scoped. The procedures did not contain sufficient information regarding the content, format, scheduling, objectives, and a means to evaluate the training received. A written training program had not been developed for members of the Training Department. (W)

Response: The initial part of this item will be addressed by rewriting AP 0004, "Plant Staff Training." The second concern within this item will be addressed by revising DP 0702, "Training Department Training." Both procedures will be issued by March, 1982.

Item 2.a(2)(d) AP 0720, Employment Processing, Revision 9, required that YAEC, NSD personnel need only complete Health Physics training once every three years. However, procedures required other personnel such as the permanent

plant staff, Vermont Yankee corporate personnel, and contractors to take annual Health Physics training. A basis had not been established for allowing NSD personnel as extended retraining frequency. (W)

Response: AP 0720, Employment Processing, will be revised to make the on-site and off-site Health Physics training requirements consistent. It is our intent to have the revised policy in effect by March, 1982.

Item 2.a.(2)(e) AP 0004, required training specific to individual departments to be developed and administered by the applicable department supervisor.

The training procedures developed by each department also required Department Supervisors to evaluate the effectiveness of their training programs annually. Interviews revealed that most department supervisors had devoted very little time to the development and implementation of training programs. Evaluation of the effectiveness of the programs was not documented. (W)

Response: See the responses to Items 2.a(2)(a) and 2.a(2)(c).

Item 2.a(2)(f) A program had not been established to account for on-the-job (OJT) within the various departments. Most training provided to new employees was through OJT. Some departments made sporadic notations on time sheets to indicate OJT; other departments used a check-off sheet. However, a uniform program had not been established to properly document OJT. (W)

Response: The majority of OJT is conducted in accordance with individual department training procedures. Instrument and Control, Chemistry and Health Physics, and Reactor Engineering and Computer Department training procedures have specific forms for such documentation. The training procedures for the other plant departments are being reviewed and will be revised as necessary to require OJT to be documented in a similar manner. This will be accomplished by March, 1982. OJT will be better documented with the centralization of department training records.

Item 2.a.(2)(g) Written initial training and retraining programs, including classroom lectures on plant systems, had not been developed for auxiliary operators. A 10-week auxiliary operator training program was developed by the Operations Department and presented to a group of new auxiliary operators for the first time in early 1981. Interviews revealed this program was enthusiastically received by the plant staff. However, this

program was not described in written procedures to ensure its continuation. Several employees expressed concern that the 1981 course would be a one-time-only endeavor and not made available for auxiliary operators hired in the future.

Interviews revealed several auxiliary operators had been in the auxiliary operator classification for several years without participating in a formal re-training program. DP 0160, Non-Licensed Operator Training Program, Revision 3, stated that operators were encouraged to attend all pertinent lectures given during the licensed operator retraining lecture series. Interviews with auxiliary operators revealed that they had not participated in this type of training. (W)

Response: The 10-week auxiliary operator course was given to train eight new auxiliary operators hired to meet the July, 1982, NRC-mandated requirements. Since auxiliary operators are usually hired on a one time basis for replacements, it is not practical or necessary to repeat the program. Two replacement AO's have been hired since the completion of the program. The two are receiving OJT and will also complete the Reactor Technology portion of our present hot license program.

AO retraining will continue to be conducted under DP 0160, "Non-Licensed Operator Training" except during the next licensed operator retraining cycle. Content and scheduling during this cycle will be modified to include some portions of the ongoing licensed operator retraining program. Vermont Yankee believes that the successful completion of the present hot license program will allow for more flexible shift scheduling.

Item 2.a.(2)(h) Lesson plans had been written for the majority of the sessions conducted during General Employee Training. This included subject areas such as new personnel indoctrination, quality assurance, fire protection, safety, first aid, health physics, and security. However, lesson plans had not been written to cover emergency plan training. (W)

Response: The Training Department is currently writing lesson plans to cover emergency plan training and will have them completed by October 30, 1981.

Item 2.a.(2)(i) The present training facilities and office space for the Training Department staff were cramped, noisy, and inadequate. The lack of proper training facilities was a distraction during lecture sessions. (W) The licensee had recognized the inadequate facilities; a new training facility was under construction and scheduled for completion in late 1981.

Response: The Training Department expects to move into a new training facility by October 15, 1981.

Item 2.a(2)(k) A written program had not been developed to conduct training on plant systems for departments other than operations. A 1-week course was offered in conjunction with the 1981 auxiliary operator training sessions to certain members of the plant staff. However, only a limited number of day shift workers attended the course. A schedule had not been established for future courses. Interviews revealed that the lack of training on plant systems for non-operation personnel had been a chronic problem for the past several years. (W)

Response: The Training Department currently plans to offer this course annually. Scheduling will be arranged so that on-site people can attend. A complete course description and implementation memo are on file in the department.

Quality Assurance Audits:

Weaknesses in the program included lack of management direction and guidance, failure to assess the effectiveness of the audit program, a high turnover rate in audit personnel, and the failure to implement an effective auditor training program.

Response:

While Yankee Atomic Electric Company (YAEC) takes issue with many of the specific alleged weaknesses in its audit program, it is acknowledged that there is room for improvement.

Following completion of the management appraisal inspection, YAEC restructured its Quality Assurance Organization. A Director of Quality Assurance was appointed, having responsibility for both the Operational and Construction QA groups. This integrated department provides for an interchange of information and expertise between the two groups. The Director of Quality Assurance will provide a new perspective to the implementation of the Operational Quality Assurance program, a management position dedicated to overall corporate quality assurance and more active management participation in the direction and control of quality assurance programs.

The audit program will be expanded, as practicable, in 1982 to include an assessment of the effectiveness of the program in areas audited. While technical areas are being audited, qualified technical personnel will be selectively utilized to perform the effectiveness assessment and to assist the OQA staff in the audit as deemed necessary.

A study of problems associated with staff stabilization is in progress. As you well know, based on your own experience, any further commitment on the subject at this time would be speculation.

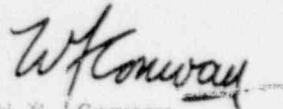
In an attempt to enhance the established, in-house training program, YAEC is currently investigating the merits, including cost effectiveness, of vendor supplied training in the area of QA. OQA is also evaluating a program, which would include the use of selective training tapes and technical training courses, which could be used for indoctrination and training of junior grade personnel.

Scheduled meetings of the OQA staff have been reinstated for the purpose of providing increased management, direction and guidance.

We trust that the information provided above is responsive to your request, however, should you desire additional information, do not hesitate to call.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION



W.F. Conway
President and
Chief Operating Officer