

NUCLEAR REGULATORY COMMISSION

ORIGINAL

COMMISSION MEETING

In the Matter of:

BRIEFING ON STAFF RESPONSE TO THE
GENERAL ACCOUNTING OFFICE DRAFT REPORT

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400 Virginia Ave., S.W. Washington, D. C. 20024

Telephone: (202) 554-2345

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BRIEFING ON STAFF RESPONSE TO THE
GENERAL ACCOUNTING OFFICE DRAFT REPORT

PUBLIC MEETING

Nuclear Regulatory Commission
Room 1130
1717 H Street, N. W.
Washington, D. C.

Thursday, July 22, 1982

The Commission met, pursuant to notice, at
2:10 p.m.

BEFORE:

- NUNZIO PALLADINO, Chairman of the Commission
- JOHN AHEARNE, Commissioner
- THOMAS ROBERTS, Commissioner
- JAMES ASSELSTINE, Commissioner

STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:

- W. DIRCKS
- F. REMICK
- S. CHILK
- L. BICKWIT
- H. DENTON
- G. MESSENGER

AUDIENCE SPEAKERS:

- J. KRAMER

P R O C E E D I N G S

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CHAIRMAN PALLADINO: Good afternoon, Ladies and gentlemen.

The Commission meets this afternoon to receive a briefing from the staff on their response to the General Accounting Office draft report, entitled Problems and Delays Overshadowing NRC's Initial Success in Improving Reactor Operator Capabilities.

The draft report was sent to the NRC for review and comment and, therefore, the information and conclusions in the report are subject to revision.

The GAO reviewed the NRC's and the industry's progress in implementing the Three Mile Island Action Plan. Written comments on the draft report have been requested by the General Accounting Office on July 29. The staff, I understand, is preparing a response to the GAO report, and is prepared to discuss the nature of the response with the Commission today.

As noted on the draft report, GAO requested that the draft report not be released pending comments.

Unless any of my fellow Commissioners have opening remarks, I am going to turn the meeting over to Mr. Dircks.

MR. DIRCKS: What we would like to do, within our 30 minutes of allotted time --

1 COMMISSIONER AHEARNE: Is this another one of
2 those?

3 COMMISSIONER ASSELSTINE: This is the test
4 case, isn't it?

5 COMMISSIONER AHEARNE: No, yesterday was.

6 COMMISSIONER ROBERTS: No, it was yesterday.

7 CHAIRMAN PALLADINO: Then I must have confused
8 them. We will test it twice.

9 COMMISSIONER AHEARNE: We can try it.

10 MR. DIRCKS: Within our 30 minute time, George
11 Messenger, the Deputy Director of the Office of
12 Inspector and Auditor, will introduce the topic by
13 putting the GAO report in perspective in relation to the
14 OIA reports that have been done. I think that that will
15 be helpful, and then we will get into where we are
16 today.

17 MR. MESSENGER: OIA issued a report on the
18 Action Plan back on June 4, 1981, and also did a
19 follow-up on that Action Plan since, which the follow up
20 report was dated June 17, 1982.

21 One thing of note here is that this report,
22 the follow-up report is really after the audit period of
23 the GAO report. The GAO report covers the period May
24 1981 to January 1982, and our follow-up work covers the
25 period November 1982 to March 1982. So really we have a

1 later audit report on that, and the management of the
2 plan, really, we closed it out in our follow-up report.

3 The second thing that we issued, we issued a
4 report on March 26, 1982, concerning the developing
5 relationship with INPO. When the field work was done
6 May 1981 to August 1981, where we found some problems
7 with developing the relationship with INPO. In January
8 1982, we also did some field work before issuing that
9 report, and in the January 1982 work we found that the
10 agency was moving ahead. In fact, in that period, the
11 Commission even gave their PPC guidance on the
12 relationship with INPO.

13 With that, we tried to put the briefing a
14 little in perspective, that in effect OIA has two audit
15 reports that are after the basic period covered by the
16 GAO audit.

17 CHAIRMAN PALLADINO: Could you repeat what the
18 basic period of the GAO report is?

19 MR. MESSENGER: The field work covered is May
20 1981 to January 1982.

21 CHAIRMAN PALLADINO: May 1981 --

22 MR. MESSENGER: To January of 1982.

23 (Commissioner Gilinsky joined the meeting.)

24 COMMISSIONER AHEARNE: George, it is correct,
25 I know in reviewing the two on the Action Plan, and you

1 also say on the one on INPO, you had reached the
2 conclusion originally that there were the kinds of
3 problems that the GAO had identified.

4 MR. MESSENGER: Right.

5 COMMISSIONER AHEARNE: But your follow-up
6 indicated, certainly with respect to the implementation
7 of the Action Plan, that the EDO's actions had taken
8 care of the bulk of the GAO concerns.

9 MR. MESSENGER: We were satisfied.

10 COMMISSIONER AHEARNE: I gather also that you
11 felt on the INPO monitoring similarly.

12 MR. MESSENGER: Yes.

13 COMMISSIONER AHEARNE: Although the problems
14 that you had seen were similar to the ones of the GAO.

15 MR. MESSENGER: Right.

16 MR. DIRCKS: I thought perhaps Harold Denton
17 could go through the basic of GAO, and how we addressed
18 them in the meantime.

19 MR. DENTON: There were three major concerns
20 by GAO, and as we have said, I think they characterize
21 the conditions at the time, but are not the conditions
22 which exist today.

23 They said that the long-term training issues
24 had lost momentum, that we relinquished reliability and
25 responsibility to INPO, and that we were not properly

1 managing the resolution of the Action Plan. What I
2 thought I would do is go to each one of those areas and
3 talk about them.

4 The first one, the long term training issues, I
5 think we found that to be a tougher nut to crack than we
6 thought back in the 06-60 days. It does require a job
7 task analysis. We have got one going, and INPC has got
8 one going.

9 There are numerous activities underway that
10 relate to manpower and staffing -- the STAs, the
11 qualifications for operators, training program, and in
12 fact we now have a human factors program plan that is
13 undergoing staff review that puts all of this together.
14 I think that we will not be able to move on the long
15 term training issue until we have got the job task
16 analysis in front of us.

17 With regard to their specific concern, that
18 is, that we had not acted on the 60 or so training
19 programs that had been submitted, that was true. We had
20 asked everybody to provide training programs to train
21 operators to cope with severe core damage. We really
22 didn't know what to ask when we asked that questions,
23 but it forced all the licensees after TMI to think about
24 training their staff to cope with conditions such as
25 TMI.

1 Everybody did send out a training program, and
2 I think the fact that they sent it in was salutary in
3 terms that it forced the companies to think about what
4 they would do in the event of severe damage. We now
5 have reviewed a number of those.

6 We have reviewed all of the training programs
7 for new plants, and I think we have reviewed a number of
8 them for existing plants. I think the plan is that they
9 will all be reviewed by the end of the year. The
10 responsibility for the review of some of these has
11 shifted to the regions.

12 COMMISSIONER SHEARNE: The actual question is,
13 is the GAO correct in their statement that you had the
14 plans for a year-and-a-half before they were reviewed?

15 MR. DENTON: I think that is correct. I
16 didn't consider it a high priority to review those at
17 the time, but they are now being reviewed.

18 These are specifically plans to train
19 operators. We had decided, when we asked for those
20 plans that we do a post-implementation, and not a
21 pre-implementation. I did not want the utilities to
22 hold up such training programs awaiting our approval.
23 So they were actually using those programs, and training
24 their people even though we had them.

25 COMMISSIONER SHEARNE: Were the utilities told

1 that it would be a post-implementation?

2 MR. DENTON: I am sure they were.

3 The next issue is the NRC dependency on INPO.
4 As has been pointed out, the Commission has provided
5 guidance on our relationship with INPO in your PPG. We
6 have one memorandum with INPO that is signed now, it was
7 signed April 1st. There are routine technical meetings
8 and contacts. I think that that issue is largely
9 resolved now.

10 We don't have formal delegations for each
11 topic, but I think the staff knows who is acting in INPO
12 and on which issues, and clearly it is the Director of
13 Human Factors, where it is human factor issues that we
14 are discussing with them.

15 MR. DIRCKS: We have a number of relating ties
16 to INPO. I think the CIA auditor pointed out that there
17 were excellent day-to-day contacts going on at the staff
18 level, but there is more contact needed at the
19 management level.

20 I know Harold and I have gotten into frequent
21 meetings with Dennis Wilkinson. I probably meet with
22 him at least once a month, and I guess Harold does,
23 too. I think that we have solved that problem of
24 management relationships with INPO.

25 COMMISSIONER GILINSKY: They are not saying

1 that the relationship is not a good one. They are
2 questioning our reliance on INPO.

3 MR. DIRCKS: There are two points. They said,
4 one, are we in effect delegating INPO our regulatory
5 responsibilities.

6 COMMISSIONER GILINSKY: That is the one I was
7 referring to.

8 MR. DIRCKS: Two, they said, we needed much
9 better management working relationships with the
10 management of INPO.

11 COMMISSIONER GILINSKY: They say that we are
12 not in a position to independently audit what INPO is
13 doing.

14 MR. DIRCKS: I think on the delegation, Harold
15 will say something, but I think we have several examples
16 that we are not doing that. I think we are taking the
17 Commission's guidance.

18 COMMISSIONER AHEARNE: Let me quote exactly
19 what they say. It says: "We are concerned that NRC, by
20 heavily relying on INPO's program, may be placing too
21 much reliance on an industry sponsored organization. In
22 the future, NRC may not be adequately prepared to
23 exercise its responsibilities by determining the
24 adequacy and effectiveness of INPO's training and
25 qualification standards and criteria for reactor

1 operators and othr key personnel."

2 At least the gist of what I thought their
3 point was, that in the absence of our monitoring and
4 having a sense of where that ought to go, but instead
5 saying, "Okay, we will accept INPO's position," that we
6 would not be in a position to fulfill our regulatory
7 responsibility.

8 COMMISSIONER GILINSKY: I think we have relied
9 a lot on INPO, and have tended to do that more and
10 more.

11 MR. DIRCKS: I am not quite sure we would
12 agree with that.

13 COMMISSIONER ROBERTS: But they make the
14 statement, "GAO sees nothing wrong with NRC relying on
15 an industry group."

16 MR. DENTON: It is their guidance, we
17 cooperate with INPO.

18 COMMISSIONER ROBERTS: As we monitor their
19 activities.

20 MR. DENTON: If I could clarify. The two
21 areas that they mention were task analysis and
22 accreditation, and we have had endless meetings with
23 INPO, and so have you, on task analysis. We are going
24 through a process right now, in which the Commission
25 will be involved, on the type of role we play in

1 accreditation. They briefed the staff on
2 accreditation. We had our peer panel briefed by
3 theirs.

4 In a sense, I think we have been encouraging
5 INPO to do it, and that they are a useful surrogate and
6 provide a lot of leverage. The more we can get them to
7 do it, we continue to overview it. I think they saw
8 maybe an absence of that in these particular areas back
9 then, but it sure isn't here today.

10 COMMISSIONER GILINSKY: The absence of what,
11 oversight?

12 MR. DENTON: I don't think we were very
13 interested in task analysis a year ago, and I imagine
14 they got that concern by talking with INPO in which we
15 seemed to be not receptive to task analysis.

16 CHAIRMAN PALLADINO: When did the Commission
17 first realize that task analysis was a necessary part of
18 the development of qualification program?

19 MR. DIRCKS: The Commission?

20 CHAIRMAN PALLADINO: Or the staff.

21 MR. DIRCKS: When the agency got interested.

22 MR. DENTON: I guess, I would have to defer to
23 staff.

24 MR. KRAMER: I believe the first reference to
25 it was in the Task Action Plan in 0737. We first began

1 to develop our own plans and task analyses about a year
2 and three months ago.

3 MR. DENTON: I think it surfaced with
4 considerable momentum after we started discussing our
5 requirements for operators and whether or not they had
6 to be degreed or not. That is what really pushed that
7 in.

8 MR. DIRCKS: They have been much more
9 extensive in their effort to do task analysis than we
10 have been. I think we have been looking at the
11 operating personnel, and they have moved far beyond us
12 into maintenance personnel, equipment personnel, and
13 health physics people. They have expanded this whole
14 horizon of job task analysis. We have gotten in only in
15 the limited area of operating personnel.

16 MR. DENTON: I think we are walking a narrow
17 sidewalk here. You would like, at least I would think
18 we would like INPO to undertake as much as they could,
19 so that they could self-regulate. At the same time, you
20 can't give it away.

21 I think we only have one signed agreement, but
22 we have a couple that are being negotiated, and I think
23 the Commission has been involved in all the rest.

24 MR. DIRCKS: I think one of the outcomes of
25 the TMI lessons was to get industry involved in this

1 area, and here they are involved. I don't think we
2 would want to send out signals to discourage them.

3 CHAIRMAN PALLADINO: I don't think we want to
4 discourage them either, but I think the point on
5 monitoring them and making sure that we are on top of
6 the situation is one we should pay attention to.

7 MR. DIRCKS: We haven't accepted any of the
8 job task analysis. They are making up theirs as they
9 reported to the Commission, and we are involved in doing
10 our own.

11 MR. DENTON: A complimentary one.

12 MR. DIRCKS: One will serve as a check on the
13 other. I think in several areas, the Commission has
14 said, get INPO involved, and at the same time maintain
15 some sort of a check basis. We have done that in the
16 construction assessment program. We have done that in
17 the performance appraisal.

18 COMMISSIONER AHEAPNE: On the construction,
19 the Commission has informally reached a conclusion.

20 CHAIRMAN PALLADINO: On what?

21 COMMISSIONER AHEARNE: On the construction
22 assessment, we have encouraged an involvement, but we
23 haven't reached the same level of --

24 MR. DIRCKS: I don't think we have approved
25 anything they have done. We basically said, go do it,

1 and we will do our own thing.

2 MR. DENTON: Of course, in training in the
3 particular area we are talking about, we do administer
4 the final exams, so we have the final say on who gets
5 the license.

6 The third issue that they raised was the
7 management of the Action Plan. They didn't think we had
8 adequate systems in place. Since that time, in response
9 to our own needs and CIA's prodding, we established
10 ORLAS, which is an operator reactor licensing action
11 summary. We keep that in detail. We have got an Action
12 Plan Tracking System for all the items.

13 COMMISSIONER GILINSKY: What does that one do,
14 this ORLAS?

15 MR. DENTON: ORLAS is the tracking of all the
16 actions that are outstanding in the operating plants.
17 Remember, we used to talk about the 5,000 backlog, ORLAS
18 has got it specifically now plant-by-plant and date
19 schedule, and how many we complete. Incidentally, we
20 have completed about 2,000 of those items this fiscal
21 year so far. So I think it is very well tracked now.

22 We have another system under Bill that keeps
23 track of all the Action Plan items that are under
24 develop, and that is the period that CIA specifically
25 looked into and found to be a closed issued.

1 CHAIRMAN PALLADINO: Found to be what?

2 MR. DENTON: A closed and resolved issue, when
3 they looked it after the GAO.

4 COMMISSIONER AHEARNE: That is the sense you
5 got.

6 MR. DENTON: I don't think there are any
7 outstanding problems today on that issue.

8 CHAIRMAN PALLADINO: What is the size of the
9 staff that is devoted directly to follow the Action Plan
10 items and their implementation, roughly?

11 MR. DENTON: We differentiate between the
12 implementation on operating plants, which has one staff
13 that implements it, and there is another who develops
14 the requirements, which I don't know how to add those
15 two together.

16 Operating actions take several hundred people
17 in total, but that involves things other than just the
18 TMI Action Plan. There must be probably 75 people or so
19 devoted to the developmental side of the Action Plan.
20 We could get that for you, how they cross-cut.

21 CHAIRMAN PALLADINO: Just to get an idea,
22 because it gives us a better feel for the magnitude of
23 the job.

24 MR. DENTON: But not all those people are in
25 human factors. I was giving you the total.

1 The next slide shows where we stand with
2 regard to just the training and qualification issue.

3 COMMISSIONER AHEARNE: I am sorry, I missed
4 it, what is LATS?

5 MR. DENTON: LATS is a licensing action
6 tracking system where we have farmed work out to
7 contractors.

8 COMMISSIONER AHEAPNE: It has been
9 instituted?

10 MR. DENTON: Yes, so we now have a separate
11 tracking of that to make sure that they are not causing
12 delay.

13 CHAIRMAN PALLADINO: Harold, what is the
14 organizational structure that coordinates the
15 implementation of the Action Plan, that oversees it?

16 MR. DENTON: The Division of Licensing, and
17 they have a person that works full-time keeping track
18 and coordinating the resolution of items which we know
19 what we want the utilities to do.

20 MR. DIRCKS: Then we have another group under
21 Resource Management that does the Action Plan Tracking
22 System, the automated system.

23 COMMISSIONER AHEAPNE: Could I follow this?

24 CHAIRMAN PALLADINO: Go ahead.

25 COMMISSIONER AHEARNE: I thought that the

1 Chairman's question was, the organization to follow the
2 implementation of the Action Plan.

3 CHAIRMAN PALLADINO: Yes.

4 COMMISSIONER AHEARNE: I think the answer is,
5 there isn't any.

6 MR. DIRCKS: No, that is not right.

7 COMMISSIONER AHEARNE: Focused strictly on the
8 Action Plan?

9 MR. DIRCKS: Yes.

10 MR. DENTON: Yes.

11 COMMISSIONER AHEARNE: Just on the Action
12 Plan?

13 MR. DENTON: Implementing the Action Plan.

14 COMMISSIONER AHEARNE: I didn't say that. I
15 said, just on the Action Plan, and the answer is no --

16 MR. DIRCKS: Let's go back to step one.

17 COMMISSIONER AHEARNE: -- because I think what
18 your point is, is that the Action Plan is imbedded into
19 a number of other actions, and you do have systems
20 tracking all of the actions, some of which are Action
21 Plan.

22 I thought your answer was, you have an
23 individual whose sole purpose is to keep track of
24 actions the licensees are supposed to take, but that
25 includes Action Plan items and others.

1 MR. DIRCKS: Could I go back to the --

2 MR. DENTON: I don't see --

3 COMMISSIONER AHEARNE: I am not trying to
4 imply that there ought to be such an organization.

5 MR. DIRCKS: Let me go back to history. When
6 I came on as Executive Director, the Action Plan was the
7 dominating theme of the agency. The Commission said,
8 get the Action Plan firmed up, and get those items out
9 of the Action Plan and transfer them to the operating
10 elements of the agency.

11 The Action Plan Tracking System is the
12 activity that basically takes all those Action Plan
13 items, tracks their development, and when they are ready
14 to be turned over to the offices for actual
15 implementation, they go into ORLAS.

16 So, in effect, we do have an Action Plan
17 Tracking System that takes this body of initiatives,
18 tracks how far they have been developed. Once they have
19 been developed, they are then turned over to the various
20 offices, and that I thought followed the Commission's
21 directive of getting the Action Plan into the operating
22 plan of the agency.

23 COMMISSIONER AHEARNE: I am not arguing with
24 that. But the answer to the question -- What is the
25 organization or the individual to manage the Action

1 Plan, the answer is, there is no organization and no
2 individual, just the action report.

3 MR. DENTON: No, I still don't agree with
4 that.

5 CHAIRMAN PALLADINO: There is a part of it.

6 MR. DIRCKS: I lost track of the context.

7 COMMISSIONER AHEARNE: I don't think there
8 should be.

9 CHAIRMAN PALLADINO: No, but there is a part
10 of it.

11 MR. DENTON: I am taking a factual exception
12 to that statement. For at least a year, in our
13 quarterly get togethers, the people who run ORLAS
14 provide me specifically how we are doing with regard to
15 737, and it is not boarded up with the other action
16 plans. I have given that to the Chairman, and I think I
17 have given that to the Commission.

18 So we give you each quarter out of ORLAS how
19 we are doing with TMI Action Plan items. So as far as I
20 am concerned, ORLAS tracks TMI Action Plan items.

21 COMMISSIONER AHEARNE: I didn't say track, I
22 said manage and in charge of implementing.

23 MR. DENTON: They allow me to manage. We are
24 83 percent there, and we will be there by the end of
25 1984.

1 COMMISSIONER AHEARNE: You are defending a
2 position that isn't under attack.

3 (General laughter.)

4 COMMISSIONER GILINSKY: You sure fooled them,
5 John.

6 (General laughter.)

7 COMMISSIONER AHEARNE: A straight answer to a
8 simple question. The question was, is there a structure
9 or person who is in charge of implementing the Action
10 Plan.

11 MR. DENTON: I still think there is.

12 COMMISSIONER AHEARNE: The answer is, you are
13 in charge of implementing the Action Plan, but other
14 things, and as you go down through your management
15 structure, your people are in charge of implementing
16 many things, some of which are part of the Action Plan.
17 You have a tracking system which has folded in all of
18 the actions that the licensees have to take, and you can
19 extract out of that a subset of what is the status of
20 the Action Plan items.

21 MR. DENTON: Maybe I should elaborate a bit
22 more. We have assigned every TMI Action Plan item to an
23 individual, so we have got, in addition to our project
24 managers who manage the project, they each have one or
25 more TMI Action plan items. I meet with them and I get

1 reports on where they go, and they write memos and
2 move. So there is an individual for each item, and
3 somebody reports to somebody.

4 I just didn't want to let it to go and pass
5 that nobody was managing the implementation of the TMI
6 Action Plan, because I think it is being managed.

7 MR. DIRCKS: We are not defending a position.
8 We have no dedicated organization in the agency that
9 manages the Action Plan.

10 COMMISSIONER AHEARNE: That is the only point
11 I was trying to make, because that was a challenge that
12 we don't. The answer is that we don't, but because,
13 rather than, yes, we do. We don't, but there is a
14 reason we don't.

15 MR. DIRCKS: There is a reason.

16 CHAIRMAN PALLADINO: Who coordinates the
17 activities of all these people that are working on the
18 individual components of the Action Plan, is that you?

19 MR. DENTON: No. Take each Action Plan item
20 that has a number, there is a project manager for that
21 item. Then he is responsible for getting input from a
22 technical organization, since we run on a matrix. He
23 gets it off, and ships it out and in, and he is
24 responsible for that item. It is assigned to him for
25 implementation. He gets it done.

1 CHAIRMAN PALLADINO: Is there any coordination
2 of that with other activities? Is that you?

3 MR. DENTON: That is him.

4 COMMISSIONER AHEARNE: It is Harold in some
5 larger sense, and it is Darrel to some extent.

6 MR. DENTON: It is done in the Division of
7 Licensing. If we know what we want to do, such as in
8 the 737 items, it falls under that implementation. If
9 it is developmental and being done agency-wide, it falls
10 under the --

11 COMMISSIONER AHEARNE: Bill, I think, made the
12 point that I hope we make in our response. The Action
13 Plan is a set of a large number of items, which the
14 Commission concluded should be done, some studied, some
15 immediate, some later. But it did not mean that they
16 were unique and only that.

17 For an initial surge, there was close
18 management of the Action Plan as an effort, but we
19 recognized that there had to be a point at which it got
20 incorporated into all of the agency's programs, because
21 there were some pieces that were just like other
22 sections of analysis of the thermal hydraulics, there
23 were some pieces that were like other pieces of the
24 human factors development or operator qualifications.

25 Let's say, in a different context, you might

1 have a manager for implementing some corrections, if we
2 reach a conclusion that here is what you have to do on
3 pressurized thermal shock, there could be a program
4 manager for that. But, the Action Plan, the Commission
5 concluded, that it would not make sense to have a
6 manager for the Action Plan.

7 CHAIRMAN PALLADINO: I think that is
8 important.

9 COMMISSICNER AHEARNE: That is the point that
10 Bill was making, and I was trying to --

11 CHAIRMAN PALLADINO: I think that is the point
12 to make in the response.

13 COMMISSIONER AHEARNE: That is why I said that
14 you were defending a position that wasn't under attack.

15 CHAIRMAN PALLADINO: But it did sound like you
16 were attacking them.

17 (General laughter.)

18 MR. DIRCKS: I didn't see your flag saying
19 that you were friendly.

20 MR. DENTON: I guess the reason I reacted the
21 way I did is, I think we have been pushing so hard for
22 so many years to get it implemented.

23 COMMISSIONER AHEARNE: Yes.

24 MR. DENTON: I have to defend that we are
25 trying to get it implemented.

1 The next item was the status of the Action
2 Plan with regard to the training and qualification
3 issues. I just wanted to summarize those.

4 There are a lot of issues that are in the
5 human factors area, but since the GAO report picked just
6 these two topics to look at. Seven of the 19 that were
7 identified in 0660 have been implemented. There are ten
8 of them that are developmental, that are in the program
9 plan and are undergoing, and there are two that have
10 since become inactive.

11 I could go into those, but in the interest of
12 staying within the 30 minutes, let me just tell you what
13 those two are that are inactive.

14 The two that are inactive were: 1.A.2.4, the
15 original 0660 said that NRR human factors people should
16 participate in inspector training, and we have never
17 been able to find the time to participate in that area;
18 and the other one was 1.A.2.6.6, that we should help
19 develop a basic course in reactor fundamentals, and we
20 have never gotten around to doing that. So those two
21 parts of the plan are inactive, and we don't intend to --

22 COMMISSIONER GILINSKY: what is this course
23 work?

24 MR. DENTON: I think it was to be used by
25 ourselves and by industry.

1 COMMISSIONER AHEARNE: I thought it was more
2 for our own people.

3 MR. DENTON: Yes, I think that was the
4 original intent.

5 COMMISSIONER AHEARNE: To get a broader
6 understanding.

7 MR. DENTON: It is one that we have never put
8 any resources in, and have not budgeted for.

9 So, seven are complete and ten are under
10 developmental.

11 If I could go to the final slide and comment
12 on the GAO recommendations, there are five of them.

13 With regard to establishing the Action Plan
14 oversight group, I thought that was already in place. I
15 guess I will refer to the conversation we just had as to
16 whether it is or not.

17 MR. DIRCKS: We don't have a management group
18 dedicated to the Action Plan.

19 COMMISSIONER AHEARNE: But we can explain
20 why.

21 CHAIRMAN PALLADINO: Do you have an oversight
22 group?

23 MR. DIRCKS: We can explain why, because we
24 have integrated it into the management structure of the
25 agency.

1 CHAIRMAN PALLADINO: How do you feel about
2 having an oversight group as they recommend?

3 MR. DIRCKS: Again, I think that segregates
4 out the Action Plan from every other activity done by
5 the agency.

6 COMMISSIONER AHEARNE: I would argue that
7 there is now a type of an oversight group, and that is
8 the CRGR, because of the issues was whether or not the
9 large number of items we have, were they being looked at
10 in some integrated fashion. So to an extent, there is.

11 CHAIRMAN PALLADINO: Is the CRGR providing --

12 COMMISSIONER AHEARNE: It provides an
13 examination of how do all the pieces fit together.

14 MR. DIRCKS: As the item moves from
15 developmental to being required, the requirement then is
16 reviewed by CRGR.

17 CHAIRMAN PALLADINO: There are some Action
18 Plan items that we have not implemented, and that maybe
19 we won't implement. Who is providing the oversight on
20 that?

21 MR. DENTON: That is in that group where all
22 the ones which are being prioritized to determine
23 whether we still think they are beneficial. So I would
24 come up with that recommendation that eventually it
25 would have to be approved by Bill.

1 COMMISSIONER AHEARNE: The Commission, in a
2 sense, will. Tomorrow, one of the questions I will ask
3 Harold at our budget meeting, as I did last year, that
4 there were a number of items on the Action Plan that
5 were not being funded, and that was not being funded
6 because they did not fit into NRR's budget, and the
7 Commission chose not to fund those.

8 It chose to fund some and not others. And I
9 will once again ask him, are there some of those items
10 in the Action Plan list that are not going to be able to
11 be funded in this program, and which ones. We will have
12 a chance to then. If we once again say, all right, you
13 are not funding these, and we don't --

14 CHAIRMAN PALLADINO: One of the functions that
15 an oversight group might undertake is to make sure that
16 the resolution of whether we are going to follow
17 something or not, or recommend that we follow something
18 or not, but see that that is done. I was trying to find
19 out where is that accomplished, I don't think that it is
20 in the CRGR.

21 MR. DIRCKS: It may be in Harold Denton's
22 office.

23 MR. DENTON: Once the Commission and the CRGR
24 approve an item, I think it is pretty clear where the
25 responsibility lies and it is in NRR, and we have

1 assigned it on down the line.

2 CHAIRMAN PALLADINO: That is once an item has
3 been approved. But there are a number of items that we
4 haven't quite decided whether or not --

5 MR. DENTON: Each office has some of those
6 items. I have most of them, I&E has some, and Research
7 has some. We do have the responsibility for
8 prioritizing all of them and getting back to you.

9 MR. DIRCKS: The Commission gave us the
10 assignment to do that prioritization of all the generic
11 issues, and that includes the TMI issues.

12 Then, we will come back with a report as to
13 (1) what items should be continued, and (2) what are our
14 recommendations for items that should be dropped out
15 because they are very low priority. I think that item
16 is due to come back up in September, I believe, from
17 NRR.

18 CHAIRMAN PALLADINO: But do I gather that you
19 feel that there is no need for a separate action plan
20 oversight group as recommended by the GAO?

21 MR. DIRCKS: I think I would disagree with
22 that recommendation because, again, you would be
23 diluting, say, the management authority that Harold
24 already has for those actions. To have another outside
25 group, I think, would dilute that management chain.

1 CHAIRMAN PALLADINO: I am not taking an
2 exception, I am only trying to find out.

3 MR. DIRCKS: I think that is why we are saying
4 that it is better to allow these items to fall within
5 the natural management areas, rather than setting up
6 extra groups for them.

7 COMMISSICNER AHEARNE: Would CIA have any
8 comment on that, since that relates more to a concern
9 that they had.

10 MR. MESSENGER: I think our report, as I
11 recall, comes down that there is a management system in
12 place to manage the Plan. I think that is the way we
13 have approached it.

14 I think that on a lot of these issues, in
15 addressing them in the response, if you consider that
16 follow-up review, even going back to all these tracking
17 systems, we specifically described them and comment on
18 them in our reports.

19 MR. DENTON: The next item is the need for a
20 focal point in the INPO only Action Plan. I think that
21 each office is now interacting with INPO on its areas,
22 and Bill has an umbrella MOA signed with them, since
23 their last bullet is to establish a formal agreement. I
24 think that we have one formal agreement, and it would be
25 under that agreement that we would enter into others for

1 such matters as accreditation.

2 MR. DIRCKS: We have the umbrella agreement,
3 and we have a separate agreement with Michelson in the
4 AEOD activity. We have Hugh Thompson interacting with
5 them on the human factors. Depending on the outcome of
6 the construction program, we will have another focal
7 point on the construction program, and so on.

8 MR. DENTON: The next bullet is to conduct
9 pre-implementation reviews of long-term training
10 programs. I think for training program, we prefer
11 post-implementation. We prefer that they don't wait on
12 us, but that they implement those training programs that
13 they think are valuable.

14 For the specific ones that they have tagged,
15 they are being reviewed, and will all be taken care of
16 in a post-implementation review by the end of the year.

17 MR. DIRCKS: There is an inspection module
18 dedicated to the implementation review of training
19 programs.

20 COMMISSIONER AHEARNE: Is the GAO correct,
21 then? I think the recommendation flows from the comment
22 they make. You had already said, Harold, that it was
23 probably correct, that we did wait about one and a half
24 years to review them, although what they say is, "NRC
25 did not stop reviewing their revised training programs

1 until about one-and-a-half years after they received
2 them. As a result, utilities implemented their training
3 programs without benefit of any review or feedback
4 information, and NRC later found many of these programs
5 to be inadequate or inconsistent." I guess it is that
6 last point.

7 If it is true that we did find them inadequate
8 or inconsistent, did we then go and make them make
9 changes. If those changes were significant, I would
10 guess that is why the GAO is saying, if it is a
11 long-term training program, we ought to review it before
12 they implement it in order to avoid that kind of a
13 problem.

14 MR. DENTON: The same issue, I think, you had
15 faced in looking at some of the other Action Plan items,
16 if you do it up front, it is resource intensive and gets
17 us on a critical path versus doing it after the fact.

18 I think here for the long-term training
19 programs, we will have to await the results of the job
20 task analysis before we really know what the definition
21 for the training program will be.

22 I think we probably ought to deal with this
23 when we talk about our interaction with INPO on
24 accreditation, and how they have proposed to accredit
25 training programs that would reflect their job task

1 analysis, and we have a role to play in that.

2 I think we would have no problem reviewing a
3 generic long-term training program that might be used as
4 a guide to everybody, but it would be resource intensive
5 to review everybody's 200-page training program.

6 The fourth bullet I have already covered. It
7 is being done, the ones that were here for a long time
8 are being reviewed.

9 This completes my thirty minute presentation.

10 CHAIRMAN PALLADINO: It wasn't bad considering

11 --

12 MR. DENTON: We owe them a letter, I believe
13 on the 29th.

14 MR. DIRCKS: Yes.

15 CHAIRMAN PALLADINO: When do you expect to
16 have the letter?

17 MR. DIRCKS: We have a draft that needs a
18 couple more word changes, and we will send that down.

19 MR. DENTON: We have a draft.

20 CHAIRMAN PALLADINO: Does that have to be
21 signed by the Chairman or the EDO?

22 MR. DIRCKS: It is signed by me, but I will
23 get comments from the Commission.

24 CHAIRMAN PALLADINO: I asked that because the
25 transmittal letter was sent to me. It is okay that it

1 go that way.

2 One of the things that I am not sure I am
3 clear on, did the NRC give INPO certain responsibility
4 for completing certain parts of the Action Plan, or
5 certain undertakings. I think you mentioned two, did
6 you not?

7 MR. DENTON: It depends, I guess, on what you
8 mean by given. There is only this one formal
9 arrangement. INPO has taken on the tasks that they
10 Action Plan called for being done, and in some cases,
11 like the job task analysis, we are letting them do that
12 program. They are keeping us informed.

13 CHAIRMAN PALLADINO: Are there certain things
14 that we specifically asked them to do as part of the TMI
15 Action Plan?

16 MR. DENTON: I don't think so. We did not
17 specifically direct it.

18 MR. DIRCKS: No, we have not.

19 MR. DENTON: They got into it as they built up
20 a staff. Frankly, they now have a little mini-NRC of
21 300 people doing many of the same things that we do.

22 CHAIRMAN PALLADINO: If they only have 300
23 people, they are doing something less than we are.

24 CHAIRMAN PALLADINO: Are there any other
25 questions?

1 COMMISSIONER ASSELSTINE: Yes.

2 COMMISSIONER AHEARNE: I also have a
3 question. Go ahead, Jim.

4 COMMISSIONER ASSELSTINE: The only thing I was
5 going to do was follow up on the Chairman's question.

6 We did not necessarily ask them to do these
7 things, but when we saw that they were doing them, have
8 we then decided that we are not independently going to
9 do them as well, particularly like in the task analysis
10 area?

11 MR. DENTON: That is certainly one big area.
12 They developed early on, for example, a definition of
13 the qualifications for a shift technical advisor and
14 gave us a draft. We commented on it, and they took our
15 comments and published a final.

16 So we did inform industry that anyone who
17 adopted the INPO standard for shift technical advisor,
18 that is what we would use for our review criteria. To
19 the extent that they have done things that we find
20 useful, we say, if you do it this way, industry, that is
21 fine with us.

22 Now, not all industry agrees with the INPO
23 recommendations. So even if we agree with INPO, there
24 is still always a fraction of industry that doesn't do
25 it the INPO way, and we have to deal with them

1 separately.

2 COMMISSIONER ASSELSTINE: But that does make
3 the second GAO criticism more meaningful -- that is, if
4 we have failed to adequately monitor the adequacy of the
5 work that is being done, even if we didn't ask them to
6 do it, if we are going to rely on it and, in essence,
7 adopt their proposals. Maybe we can do that by just
8 reviewing those job task analyses.

9 MR. DENTON: We sure haven't written down a
10 lot of contracts because I think to try to decide what
11 you are going to contract out to industry gets very
12 complicated. What we do is have a lot of technical
13 interaction on things like the job task analysis, and
14 eventually we might agree that that would form the
15 basis.

16 As I mentioned, who has got the final
17 responsibility for training and qualifications, since we
18 issue exams and we grade them, I don't feel we have
19 given away any responsibility. Even if INPO is out
20 there today providing guidance to utilities on how to
21 train their staff that I did not play a big role in
22 developing, the NRC by being the examiner, I think, has
23 the say.

24 COMMISSIONER ASSELSTINE: When we had our
25 briefing a little while back, I guess it was from INPO,

1 on what they were doing in the job task analysis area, I
2 sort of had the uneasy feeling that job task analysis --
3 First of all, I wasn't real comfortable with what that
4 concept was or was becoming and, second, I guess I sort
5 of had an uneasy feeling that that was taking on an
6 awfully large degree of importance. The GAO report
7 seems to underscore that even more.

8 MR. DENTON: One of the things we did, is we
9 convened this peer panel of half-dozen career
10 professionals in the field, and they reviewed, as part
11 of their development of recommendations to us, what the
12 INPO people were doing. So we have had several
13 opportunities of a technical nature to oversee what they
14 are doing.

15 I think what is missing is any kind of formal
16 relationship. They are doing their thing regardless of
17 what we do. If we want to get on board, we have got the
18 option to. At the end, if we decide to disregard it
19 all, we can do that, too. So I don't think that we are
20 tied to their job task analysis.

21 COMMISSIONER AHEARNE: Could I then follow up,
22 Jim?

23 Then I think you have got to address what the
24 GAO says. What the GAO says about that is, "The NRC
25 Director of Human Factor Safety told us that NRC plans

1 to accept INPO certification and to approve the training
2 programs based on INPO's review, without independent
3 review or evaluation.

4 "The Director of NRC's Division of Human
5 Factor Safety told us that NRC staff officials meet with
6 INPO officials approximately one day every six to eight
7 weeks. Aside from this contact, NRC relies on a
8 contractor and the peer review group to monitor INPO's
9 work. The contractor is coordinating with INPO.

10 "Aside from these measures, NRC has no formal
11 mechanism for determining what INPO is doing. There is
12 no formal agreements between NRC and INPO for reviewing
13 and evaluating the task analysis work or for developing
14 and accrediting the training programs."

15 MR. DENTON: I think that is a
16 misunderstanding of how we do it. Certainly, we don't
17 rely on our contractor to do it.

18 COMMISSIONER AHEARNE: Then I think that your
19 answer has to speak explicitly to this, because from
20 what they are saying, at least it appears that according
21 to whoever they were speaking to as the Director of
22 Human Factor Safety Division, it appears that we have
23 essentially said that we are going to accept INPO's
24 work, and we are going to rely on a contractor to
25 monitor it.

1 MR. DENTON: That may have been someone's
2 opinion at that time, but a lot of work has gone on the
3 job task analysis since they made that review.

4 COMMISSIONER AHEARNE: I hope we can then
5 actually address this.

6 Are you saying that we are not going to accept
7 their task analysis without some independent
8 evaluation?

9 MR. DENTON: I never thought anything
10 differently.

11 MR. KRAMER: I think that it is a fair
12 statement that if we find INPO's job task analyses to be
13 technically adequate, we will accept them. We will
14 review their job task analysis from that standpoint.

15 COMMISSIONER AHEARNE: Joel, I guess the
16 question would be, how do we intend to review it, using
17 what? The GAO is saying that we are not building up the
18 competence in order to do that review.

19 MR. KRAMER: I don't think that GAC
20 understands the relationship between us and INPO
21 vis-a-vis task analysis, where the people in the Office
22 of Research, who are doing our task analyses, are
23 interacting very closely with the INPO task analyses
24 people to establish a common data base that can be
25 used. I think we need to bring this in the forefront in

1 the response.

2 COMMISSIONER AHEARNE: Yes.

3 MR. DENTON: I don't see that much differently
4 than the applicant does the geological review. We go
5 out and audit what he does and look in the trenches, and
6 hire consultants. But it doesn't mean that we do the
7 work ourselves, and would apply the same standards
8 here. We would have to have the technical staff agree
9 that it was competent.

10 CHAIRMAN PALLADINO: Any more questions?

11 (No response.)

12 CHAIRMAN PALLADINO: You expect to get this in
13 draft form?

14 MR. DIRCKS: Yes. We will get it done by
15 Monday.

16 CHAIRMAN PALLADINO: Monday, what is the date
17 then, the 26th?

18 MR. DIRCKS: Yes.

19 CHAIRMAN PALLADINO: How important are these
20 deadlines? It is going to be tight to get something
21 signed and out by the 26th.

22 MR. DENTON: We could probably do it
23 tomorrow. I suggested Monday, since we were all going
24 to be tied up tomorrow.

25 CHAIRMAN PALLADINO: Yes.

1 What are you going to do, you are going to ask
2 for our comments, and then you are going to collect them
3 and get them out.

4 COMMISSIONER AHEARNE: Perhaps George might be
5 able to address the question that the Chairman just
6 raised. This is now a report going back to the GAO. We
7 have a July 29, I guess, deadline on it.

8 MR. MESSENGER: We put it in our transmittal.

9 CHAIRMAN PALLADINO: It is a 30-day
10 proposition.

11 MR. MESSENGER: The GAO has asked for the NRC
12 written comments by the 29th and that is to the GAO.

13 COMMISSIONER AHEARNE: It goes on to say that
14 if additional time is needed, it must be requested.
15 Extensions beyond 30 days must be granted by the
16 Comptroller General. Do you mean that we could request
17 a few days extension.

18 MR. MESSENGER: Yes, we can get that done.

19 CHAIRMAN PALLADINO: It might be wise to do it
20 just so we don't get entrapped.

21 MR. MESSENGER: Do you want us to draft a
22 request for extension?

23 CHAIRMAN PALLADINO: A week, is that
24 reasonable?

25 COMMISSIONER AHEARNE: If they get it to us on

1 Monday, we ought to be able to get it out.

2 CHAIRMAN PALLADINO: Yes, I think we ought to
3 try for the 29th, but there are a lot of hitches
4 sometimes.

5 COMMISSIONER AHEARNE: Why don't you ask for
6 an extension of a week.

7 MR. MESSENGER: Yes, we can draft that.

8 COMMISSIONER AHEARNE: You perhaps could do it
9 by a fast phone call.

10 MR. MESSENGER: Yes.

11 CHAIRMAN PALLADINO: Thank you very much.

12 (Whereupon, at 3:00 p.m., the Commission
13 adjourned.)

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NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the
COMMISSION MEETING

in the matter of: PUBLIC MEETING -- BRIEFING ON STAFF RESPONSE TO THE
GENERAL ACCOUNTING OFFICE DRAFT REPORT

Date of Proceeding: July 22, 1982

Docket Number: _____

Place of Proceeding: Washington, D. C.

were held as herein appears, and that this is the original transcript
thereof for the file of the Commission.

Patricia A. Minson

Official Reporter (Typed)

Patricia A. Minson

Official Reporter (Signature)

137

(DRAFT)

RESPONSE TO
GAO REPORT ON
"PROBLEMS AND DELAYS WHICH
OVERSHADOW INITIAL SUCCESS
ON IMPROVING LICENSED OPERATORS'
CAPABILITIES"

NRR 7/22/82

277

CONCERNS IDENTIFIED BY GAO

- LONG-TERM TRAINING ISSUES
- NRC DEPENDENCY ON INPO
- MANAGEMENT OF ACTION PLAN

387

RESPONSE TO GAO CONCERNS

"LONG-TERM TRAINING ISSUES"

- STAFF REQUIRES JOB/TASK ANALYSIS DATA TO PROVIDE TECHNICAL BASIS

- NUMEROUS ACTIVITIES UNDERWAY AND COMPLETED WHICH INTERRELATE WITH JTA
 - MANPOWER AND STAFFING
 - SIMULATORS
 - STA/SE - ROLE/FUNCTION
 - OPERATOR QUALIFICATIONS PLAN
 - TRAINING PROGRAM PLAN

497

RESPONSE TO GAO CONCERNS

"NRC DEPENDENCY ON INPO"

- MEMORANDUM OF AGREEMENT APRIL 1, 1982
- ROUTINE MEETINGS AND CONTACTS
- INDEPENDENT ACTIONS
 - RES - JTA
 - IE - PAT INSPECTIONS
 - AEOD - "SEE-IN"
- MINIMUM STANDARDS VS "BENCHMARKS FOR EXCELLENCE"
- INDUSTRY DATA RESOURCE
- ACCREDITATION PROGRAM (under review)

527

RESPONSE TO GAO CONCERNS

"MANAGEMENT OF ACTION PLAN"

NRR HAS SYSTEMS IN PLACE TO MANAGE
ACTION PLAN WORK

ORLAS - OPERATING REACTOR LICENSING ACTION
SUMMARY (IMPLEMENTATION)

APTS - ACTION PLAN TRACKING SYSTEM (DEVELOPMENT)

LATS - LICENSING ACTION TRACKING SYSTEM
(MONITORS STATUS OF WORK BEING
DONE BY CONTRACTORS)

Fig 7

STATUS OF TRAINING &
QUALIFICATION ISSUES

TOTAL NUMBER OF ISSUES	19
IMPLEMENTED OR COMPLETE	7
DEVELOPMENTAL	9
INACTIVE	3

12/81

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Meeting Title: Discussion of GAO Report on Reactor Operator Capabilities

MEETING DATE: 7/22/82 Open Closed

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SPECIFIC GAO RECOMMENDATIONS

- ESTABLISH ACTION PLAN OVERSIGHT GROUP
- FOCAL POINT TO INTERACT WITH INPO ON ACTION PLAN
- CONDUCT PRE-IMPLEMENTATION REVIEWS OF LONG-TERM TRAINING PROGRAMS
- CONDUCT POST-IMPLEMENTATION REVIEWS OF ALL SHORT-TERM ACTION PLAN ITEMS
- ESTABLISH FORMAL AGREEMENT WITH INPO