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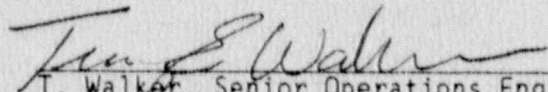
Facility Name: Oyster Creek Nuclear Generating Station

Inspection at: Forked River, New Jersey

Inspection conducted: May 14 and June 25 to July 10, 1990

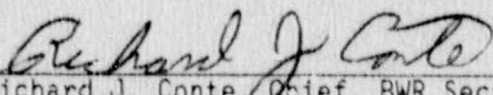
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EXECUTIVE SUMMARY

A special announced training program team inspection was performed at the Oyster Creek Nuclear Generating Station from June 25 to July 10, 1990, and at the Nine Mile Point Training Center on May 14, 1990. This indepth team inspection focused on Oyster Creek's training programs and their implementation. The specific training areas inspected were licensed operator, non-licensed operator, and technical staff and managers. The inspection included a review of training program procedures, training materials, records, qualification standards, and other applicable documents; observations of classroom and simulator training; and interviews with operators, engineers, trainees, instructors, supervisors and managers.

The team made only limited conclusions about the task analysis, development of learning objectives, and design of the licensee's Systems Approach to Training (SAT) based operations training programs due to the status of the job task analyses for the positions reviewed. The licensee determined that their original task analysis for the operations training program was inadequate and is currently performing a revalidation of the operations training materials which includes revision of the task lists, selection of tasks for training, development of a task-to-training materials matrix, and analysis of the tasks selected for training. The revalidation is complete for approximately half of the Control Room Operator (CRO) tasks, but analysis has not yet been performed for the Senior Reactor Operator (SRO), Equipment Operator (EO), and Radwaste Operator (RWO) tasks. Without complete job and task analyses for the operations training programs, the team could not readily determine the adequacy of the implementation of the SAT-based programs in the areas of task analysis, development of learning objectives, and design of training. Without a complete task analysis, it is not possible to ensure that learning objectives exist for all tasks selected for training, that effective training is provided on all applicable tasks, or that the examination bank is sufficient for evaluation of the operators. The foundation of an SAT-based training program is the task analysis and the resulting link between the task lists and the training materials, including the test items. Without this foundation, there is no assurance that the operators are being trained and evaluated on all applicable tasks.

An apparent violation was identified with respect to trainee evaluation. The NRC determined that the written examinations administered as part of the 1989 requalification examinations for two licensed operators were graded incorrectly. Based on regrading of the examinations, the two individuals did not pass the written examinations. These individuals performed licensed duties for a period in excess of one year without the remediation and re-examination required by facility procedures and NRC regulations. The licensee's failure to identify the individuals that did not demonstrate a satisfactory level of proficiency to perform licensed duties is considered an apparent violation, pending conduct of an enforcement conference (219/90-80-01, Section 2.4.2).

The facility's grading practices were determined to be a program weakness. Examples were noted in which grading was not performed in accordance with the

answer key and credit was given for technically incorrect answers. Additionally, trainees were often given credit when no credit was due because of deficiencies in test items. The effectiveness of the review process for examination grading was also of concern, due to the deficiencies identified in the grading process (219/90-80-02, Section 2.4.2).

Additionally, the team identified concerns with the licensee's allowance of waivers for participation in licensed operator requalification examinations. It appears that the procedures governing the licensed operator requalification program do not ensure that newly-licensed operators meet the requirements of 10 CFR 55.59 for annual operating tests and biennial written examinations within the appropriate time periods. The waiver of licensed operator requalification examinations is considered to be an unresolved item (219/90-20-03, Section 2.4.3), pending further review.

In general, the individual methods used to evaluate the operations training programs appear to be adequate, but there is no systematic method used to integrate this information into an overall evaluation of the program. The training program administrative procedures and the implementation of the program evaluation methods, such as evaluation of instructor skills, do not ensure that a thorough, on-going evaluation of training effectiveness is performed and that appropriate corrective actions are identified and implemented. Program evaluation was determined to be a program weakness as evidenced by the failure to identify the deficiencies in the licensed operator requalification examination materials, as discussed in Inspection Report 50-219/90-05, and in the grading of the quizzes and examinations, as noted in this report (219/90-80-04, Section 2.5).

The licensee has made considerable progress toward implementing a Technical Staff and Managers (TS&M) training program during the last eighteen months. User group and training management are strongly supporting the effort. The Steering Committee Meetings appear to be an effective mechanism for providing feedback on user group needs. The TS&M training staff has a strong commitment to the program and has accomplished much toward reestablishment of TS&M training. The governing procedure for the TS&M training program has not been updated to reflect the current program and is scheduled to be revised. Implementation of Standards of Operation should formalize the initiatives established by the training staff.

DETAILS

1.0 Background and Scope of Inspection

The Nuclear Regulatory Commission considers effective training of personnel to be an important part of safe nuclear power plant operations. This inspection was in keeping with NRC policy as stated in the "Commission Policy Statement on Training and Qualifications of Nuclear Plant Personnel" (as published in Federal Register 53 FR 46603), which states that the NRC will expand the method by which it monitors the industry training programs by performing post-accreditation inspections at selected sites.

This inspection was conducted using the guidance of NUREG-1220, "Training Review Criteria and Procedures." NUREG-1220 provides criteria to review performance based training, or a Systems Approach to Training (SAT) based program. The criteria assess the five essential elements of an SAT program. These elements are:

1. Systematic analysis of the jobs to be performed,
2. Learning objectives that are derived from the analysis and that describe desired performance after training,
3. Training design and implementation based on the learning objectives,
4. Evaluation of trainee mastery of the objectives during training,
5. Evaluation and revision of the training based on the performance of trained personnel in the job setting.

The specific training programs inspected were licensed operator (initial and requalification), non-licensed operator (equipment operator and rad-waste operator), and technical staff and managers.

The inspection included a review of training program procedures, training materials, records, qualification standards, and other applicable documents; observations of classroom and simulator training; and interviews with operators, engineers, trainees, instructors, supervisors, and managers.

The inspection was initiated by obtaining materials related to the selected training programs from the licensee. Specific job tasks were selected for each program (except for technical staff and managers) and training program procedures were reviewed in preparation for the inspection. The focus of the inspection was on (1) analysis of the jobs and tasks; (2) derivation of training objectives from the tasks; (3) design, development, and implementation of training for the tasks; (4) observation and evaluation of trainees to determine their level of task mastery; and

(5) how feedback on training, trainee evaluations, and on-the-job performance indicators are incorporated into evaluation and revision of the training programs.

2.0 Operations Training Programs

The licensed operator training programs at Oyster Creek include hot license (initial) training for both reactor operator (RO) and senior reactor operator (SRO) license candidates, SRO upgrade training for licensed ROs, and requalification training for all licensed individuals. Oyster Creek's licensed operator requalification program was evaluated in accordance with ES-601 of NUREG-1021, Examiner Standards, Rev. 5, and the NRC administered requalification examinations to twenty-one licensed operators from April to June, 1990. The licensee's requalification program was evaluated as satisfactory in accordance with the criteria of ES-601, but a number of program weaknesses were identified. The results of the requalification program evaluation are discussed in Report No. 50-219/90-05.

The non-licensed operator (NLO) training program at Oyster Creek provides both initial and continuing (requalification) training for equipment operators (EOs) and radwaste operators (RWOs). The licensee plans to implement a Nuclear Plant Operator (NPO) progression program, which will include a provision for all EOs to advance to licensed operator positions. In the past, both the EO and RWO training programs were interrelated. With the implementation of the progression program, RWO training will specifically address only RWO duties and responsibilities. Modifications have been made to NLO training to accommodate the progression program, but current procedures dealing with NLO initial and requalification training programs do not reflect the new progression program.

2.1 Job Task Analysis

The team reviewed the job and task analyses for the operations training programs to determine if a systematic method was utilized. Currently, operations training is based on job and task analyses conducted by a contractor prior to initial accreditation by the National Nuclear Accrediting Board in 1986. These analyses were based on a BWR generic task list and customized for the facility using job incumbents as subject matter experts. Positions analyzed included CRO, EO, and SRO. In 1987, the control room operator (CRO) task list was revised and the RWO task list was developed.

In 1989, as the result of an internal self evaluation of the accredited training programs, the licensee determined that the original task analyses for the operations training programs were not adequate. Revalidation of the operations training task lists was initiated. The revalidation effort entails update of the task lists, selection

of tasks for both initial and continuing training, development of a task-to-training materials matrix, and analysis of the tasks selected for training.

The first task list to be revalidated was the CRO task list. During this revalidation effort, 405 of the original 726 tasks were deleted or consolidated and 541 new tasks were identified. Incumbent surveys and training intensity factors were completed early in 1990. Currently, 168 of the newly identified tasks remain to be analyzed and the 321 original tasks require revalidation of conditions, standards, and performance elements. The job and task analyses for the SRO, EO and RWO positions are in lesser stages of completion.

Difficulty has been encountered in receiving consistent subject matter expert support from the operations department apparently due to problems associated with maintaining a six shift rotation.

Revalidation of the CRO task list is projected to be completed late in 1990. Revalidation of the task lists for the SRO, EO, and RWO positions are scheduled to be completed in February, May, and June, 1991, respectively. Training materials are being modified to some extent as the revalidation is being performed, but final evaluation of the training impact resulting from the revalidation will not occur until after all operations task analyses are completed.

As a result of the lack of up-to-date task analysis data, the team determined that there is no documented link between the current operations training materials and the CRO, SRO, EO and RWO task lists. The original analyses, conducted in 1985, cross-referenced tasks to the qualification standards (for in-plant training) and classroom training materials in use at the time. This cross-reference addressed initial training for all the operations positions and continuing training for licensed operators, but did not include continuing training for NLOs. The numbering system used for this cross-reference does not apply to current lesson plans. For the EO and RWO tasks, this cross-reference information has not been revised since 1985 and 1987 respectively, and the cross-referencing for the CRO and SRO tasks is only complete for the tasks that have been revalidated. Additionally, the cross-reference information for the licensed operator tasks that have been analyzed has not yet been entered into the computerized Training Matrix Management System (TMMS). The instructors indicated that this had not been done due to their training workload. Currently, the information is manually entered onto the TMMS printouts rather than being input into the automated system. In the interim, the instructors use the hand-written TMMS printout when available, individual knowledge of the system, and already existing training materials to develop the training for licensed and non-licensed operators.

The team could not conclude that current training addresses all applicable CRO, SRO, EO and RWO tasks. This is of particular concern for the NLO tasks due to the limited progress on development of the EO and RWO task lists and the lack of task analyses for these positions. Comparison of the original task lists and the current task lists (which are in still in the development process) indicated that the differences are considerable. A comparison for the CRO tasks indicated that 63% of the CRO tasks had not been identified in the original task analysis. Of the six EO tasks selected for detailed review for this inspection, three were newly identified tasks. Based on the considerable differences between the original task lists and the updated task lists and the lack of up-to-date task analyses, the team concluded that there is no assurance that training addresses all applicable tasks.

In order to gain an understanding of the methods in use (or planned for use) in conducting job and task analyses, the team reviewed the analyses for several CRO tasks that had been revalidated. Additionally, the licensee developed a task-to-training materials matrix for the EO and RWO tasks selected for this inspection. Review of the task-to-training materials matrix for the selected tasks indicated that the methods to be used for the task analyses are appropriate. The Training Matrix Management System appears to be an adequate, easy-to-use, computer-based system that, when implemented, will facilitate cross-referencing and updating of the training materials.

2.2 Learning Objectives

The team reviewed the current lesson plans to determine if the learning objectives were derived from the job task analysis. All lesson plans reviewed included measurable learning objectives; however, the learning objectives are not currently linked to CRO, SRO, EO and RWO tasks. Without a complete task analysis, the team could not readily determine that learning objectives exist for all tasks selected for training. In reviewing the analyzed CRO tasks, the relationship between the enabling objectives of the task and the behavioral objectives of the lesson plan could not be determined. Upon completion of the task analyses, Oyster Creek plans to ensure that there is a direct correlation between the behavioral learning objectives of the lesson plans and the enabling objectives associated with the tasks.

Based on the planned NPO progression program, EO continuing training has recently been targeted to prepare EOs for hot license training. The learning objectives for this training relate to CRO skills and knowledge and not specifically to equipment operators. Without a link between EO tasks and EO training materials and with emphasis on upgrading EOs to the CRO level, there are insufficient assurances that EOs will be provided with training to maintain proficiency on EO specific tasks. For example, drywell corrosion has been of concern at Oyster Creek. One EO task is to "monitor drywell cathodic protection." Discussions with operators indicated that this task is

problematic for them because the indication seldom works properly and, routinely, conductivity readings are high on at least one indicator. During the observed training session on primary containment, cathodic protection was included in the lesson plan, but because it was not identified as a learning objective the instructor did not address cathodic protection during the training session.

The learning objectives for RWO continuing training were basically reiterations of the initial training program learning objectives. There was no systematic method used for determining which objectives are appropriate for RWO requalification training. The subject matter of an observed continuing training session on intake systems did not appear to be job related. The material presented met the objectives of the lesson plan, but the objectives did not appear to be appropriate for requalification training in that it was not related to the radwaste operators' job requirements.

2.3 Design and Implementation

2.3.1 Training Materials

The team reviewed several training lesson plans for both licensed and non-licensed operator training and the process for maintaining the materials up-to-date and technically correct to evaluate the implementation of the SAT-based programs. The lesson plans reviewed were accurate and the format was consistent. No technical deficiencies were identified. References to various procedures were checked and found to be correctly cited.

The lesson plans are stored in individual boxes, each of which contains all the information required to teach the class including the lesson plan and view graphs. Also included is a form from the Operator Training Document Action Item Tracking System (OTDAITS), which provides a computerized method of tracking changes to the lesson plans. The OTDAITS System is used to track such items as plant modifications, LERs and industry events that can affect a training lesson plan.

GPUN policies and procedures allow for lesson plans and related training materials to be reviewed and revised (if required) prior to use, rather than at a fixed interval. The Training Department has identified system experts for each plant system who are responsible for updating lesson plans and other training materials for that system. This approach provides a check of the materials before they are used.

The system expert method appeared to be generally effective for licensed operator training, but the inspectors identified a concern that this method may not always ensure that up-to-date and technically correct information is presented to the

students. During one of the observed training sessions, the instructor did not use the up-to-date lesson plan. The updated, marked up copy of the lesson plan was unavailable at the time the class was scheduled to be taught. In this instance the instructor happened to be the system expert for the subject and was familiar with the changes to the training material. This example indicates the potential for a breakdown in the system due to relying on individual instructors for tracking the status of the lesson plans while they are being revised or updated. When someone other than the system expert is assigned to teach the class, it is up to that individual to find the system expert and obtain the most current copy of the lesson plan. This method results in a word-of-mouth system for maintaining lesson plans up-to-date.

The team determined that NLO lesson plans are not always revised or fully developed prior to use. It also appears that NLO lesson plan revisions are seldom reviewed by the operations department prior to presentation during training. A review of lesson plans for EO requalification training and discussions with classroom instructors indicated that lesson plans are routinely used prior to their approval by the operations department and that often classes are taught with marked up, unapproved lesson plans. The team observed one EO continuing training session on the primary containment system. For this lesson there was no lesson plan developed specifically for EO training, rather a hot license lesson plan was used with revised learning objectives for the EO class. The learning objectives were reviewed by the requalification coordinator prior to use, but the lesson plan had not been reviewed or approved by a training supervisor or the operations department. The instructor responsible for this lesson indicated that because of a heavy workload, sufficient time had not been available to revise the content of the lesson plan. Also, in this case, the lesson plan for the training session was assembled by the instructor assigned to the session rather than the system expert.

An additional factor that appears to hinder the use of reviewed and approved lesson plans is the length of time required for revision, review, and approval. Discussions with the instructor responsible for tracking the lesson plans indicated that an average of two to three months was required for typing, review, and approval of the lesson plan after it is revised by the instructor or system expert. The majority of this time is spent in word processing. Lesson plans are not sent to the user group for review until after they have been approved by the training department.

2.3.2 Observation of Training

Three classroom training sessions and one simulator training session for licensed operator requalification training were observed during the inspection to evaluate the implementation of the SAT-based training. The instructors maintained control of the class and encouraged participation from the students. The licensed operator classes started on time and the breaks were appropriate. The instructors utilized handouts and audio/visual equipment to enhance the training. The Nine Mile Point Unit 1 simulator was used for simulator training since the Oyster Creek plant-reference simulator is under construction. The training, both in the classroom and in the simulator, was well organized and the behavioral objectives contained in the lesson plans were reviewed prior to each training session.

One EO requalification classroom session was observed. The instructor demonstrated effective instructional techniques. However, the initiatives defined by the Training Manager on training administration structure were not closely adhered to. Training started fifteen minutes late and most breaks were five to ten minutes longer than planned because students were late in arriving and returning to class. The class was interrupted twice because of personal phone calls to a student. When notified of the problem, the licensee took corrective action to prevent incoming telephone calls to training classrooms.

During observation of RWO requalification training, the inspector noted that the learning objectives listed in the lesson plan were effectively presented to the class as questions and scenarios. Participation by the trainees was excellent and the objectives of the training were met.

2.3.3 Instructor Qualifications

In order to evaluate the implementation of the training programs, the team assessed the qualifications of the training instructors. Based on the results of interviews, the team noted that the licensed operators were generally satisfied with the training they are receiving. The operators stated that there has been an improvement, in the last two years, in the quality of the instructors and the lesson plans. In the opinion of the operators, the instructors were highly dedicated individuals and willing to provide any assistance that is needed by the class. However, the operators were concerned about the minimal plant-specific experience of the newly hired instructors. Although these new instructors were able to teach the assigned lesson plans adequately, their knowledge of Oyster Creek's day to day plant operations was considered weak.

Interviews with several non-licensed operators indicated a similar concern about instructor credibility. The operators' concerns were based on lack of Oyster Creek operating experience among the instructors and minimal time spent in the plant by the instructors preparing for training. Discussions with the instructors indicated that their instructional and administrative workloads prevent them from spending enough time in the plant. It appears that the instructors' workload hinders the instructors from gaining the needed plant specific experience.

The non-licensed operators indicated that many instructors emphasize limits, setpoints, design criteria, and control room indications which are included in the Operations Plant Manual (OPM) and lesson plans, but they don't relate the information to EO tasks and aren't able to answer questions related to plant locations or operating experience. Observation of EO requalification training on the primary containment system supported the operators' perspective. The hot license lesson plan and associated training materials were used for the lesson. None of the training related directly to EO primary containment system tasks or to plant operating experience.

2.3.4 On-the-Job Training

The team reviewed the methods used to perform on-the-job training (OJT) for initial and requalification training for licensed and non-licensed operators to assess the effectiveness of the training programs. OJT for non-licensed operators is currently administered by the respective operations and radwaste supervisors. All individuals responsible for administering OJT have received formal training on how to conduct OJT.

The team determined that the EO Qualification Standard used for OJT does not include all EO tasks and is not regularly updated. EOs complete a Qualification Standard as part of initial training which documents their proficiency in performing selected EO tasks. The EO Qualification Standard has not been revised since 1986. In April 1989, the Qualification Standard was supplemented with an Operations Department Watchstanding Practices OJT Checklist which acts as a guide in training EOs on knowledge and performance items which are not system specific, but are performed as part of the normal daily routine. The EO Qualification Standard has not been maintained current with respect to plant configuration or EO responsibilities. For example, two of the six EO tasks selected for detailed review during this inspection were not included in the EO Qualification Standard (maintain torus water level and respond to a partial/total loss of DC power). Also, with respect to the requalification session observed by the team on the primary containment system, neither post-accident sampling nor drywell cathodic protection were included in the EO Qualification Standard.

The EO requalification program includes no formal on-the-job training to maintain proficiency in performing infrequent or difficult tasks. The program description dictates that the requalification program will include in-plant training to maintain proficiency on infrequently operated systems and equipment. Currently, there is no formal process in place to meet this in-plant training requirement. The EO Qualification Standard and Watchstanding Practices OJT Checklist are only used for initial training.

During the recent NRC administered requalification examinations, a number of deficiencies were identified with the administration of the walk-through portion of the examinations and the facility developed Job Performance Measures (JPMs). In order to correct these problems, the Operations Department has developed an OJT program for requalification training. The team was provided with a draft of the procedure which is based on the use of JPMs similar to those used for NRC requalification examinations. The Operations Department intends to implement this program for licensed operators in July 1990 and in future requalification cycles for EOs. The team concluded that the small number of JPMs intended to be completed each requalification cycle (four) would not be sufficient to effectively address the large number of tasks applicable to continuing training.

2.3.5 Training Documentation and Control of Inactive Licenses

A review of the operator training files for three senior reactor operators and three reactor operators was conducted to evaluate the methods used for documentation of training. The individual files were cross-referenced with the training department's master book. Attendance, makeup classes, quizzes and makeup quizzes were verified. Each file contained a "Training File Summary" sheet which is used by the training personnel to ensure the files are maintained accurate. The inspectors determined that the record keeping system is effective and the files are properly maintained.

The licensee's program for controlling active and inactive licensees was reviewed and determined to be adequate. The Manager, Plant Operations is responsible for administratively assuring that all individuals are rotated through minimum shift manning positions so that each individual maintains an active license. Individuals not assigned to an operating crew and who do not meet the watchstanding requirements for an active license are placed in an inactive status in accordance with facility procedures.

2.4 Trainee Evaluation

2.4.1 Examination Bank

The team reviewed the methods used to maintain the examination bank of test items for the operations training programs as part of the assessment of the training programs' effectiveness in evaluating trainee mastery of the training objectives. The examination bank is currently maintained by a combination of written and automated methods. Written questions, based on the training materials from the original accredited programs are maintained in locked file cabinets. The new, automated system is a controlled access system. As new questions are generated and old questions are used for examinations, an examination question cover sheet is completed. The cover sheet allows a tie-in of the question to the associated task enabling objectives and the lesson plan behavioral learning objectives. This feature is being utilized for the CRO tasks that have been analyzed, but cannot be used for the remaining CRO tasks that have not been analyzed or for the SRO and NLO tasks.

The current examination development and review practices and procedures do not provide mechanisms to ensure that an appropriate sample of learning objectives are covered during trainee evaluation or that students have mastered all appropriate learning objectives. The examination bank software has the capability to provide examination development and review tools such as an evaluation of the extent to which learning objectives for a particular lesson have been addressed by examination (both individually and cumulatively) and analysis of scores for question related to each learning objective. However, these features are not yet available because the lesson and learning objective cross-reference information has not yet been entered into the examination bank. Instructors indicated that their instructional workload has prevented them from inputting this information even when it is available. Procedures addressing examination development and review using the examination bank are not yet in place. Currently there is no procedural guidance or requirements for sampling student knowledge with respect to learning objectives. Discussion with instructors indicated that such procedures are under development.

Use of the examination bank features for preparation and review of examinations is particularly applicable to requalification where the same topic is covered multiple times in successive weeks. Observation of the development of the weekly quiz for EO requalification training supported the team's concerns. The test that was to be administered on Friday afternoon was being prepared at 10:00 a.m., Friday morning. There was no systematic method used for ensuring that an appropriate sample of learning objectives and previously identified weaknesses was covered.

Based on the review of the examination bank and because of the incomplete task analysis, it could not be determined that the examination bank is sufficient for evaluation of the operators. The current system does not allow determination of the relationship between the tasks, objectives, lesson plans, and questions. The team could not readily determine that learning objectives are being tested appropriately and that all test items are related to valid learning objectives.

2.4.2 Grading Practices

Written examinations from the 1989 licensed operator biennial requalification examination were reviewed for content and grading to assess the effectiveness of the training programs in evaluating trainee mastery of training objectives. As a result of the review of eight written examinations, the NRC identified examinations that had not been graded in accordance with the answer key. Most of the deviations from the answer key resulted in the trainees receiving credit for answers that were incorrect or incomplete.

During the onsite review, the inspectors identified a concern that one licensed operator had not passed the examination due to an incorrectly graded question. The licensee reviewed the grading of the test item in question and initially determined that the original grading was correct. After further investigation by the NRC and the licensee, it was determined that the individual's answer was incorrect. The regrade of the examination resulted in a score below 80%, which constitutes a failure of the written examination. The licensee removed the individual from licensed duties and initiated an event critique to determine the cause of the incorrect grading.

During the in-office review of the written examinations following the onsite inspection, the NRC identified a second examination that was graded incorrectly resulting in an incorrect pass/fail decision on the part of the licensee. The NRC immediately notified the licensee of the concern and requested that the licensee perform an independent review of the examination grading. At the time the NRC identified the second case of incorrect grading (five working days after the completion of the inspection), the licensee had not yet conducted the critique of the original event. The licensee informed the NRC that they performed a cursory review of the written examinations which did not identify any problems similar to the first case.

The inadequacies in the licensee's grading resulted in two individuals performing licensed duties for a period of time in excess of one year without having satisfactorily passed the biennial written examination required by 10 CFR 55.59(a)(2). The

licensee's failure to identify the individuals who did not demonstrate a satisfactory level of proficiency to perform licensed duties is an apparent violation of 10 CFR 50.54(k) (50-219/90-80-01).

Additional problems were identified during review of the written examinations and weekly quizzes. A test item valued at two points had part of the answer printed on the question sheet. The problem was identified by the instructor during grading of the examinations and, instead of deleting part of the question, the operators were given full credit for merely identifying the answer. In addition, one multiple choice question had the wrong answer circled and the operator was given full credit for an answer that was written on the paper next to the wrong answer. One two part question was so poorly written that most of the operators only answered one part of the question. The answer key was revised and the operators received full credit for answering one part of the question. One quiz had two multiple choice questions for which the answer key was revised to accept any of three of the four choices, including "none of the above", as correct answers for full credit. Two of the quizzes that were reviewed had multiple questions that had been deleted due to problems with questions without consideration of the effect this would have on the validity of the quizzes as evaluation tools.

The majority of the identified grading problems involved students being given credit for incorrect answers or additional credit because of deficiencies in the question. The licensee stated that their policy is to not penalize the students for poor test items. However, instead of being penalized, the students were being given credit when no credit was due. The licensee indicated that the intent had been to delete flawed questions; but, for the above examples and in other identified cases, deletions had not been done.

The identified deficiencies in grading led the NRC to question the licensee's review process for quizzes and written examinations. In accordance with training procedures, examination grading is reviewed only when the examination score is within 2% of 80%. No review is currently performed on the grading of weekly quizzes. The licensee agreed to address the policy for regrading and reviewing examinations.

Overall, the facility's grading practices were determined to be inconsistent with normally accepted practice and are considered a program weakness (219/90-80-02).

2.4.3 Waiver of Examinations

The NRC identified two concerns with the licensee's procedure for participation in licensed operator requalification

examinations which was reviewed as part of the team's assessment of trainee evaluation practices. The administrative procedure governing the licensed operator requalification program allows the NRC license examination to be substituted for the facility administered requalification examination if the NRC examination is completed within six months of the requalification examination date. The procedure also allows licensed ROs enrolled in an SRO training program to waive the requalification examination if their upcoming NRC examination is scheduled within three months of the requalification examination date. The procedure does not ensure that the operators meet the requirements of 10 CFR 55.59 for annual operating tests and biennial written examinations.

The licensee granted waivers of the 1989 biennial requalification examinations for four SROs that were administered NRC license examinations in December 1988. These SROs did not receive annual operating tests until May 1990. The elapsed time between their NRC license examinations and their first annual operating tests was 16 months, which does not appear to meet the intent of 10 CFR 55.59 which requires an annual operating test. Additionally, only one of these SROs participated in the NRC administered written examinations administered in April 1990. The remaining three SROs must take a written examination by December 1990 to meet the requirement of 10 CFR 55.59 for a biennial written examination. The waivers of the 1989 requalification examinations were granted in accordance with licensee procedures, but the requirement for a biennial written examination apparently was not considered when the waivers were granted.

When the NRC raised these concerns about the waiver of examinations, a licensee training department representative stated that the intent had been to allow waiver of the requalification examinations if the NRC examination is taken within three months of the scheduled requalification examination. The licensee plans to revise the procedure to address the NRC concerns and to administer written examinations to the three SROs in October 1990. The waiver of licensed operator requalification examinations is considered to be an unresolved item (50-219/90-80-03), pending further review.

2.5 Program Evaluation

The administrative procedure that addresses training program and course evaluation describes several methods that can be used for evaluation. These evaluation methods are utilized to varying degrees of effectiveness as discussed below. The program evaluation procedure also allows the Training Manager to take credit for evaluation processes outside of training, such as INPO audits, NRC inspections, and QA audits.

"Once Back on the Job" (OBJ) evaluations are performed after every initial training program is complete by sending questionnaires to the students and their supervisors. The training procedure indicates that OBJ evaluations should also be performed for continuing training programs, but none have been performed. For one initial licensing program OBJ evaluation that was reviewed by the team, 55% of the trainees and their supervisors responded. Memoranda were prepared discussing some of the concerns, but the majority of the recommendations of the Training Development Specialist were rejected. Interviews of several non-licensed operators indicated that many of the concerns relative to NLO initial training remain concerns with requalification training. Examples of concerns expressed include: the desire for more in-plant time during training; the concern that NLOs are receiving licensed operator training; complaints about training that is not job-related, specifically academic subjects; and concern that the Operations Plant Manual (OPM) is out of date.

Procedures require Trainee Response Forms (TRFs) or other equivalent forms to be provided to the trainees weekly for both initial and requalification training. After the TRFs have been completed, the forms are routed to appropriate personnel for review, comment, and determination of any required action. No specific individual has responsibility for ensuring that the responses are evaluated and that appropriate action is taken. The TRF appears to be used infrequently. During interviews, a number of trainees stated that they have not been given TRFs since early this year. The inspectors reviewed the completed forms for licensed operator requalification cycles 90-1 and 90-2 for the first quarter of 1990. These forms had not yet been routed through the training organization. Many of the forms were incomplete and those that were complete dealt mainly with conditions in the classroom and the experience level of the instructors. No TRFs were completed for cycles 90-3 and 90-4, because the requalification examinations were administered during those cycles.

The licensed operators stated that, in spite of the infrequent use of evaluation forms, there are effective communication channels between operations and training such that any problems can be resolved easily. If trainees have major problems with training, they proceed directly to the appropriate supervisor to voice their concerns. The "Operator Concerns Form" was also considered by the licensed operators to be an effective method for resolving training related problems.

Evaluations of the instructional skills of training instructors are required to be performed on a recurrent basis by licensee procedures. The forms used for these evaluations are designed to be used by both training department and plant staff. The forms appear to be adequate for evaluation of instructional skills. The inspectors reviewed evaluations performed by user group supervisors, training supervisors, and the Training Development Specialist. This review indicated

that instructors are evaluated more frequently than required by procedure, suggestions are made for improvement of instructional skills and techniques, and the suggestions are acted upon by the Training Department. Results of interviews and observation of training by the team indicated no concerns with the instructional skills of the training department staff.

A test item analysis is conducted for licensed operator requalification examinations. The current method utilizes a labor intensive, manual system. However, the system appears to be effective in identifying "problem" questions and should be effective for recommending improvements to the training process. The test item analysis system will be automated as training staff workload permits.

There is no process in place to ensure that problems identified during evaluations are corrected or fed back into the training programs. For example, review of the 1989 written examinations identified a test item that was flagged during the grading process as a potential problem. The individual grading the examination noted on the answer key that the question should be deleted since the given information did not solicit the required answer and could be misleading. The question was not deleted from the 1989 examinations. The examination question bank submitted to the NRC for the April 1990 requalification examinations contained this question in the same form as it was administered during the 1989 examinations. All questions that were submitted to the NRC had been reviewed by representatives from both operations and training in February 1990. Other examples of lack of feedback were identified during the NRC administered requalification examinations. JPMs with previously identified problems (identified during the facility administered examinations in 1989) were administered during the NRC examinations in 1990 without revision.

The procedure for training system development which governs all site and corporate training programs indicates that evaluation of the quality of training should be a combination of continuous evaluation efforts and of periodic comprehensive evaluations. This procedure requires that each program be evaluated every four years, but this requirement can be waived by the site training manager. The approaches and requirements described above appeared to be more oriented toward generating a report at some regular frequency (e.g., four years) than in providing an on-going, integrated evaluation of the effectiveness of Oyster Creek training programs.

Neither the administrative procedures, nor information provided to the team during the inspection indicated that there was an systematic effort to integrate, on an on-going basis, all the feedback obtained related to the effectiveness of the training programs. Rather, the procedures allow for using any individual indicator of training program effectiveness, internally or externally generated,

as the basis for training program evaluation. While the individual elements of training program evaluation are generally in-place, there is no systematic method used to integrate this information into an overall evaluation of the program and to ensure that corrective actions are identified and implemented.

The inspectors reviewed the findings, in draft form, of a recently completed Quality Assurance (QA) audit of the Training Department. The QA audit raised a concern regarding methods in place to systematically evaluate the effectiveness of training programs and revise training programs as appropriate.

The licensee's failure to correct the problems with the written examination bank, JPMs, and simulator scenarios identified during the NRC administered requalification examinations, as discussed in Inspection Report No. 50-219/90-05, is an example of the deficiencies in the evaluation of the training programs. The licensee's program evaluation methods also failed to identify the deficiencies in examination grading discussed in Section 2.4.2 of this report. The deficiencies noted in the program evaluation area are collectively considered a program weakness (219/90-80-04).

2.6 Summary of Operations Training

The foundation of an SAT-based training program is the task analysis which defines the link between the task lists and the training materials, including the test items. A task analysis and a documented link between the task lists and the training materials, including test items, provides assurance that the operators are being trained and evaluated on all applicable tasks that they perform.

The team could make only limited conclusions as to the adequacy of the job and task analyses because the analyses for the positions reviewed are incomplete. The methods used to perform the analysis appear to be adequate.

Due to incomplete status of the task analyses, the team could not readily assess the licensee's ability to develop learning objectives based on the task analysis. Without a complete task analysis, the link between the task lists and the learning objectives is not complete; therefore, there is no assurance that learning objectives exist for all tasks selected for training. Currently, the identified enabling objectives from the task analysis for licensed operators do not closely correlate to existing behavioral objectives in the lesson plans. Revalidation has not been completed for any EO or RWO tasks; therefore, there is no correlation between the learning objectives currently defined for non-licensed operator training and the task analyses for the EO and RWO positions.

The team could not determine if the design of training was appropriate with respect to the learning objectives and the task lists due to

the status of the task analyses. There is no documented link between the operations training materials currently in use and the CRO, SRO, EO, and RWO task lists developed during the revalidation of the task analyses. The large number of new tasks that are being identified during the revalidation effort raises a concern that training may not be designed for all appropriate tasks.

The link between learning objectives and test items is not complete due to the lack of complete task analyses. Mechanisms for evaluating the extent to which learning objectives are achieved for training have been developed, but cannot be implemented without the cross-reference information from the task analyses. The team could not readily determine that learning objectives are being tested appropriately and that test items are related to valid learning objectives.

When the licensee initiated the revalidation of the task analyses, the decision was made to place priority on maintenance of quality training materials, rather than on the revalidation effort. In general, this emphasis has resulted in quality lesson plans; but, in one case, an instructor indicated that because of a heavy workload, sufficient time had not been available to revise the content of the lesson plan prior to presentation. The method for control of lesson plans is dependent upon instructors having sufficient preparation time to make the necessary changes; but, as indicated by the instructors, the workload hinders the effectiveness of this process. The heavy workload was also viewed by the training staff to be a problem in that it is difficult for the instructors to spend time in the plant which would alleviate some of the operators' concern about the credibility of the instructors. Additionally, the automated systems that have been developed for implementation of the SAT-based program are not being utilized to their full potential. In summary, it appears that some of the tools for implementation of the SAT-based training programs are not being utilized effectively.

In the area of trainee evaluation, the facility's grading practices were determined to be a program weakness. Examples were noted in which grading was not performed in accordance with the answer key and credit was given for technically incorrect answers. Additionally, when deficiencies were identified in test items, trainees were given credit when no credit was due. These grading practices can invalidate the evaluations as occurred in the two cases of incorrect pass/fail decisions on the licensed operator requalification examinations identified by the NRC. The effectiveness of the review process for examination grading was also questioned due to the deficiencies identified in the grading process.

The individual methods for evaluating the operations training programs appear to be adequate, but there is no systematic method used to integrate this information into an overall evaluation of the

program. The administrative procedures and the implementation of the program evaluation tools do not ensure that a thorough, ongoing evaluation of training effectiveness is performed and that appropriate corrective actions are identified and implemented. Program evaluation was considered to be a weakness.

3.0 Technical Staff and Managers Training Program

The Technical Staff and Managers (TS&M) training program was initially accredited in 1986, but during subsequent years was inconsistently implemented. TS&M training was conducted supplemental to a training program for new engineers which was discontinued in 1988. During the last eighteen months the TS&M program has been reestablished and all instruction modules were rewritten. During this inspection, only the program as it is currently being implemented was evaluated.

The TS&M program provides general training intended to supplement experience, position specific training, and educational background. It is intended for newly assigned personnel who are or will be assigned duties at Oyster Creek which will involve them in the day-to-day support of the operation of the plant.

Because the TS&M program has recently been revised, the program description procedure does not clearly describe the new program. This has been recognized by the licensee and the team was shown a marked-up copy of the procedure with proposed changes. The revised procedure is scheduled to be issued as soon as all changes are finalized. The licensee also plans to issue administrative controls to formalize the program as Standards of Operation.

The TS&M program is managed by the Corporate Training Manager with a TS&M Coordinator on-site. The program operates independently from the site training department, but uses site training instructors to train on certain modules.

3.1 Job Task Analysis

The TS&M program description indicates that the program was constructed using a job analysis. A previous job analysis had been conducted using the Three Mile Island (TMI) Plant Engineering Group. This group was identified at the time as being representative of the program needs. This job analysis was not used in the construction of the current program. Because the TS&M program consists of basic orientation training for varied groups of personnel, a job analysis is not essential to the design of the program. The licensee intends to revise the program description to remove the reference to the job analysis.

The TS&M initial training program consists of eight modules which conform to the industry guidelines for "Technical Development Programs for Technical Staff and Managers," and three additional modules which comprise supervisor and management training. The TS&M program description indicates that continuing training will be performed on an annual cycle to update students on significant events, plant and procedure changes, and new regulations or guidelines.

3.2 Learning Objectives

The team reviewed several lesson plans for TS&M training modules. All of the reviewed lesson plans complied with the standard GPUN format and included measurable objectives (6 to 11 learning objectives per lesson plan). Each lesson plan addressed all of the stated learning objectives within the lesson plan. The content of the lesson plans included sufficient detail so that the lesson could be taught consistently.

In the past, the TS&M program user groups were not involved in the development and review of the training materials. One individual interviewed indicated that some information that was not technically correct was presented in the training on plant modifications. This deficiency was recognized by the licensee and a policy was initiated to give the user groups the opportunity to review the lesson plans prior to use. Plant Engineering is currently reviewing the lesson plans for plant systems training. The review policy is currently an informal process that the licensee intends to formalize in proposed Standards of Operation. User group review of training materials is intended to ensure that learning objectives are appropriate and that the material presented is technically accurate.

3.3 Design and Implementation

Discussions with user group personnel indicated that the TS&M program has strong management support. Both students and managers were very positive about the current training program. The Basic Principles Trainer (BPT) and plant systems training were frequently complemented. Systems course handouts and piping and instrument drawings that were utilized for training were specifically identified as useful enhancements to training.

Based on classroom observations and discussions with the users, the instructors appear to be knowledgeable and qualified. The four hour training session that was observed (Quality Assurance) was conducted very well. The instructor demonstrated excellent instructional skills and was knowledgeable on the subject matter. The lesson plan was properly reviewed and approved and complied with the standard GPUN format. Each student was provided with a handout which included the lesson plan and a hard copy of all transparencies. A reference

book which included the QA Plan and other related references was provided at each table. All learning objectives were addressed during the training session.

Each user group has appointed a training coordinator who tracks the training status of the individuals in his or her group. Provisions have been established for managers to exempt individuals from initial TS&M training modules. Where exemptions or waivers are used, the waiver criteria is being adhered to and exemptions are documented. In spite of these findings, the team determined that records retention and maintenance of the individual training matrices were areas that could be improved. The training matrices are currently being computerized. When this process is complete, current, up-to-date matrices will be available to all group training coordinators on personal computers. In addition, the licensee plans to specify record retention requirements in the proposed Standards of Operation.

Absenteeism at training sessions was identified as an on-going problem. The licensee has initiated a program to send confirmation letters to individuals scheduled for training. This initiative along with individual training coordinator efforts and management support was said to have improved training session attendance. However, a training session that was observed by the team was delayed approximately thirty minutes because students were late in arriving and only thirteen of the twenty-six students that were scheduled to attend actually attended the training session. This indicated that absenteeism is still an issue requiring further attention. Several group training coordinators indicated that scheduling of classes was also in need of improvement.

The inspectors noted that the TS&M program description indicates that the initial training program is designed as a four year cycle. It appears that allowing four years for a new employee to complete the program does not meet the intent of providing a basic orientation for staff members. The licensee agreed with the inspectors' concern about the length of the initial training program.

The only continuing training provided for the technical staff and managers to date addressed SOERs. Other areas, such as procedure changes, included in the industry guidelines and TS&M program description for continuing training for technical staff and managers have not been addressed. The licensee indicated that priority was placed on implementation of the initial training program rather than expansion of the continuing training program. As initial training progresses, the licensee intends to place more importance on continuing training and expand the program to cover additional subjects.

3.4 Trainee Evaluation

Written examinations are administered for trainee evaluation for all modules except the BPT. The team reviewed the examination administered following the observed training session on QA. The examination included ten questions and each learning objective was evaluated by one or more of the questions.

Currently there are no formalized guidelines for remedial training, but the licensee intends to address remedial training in the proposed Standards of Operation.

3.5 Program Evaluation

The team verified that course and program evaluations were being conducted. Results of trainee reaction interviews conducted for several courses and once-back-on-the-job interviews performed by a TS&M training coordinator were used to evaluate the effectiveness of the TS&M training program. Actions taken to improve the program as a result of the evaluations were documented.

All students interviewed indicated that they had an opportunity to provide feedback on the TS&M training. Student feedback forms were distributed in the observed training session. Most of the forms were returned to the instructors at the end of the class. The only area that students felt they did not have a sufficient opportunity to provide feedback was for the training on plant systems. Feedback forms were not supplied until the completion of the sixteen week course, which did not allow for effective feedback on all participating instructors and topics covered by the course.

There appears to be good communications between the TS&M user groups and the training staff. The users specifically identified the Steering Committee Meetings as useful and beneficial for improving training. One function of these meetings is to allow the user groups to provide input regarding their training needs. As a result of a Steering Committee Meeting, user groups were provided with descriptions of each training module to aid in their assessment of training applicability. Program changes which resulted from user group input were specifically noted. The Steering Committee will also be included in the proposed Standards of Operation.

3.6 Summary of Technical Staff and Managers Training

The licensee has made considerable progress toward implementing a TS&M training program during the last eighteen months. User group and training management are strongly supporting the effort. The Steering Committee Meetings appear to be an effective mechanism for providing feedback on user group needs. The TS&M training staff has a strong commitment to the program and has accomplished much toward reestablishment of TS&M training.

The governing procedure for the TS&M training program is in need of revision and is scheduled to be revised. Additionally, the implementation of Standards of Operation should formalize the initiatives established by the training staff.

4.0 Exit Meeting Summary

The training program inspection was announced to the licensee in a letter from the NRC Regional Office, dated April 9, 1990. This letter requested the licensee to provide materials needed for inspection preparation.

Licensee management was informed of the purpose and scope of the inspection at the entrance meeting on June 25, 1990. The findings of the inspection were periodically discussed with station management throughout the inspection period and were summarized at the exit meeting on June 29, 1990. Attendees at the entrance and exit meetings are listed in Appendix A of this report.

Additional findings and conclusions were discussed during telephone conversations with the licensee subsequent to the inspection. The licensee committed to regrade all licensed operator requalification examinations administered in 1989 and to determine the root cause of the improperly graded examinations. The licensee's letter documenting these commitments, dated July 11, 1990, is attached as Appendix C.

APPENDIX A

PERSONS CONTACTED

GPU Nuclear Corporation

- * P. B. Fiedler, Director, Nuclear Assurance
- #* E. E. Fitzpatrick, Vice President and Director, Oyster Creek
- #* R. P. Coe, Training and Education Director
- * J. J. Barton, Deputy Plant Director, Oyster Creek
- #* J. D. Kowalski, Manager, Plant Training
- #* W. R. Naylor, Manager, Corporate Training
- #* J. J. Shea, Technical Staff and Manager Training Coordinator, OC
- * F. Perry, Technical Staff and Manager Training Coordinator, TMI
- * F. Kacinko, Education Development Coordinator, TMI
- M. Allgaier, Instructor, Technical Staff and Managers
- #* R. Lewis, Maintenance Training Manager
- #* D. V. Stellhorn, Supervisor, Training Department Admin Support
- * S. Van Gulick, Training Department Information Control Specialist
- * D. Larsen, Maintenance Training Coordinator
- P. Hays, Operations Training Technical Program Support
- #* G. T. Hollingsworth, Instructor, Operations Training
- #* S. McCann, Instructor, Operations Training
- D. Rodgers, Instructor, Operations Training
- G. Young, Instructor, Operations Training
- C. Silvers, Instructor, Operations Training
- P. Capehart, Instructor, Operations Training
- S. Sowell, Instructor, Operations Training
- R. Kniphuisen, Instructor, Operations Training
- K. Farley, Instructor, Operations Training
- M. Rossi, Instructor, Operations Training
- N. Boulware, Simulator Coordinator
- #* J. Van Woert, Training Development Coordinator
- #* J. Williams, Support Training Manager
- # G. W. Cropper, Operations Training Manager
- # R. Barrett, Plant Operations Director
- R. Brown, Radwaste Operations Manager
- J. Marcinczyk, Radwaste Supervisor
- T. Zonkowski, Radwaste Supervisor
- #* A. H. Rone, Plant Engineering Director
- L. Schreiber, Manager, Startup and Test
- B. Bailey, Plant Engineer
- S. Zeman, Spare Parts Engineer
- P. Dawson, Administrator, MCNR QC
- T. Quintenz, Plant Materiel Director
- J. Halsey, Technical Support Administrator
- B. Mahoney, Supervisor, Administrative Support
- K. Wolf, Radiological Engineering Manager
- J. Derby, Radiological Engineering Plant Support
- T. Palczewski, Site Services Staff Analyst

- * L. L. Lammers, Plant Maintenance Director
- * G. True, Mechanical Maintenance Superintendent
- * W. Muehleisen, Maintenance Support Superintendent
- * W. J. Quinlan, Station Services Manager, Plant Maintenance
- *# G. W. Busch, Licensing Manager
- *# M. Heller, Licensing Engineer
- # P. Thompson, QA Auditor

The inspectors also held discussions with licensed operators, equipment operators and radwaste operators.

Other

- *# N. J. DiNucci, State of New Jersey
- # J. Cantrell, INPO

U.S. Nuclear Regulatory Commission

- # R. Conte, Chief, BWR Section, DRS
- # E. Collins, Senior Resident Inspector
- # C. Thomas, Deputy Director, DLPQE, NRR

* Denotes those present for the entrance meeting on June 25, 1990.

Denotes those present for the exit meeting on June 29, 1990.

APPENDIX B

PROCEDURES REVIEWED

- 1000-POL-2600.01 - GPU Nuclear Corporation Training Policy, Rev. 0-00
- 6200-ADM-2682.01 - Training System Development, Rev. 4
- 1000-PLN-2600.01 - GPU Nuclear Corporation Training Plan, Rev. 1
- 6200-ADM-1010.01 - T&E Department Organization and Functions, Rev. 4
- 6200-ADM-2682.04 - Request For Training (Needs Analysis), Rev. 1
- 6230-ADM-2602.01 - Project Tracking System, Rev. 1
- 6230-ADM-2600.07 - Maintenance of Training Matrices, Rev. 0
- 6200-ADM-1210.01 - T&E Department Records, Rev. 1
- 6230-ADM-2600.03 - T&E Department Records Procedures, Rev. 1
- 1000-ADM-2604.01 - Control of Examinations, Rev. 0-00
- 6231-ADM-2604.01 - Control of Examinations - Operator Training, Rev. 2
- 7800-ADM-2682.06 - Program Descriptions, Rev. 0-00
- 6231-PGD-2619 - Equipment Operator Requalification, Rev. 0
- 6231-PGD-2611 - Senior Reactor Operator (SRO) Initial Training Program, Rev. 1
- 6231-PGD-2610 - Reactor Operator Initial Training Program, Rev. 1
- 6200-PGD-2610 - GPUN Licensed Operator Requalification Training Program Rev. 1
- 6231-PGD-2612 - Oyster Creek Licensed Operator Requalification Training Program, Rev. 9
- 6231-PGD-2613 - Equipment Operator Initial Training Program, Rev. 1
- 7831-PGD-2616 - Radwaste Operator Initial Training Program, Rev. 0
- 6231-PGD-2617 - Radwaste Operator Requalification, Rev. 0
- 6250-PGD-2720 - Technical Staff and Manager Training Program Description Rev. 3
- 6200-ADM-2682.11 - Course/Program Evaluation, Rev. 1
- 6230-ADM-2682.10 - Trainee Evaluation - Once Back-on-the-Job, Rev. 0
- 6200-PGD-2760 - Instructor Development Training Program Description, Rev. 0
- 6200-ADM-2730.01 - Instructor Certification and Qualification Procedures, Rev. 1
- 7850-ADM-2723 - Corporate Training Instructor Indoctrination and Qualification Training Program, Rev. 0
- 6200-ADM-2607.01 - Instructor Evaluation, Rev. 3
- 1000-ADM-2682.02 - GPUN Training Advisory Council, Rev. 0
- 6231-ADM-2610.01 - Operator Training Instructor Indoctrination, Qualification, and Certification Training Program, Rev. 2
- 7800-GDL-2682.00 - OCNGS Operator Training Document Control Procedure, Rev. 1
- Oyster Creek Licensed Operator Training On-the-Job Training (OJT) Program (Draft)