

YANKEE ATOMIC ELECTRIC COMPANY

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October 27, 1989
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BYR 89-155

United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406

Attention: Mr. Robert M. Gallo, Chief
Operations Branch
Division of Reactor Safety

Reference: (a) License No. DPR-3 (Docket No. 50-29)
(b) USNRC Letter to YAEC dated August 23, 1989,
Requalification Examination Report No.
50-029/89-03(OL-RQ)

Dear Sir:

Reference (b) documents the results of the NRC requalification examinations administered on June 20-30, 1989. The report identified a concern pertaining to the potential correlation of failures with the position of Shift Supervisor. The following provides our assessment and response to this concern.

Our assessment encompassed the personnel, procedures, training, and all aspects of the evaluation process in search of attributes which might identify generic weaknesses in our program. Three areas for improvement were identified and further analyzed to determine if they represented knowledge or administrative deficiencies. All three were administrative.

The first area for improvement, procedural adequacy, had previously been identified and was (is) being actively pursued. With the advent of new Emergency Operating Procedures (EOPs), which are written in a very comprehensive style, it became apparent that the normal operating procedures have relied too heavily on operator knowledge. As indicated in the examination report, Yankee has established an Operations Support Group specifically designed to revise and maintain the normal operating procedures in a comprehensive and integrated form.

A second area for improvement, examination skills, emerged from our study of potential time dependent training factors. Recently licensed personnel generally displayed better examination taking skills than the

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"older" licensees. Even though they understand the accuracy and fairness of the new, more specific examination format, the older licensees still tend to revert to an earlier, more general style of answering questions. This reflects their previous examination successes, which were based on broad spectrum knowledge, but detracts from their ability to demonstrate specific knowledge.

The third area for improvement, procedure familiarity, is also a time dependent training factor. Recently licensed operators retain a strong, tactile sense of procedures familiarity which stems from on-the-job performance. With time and advancement, however, the senior licensee's familiarity matures to the more conceptual perspective of a supervisory role. When combined with the examination skills described above, this conceptual perspective serves to make the Job Performance Measures (JPM) demonstrations a particular challenge for the older operators.

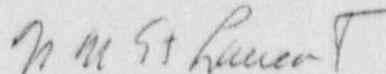
Corrective actions to improve the second and third areas have been incorporated into the training programs. Presentation format in the requalification programs has been modified from a systems basis to a situational basis. While not altering our systematic approach to training, this technique is more in line with the present evaluation process, uses higher order learning objectives and results in greater familiarization with operating procedures. In addition, the number of walkthrough (JPM) examinations, which focus on procedure familiarity and provide immediate remediation, will be significantly increased.

To address the immediate and specific needs of the three Shift Supervisors in question, each case was analyzed and a specific corrective action plan developed. Each plan included both short term and long term remedial training and re-evaluations. After completing their respective short term curricula, each Shift Supervisor was successfully re-evaluated and returned to normal duties. Each is currently engaged in a long term program to monitor the continued success of these plans.

We trust you will find this submittal satisfactory; however, should you desire additional information, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY



N. N. St Laurent
Acting Manager of Operations

cc: [3] NSARC Chairman (YAEC)
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