

## UNITED STATES NUCLEAR REGULATORY COMMISSION REGION V 1450 MARIA LANE, SUITE 210 WALNUT CREEK, CALIFORNIA 94596

October 12, 1989

Southern California Edison Company San Onofre Nuclear Generating Station P. O. Box 128 San Clemente, California 92672

Attention: Robert H. Bridenbecker, Vice President and Site Manager

Dear Mr. Bridenbecker:

Subject: Final Regualification Program Evaluation Report

During the period of August 15, 1989 through September 1, 1989, the NRC conducted an evaluation of the San Onofre Unit 2/3 Operator Regualification Program. The evaluation was based on written and operating examinations administered in accordance with NUREG-1021, ES-601, Revision 5, "Administration of NRC Regualification Program Evaluations."

The purpose of the evaluation was to determine the effectiveness of the San Onofre Unit 2/3 Operator Requalification Program and to evaluate individual operators for renewal of their six year term licenses. Twenty licensed operators representing five operating crews were evaluated. Additionally, each crew's team performance was evaluated in an operational setting.

Details and findings of the evaluation are contained in the Examination Report, which is Enclosure (1) of this letter. As specified in NUREG-1021, ES-601, the program may be evaluated only as "satisfactory" or "unsatisfactory."

Based on the NRC evaluation, conducted in accordance with ES-601, the San Onofre Unit 2/3 Operator Regualification Program is satisfactory. However, two findings of particular concern were identified.

The first finding is that the majority of the operators examined exhibited a weak performance in the area of <u>normal operations</u>. This was particularly evident in the results of the written examinations. Twelve operators performed at a level of below 80% in this specific functional area. Furthermore, some of the operators in this group scored less than 60%. Although the "normal operations" functional area is only a small portion of the overall program evaluation, it becomes significant when considering recent events involving operator error at your facility such as:

LER 89-004 (Unit 2) - "Core Protection Calculator Operability" LER 89-006 (Unit 3) - "Reactor Trip/Loss of Load", and LER 89-001 (Unit 3) - "Reactor Trip/Loss of U.P.S."

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Therefore, this finding augments our concern of your operating crews' ability to efficiently perform basic plant operations without challenging safety systems. Your management staff, identified in Enclosure (1), concurred with this finding and agreed to take immediate action to correct the program training weaknesses that contributed to this condition.

The second observation was that non-licensed operators routinely are permitted to operate the electrical panels in the control room without direct supervision. The Code of Federal Regulations, Part 10 CFR 50.54.j., requires that "apparatus and mechanisms other than controls" which may affect the reactivity or power level of the reactor shall be manipulated only with the "knowledge and consent" of a licensed operator or senior operator. Not all of your Auxiliary Control Room Operators (ACO's) are licensed. Also, it is not clear in your procedures or apparent in your operator training program that your licensed operators maintain "knowledge and consent" of ACO manipulations of safety related control room electrical switchgear. Your management staff, identified in Enclosure (1), committed to take immediate actions to ensure that all manipulations that may affect the reactivity or power level of the reactor are always performed by a licensed operator, or with the "knowledge and consent" of a licensed operator. Furthermore, they stated that all of your ACO's would be licensed within the next two requalification program cycles.

Nineteen of the twenty operator's individual performances were judged satisfactory by the NRC, and will be eligible for renewal of their six year term licenses. We understand that the individual identified by the NRC who failed the written portion of the examination was removed from licensed duties, remediated in the areas of weakness, and then returned to licensed duties consistent with the approved requalification program. The NRC will arrange to readminister a requalification examination for this individual, in the area of deficiency, within six months of the initial failure notification letter.

All five of the operating crews' performances were judged satisfactory by the NRC.

It is a requirement of 10 CFR 55.57(b)(2)(iv) that all applicants for license renewal must pass an NRC administered written and operating test during the term of a six year license prior to the renewal of the operating license.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and enclosure (1) will be placed in the NRC Public Document Room.

If our understanding of your actions in response to the two programmatic weaknesses and to the individual operator who failed the examination is incorrect, or if you should have any questions concerning this evaluation, please contact us.

Sincerely,

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Alfred E. Chaffee, Deputy Director Division of Reactor Safety and Projects Enclosure 1: Examination Report 50-361/0L-89-02 (w/Attachment A, Examination Security Agreements) Requalification Results Summary Sheets Enclosure 2: (ES-601, Attachments 16 and 17) Enclosure 3: Individual Regualification Examination Reports (ES-601, Attachment 18) Simulation Facility Report Enclosure 4: (ES-501, Attachment 3, Enclosure 5) cc w/enclosures (1), (2), (3), and (4): J. Reeder, Manager Nuclear Training, San Onofre, SCE R. Cross, RV (2 copies) cc w/enclosure (2) w/o Attachment A: J. Lanning, OLB-HQ cc w/enclosure (1) only: G. Wright, LOLB Project Manager, NRR J. Martin, RV B. Faulkenberry, RV A. Johnson, RV R. Zimmerman, RV A. Chaffee, RV D. Kirsch, RV L. Miller, RV P. Johnson, RV T. Meadows, RV P. Morrill, RV C. Caldwell, SRI B. Moffitt, PNL H. Ray, SCE D. Mette, SCE

L. Simmons, SCE

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Examination Report 50-361/OL-89-02 Enclosure 1: (w/Attachment A, Examination Security Agreements) Regualification Results Summary Sheets Enclosure 2: (ES-601, Attachments 16 and 17) Individual Regualification Examination Enclosure 3: Reports (ES-601, Attachment 18) Enclosure 4: Simulation Facility Report (ES-501, Attachment 3, Enclosure 5) cc w/enclosures (1), (2), (3), and (4): J. Reeder, Manager Nuclear Training, San Onofre, SCE R. Cross, RV (2 copies) cc w/enclosure (2) w/o Attachment A: J. Lanning, OLB-HQ cc w/enclosure (1) only: G. Wright, LOLB Project Manager, NRR J. Martin, RV B. Faulkenberry, RV A. Johnson, RV R. Zimmerman, RV A. Chaffee, RV D. Kirsch, RV L. Miller, RV P. Johnson, RV T. Meadows, RV P. Morrill, RV C. Caldwell, SRI B. Moffitt, PNL H. Ray, SCE D. Mette, SCE L. Simmons, SCE an A chaffe 06 REGION V LMiller. PJohnson DKirsch TMeadows/nw PMorrill 10/6/89 10/10 /89 10/6/89 10/5/89 10/4/89 REQUEST COPY REQUEST COPY REQUEST COPY REQUEST COPY REQUEST COPY / NO YES TNO NO YES NO YES NO YE8 com totan may tet SEND TO PDR RZimmerman YE8 NO 10/1/89 Culdwel DO NOT SEND ENCLOSURES 10/25/8% 2 AND 3 TO PDR YES /NO