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Gentlemen:

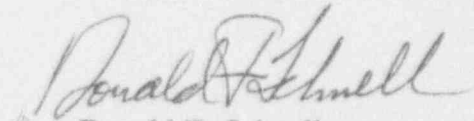
INSPECTION REPORT NO. 50-483/93006
CALLAWAY PLANT

This responds to Mr. T. O. Martin's letter dated June 7, 1993, covering events discussed in Inspection Report 50-483/93006. Our response to open item 50-483/93006-01 is presented in the attachment.

None of the material in the response is considered proprietary by Union Electric Company.

If you have any questions regarding this response, or if additional information is required, please let me know.

Very truly yours,



Donald F. Schnell

DFS/tmw/klw

Attachment: 1) Response to Open Item

cc: J. B. Martin - Regional Administrator, USNRC Region III
I. N. Jackiw - Chief, Reactor Projects Section 3C, USNRC Region III
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T. O. Martin, Acting Director, Division of Reactor Safety, USNRC Region IV

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Summary of NRC Open Item 50-483/93006-01

In NRC Inspection Report No. 50-483/93006(DRS), an open item was identified concerning training administration procedures. The concern identified in the inspection report is:

The records reviewed by the inspectors indicated that all licensed operators in a crew have been given credit for all required plant control manipulations performed during specific simulator sessions. The inspectors identified instances when five individuals each received credit for plant control manipulations, such as a reactor startup, during a single simulator training session. The five-member-crew consisted of one Reactor Operator (RO license), one Balance of Plant Operator (RO license), the Control Room Supervisor (SRO license), Shift Supervisor (SRO license), and a Field Supervisor/STA (SRO license). During a Reactor Startup, only the Reactor Operator manipulates the controls to bring the reactor critical and the Field Supervisor/STA has no command responsibility for the startup; however, all individuals in the crew received credit for performing or directing the reactor startup.

The inspectors requested Union Electric to provide a written response indicating what actions are included in the training program to verify that licensed operators have the ability to perform plant control manipulations in lieu of actual performance.

Callaway Plant Response

As noted in the inspection report, Callaway Plant training programs for licensed operators are based on a systematic approach to training (SAT). As part of the SAT program, specific tasks for Reactor Operators and Senior Reactor Operators are identified to be included in the licensed operator Regualification Program. These tasks include the items listed in 10CFR55.59.c.3.i, as well as many other important plant manipulations. Throughout a two year requalification cycle, these tasks are performed by crews on the simulator on a regular basis, which assures that items identified in 10CFR55.59.c.3.i are performed at least annually and biennially. Callaway Plant has identified 30 specific manipulations that an individual must participate in on either an annual or biennial basis (15 annually, 15 biennially). Over a two year cycle, this translates to participation in a minimum of 45 manipulations for each licensed operator. The SAT based training program, however, assures that each licensed operator at Callaway Plant has participated in over 150 of these required manipulations within the two year cycle. Due to normal crew rotation practices, individual licensed operators will typically participate in these manipulations from different licensed positions. Crew performance is evaluated and critiqued at the conclusion of each simulator session.

Regardless of position, each individual is held accountable for the performance of the crew for all plant manipulations. Tracking mechanisms ensure that each licensed operator performs or participates in each manipulation identified in the Job and Task Analysis.

In addition to the simulator sessions scheduled in requalification training, systematic evaluation of each operator is an integral part of the training program. The evaluation program includes a mixture of periodic written examinations, job performance measures, and dynamic simulator evaluations. Performance of significant plant manipulations is an integral part of both the job performance measure and dynamic simulator elements of the evaluation program.

The requalification program incorporates performance-based feedback mechanisms to ensure that operational weaknesses are identified and addressed. These feedback mechanisms include regularly scheduled meetings with the Operations Department to discuss training program effectiveness, systematic review of plant operating experience, and periodic observation of crew performance by management personnel.

To receive credit for the required manipulation, the individual does not have to physically perform the manipulation provided he or she is directly involved as a team member in its performance. The Training Department procedure that covers this area (TDP-ZZ-00022, Licensed Operator Requalification Program) will be revised to clarify the definition of licensed operator participation in the required plant manipulations.

Callaway Plant management is confident that the implementation of the SAT-based licensed operator training program combined with management oversight of operator performance ensures that licensed operators have the ability to perform all required plant manipulations.