

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

IE Inspection Report No. 50-313/80-12
50-368/80-12

Docket No. 50-313
50-368

License No. DPR-51
NPF-6

Licensee: Arkansas Power and Light Company
P. O. Box 551
Little Rock, Arkansas 72203

Facility Name: Arkansas Nuclear One (ANO), Units 1 and 2

Inspection At: ANO Site, Russellville, Arkansas

Inspection Conducted: June 17-20, 1980 and July 14-18, 1980

Inspectors: M. I. Aneshansley 10/2/80
M. I. Aneshansley, Reactor Inspector Date

S. R. Dean _____ Date
S. R. Dean, Reactor Inspector

J. E. Gagliardo 10/3/80
J. E. Gagliardo, Chief, Nuclear Support Section Date

N. P. Jaudon 10/2/80
N. P. Jaudon, Reactor Inspector Date

Reviewed by: J. E. Gagliardo 10/3/80
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Approved by: D. M. Hunnicutt 10/21/80
D. M. Hunnicutt, Chief, Reactor Projects Section #2 Date

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Inspection Summary:

Inspection Conducted During Period of June 17-20, 1980 and July 14-18, 1980
(Report No. 50-313/80-12 and 50-368/80-12)

Areas Inspected: Routine, unannounced inspection of licensee action on previous inspection findings; licensee internal audits; quality assurance program for procurement, receipt, handling and storage of material; maintenance records; licensed operator requalification program; fire brigade training; general training; and training records. The inspection involved one-hundred-fifty-seven (157) inspector-hours on site by four (4) NRC inspectors, and four (4) hours at the licensee's corporate offices by one inspector.

Results: Of the eight (8) areas inspected, no items of noncompliance or deviations were found in four (4) areas; four (4) apparent items of noncompliance were found in four (4) areas (infraction-failure to take prompt corrective action, paragraph 2; infraction - requalification training program requirements not met, paragraph 6; infraction - fire brigade training not complete, paragraph 7; deficiency - failure to maintain records, paragraph 9).

1. Persons Contacteda. Arkansas Power and Light Company

D. Arnold, Chemist
 B. Baker, Operations Superintendent
 *B. Bata, Quality Assurance Engineer
 #W. Cavanaugh, Vice President, Generation and Construction
 G. Charles, SRC Secretary
 J. Constantin, Lead Training Coordinator, Unit 2
 J. Crow, Stores Supervisor
 *F. Foster, Operations and Maintenance Manager
 *J. Garnett, Material Management Supervisor
 T. Green, Lead Training Coordinator, Unit 1
 J. Griffin, Manager of Nuclear Operations
 #*L. Humphrey, Plant Administrative Manager
 P. Jones, Maintenance Supervisor
 *J. Killingsworth, Training Coordinator, General Office
 D. Lach, QA Engineer
 J. Lovett, Assistant Engineer, Mechanical
 #B. Morehead, Director, Administrative Services
 B. Neal, I&C Supervisor
 #*J. O'Hanlon, ANO General Manager
 V. Pettus, Assistant Maintenance Superintendent
 *J. Ray, Quality Control Engineer
 #*R. Roderick, Human Resources Supervisor
 *L. Schempp, Manager of Nuclear Quality Control
 #*J. Shurgar, Manager, Generation and Construction Training
 D. Snellings, Technical Analysis Superintendent
 #*J. Vandergrift, Training and Counseling Supervisor
 T. Wilkins, I&C Technician

b. Bechtel

J. Driggs, Quality Control Engineer
 J. Pugh, Welding Engineer

c. The inspectors also contacted other plant personnel including operators, technicians and administrative personnel.

*Denotes presence at exit interviews.

#Denotes presence at the management meeting in Region IV offices on August 11, 1980.

2. Licensee Action on Previous Inspection Findings

(Open) Noncompliance (313/79-16-05; 368/79-14-04): Training Program Inadequacies and Failure to Implement the Program. The program implementation failures involved:

- No documented on-the-job training (OJT) for selected maintenance group personnel.
- No technical training for a selected maintenance mechanic.
- No QA indoctrination for two employees.
- No systems training for four maintenance personnel.

The inspector found that some technical training had been provided to the maintenance mechanic and the QA indoctrination had been given to the two employees.

Two of the three maintenance mechanics previously reviewed had received documented OJT in areas such as crane operations, rigging, centrifugal pumps, manual valves, and familiarization with blueprints. The third mechanic had received no documented OJT. Two of three maintenance electricians had received no documented OJT. The third electrician had only one documented OJT activity (Operation of Small Mobile Crane). The I&C technician previously reviewed had received no documented OJT. It is noted that in the licensee's response* to this item of noncompliance no commitment was made regarding the OJT problems and the corrective action to be taken.

During interviews with training staff members, the inspector found that the licensee had not initiated the systems training required of maintenance and I&C technical support personnel. The licensee had committed (in his response to the noncompliance) to begin the systems training in the first quarter of 1980.

The program inadequacies of this noncompliance involved a lack of retraining requirements for a number of employee groups and a failure to provide means for evaluating the effectiveness of the training program.

In the licensee's response to the noncompliance, he stated that revisions to the training system were underway and that a procedure was being developed specifically to define training procedures including retraining requirements for all employees. The response also stated that the procedure would identify methods for evaluating the effectiveness of the training. The response did not, however, identify a date when the program and procedures would be completed.

The inspector found that the licensee had in the final draft form a procedure (No. 1000.15) entitled "Station Training Program," which described the overall training program and established general requirements and methods for conducting training. This procedure was undergoing management

*Letter D.C. Trimble (AP&L) to K.V. Seyfirt (RIV), dated January 2, 1980.

review and was scheduled to be issued in late July or early August 1980. Procedure 1000.15 referenced a procedure (No. 1023.01) entitled "Training Program Implementation" which would provide detailed training requirements for specific positions/jobs. Procedure 1023.01 was being drafted by the training staff and was scheduled to be prepared for initial review by July 21, 1980. Considering a normal review process of about three weeks this procedure would not be issued until mid-August 1980.

Criterion XVI of 10 CFR 50, Appendix B states that measures shall be established to assure that conditions adverse to quality such as deficiencies and nonconformances are promptly identified and corrected. This requirement is amplified by Section 16.2.3 of the licensee's Quality Assurance Manual which requires that the corrective action for deficiencies and nonconformances shall be prompt and shall prevent recurrence of the nonconformance. Criterion V of 10 CFR 50, Appendix B states that activities affecting quality shall be prescribed by documented instructions and shall be accomplished in accordance with these instructions.

The licensee's failure to take prompt action to correct the above non-compliance identified during inspection 313/79-16-05 and 368/79-14-04, (conducted in August 1979) constitutes an apparent item of noncompliance (313/80-12-01; 368/80-12-01).

Licensee representatives argued that it was very difficult to completely revise their training program in the current environment brought on by the many changes imposed on licensees due to the TMI-2 accident. The inspector's position, however, was that the licensee should have at least implemented interim measures to attempt to satisfy the training requirements of their current program while the new program was being developed.

(Open) Noncompliance (313/79-15-05): Requalification program requirements not met. This item of noncompliance involved the licensee's failure to give three lectures required by the requalification program and to complete the annual performance evaluation of a licensed operator. The inspector found that the missed lectures had been given and the performance evaluation had been completed. The revision to the training program and the development of an evaluation status log had not been completed as committed in the licensee's response* to this noncompliance. The licensee's failure to take prompt corrective action to prevent recurrence of this noncompliance is a second example of the apparent item of noncompliance against Criterion V of 10 CFR 50, Appendix B as cited above (313/80-12-01; 368/80-12-01).

*Letter D.C. Trimble (AP&L) to G. L. Madsen, dated September 14, 1979.

(Closed) Noncompliance (368/79-14-07): SRC's Failure to Audit Non-licensed Training. The inspector verified that an SRC audit of non-licensed training was performed in October 1979 (See paragraph 3 of this report). The inspector also reviewed the SRC Audit Schedule, dated June 26, 1980, and verified that staff training and qualifications had been included as a future audit item. This item is closed.

(Closed) Unresolved Item (313/78-15-12): SRC review of all violations. The inspector verified that the SRC secretary had a tickler system to assure that all NRC inspection reports and all LER's were reviewed by the SRC. QA audit finding reports, QC inspection reports and ANO nonconformance reports are screened by the QA Manager and those which involved violations were forwarded to the SRC for review. The QA Manager had no tickler system to assure that all NRC inspection reports and all LER's are reviewed by the SRC. QA Audit Finding Reports, QC Inspection Reports and ANO Nonconformance Reports are screened by the QA Manager and those which involved violations were forwarded to the SRC for review. The QA Manager had no tickler system to assure himself that all of the above reports are received for his screening, but he said that he did review them to assure that none were missed. This item is closed.

(Open) Unresolved Item (313/78-04-02): Air handling system for Unit 1 fuel handling area not on the Q-List. The inspector found that the Q-List had not been revised to include the subject air handling equipment. The inspector was shown a Document Review Sheet which was prepared to effect the Q-List changes and would be reviewed at the next SRC meeting. The Q-List changes included a listing for the exhaust fan, system filters, vent ducts, and duct supports. This item will remain open until the proposed Q-List changes are approved and issued.

(Closed) Unresolved Item (313/79-16-01; 368/79-14-01): Safety Evaluations for Jumpers and Bypasses on Operating Systems. The licensee had issued a new procedure (No. 1000.28) entitled "Jumper and Lifted Lead Control," which required a safety-evaluation for all temporary modifications to safety systems not previously reviewed by the PSC. This item is closed.

3. Licensee Internal Audits

The inspector reviewed the report of an audit performed by a member of the Safety Review Committee (SRC) in the area of training in October 1979. The report identified six items which required corrective action. The six items which were categorized as deficiencies included:

- No training file for a number of employees;
- Education and college training records not in the training file;

- No documentation of Industrial Safety Training for most of the plant personnel;
- Several employees had not received Quality Assurance Program training;
- No documentation of training on the Emergency Plan; and
- Five members of the emergency security and evacuation team had not received any formalized training in fifteen months or longer.

The audit report also included two recommendations for improvements in the program.

The licensee had taken action to correct all but the second and third deficiencies listed above. These items were scheduled for completion on July 30, 1980.

4. Quality Assurance Program for Procurement, Receipt, Handling, and Storage of Material

The inspectors reviewed the licensee's implementation of the Quality Assurance Program for procurement, receipt, handling and storage of materials to verify conformance with regulatory requirements as defined by 10 CFR 50, Appendix B, Arkansas Power and Light Company Quality Assurance Topical Report (revision 4), ANSI N45.2.13-1976, ANSI N45.2.2-1972, and Regulatory Guide 1.38. The Arkansas Power and Light Company's Revision 5 to the Quality Assurance Topical Report was accepted by the NRC on May 2, 1980. The licensee committed to update and revise procedures and instructions implementing revision 5 of the licensee's QA Topical Report by November 2, 1980.

Procurement

The inspector noted and discussed with licensee management the fact that procurement procedures did not require an engineering or technical review of material specifications delineated on requisitions.

- . The licensee's administrative procedures allow any member of the plant staff to initiate a requisition for safety-related material.
- . The requisition originator is responsible for determining the appropriate specifications - either original, equivalent, or better.
- . The licensee's program required several reviews of a requisition; however, the program does not designate a mechanism for a technical review of procurement specifications.

The licensee acknowledged this weakness and committed to incorporate review guidance in a procedure that was in draft form and scheduled to be implemented by November 2, 1980. This item will remain open pending implementation of the new procedures (Open item 313/80-12-02; 368/80-12-02).

Receipt and Control of Material

One instance of improper safety-related material being issued for use was identified. The inspector's investigation of this occurrence revealed the following:

- . In September 1979, a problem with replacement seals for Reactor Coolant Pumps (RCP) was discovered, and as a result, quality assurance personnel visited the seal manufacturer in October 1979. This visit resulted in the identification of problems with the manufacturer and the corrective measures to be taken.
- . In May 1980, during a RCP seal replacement, safety-related material that was incorrectly identified (by the manufacturer) was issued for use. The mechanic performing the job identified that the parts were incorrect.
- . Review of the licensee's administrative procedures for verification and acceptance of material indicated that they comply with the guidance of ANSI N45.2.2 and ANSI N45.2.13; however, the attributes inspected at receipt inspection were found to be minimal for essentially all material received.

Control of Material

The inspector noted that the licensee's procedures did not address the control of certain safety-related material such as welding rods. The inspector noted that the licensee depended upon a contractor to control welding rods and to make all safety-related welds.

5. Maintenance Records

During the June segment of the inspection, the maintenance records for the replacement of Reactor Coolant Pump shaft seals for Unit 1 RCP's, "B" and "C" were reviewed. These records included Job Orders 1-4411-80-5 and 1-4418-80-5. The following concerns were identified:

- . Job Orders 1-4411-80-5 and 1-4418-80-5 indicated that the same shaft seal, serial 0313, was installed in the both pumps.
- . Management had reviewed Job Orders 1-4411-80-5 and 1-4418-80-5 and had determined that the records were complete and accurate.

- . AP&L quality control memo report ANO-80-2761 dated June 12, 1980, indicated procedural steps in the tear-down of RCP "B" seal were not being signed off as the work was done.
- . By interview, the inspector established the fact that the record of RCP seal replacement was not completed until more than a week after the work was completed.
- . Records of the shaft seal replacement on RCP's "A" and "D" were still "in review" and not readily available for inspection although the work on all four RCP shaft seals was accomplished within the same time frame.

Since accurate maintenance of records is required by 10 CFR 50, Appendix B, Criterion XVII, additional maintenance records were reviewed in the July 1980 portion of this inspection. The inspector found no other discrepancies in maintenance records; however, it was noted that the level of information recorded was so minimal as to make the details of most work performed or the actual identity of material used untraceable. It was noted that in those few instances wherein step-by-step work procedures were provided, signatures of the completion of each step were made on the file copy after the fact, not at the time the work was done or at the end of the shift on which the work was done.

6. Licensed Operator Requalification Program

The inspector reviewed the licensed operator requalification program for ANO Units 1 and 2. This review consisted of records review, interviews with operators and senior operators and discussions with the Lead Training Coordinators for both units and the Training and Counseling Supervisor.

Requalification Schedules

Requalification Training Schedules did not reflect the actual training given. As a result of an inspection conducted in July 1979, requalification training schedules were implemented; however, these schedules did not accurately reflect the training that was provided. In the category of Instrumentation and Controls, Unit 1 lectures were scheduled for November 21, 1979, November 28, 1979, December 5, 1979, December 12, 1979 and December 19, 1979.

Informal records maintained by the Unit 1 Lead Training Coordinator indicated that Unit 1 requalification lectures in the category of Instrumentation and Controls were actually conducted on November 14, 1979, November 21, 1979, November 28, 1979, December 5, 1979, December 12, 1979 and February 9, 1980.

No schedule changes were available to indicate a revision had taken place.

The inspector interviewed operators from Unit 1 and 2 to verify the status of scheduling of requalification training. The results are indicated below:

- Five operators indicated that requalification scheduling was inadequate because there was insufficient time to train and there was a deficiency in the number of people assigned as instructors.

Other statements from the operators interviewed included:

- "Effectively there has been no requalification training since the first of the year."
- "I have attended only two or three lectures over the past year."
- "I have not attended a lecture since I received my license in January."
- "A requalification schedule is needed to keep up with all the changes around here."

The requirement to conduct a preplanned and scheduled requalification program is contained in 10 CFR 55, Appendix A. This requirement is implemented at ANO through Technical Specification C.4.1 (both Unit 1 and 2). The licensee is in the process of developing specific guideline to implement these requirements. This item will remain open pending implementation of the new procedures (Open Item 313/80-12-03; 368/80-12-03).

Requalification Lectures

The inspector reviewed the 1979 requalification examination and results for ANO Units 1 and 2. The review included the mechanism that the licensee used to evaluate the examination and develop the requalification lecture series. Requalification lecture lesson plans were also reviewed.

The review of the 1979 requalification examination for Unit 1 indicated that four licensed operators had weak knowledge (i.e., exam grade less than 80%) in the category of Instrumentation and Controls. The requalification examination addressed the following subjects (in the category of Instrumentation and Controls):

OTSG Level Instrumentation

Control Rod Position Indications

Turbine By-pass Valve Controls
Nuclear Instrumentation
Reactor Coolant Temperature Element Failures
Condensate Pump Start Controls
ICS/BTU Limits
Decay Heat Suction Value Control

The requalification lecture given to correct the weakness of the operators in these areas was "Steam Line Break Instrumentation and Control." Further, one senior operator was given credit for "upgrading" in the area of Instrumentation and Controls by attending the simulator course. The simulator was not plant specific and the requirements for requalification training is that it be plant specific.

Two operators who participated in the Unit 2 requalification program and two operators who participated in the Unit 1 requalification program were identified as weak in the area of Instrumentation and Controls and attended the requalification lecture for this category; however, a re-examination was not given to verify that their knowledge level had improved to satisfactory.

Technical Specification 6.4.1 for both Unit 1 and 2 require requalification programs which meet or exceed the requirements of 10 CFR 55, Appendix A. 10 CFR 55, Appendix A requires that the requalification program include preplanned lectures on a regular and continuing basis throughout the license period in those areas where annual operator and senior operator written examinations indicate that scope and depth of coverage is needed in specific areas, including plant instrumentation and control systems. 10 CFR 55, Appendix A further requires that the requalification program include written examinations which determine licensed operator and senior operator knowledge of subjects covered in the requalification program.

The licensee's failure to provide requalification training in subjects identified as weak and the failure to re-examine individuals at the conclusion of this training constitutes an apparent item of noncompliance at the infraction level (313/80-12-04 and 368/80-12-04).

The licensee did not have formal lesson plans developed to support the requalification lecture series. Training coordinators for both units indicated that old lesson plans were available and were used as a guide for conducting requalification lectures. One operator interviewed stated that he had no knowledge of formal lesson plans and that in many cases the instructors relied upon the knowledge of the operators to complete lectures. Another operator stated that the quality of requalification lectures conducted by shift supervisors was, in most cases, better than

those lectures presented by the training department. He attributed this to a better working knowledge of the systems. This item will remain open pending implementation of the new training program which contains specific guidance in the area of requalification training lesson plans. (Open Item 313/80-12-05; 368/80-12-05)

Requalification Annual Examinations

The annual requalification examination for both ANO Units 1 and 2 had been given in a single version. The examination given in 1979 for Unit 1 required four and one-half months to administer to all individuals required to take the examination. The examination given in 1979 for Unit 2 operators required two and one-half months to administer. The 1980 examination cycle was started in May 1980 and was not completed as of July 16, 1980. The inspector found that the licensee had taken no special measures to prevent compromising the exam over the long time period in which it was given. This is an open item (313/80-12-06; 368/80-12-06) pending the licensee's review and resolution of this potential problem.

Licensed Operator Absent From License Duties for Greater Than Four Months

One licensed senior operator was absent from licensed duties for a period of four months. Retraining conducted for the operator included:

- . One week observation training on each unit.
- . One week simulator training on each unit.
- . Classroom Training.
- . Procedure and Procedure revision review.
- . Completion of the annual examination for each unit.
- . Oral examination by the Operations Superintendent.

This training appeared to be consistent with the licensee's FSAR commitments; however, no documentation could be found which indicated that the required observation training was completed on each unit. This item has been identified as an unresolved item (313/80-12-07; 368/80-12-07) pending the licensee's retrieval of the records to document this training.

Reactivity Control Manipulations

The inspector reviewed training records to verify that licensed operators were conducting at least ten reactivity control manipulations during the term of their license. It was determined that actual reactivity control manipulations for Unit 1 operators have not been routinely documented since 1978. Interviews with licensee personnel indicated that the requirement to conduct ten manipulations was met through the use of the simulator.

A review of the training records revealed that on March 6, 1980, one operator documented that he had performed five reactivity manipulations on a reduction in power from 80% to 30% (80% - 70%, 70% - 60%, 60% - 50%, 50% - 40%, 40% - 30%).

For one senior operator licensed on both units, no record of reactivity control manipulations could be found for his Unit 2 license. This item has been identified as an unresolved item (313/80-12-08; 363/80-12-08) pending the licensee's retrieval of the records of the control manipulations.

Annual Performance Evaluations

Appendix A to 10 CFR 55 requires a systematic evaluation and observation of the performance and competency of operators and senior operators be completed annually. The last performance evaluations for Unit 1 operators was completed in June 1979. One shift supervisor interviewed indicated that he had never seen an evaluation on his performance as an operator, did not know the areas in which he was being evaluated, and did not know how to perform an annual evaluation on the operators assigned to his shift. A random review of individual training records revealed that the most recent annual evaluation for one Unit 2 operator was dated April 28, 1979. This item is unresolved pending further review. (313/80-12-09; 368/80-12-09)

Operator Review of Abnormal and Emergency Procedures

10 CFR 55, Appendix A, requires each licensed operator and senior operator to review the abnormal and emergency procedures on a regularly scheduled basis. ANO has implemented this requirement in a memorandum dated August 4, 1978, from G. H. Miller to Group Supervisors. This memo required operators to review abnormal and emergency procedures semi-annually. The inspector reviewed ten individual training records to verify that these reviews were current. Interviews with operators indicated that they routinely completed the reviews and that this effort required from one shift to several weeks to complete. The results of the record review are listed below:

- . There was no review check sheet in the training record for one operator
- . Five training records did not contain the most current review check sheet.
- . Review check sheets in two training records were current but were incomplete.

The failure to provide records of abnormal and emergency procedure reviews is an example of the apparent item of noncompliance as discussed in paragraph 9 of this report.

Operator Interviews

The inspector conducted interviews with licensed operators from both Units to verify that the requalification training program had been properly implemented and to review immediate actions on emergency procedures. A significant portion of the findings from these interviews are stated in the paragraphs above. The remaining results are listed below:

- . Three operators could not correctly state the immediate actions of the turbine trip emergency procedure.
- . One operator could not correctly state the immediate actions of the Reactor-Turbine Trip emergency procedure.
- . Two operators could not specify the correct procedure for bypassing the SLBIC trip on a plant cooldown. One of the operators did not remember the SLBIC setpoints.
- . Two operators could not correctly describe the reasons for expected pressurizer level and pressure transients following a turbine trip.

Training on Facility Design Changes

10 CFR 55, Appendix A, requires each licensed operator and senior operator to be cognizant of facility design changes. The inspector reviewed records to determine that this training was accomplished. Design change training was conducted for Unit 1 on February 4-6, 1980, February 8, 1980 and February 15, 1980. The attendance records for these training sessions indicated that one licensed operator and six licensed senior operators did not attend design change training. No records of Unit 2 design change training were identified. The inspector will review this area during a future inspection to determine if those operators and senior operators who missed this training were excused due to job functions. Further, a detailed search will be made to locate Unit 2 records.

This item is unresolved. (Unresolved Item 313/80-12-10; 368/80-12-10)

7. Fire Brigade Training

Technical Specification for Unit 1, paragraph 6.4.2, requires that fire brigade training shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except that the frequency of training shall be six times per year.

The Technical Specifications for Unit 2, paragraph 6.4.2, are the same for fire protection training except that the frequency specified is quarterly.

The inspector found that fire brigade training for Unit 1 had not been conducted since January 1980, and for Unit 2, fire brigade training had not been conducted since February 1980. Thus this training was not being conducted at a frequency to meet the technical specification requirements.

This is an apparent item of noncompliance. (313/80-12-11; 368/80-12-11)

The inspector did note that fire prevention and fire fighting training were being pursued vigorously in areas other than training for the fire brigade. This was explained to the inspectors as resulting from the inability to make personnel from operations available for fire brigade training because of shortages in operations personnel.

8. General Training

Technical Specifications, paragraph 6.4.1, requires that the training program shall meet or exceed the requirements of Section 5.5 of ANSI 18.1. Section 5.5 of ANSI 18.1 states that the retraining and replacement training program shall maintain the proficiency of the operating organization. The "operating organization" as defined by ANSI 18.1 consists of onsite personnel concerned with day to day operation, maintenance and certain technical services. The inspector found that the ANO implementation of this requirement failed to address one element of general employee training as delineated in Section 5.4 of ANSI 18.1. This missing element was the requirement to provide general employee training in "appropriate plans and procedures." The inspector determined by interviews with members of the training staff that this requirement had in the past been left up to the discretion of the supervisors of the various groups. The inspector could not find any training records to indicate that training of this type had actually been given; the inspector therefore was unable to ascertain what ANO considered to be the minimum acceptable standard of training in this area (i.e., which procedures were covered). The inspector was told by members of the training staff that general employee training in appropriate plans and procedures would be included in the training instructions under preparation. The inspector found during interviews of non-licensed personnel an example of how failure to provide a minimum standard in this training could result in an unsafe condition. Specifically, one member of the technical support group discussed operation of a tagged (Hold Tagged) valve during chemistry sampling that was in violation of the licensee's HOLD and CAUTION tag procedure. The interviewee did not know that the procedure had apparently been violated. The operation of the tagged valve had purportedly been done under the direction of a Senior Licensed Operator. This will be considered an open item pending action by the licensee to establish minimum training requirements in this area and to implement them for all affected employees. (Open item 313/80-12-12; 368/80-12-12)

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The inspector interviewed approximately ten female employees selected at random; all had received training as required by Regulatory Guide 8.13. All had apparent knowledge of the potential consequences of radiation exposure to an unborn child; however, only one-half of those interviewed could describe a radiation warning sign or the markings/barriers used to warn personnel of a radiation area.

The inspectors reviewed the training program for quality assurance. The licensee recently made an effort to ensure that all personnel received an initial quality assurance indoctrination; however, there was no discernable program to maintain proficiency in quality assurance. Only one individual had been retrained in quality assurance and this was the result of a lost initial training record. 10 CFR 50, Appendix B, Criterion II requires that all personnel working in areas affecting quality shall receive indoctrination and training to assure suitable proficiency in quality related activities is achieved and maintained. Section 2.7 of the licensee's QA Manual for Operations requires initial QA indoctrination training but does not address periodic retraining requirements. This item has been identified as an unresolved item (313/80-12-13; 368/80-12-13) and will be referred to NRC management for resolution.

9. Training Records

During the course of the inspection the inspectors reviewed numerous records in the areas of operator requalification training and non-licensed personnel training.

Operator Requalification Records

The inspector reviewed individual training records (ANO file 14.0) and general requalification records (ANO file 14.0) and general requalification records (ANO file series 11.xx). In many cases records were difficult to locate, incomplete or did not exist.

In the area of individual training records, the inspector found the following:

- . Attendance at required requalification lectures was not documented in the individual training records.
- . The most recent annual examination for Unit 1 was not filed. The examination was completed in June 1979 and the completed examinations were on the training coordinators desk.
- . There was no documentation of additional training required to correct deficient areas noted on the annual examination.

A review of the general requalification records revealed the following:

- . Sixty Lectures were scheduled for the Unit 2 requalification

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training program and it was determined through interviews with licensee representatives that they were conducted. Documentation could be found for only twelve of the lectures.

Twenty-four lectures were scheduled for the Unit 1 requalification program and it was determined through interviews with licensee representatives that they were conducted. Documentation could be found for only seventeen of the lectures.

Several records filed were incomplete as indicated below:

- Six 1980 Lecture Attendance records did not indicate the length or duration of the training session.
- One 1980 Lecture Attendance sheet did not indicate who gave the lecture.
- Three 1980 Requalification Routing Sheets were not dated.
- Eight 1980 Requalification Routing Sheets were not initialed by all operators.
- Three 1980 Lecture Attendance Sheets were not signed.
- The due date was not complete on four 1980 Requalification Routing Sheets.
- The Instruction Block was not complete on two 1980 requalification Routing Sheets.

Non-licensed Personnel Training Records

Training records were not posted for four to six months after the training was completed. Until posted, a record of training given could only be obtained by a manual search of uncollated records located in the file room, the training department offices, or the department giving the training.

All training given was not documented correctly. For example, one individual interviewed claimed to have received respirator training during the summer of 1979, yet the latest computer printout available in the training department indicated this individual had not received respirator training. The computer printout, which was five months old (dated February 22, 1980) is the method by which this type of training was tracked at ANO so that personnel may be scheduled for retraining annually. In another case, an individual who received QA indoctrination training in March 1980, claimed during an interview that he had received this training previously. The inspector noted that this individual was the only person at ANO who had received retraining, although the training was inadvertent.

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Fire brigade training records for Unit 2 training conducted in February 1980, had been designated for filing in an incorrect file; thus this record of required training would not have been retrievable except by a complete file search.

On-the-job training records for I&C technicians were not filed or maintained. This fact was verified by interview with an I&C Supervisor.

An interview with a Maintenance Supervisor indicated that records of on-the-job training were no longer maintained for maintenance.

The inspector also noted that a Safety Review Committee audit conducted in December 1979, had pointed out that summaries of training for individuals often did not include all training given.

The inspector found that the system for filing training records was made up of several individual record systems. The records of general employee training (e.g., QA indoctrination, Health Physics, indoctrination, etc.) were put in a computer. Individual records were also filed in subject files. The computer printout was used to identify personnel requiring update training or who had not had training in a given category. Other training given was documented in subject files. The fact that an individual was given training was documented on magnetic cards in word processing equipment. Periodically, the individual records in word processing were printed out and the resulting summaries posted to individual records. Individual records also included some examination results; however, the inspector found that the specific requirements for training records for non-licensed personnel were delineated in a memorandum dated August 4, 1978 for Unit 1 and in the FSAR for Unit 2. The two requirements were not identical although non-licensed personnel were being trained at one time to support both units.

Records Review Summary

10 CFR 50, Appendix B, Criterion XVII requires that sufficient records be maintained to furnish evidence of activities affecting quality. Criterion XVII also requires that records shall be identifiable and retrievable. Chapter 17 of the Arkansas Power and Light Company Quality Assurance Manual states in part that, "records storage shall provide for retrieval of information without undue delay."

The licensee's failure to properly document requalification and non-licensed personnel training and to promptly file these records as indicated in the above paragraphs constitutes an apparent item of non-compliance against 10 CFR 50, Appendix B. (313/80-12-14; 368/80-12-14)

10. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of non-compliance, or deviations. The unresolved items identified in this inspection are listed below:

<u>Number</u>	<u>Subject</u>	<u>Paragraph</u>
313/80-12-07; 368/80-12-07	Licensed Operator absent from licensed duties for greater than 4 months.	6
313/80-12-08; 368/80-12-08	Records of reactivity control manipulations.	6
313/80-12-09; 368/80-12-09	Operator annual evaluations	6
313/80-12-10; 368/80-12-10	Design Change Training	6
313/80-12-13; 368/80-12-13	QA Refresher Training	8

11. Exit Interview

The inspectors met with Mr. F. Foster, ANO's Operations and Maintenance Manager and other members of the ANO staff on June 20, 1980, and with Mr. J. P. O'Hanlon, ANO's General Manager, and other members of the ANO staff on July 18, 1980. At these meetings, the inspectors summarized the scope of the inspections and the findings. Mr. Gagliardo (NRC/RIV) met with Mr. John Griffin, Manager of Nuclear Operations at the ANO Corporate offices on June 20, 1980. At this meeting Mr. Gagliardo expressed concern that action to correct the previously identified problems in the area of training had not yet been completed.

12. Management Meeting

A management meeting was held (at the licensee's request) in the Region IV offices on August 11, 1980. The licensee representatives who were present at the meeting are denoted in paragraph 1. Region IV representatives included the Director, Mr. K. V. Seyfrit; Chief of the Reactor Operations and Nuclear Support Branch (RONSB), Mr. G. L. Madsen; the Assistant to the Director Mr. W. E. Vetter; and other members of the RONSBB.

During the management meeting Region IV representatives stated that the findings of this inspection met the criteria for issuing a civil penalty and that the region was reviewing the inspection findings to determine if a civil penalty would be recommended. The regional representatives also expressed concern over the licensee's enforcement history and the numerous repetitive items of noncompliance. It was also noted that the

licensee has not had a favorable record of taking action to correct and/or resolve issues identified by the region.

The licensee representatives presented a comprehensive program for upgrading the training of both licensed and non-licensed personnel. In response to a request by the regional representatives the licensee personnel agreed to provide the region with a written summary of the proposed training program. They agreed to provide, with the written summary, commitment dates for the completion of the various program elements, dates when the program's implementation would begin, and dates when the program implementation would be completed. The licensee representatives said that they would expedite the submittal of this summary.