# U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

# REGION IV

Report: 50-267/81-22

Docket: 50-267

License: DPR-34

Licensee: Public Service Company of Colorado Post Office Box 840 Denver, Colorado 80201

Facility Name: Fort St. Vrain Nuclear Generating Station

Inspection at: Fort St. Vrain Site, Platteville, Colorado

Inspection Conducted: October 6-9, 1981

Inspector:	S.H. Johnson						10/23/81
	E. H. Johnson, Section	Reactor	Inspector,	Systems	and	Technical	Date

Approved:

S.H. Johnson

Ter R. E. Hall, Chief, Systems and Technical Section

10/23/51 Date

Inspection Summary

Inspection Conducted October 6-9, 1981 (Report 50-267/81-22) Areas Inspected: Routine unannounced inspection of training and requalification training programs. The inspection involved 32 inspector-hours by one NRC inspector. Results: Within the areas inspected, no violations or deviacions were noted.

#### 1. Persons Contacted

- M. Block, Superintendent of Operations
- P. Brearly, Training Instructor
- \*R. Craun, Superintendent, Nuclear Site Engineering
- D. Evans, Shift Supervisor
- W. Franek, Results Engineering Supervisor
- \*J. Gahm, QA Manager
- Hill, Station Manager
  - Orlin, Superintendent, QA Services
- L. Singleton, Superintendent, Operations OA
- R. Wadas, Training Supervisor
- \*D. Warembourg, Manager, Nuclear Production

The NRC inspector also interviewed other plant personnel including craftsmen, technicians, reactor operators and administrative personnel.

\*Denotes those present at the exit interview.

## 2. Training

The objective of this inspection effort was to verify that the overall training program for nonlicensed employees and general training for licensed employees are in conformance with Technical Specifications and QA program requirements.

The training program for the Fort St. Vrain Nuclear Generating Station is detailed in the Training Programs Administrative Manual (TPAM) (Revision 7 of March 27, 1981). The TPAM consolidates the indoctrination, training, and retraining requirements for all plant staff members. The NRC inspector reviewed the TPAM in detail and found that it included an extensive description of the indoctrination (General Employee Training requirements) and the initial training required for each new plant staff member. The TPAM also included a qualification card for each unique plant staff position (below the supervisory level). For example, within the mechanical maintenance department, the inspector noted that qualification cards were available for maintenance helper, mechanic, classified mechanics (for classifications such as millwright, machinist, or welder), fuel handler, and working foreman, as well as specialized functions such as crane operator, fork lift operator, and maintenance clerk. Within each department, a newly assigned member is able, therefore, to refer to these cards to determine those additional skills that would be necessary for advancement to each new level of responsibility. This appeared to be a particularly strong feature of the overall station training program.

The NRC inspector noted that, although these qualification cards outlined the experience and skills needed for advancement, some improvement could be achieved by supplementing these cards with a qualification guide that would set out the specific types of skills that should be demonstrated or acquired for each new level. The NRC inspector noted, however, that such improvements were already underway for the operations department training program. The licensee's training staff had developed a detailed qualification program for the nonlicensed auxiliary tender watchstander. This program consisted of a qualification booklet containing a section for each system for which the auxiliary tender is responsible and the knowledge level required on that system, including the practical evolutions for which the trainee must demonstrate an understanding. Verification of the trainee's progress is accomplished by oral examinations covering groups of related systems conducted by the training staff.

The licensee's training staff consists of four instructors, one supervisor, and one secretary. The supervisor and three instructors are licensed senior reactor operators, while the fourth instructor carries a license as a special senior reactor operator limited to fuel handling. Each of these individuals participates in the licensed operator requalification program.

This staff has direct responsibility for the General Employee Training program and operations department training. Training for other departments are the responsibility of departmental supervisors under the guidance of the TPAM. The training staff is responsible, however, for the collection and maintenance of all employee training records, even though the department supervisors are responsible for the actual training activities. The NRC inspector established that, because the records were maintained at some distance from where the training activities were taking place, some types of informal training were not being recorded. This was discussed during the exit interview, and the licensee agreed to look into this to determine what improvements might be made to ensure that all training would be recorded.

The NRC inspector determined that the TPAM did not set out a formal mechanism for evaluation of the effectiveness of training by the departmental supervisors or training staff. It was verified, however, that lessons learned from maintenance and operating experience were being fed back into the training program. This was evidenced by a new video tape training program on mechanical maintenance that had recently been installed and which was being used at the time of the inspection to upgrade all mechanical craftsmen in rigging techniques, the need for which had been identified during an earlier maintenance outage. The NRC inspector indicated to the licensee representatives during the exit interview that these continued improvements in the depth and quality of training appeared to be another strong feature of the training program. He pointed out that periodic, objective evaluations of the effectiveness of training would ensure that the need for any further changes would be identified. Members of the licensee's staff agreed to review this item. In interviews with members of the plant staff, including technicians, craftsmen, and supervisors, it was apparent that the training program outlined in the TPAM was being carried out and that a commitment to training was being made at all levels of the plant staff.

No violations or deviations were identified in this part of the inspection.

#### 3. Requalification Training

The objective of this inspection effort was to verify that the requalification training program is being conducted in accordance with regulatory requirements.

The NRC inspector determined that the licensee is currently conducting the required licensed operator requalification training in accordance with a program submitted for approval in January 1981 to the Operator Licensing Branch of the Office of Nuclear Reactor Regulation. The licensee's previous and presently approved program dates from 1977. However, the licensee has implemented the January 1981 proposed program in order to include the revised and upgraded requirements for operator regualification that are contained in NUREG 0737, "Clarification of TMI Action Plan Requirements." The NRC inspector reviewed this program and determined that the upgraded requirements had been incorporated. oposed program appeared to meet or exceed the requalification The training requirements of 10 CFR 55, Appendix A as extended by NUREG 0737. He indicated this finding to licensee representatives at the exit interview; however, he further stated that approval of the program was the responsibility of the Operator Licensing Branch and additional revisions or questions could result from their review.

The NRC inspector then reviewed the status of the current requalification program. He determined that the program scheduled by the licensee exceeded the proposed program in the depth and coverage of formal lectures. The licensee's proposed program requires that the requalification lecture series, required for those operators who demonstrate weaknesses in areas as determined from results of the annual exam, will endeavor to be sixty hours in length each year with a minimum of forty hours. In actual practice, the licensee does not exempt any operators from attendance and has scheduled approximately eighty hours of lectures this year.

The NRC inspector reviewed records of completed requalification activities, including annual examination results, and conducted interviews with operators in order to determine if these activities had been completed as required. The inspector had no questions in this area.

No violations or deviations were identified in this area.

## 4. Exit Interview

The NRC inspector conducted an exit interview on October 9, 1981, with members of the licensee's staff as denoted in paragraph 1. The NRC Senior Resident Reactor Inspector also attended. The inspector's observations and findings noted in the foregoing paragraphs were discussed.