



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

November 10, 1989

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington DC 20555

Dear Sir:

Overall Assessment of Trojan Training Programs

On May 10, 1989 an enforcement conference/management meeting was held in the Nuclear Regulatory Commission (NRC) Region V Office to discuss NRC concerns developed as a result of a Security Team Inspection held at Trojan from March 29 through April 5, 1989 (50-344/89-02). A specific condition that required further evaluation was the overall assessment of Trojan training programs, based on the examples raised in the security officer firearms proficiency area.

Portland General Electric Company has reviewed the Trojan training programs, including the security training program, with respect to maintaining student proficiency during training intervals. The results of this review are presented in the attachment.

Sincerely,

Attachment

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith  
State of Oregon  
Department of Energy

Mr. R. C. Barr  
NRC Resident Inspector  
Trojan Nuclear Plant

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### Security Training

By letters dated August 28, 1989 and September 21, 1989 [in response to a Notice of Violation associated with Nuclear Regulatory Commission (NRC) Inspection Report No. 50-344/89-02] Portland General Electric Company (PGE) discussed upgrades to the Trojan weapons qualification program. These changes are being incorporated into the Trojan Security Force Training and Qualification (T&Q) Plan (PGE 1024) and will be submitted to the NRC once issued.

In addition to the improvements made to the weapons qualification program, the overall Security Training program has been reviewed with respect to the weapons proficiency concerns. The T&Q Plan was systematically reviewed and revised to ensure that required information is stressed during training. The Plan will either meet or exceed all commitments with the clearly defined intention of producing well-trained security officers. Enhancements have been made in other areas of Security Training, as discussed below.

- Two training assistants have been added to the Security Training staff, both of whom have successfully completed the Institute for Nuclear Power Operations (INPO) accredited Initial Instructor Course. The additional resources have made it possible to implement several new programs.
- New Supervisor Correspondence Course Programs are voluntary self-study courses for shift supervisors to participate in while on-shift. The goal is for all shift supervisors to complete one course per month, resulting in a supervisory staff that is well-versed in current security procedures and practices.
- A Security Training individual has attended a tactical response force deployment seminar to assist in developing and implementing a tactical exercise program. This program is envisioned to include decision making and deployment of security response personnel for varied tactical scenarios.
- Security Personnel are retrained and requalified at least every 12 months to perform assigned job tasks for both normal and contingency operations. The certification program may include classroom instruction or be performance-based to demonstrate the ability to complete tasks as described in the Trojan Security Force Training and Qualification Plan.
- In order to keep the training program up to date and responsive to changing operational functions, a Security Training Development Recommendation (STDR) Program is in place. The STDRs are utilized to document and provide for the evaluation and tracking of concerns

related to training. A recommendation can be made to update training programs and materials based on identified errors, changes to security procedures, etc., or to incorporate lessons-learned from operational experiences or incidents. In addition to the STDR program, the Security Training staff utilizes the Security Training Action Report, which documents training conducted by the on-shift Supervisory Teams, on a routine basis. These reports are used to evaluate and make improvements to the Security Training program.

- A project is also in progress to review all security lesson plans and tests and revise them as needed to make the knowledge areas more challenging to the student.
- Supplemental "live" presentations to the General Employee Training Program for Security are now conducted on a routine basis. The live presentations cover a wide variety of security-related issues and have had a measurable impact on reducing Security events and incidents.

#### Trojan Training

The Trojan Training Department has completed an overall assessment of their training programs to identify and correct, as necessary, any conditions similar to those identified in the security officer firearms training program. This review has not identified any problem areas. The results of the review are detailed below.

The review focused on three areas: ensuring that training programs have additional margin to the regulatory requirements, ensuring the student and program evaluation procedures identify job performance weaknesses, and ensuring that identified problems are adequately resolved.

The training programs administered by the Trojan Training Department are based on NRC requirements and PGE's commitment to the National Academy for Nuclear Training. The majority of the programs are regulatory requirements but the actual content and acceptance criteria are determined by PGE. One exception is the Licensed Operator Training program. Title 10, Code of Federal Regulations, Part 55 provides specific criteria for the content as well as the acceptance criteria. PGE's requirements for passing have been modified to provide margin above the requirements. This provides us with the ability to identify the need for and provide additional training prior to reaching the criteria defined in the regulations.

Training programs conducted by the Trojan Training Department are evaluated in accordance with Training Administrative Procedure (TAP)-190 (Training Evaluation). This procedure provides for Course Completion Evaluations and for Performance-Based Evaluations. The Course Completion

Evaluation is completed by the student following the course and is designed to provide feedback on the course content and conduct.

Performance-Based Evaluations are completed by the students and their supervisors after they have completed the program and have been assigned to their job for a period of time. This evaluation is designed to determine if the training was adequate for the individual to competently perform the tasks they are assigned to perform. If deficiencies are noted, a Training Development Recommendation (TDR) is initiated to determine the appropriate course of action to improve the training program. A TDR may also be initiated if performance or knowledge weaknesses are noted by an individual or a supervisor during normal work assignments.

The classroom and self-study portions of the training programs are evaluated by examination. The results of the examinations are reviewed to identify program and individual weaknesses. Corrective action is developed and implemented as appropriate. The on-the-job training/evaluation portion of the program is conducted by qualified job incumbents. The criteria for completion of the program requires the student to be able to perform the task without assistance. If problems are noted, a TDR can be initiated.

Certain tasks identified through training program analysis or by departmental supervisors are also reviewed on an annual basis to determine if additional training is necessary. The tasks reviewed may be selected based on observed deficiencies in performance of the task, upcoming job assignments, or the importance or difficulty of the task. This review is performed by the Training Advisory Committees (TACs). The TACs consist of supervisory personnel from training and other departments, and job incumbents. The TACs, in addition to selecting tasks for retraining, also determine the lecture content of the retraining programs.

The training programs are evaluated on an annual basis by the Nuclear Quality Assurance Organization. Results of these evaluations are used to make improvements to the programs. In addition, audits conducted within other departments, Human Performance Evaluation System evaluations, QA rover reports, and event reports are reviewed to identify any training deficiencies, and action is taken as appropriate.

The training programs accredited by the National Academy for Nuclear Training are reviewed to maintain their accredited status. This consists of a two year review by the Training Department with a report submittal to the Institute for Nuclear Power Operations (INPO), and a four year reaccreditation evaluation. The reaccreditation evaluation includes a full review by INPO that addresses all aspects of the program, and a subsequent review by the National Nuclear Accrediting Board.