

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

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STATE

In Reply Refer To:  
Docket No. 50-298/80-13

November 13, 1980

Nebraska Public Power District  
ATTN: Mr. J. M. Pilant, Director  
Licensing and Quality Assurance  
P. O. Box 499  
Columbus, Nebraska 68601

U.S. NRC  
DIST. DIVISION SERVICES  
BRANCH

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Gentlemen:

Thank you for your letter of October 16, 1980, in response to our letter and Notice of Violation dated September 24, 1980. As a result of our review, we find that additional information is needed. Specifically, we continue to feel that you were in noncompliance as specified in Item A of the above Notice of Violation and you are requested to respond within 20 days of the date of this letter with a written statement indicating the corrective steps which will be taken to ensure that your requalification program will, in the future, be implemented on a continuing basis.

While we can appreciate the impact of plant activities on requalification training, we feel our position in this matter is not without merit. One function of the requalification training program is to identify those areas of operator knowledge that are deficient and to provide retraining activities in these areas in a timely fashion. We interpret the intent of the word 'continuous' in Appendix A to 10 CFR 55 to mean that the period between the time an individual has demonstrated a weakness in an area and that point in time where the weakness is corrected should be minimum. Please note that it is the purpose of 10 CFR 55 to assure that the operators have a level of comprehension to perform adequately in any and all operational occurrences. Your reference to the average grade on the annual examination being acceptable is correct; however, in Section III.B of your approved requalification program you establish that 80% correct is the acceptable score in each category. Our review of the results of the 1980 examination revealed that several operators scored less than 80% in a number of categories. These weaknesses should have been corrected in a timely manner as indicated above.

We continue to feel that you were in deviation from your commitments made in your approved requalification program. In your letter you note that you do not consider that the area of "Station QA program as related to station

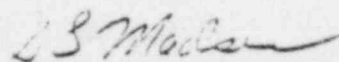
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November 13, 1980

operations" must be specifically covered on annual exams. However, your approved requalification program states, "A planned lecture series shall be presented covering, as a minimum, those areas [as listed in the requalification program] where annual examinations indicate a need for additional training." The requalification program states that the area "Station QA program as related to station operations" will be one of the areas included in the program and thus should have been covered in the annual exam. In a subsequent inspection, we will review your QA retraining program and verify that all operators have received the training and have been examined on the material. Further, we recognize that the area of "Station QA program as related to station operations" is not an area addressed in 10 CFR 55, Appendix A. You have the option of removing your commitment to include this area in your annual operator requalification examination, provided you comply with the requirements of 10 CFR 50.54, paragraph i-1.

If you have any further questions regarding this issue, we would be pleased to discuss them with you.

Sincerely,



G. L. Madsen, Chief,  
Reactor Operations and  
Nuclear Support Branch