

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

Region I

Report No. 50-293/80-14
Docket No. 50-293
License No. DPR-35 Priority -- Category C
Licensee: Boston Edison Company
800 Boylston Street
Boston, Massachusetts
Facility Name: Pilgrim Nuclear Power Station
Inspection at: Plymouth, Massachusetts
Inspection conducted: April 8-11, 1980
Inspectors: *D.L. Caperton for* 5/9/80
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Section No. 1, RO&NS Branch

Inspection Summary:

Inspection on April 8-11, 1980 (Report No. 50-293/80-14)

Areas Inspected: Routine, unannounced inspection of training, including general employee training, licensed operator requalification training and on-the-job training for plant staff. Plant tours were made on day and evening shifts. An OSHA exit meeting was attended. The inspection involved 78 inspector-hours by four regionally based NRC inspectors.

Results: Of the three major areas inspected, no items of noncompliance or deviations were identified in two areas. One apparent item of noncompliance was identified in the remaining area (Deficiency - Failure to keep records as required by licensee's training manual - Paragraph 2.b).

DETAILS

1. Persons Contacted

- *E. Cobb, Operations Supervisor
- F. Giardiello, Instructor
- *C. Mathis, Methods, Compliance, Training Group Leader
- *P. McGuire, Station Manager
- W. Olsen, Senior Nuclear Training Specialist
- *W. Stephany, Nuclear Training Specialist
- *R. Machon, Assistant Station Manager

*denotes those present at the exit meeting on April 11, 1980.

The inspectors also interviewed other licensee employees and contractor personnel during the course of this inspection. They included engineers, licensed operators, maintenance and clerical staff members.

2. Requalification Training

References: 10 CFR 55, Appendix A

Pilgrim Nuclear Power Station Training Manual, Rev. 3,
5/13/78

a. Training Program

The program was reviewed to verify that it includes the following:

- an established, pre-planned lecture series conducted on a regular and continuing basis with documentation of lecture attendance;
- required reactivity control manipulation or supervision of these activities;
- an annual written examination;
- systematic observation and evaluation of performance;
- review of changes in facility design, procedures and license conditions.

The requalification training program as described and implemented appeared to meet past regulatory requirements.

The inspector selected four lectures at random and reviewed the lesson plans or lecture outlines for these: radiation protection, reactor physics, radiation emergency plan, loss of d-c buses and plant administrative controls.

An internal Quality Assurance Department Audit, 79-29, Training and Qualifications, dated September 27, 1979, identified improvements which had been or could be made to the Training Manual; the response to this audit finding was commitment to revise the Training Manual by May 1, 1980. The inspector verified that this revision effort was underway. However, a letter to the licensee dated March 29, 1980, "Qualifications of Reactor Operators", requires further changes to the requalification program. Licensee representatives committed to include those requirements in the revision to the Training Manual which is in progress, and to complete the revision by August 1, 1980. This will be an area for followup inspection (293/80-14-01). The Audit also identified needs for increased training staff; a new Training Specialist reported three weeks prior to this inspection and another is expected in a few weeks. Staff needs will be further examined in light of new program requirements.

Discussions with the training staff and with operators identified the need for and commitment to provide training for the plant operators regarding the extensive plant modifications made during the current refueling outage. The Plant Design Change Requests are to be reviewed and placed into one of three categories for training purposes:

- (1) document acknowledgement reading list
- (2) on-shift discussions
- (3) formal classroom presentations.

These training categories would then be used to train operators regarding plant modifications prior to restart from the current outage. Licensee management reaffirmed this commitment for operator training on plant modifications prior to restart; this will be an item for inspector followup (293/80-14-02).

b. Record Reviews and Interviews

The inspector selected and reviewed the individual training records of ten licensed operators to verify that each contained the following documentation:

- annual written examinations and answers
- attendance at required lectures
- results of performance evaluations
- reactivity control manipulations
- documentation of self-study

Satisfactory records for the requalifications requirements of Appendix A to 10 CFR 55 were made available. However, the Pilgrim Nuclear Power Station Training Manual requires a summary record to be kept on Form 0-3, PNPS Licensed Operator Requalification Summary. The licensee was deficient in recording the requalification examination results for the examination administered in the spring of 1979 on the forms and in documenting on the form the annual review of the training record for each licensed operator by the Station Manager as required by paragraph 3.1.2.3.1 of the Training Manual. This failure to follow the approved Manual for record-keeping is considered to be an item of noncompliance (293/80-14-03).

Interviews were conducted with three licensed operators to verify that the records reflect training actually received. No discrepancies between interviews and records were noted.

One of the individuals whose records were reviewed had been removed from licensed duties for medical reasons, participated in an extensive individual requalification program and was subsequently re-licensed by the NRC.

The inspector had no further questions regarding requalification training.

3. General Employee Training

References: American National Standards Institute,
ANSI N18.1-1971

Pilgrim Nuclear Power Station Training Manual, Revision
3, 5/31/78

a. Program for Training

The training program includes radiation protection, security, quality assurance introduction, industrial safety and emergency plan orientation. The lesson plans for the training were reviewed. A combination of videotaped instruction and lecture is used.

The inspector attended a four hour training session being given to newly reporting station and contractor personnel. The areas covered during this General Employee Training (G.E.T.) included radiation protection, security and access controls, quality assurance, and safety precautions.

The inspector questioned the licensee concerning specific instructions concerning prenatal exposure and the information included in Regulatory Guide 8.13. The licensee stated that the information is provided separately to female personnel. The inspector noted that this information was provided in general during the G.E.T. lecture. The inspector spot checked records of female personnel to ensure that this specific training was given to them.

The inspector had no further questions in this area.

b. Program Participation

The inspector reviewed training records and conducted interviews with several individuals to verify that training is being conducted in accordance with the training manual, that the training is meaningful to participants and that records reflect training actually being received. Seventeen records were reviewed. Interviews involved the following:

- one employee with less than two years service
- one employee with more than two years service

- one contractor employee
- two females

The interviews substantiated the training records. The inspector had no further questions.

No items of noncompliance were identified.

4. On-the-Job Training

The inspector reviewed training records for fifteen individuals to verify that on-the-job training was being conducted in accordance with Chapter 3.0, Group Training of the Pilgrim Nuclear Power Station Training Manual. Records for the following classification of personnel were reviewed:

- auxiliary operators (rad waste)
- health physics technicians
- nuclear plant attendants
- health physics clerks
- chemistry technicians
- nuclear control technicians
- maintenance
- clerical

An interview was conducted with one of these individuals to verify that records reflected actual training received. The inspector had no further questions with regard to verification of training actually received.

Two of the fifteen individuals did not have the general indoctrination group checklist on file. They were:

- a. A health physics clerk who had been transferred from the Nuclear Engineering Department to a permanent position with the station's Nuclear Operations Department. The licensee has initiated changes to administrative controls to ensure that requirements such as initial on-the-job training and indoctrination are not overlooked as a result of interdepartmental transfers among corporate departments.
- b. A maintenance group duty supervisor was temporarily assigned to the station staff during the current outage. No general group checklist was on file at the station for this individual. Licensee representatives enumerated the additional administrative restraints which controlled this person's activities while on site.

The area of initial on-the-job group training required of station personnel (including interdepartmental transfers, temporary assignees and new staff) will be reviewed in subsequent inspections (293/80-14-04).

5. OSHA Inspection

During the course of the inspection, the inspector attended an exit meeting between Boston Edison Company and the Department of Labor, Occupational Safety and Health Administration (OSHA). The inspector determined the concerns expressed by the OSHA representatives were outside the regulatory scope of the USNRC; and therefore, did not require followup by the inspector.

6. Facility Tours

On several occasions during the inspection, tours of the facility were conducted which included portions of the Turbine Building, Reactor Building, Control Building, Security Guard House, and Security Fence. During the tours, the inspector discussed plant operations and observed housekeeping, radiation protection measures, and process monitoring instrumentation for compliance with Technical Specifications. In addition, the inspector observed control room operations on both day and evening shifts for control room manning, shift turnovers, and facility operation in accordance with administrative and Technical Specification requirements.

No items of noncompliance were identified. However, the inspector expressed concern with degradation of housekeeping in general throughout the facility and stated that housekeeping will be reviewed during future inspections of the facility.

7. Exit Interview

The inspector met with management representatives (identified in Paragraph 1) at the conclusion of the inspection on April 11, 1980. The purpose scope and findings of the inspection were presented at this meeting.