



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA ST., N.W., SUITE 3100
 ATLANTA, GEORGIA 30303

Report Nos. 50-259/82-27, 50-260/82-27, 50-296/82-27

Licensee: Tennessee Valley Authority
 500A Chestnut Street
 Chattanooga, TN 37401

Facility Name: Browns Ferry

Docket Nos. 50-259, 50-260 and 50-296

License Nos. DPR-33, DPR-52 and DPR-68

Inspection at Browns Ferry site near Decatur, Alabama

Inspector: P. H. Skinner Sept. 24, 1982
 P. H. Skinner Date Signed

Approved by: C. M. Upright 9/24/82
 C. M. Upright, Section Chief Date Signed
 Engineering Inspection Branch
 Division of Engineering and Technical Programs

SUMMARY

Inspection on August 30 - September 3, 1982

Areas Inspected

This routine, unannounced inspection involved 31 inspector-hours on site in the areas of general employee training and requalification training of operators.

Results

Of the two areas inspected, no violations or deviations were identified in one area; three apparent violations were found in one area (Failure to follow procedures for general employee training, paragraph 5.a; failure to train craftsmen in the Quality Assurance program, paragraph 5.b; and failure to perform indepth audit of training, paragraph 5.c).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

J. Brazell, Security Captain
*T. Chinn, Compliance Staff Supervisor
*R. Cole, Office of Power QA and Audit Staff
M. Davis, Training Supervisor
*G. Hudson, Training Officer
*G. Jones, Plant Superintendent
*L. Jones, Quality Assurance Supervisor
*J. Miller, Assistant Outage Director
E. Thornton, Training Shift Engineer

Other licensee employees contacted included technicians, operators, security force members and office personnel.

NRC Resident Inspectors

*J. Chase, Senior Resident Inspector
*G. Paulk, Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on September 3, 1982, with those persons indicated in paragraph 1 above. The licensee acknowledged the following inspection findings:

Violation 259, 260, 296/82-27-01, Failure to Follow Procedures for the General Employee Training Program

Violation 259, 260, 296/82-27-02, Failure to Assure Craft are Trained In the Quality Assurance Program Prior to Performing Work on Safety Related Equipment.

Violation 259, 260, 296/82-27-03, Failure to Perform Indepth Audit of General Employee Training Program

Inspector Followup Item 259, 260, 296/82-27-04, Correction of Apparent Conflicting Procedure Requirements

3. Licensee Action on Previous Enforcement Matters

Not inspected.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Training (41700)

- References:
- (a) Accepted QA Program, TVA-TR75-1A, Revision 5, Section 17.2.2, Operational Quality Assurance Program
 - (b) Operational Quality Assurance Manual (OQAM) Part III, Section 6.1, Selection and Training of Personnel for Nuclear Power Plants, dated January 15, 1981
 - (c) Division Procedure Manual (DPM) No. N79A7, Nuclear Plant General Employee Training Program, dated 11/24/81
 - (d) Standard Practice (BF) 4.4, Training and Qualifications - Policy, dated 8/31/81
 - (e) Standard Practice (BF) 4.5, Plant General Employee Training Program, dated 6/23/82
 - (f) Outage Section Instruction Letter (OSIL) 26, Outage Training, dated 7/24/81

The inspector reviewed the training program which provides required general employee training (GET) for facility staff personnel. This program was reviewed to verify that it complies with requirements contained in references (a) through (f) above; the program covers training in the areas of administrative controls and procedures, radiological health and safety, industrial safety, security procedures, the emergency plan, quality assurance training, and prenatal radiation exposure training for females. The inspector reviewed training records of approximately 200 plant personnel.

Within the area inspected, two violations and one inspector followup item were identified and are discussed in the following paragraphs.

a. Failure to Follow Procedures

10 CFR 50, Appendix B Criterion V and Section 17.2.5 of the accepted QA Program require that activities affecting quality shall be prescribed by procedures and shall be accomplished in accordance with those procedures. Requirements for training at Browns Ferry are identified in references (a) through (f). The following list identifies examples where these referenced documents are not being followed:

- (1) Reference (b), paragraph 1.5.1 requires that training programs be kept up to date to reflect plant modifications and changes in procedures. Currently, plant procedures do not specify that the training department receive information on plant modifications or

changes to procedures. The Training Supervisor stated that training presentations were changed when the Assistant Plant Superintendent verbally directed that a change be made.

- (2) Reference (b), paragraph 1.5.1, requires a continuing program for training of replacement personnel and for retraining necessary to ensure that personnel remain proficient. Currently plant procedure requirements do not assure that proficiency is maintained in areas of QA/QC indoctrination, standard practices and plant instructions, document control and authorization of work performance, temporary conditions, plant modifications, and procurement and material control. Retraining on these subjects is not provided and a method has not been established to determine that proficiency is maintained in these areas.
- (3) Reference (e), requires an instructor (for teaching a GET course) to complete an instructor certification program and be recertified every two years. This is a self-imposed requirement. Persons presently conducting GET have not completed the instructor certification program.
- (4) Reference (e), requires that the outage organization train all outage annual personnel according to the requirements of this standard practice, implementing this training through the outage organization. Discussions with the outage Training Officer identified this to be the training associated with similar positions of permanent plant personnel. Based on the review of 147 training records (computer run dated June 15, 1982), 106 outage annual personnel have not received one or more of the GET courses specified for their position. For example, of the 21 General Foreman listed on the training record, only eight had received the QA/QC training required by GET-4.
- (5) Reference (e) requires that personnel who do not receive retraining have their access badges pulled. A review of training records indicate approximately 10% of all plant staff personnel (this figure does not include outage personnel) have not completed their training/retraining as specified by reference (e) and access badges of these personnel have not been pulled. A violation for failure to accomplish all required GET was identified by inspection reports 50-259, 260, 296/81-02 dated March 18, 1981. The TVA response (dated April 17, 1981) to this violation was that a positive means was established to assure recurrence control by requiring unescorted privileges be removed until required retraining is accomplished. The removal of unescorted privileges for personnel that have not received all the specified training is not being accomplished.
- (6) Reference (f), requires a list of outage annual personnel to be included in the general outage employee training program and

updated monthly. The most recent listing of these personnel was dated October 8, 1981.

- (7) Reference (f), requires that the outage training officer update personnel field files. Personnel field files were not up-to-date to reflect present training status of personnel and many personnel did not have an established file.
- (8) Reference (f), requires that the outage training officer initiate a specific form to identify delinquent personnel training to the outage director. Delinquent personnel training had not been identified to the outage director.
- (9) Reference (f), requires that the outage training officer review training records annually to ensure that personnel have received required training. A review of available training records indicated that annual reviews had not been performed for these personnel.
- (10) BF 3.10, Cleanliness of Piping Systems, dated 6/29/82, requires that all personnel be instructed in the importance of keeping foreign articles and debris out of primary system piping and equipment internals. This training is not being provided to all personnel and a training course could not be identified that covers this subject matter.

The inspector concluded, based on the examples identified above, that there is a definite lack of management attention to the requirements of the GET program. Similar findings were identified during the January 1981 inspection and discussed with Browns Ferry management at that time. Multiple examples of failure to follow procedures identified above constitute a violation (259, 260, 296/82-27-01).

b. Failure to Train Craftsmen In the Quality Assurance Program Prior to Performing Work on Safety Related Equipment

10 CFR 50, Appendix B Criterion II, and reference (a) require a training and indoctrination program to assure that personnel responsible for performing quality-affecting activities are instructed as to the purpose, scope, and implementation of the quality assurance program. Reference (b) requires that all persons regularly employed in the nuclear plant, including temporary maintenance and service personnel, be trained in the Plant Quality Assurance Program.

Contrary to the above, a training and indoctrination program has not been established to assure that personnel responsible for performing quality-affecting activities are instructed as to the purpose, scope,

and implementation of the quality assurance program as indicated in the following examples:

1. Reference (e) does not include this requirement to train temporary outage craftsmen in the QA program. In that the temporary outage craftsmen perform essentially the same function as permanently assigned craftsmen and the outage annual craftsman, it is appropriate and necessary that they receive the same training. The latest industry standard on this subject, ANS 3.1-1981, supports the position that temporary employees must be trained in all areas where their activities could effect the quality of an operating nuclear power plant. The primary responsibility for quality must be placed on the individual performing the activity affecting quality and that individual must be trained to carry out that responsibility. The field services access list dated August 2, 1982, has approximately 1130 personnel identified. These personnel are classified as temporary outage personnel. The outage training officer stated that the only GET training that has been provided to these personnel is the training associated with badging for unescorted access. This badge training does not include training in the area of plant quality assurance.
2. References (c) and (e) allows section supervisors the flexibility to take up to six months to accomplish the GET courses for their personnel. There are no provisions established to assure that personnel performing activities affecting quality have had the required QA/QC indoctrination prior to performing such activities.

The examples of failures to assure that personnel performing activities affecting quality have had the required QA/QC indoctrination prior to performing such activities constitute a violation (259, 260, 296/82-27-02).

c. Failure to Perform Adequate Audit

10 CFR 50, Appendix B Criterion XVIII requires that a comprehensive system of planned and periodic audits be carried out to verify compliance with all aspects of the quality assurance program. The accepted QA Program, Section 17.2.18 states that audits shall be conducted to ensure compliance with training requirements. Table 17.2-5 of the accepted QA Program, states that requirements of ANSI N45.2.12 Draft 3, Revision 4, - February 1974, will be met for auditing quality assurance programs. Section 4.3.2.3 of this standard requires that selected elements of the program shall be audited to the depth necessary to determine whether or not the program is being implemented effectively.

Audit OPQAA-CH-82TS-01 dated April 12 - May 7, 1982 subject; Personnel Training in QA and Health Physics; Licensed Operator Retraining; Inspector Training; Plant Staff Performance, Training, Qualification was conducted on Browns Ferry and various other TVA facilities. This audit identified one finding involving Browns Ferry GET; some personnel have not completed all their required GET within six months nor have their access badges been pulled as required by reference (e) (see item 5.a.6 above). There was a statement under the heading of Overall Quality Program Effectiveness which stated that implementation of the GET program is inadequate; however, this was not a finding and was not identified as requiring corrective action. Consequently, audit OPQAA-CH-82TS-01 did not audit to the depth necessary to determine that training was being implemented effectively in that, the violation discussed in 5.a above is based on numerous problems which would have been identified by an indepth audit. This failure to perform audits to a depth necessary to determine program effectiveness constitutes a violation (259, 260, 296/82-27-03).

d. Clarification of Conflicting Statements in BF 4.4

Reference (c), under "Documentation", identifies two different retention times for training records. The licensee stated that a review of this area would be performed and a revision to this procedure, providing clarification of these requirements, would be accomplished by October 15, 1982. This clarification problem will be carried as an inspector followup item pending review of the procedure revision during a subsequent inspection (259, 260, 296/82-27-04).

6. Requalification Training (41701)

- References:
- (a) Technical Specifications, Section 6
 - (b) Final Safety Analysis Report, Section 13.3
 - (c) 10 CFR 55, Appendix A, Requalification Programs for Licensed Operators of Production and Utilization Facilities
 - (d) OQAM Part III, Section 6.1., Selection and Training of Personnel for Nuclear Power Plants, dated January 15, 1981
 - (e) OPM No. N78A13, Nuclear Generating Plant Operator Training Programs Manual, dated 8/21/81
 - (f) BFA 75, Training and Retraining of Licensed Operators

The inspector reviewed the requalification program to determine conformance to references (a) through (f). The inspector reviewed the following areas: retraining conducted in 1981 and to date in 1982; annual written examinations and the individual's responses; documentation of required control manipulations; schedule for conducting lectures and prepared lesson plans; and participation in an accelerated training program when applicable. The training records of five licensed operators were reviewed.

Within this area, no violations or deviations were identified.